



**Tamworth Borough Council
– Local Plan 2006-2031
Submission Consultation
Statement – February 2015**

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1. Purpose of Document

The Submission Consultation Statement describes how Tamworth Borough Council has undertaken community participation and stakeholder involvement to produce the Local Plan. It sets out how previous stages of consultation and engagement have shaped the Submission version of the Local Plan. It is produced to fulfil requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. It forms the statement defined at Regulation 17 (d) comprising, “a statement setting out:

- (i) which bodies and persons were invited to make representations under regulation 18,*
- (ii) how those bodies were invited to make representations,*
- (iii) a summary of the main issues raised by those representations, and*
- (iv) how those main issues have been addressed in the Local Plan.*

And forms the required statement of Regulation 22 (1) part (c):

- (i) which bodies and persons the local planning authority invited to make representations under regulation 18,*
- (ii) how those bodies and persons were invited to make representations under regulation 18*
- (iii) a summary of the main issues raised by the representations made pursuant to regulation 18*
- (iv) how many representations made pursuant to regulation 18 have been taken into account*
- (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations.*

During the course of preparing the Local Plan the relevant Regulations, originally published in 2004 were updated in 2008 and 2009. In April 2012 a set of Regulations were issued which replace all previous versions in their entirety. Whilst the requirement to produce this statement is not new, the specific regulations, which refer to it, have changed. The Regulations refer to the entire process of preparing Development Plan Documents (DPDs) such as the Local Plan. Work undertaken under previous Regulations is still valid albeit that the specific Regulation (including number) may have changed. Under previous regulations most of the work in preparing the Local Plan (then Core Strategy) was referred to as Regulation 25. In the 2012 Regulations the equivalent stage is referred to as Regulation 18.

This Consultation Statement forms one of the “proposed submission documents” referred to at Regulation 19. It also shows how the Council has met the requirements of the adopted Statement of Community Involvement (SCI) (2014).

2. Summary of consultation undertaken

The Borough Council has been working on a new Local Plan since 2006 and has produced a number of consultation documents, including the Issues and Options in 2008, an Option Report and a separate proposed Spatial Strategy, both in 2009, a Housing Policy in 2011, Pre-submission (Withdrawn Plan) 2012, Draft Local Plan 2014 and finally Pre-submission Local Plan 2014.

Prior to the submission of the Local Plan, a total of eight distinct periods of consultation and engagement took place as follows:

1. Early involvement on identifying issues and a vision for the Core Strategy: 2006/07
2. Issues and Options: March 2008
3. Refined Options Document: March 2009
4. Participation on Preferred Spatial Strategy Document: October 2009
5. Housing Policy Consultation March 2011
6. Tamworth Local Plan Pre-Submission: June to July 2012
7. Draft Tamworth Local Plan: March to May 2014
8. Pre-submission Local Plan: October to December 2014

A summary of comments received at stage 8 is included within the Appendices of this document.

It is important to emphasise that consultation was not restricted to these periods; it has been ongoing since 2006. During and between the consultation periods, the council has undertaken continuous consultation with the communities of Tamworth, along with other stakeholders including developers, landowners and infrastructure providers to input into the development of the Local Plan. This has included delivering stakeholder workshops, staffed public exhibitions across the borough and presentations to groups. Information has been made available on the Council's website throughout and in particular since the submission of the withdrawn Plan. The full evidence base has been available and updated at each consultation stage. Earlier on in the process a number of Local Development Framework (LDF) newsletters were produced and distributed to keep stakeholders up to date of the Core Strategy's progress and collect contact information to inform them directly of when new consultations were happening.

In terms of who has been involved in the consultation, Appendix 1 sets out the organisations, including statutory bodies, who were invited to have their say and get involved in the Local Plan's production.

3. Relationship to the Tamworth Statement of Community Involvement (SCI)

The SCI was adopted in 2014, replacing the original SCI from 2006. It outlines who should be consulted at each stage of Local Plan production and the types of methods which could be used. Since the start of the Local Plan process, the Town and Country Planning (Local Development)(England) (Amended) Regulations 2008 have altered the stages of production of a Development Plan Document, removing the Preferred Options (regulation 26) stage and therefore reverting to a two rather than three stage consultation system. Under current legislation there are two stages where the document should be the subject of consultation namely the early stage of document formation (Reg. 18 stage) when issues and policy options are being explored and developed and then formal consultation on the Publication Version when the plan has been almost finalised (the current stage).

The Council has therefore undertaken more consultation and engagement than set out in Regulation 18. This has been necessary to give the public and stakeholders the opportunity to respond to altering circumstances, to adequately and comprehensively allow full and proper participation.

The SCI proposes that the consultation methods and those engaged with would vary according to the purpose of the consultation and the bodies or persons who the council were keen to involve. This proved to be the case with intensive wide ranging awareness raising events being predominant at the Identifying Issues and Issues and Options Stages including one to one meetings with key stakeholders, workshops, and public exhibitions. This included a series of workshop events involving a large number of stakeholders in order to identify and refine issues, develop options and preferences for shaping the spatial strategy for the borough. Throughout the Local Plan's preparation Tamworth Councillors have been supported through individually tailored workshops and discussion sessions. The establishment of a formal cross-party Local Plan Sub-Group to oversee its production also ensured political buy in to the document at the most senior level.

4. Relationship with the Sustainability Appraisal (SA)

The SA and Local Plan have been developed in tandem. An SA scoping report was produced for consultation first in 2006, then following the withdrawal of the Local Plan in March 2013 an updated scoping report was produce and consulted on later that year. This enabled updated advice from stakeholders and the public to be taken into account in establishing the scope and objectives of the SA.

The SA has been updated and consulted on throughout the Local Plan process.

5. Compliance with the Duty to Co-operate

In preparing the Local Plan the Council has complied with the legal requirements of the duty to co-operate. The Duty to Co-operate Statement sets out in detail how the Council has achieved this.

6. Consultation stages reviewed

The following section includes a breakdown of the consultation undertaken at each of the 8 discrete stages of the Local Plan's production. It includes details of the methods used, who was invited to submit representations and a summary of issues that were raised. A more detailed summary of the issues in stages 1 to 6 can be found in the previous versions of this document, including the council's response and importantly how they were incorporated into subsequent versions of the Local Plan. The detailed summary of stage 8 can be found within this document.

Stage 1: Frontloading-raising awareness

The production of the Local Plan commenced with officers working with Tamworth's communities and key stakeholders to identify the issues affecting the Borough. This involved producing and distributing an LDF Questionnaire which raised general awareness that the LDF process had begun. It also set out to engage with people early on and gain ideas about the issues affecting Tamworth.

The Council sent 220 LDF questionnaires to organisations and voluntary groups from the Tamworth area. A questionnaire which sought views on what people valued, disliked and issues that require addressing was also posted on the Council website. There were 26 respondents, 23 of which had comments to make and were entered onto the consultation database. In terms of responses, factors including Tamworth's built and natural heritage and attractions, its strong communities, potential for growth arising from its strategic location were valued with infrastructure, litter, image and anti-social behaviour identified as dislikes. In terms of potential remedies, these ranged from promoting Anker Valley as a new sustainable neighbourhood to limiting high density residential development along with addressing the causes of litter. These were fed into a list of potential issues for consideration by the Local Plan whilst helping to inform the development of a vision for Tamworth. This was used as a basis for the subsequent consultation stage of its production.

The Council then carried out informal consultation on the vision and issues for the Local Plan from 15 February to 16 March 2007. A total of 32,000 leaflets were distributed with the local newspaper, the Tamworth Herald, which included a list of suggested issues for consideration by the Local Plan along with a vision. Copies of the leaflet were also sent directly to around 320 people and organisations on the consultation database who wish to be kept informed. The information was available on the Council's website and an exhibition was displayed in the Council's customer service area for the duration of the consultation period.

There were 104 respondents who made a total of 183 representations to the consultation. This amounted to a 0.3% response rate, which was disappointing compared with the number of leaflets and letters that were distributed. The low response rate could be explained by the nature of the consultation, which was to stimulate discussion about a vision for the future and general issues. Many people commented that the issues that had been highlighted were obvious and valid but without firm proposals they found it difficult to comment in detail.

However, comments received illustrated general support for the vision; in particular the need to focus investment in the town centre, the need for supporting infrastructure (roads, community facilities, green spaces) to deliver the vision, support for development to respect local character and distinctiveness, minimise

Greenfield development, preservation of historic buildings, ensure facilities and opportunities for both younger and older people, the need for an element of future housing provision to be accommodated outside of the borough, a greater emphasis on biodiversity and renewable energy and the need to align more closely with the (then) Tamworth Community Plan. In terms of the issues, respondents generally agreed that the issues identified were the correct ones for the Local Plan to address although the need for improved linkages between the town centre and the out of centre retail areas and to employment areas in general, the re-use of vacant town centre properties, protecting and enhancing the canal and a greater emphasis on ensuring future growth should not be at the expense of the natural and physical environment.

Representations which were carried forward within the subsequent Issues & Options Document included a greater focus on the town centre, increased emphasis on sustainability issues, the need for housing densities to respond to local character and distinctiveness, upgrading the town's infrastructure to support future growth and the need to enhance biodiversity and mitigate against the impacts of climate change including flooding issues.

Stage 2: Issues & Options

The Council carried out a formal consultation on the issues and options for the Local Plan from 6 March to 18 April 2008. The full Issues and Options report, Initial Sustainability Appraisal and a questionnaire were sent to all statutory consultees. In addition summary documents were sent to 305 non-statutory consultees and the full report was made available in libraries and in the Council's customer service area as part of an exhibition during the consultation period. The Council also used Limehouse, an online consultation portal to consult online. All consultees received an automatic email notification and a link to this portal was made available on the Council's website where the documents could also be downloaded.

The Council received 58 responses to the Issues and Options consultation. Based on the number of consultees, this amounted to a 16.5% response rate. This is disappointing considering the various methods used and the introduction of the Limehouse online consultation software. The low response rate could be explained by the nature of the consultation, asking people about strategic issues and options rather than specific issues.

The Issues & options consultation document identified the key issues for consideration, proposed a vision for the town by 2026 and outlined spatial objectives related to the issues raised. With respect to development opportunities four spatial options were put forward for consideration at this stage. The document also included suggested key areas for core policies and under the heading of Generic Development Management policies to provide links to the spatial objectives.

With respect to the issues there was a mixed response from the consultation and these were identified as requiring addressing in developing the issues further. Responses were also mixed as to the vision. However there was a general consensus that the right spatial objectives had been identified with suggestions put forward as to how they could be improved.

In relation to the spatial options, a mixed response was received. This was partly due to respondents naturally selecting the option that met their individual requirements

and aspirations rather than a holistic view of what was best for Tamworth as a whole. There was an indication that each option had its merit and that these could be combined to deliver a single option. In this respect it was considered appropriate to move to the next stage of the process through the production of an option document to take into account, where appropriate, the responses received to date.

Summary of the Responses Received

The following provides a summary of the responses received in relation to key questions:

Issues: there was a mixed response and these will need to be addressed in developing the issues further.

The Vision: Again there was a mixed response and it will therefore be important that the issues raised are reflected in the vision for the town.

Spatial Objectives: Overall there was a general consensus that the right objectives had been identified but suggestions were made as to how they could be improved.

Spatial Options: In accordance with Government guidance as to the focus for Core Strategies, options should be developed as to how development requirements can be accommodated. There was a mixed response to the four options suggested as respondents generally responded relative to their own circumstances and aspirations rather than providing a holistic view as to what was appropriate for the town as a whole.

Sustainability: there was general agreement that the suggested areas that the core policies should cover were right.

Heart of the Town: Surprisingly there were only a few respondents to this key part of the towns' future.

Development Briefs: There was agreement that development briefs should be provided for development sites to provide clarity in what was required.

Flexibility: Because of the length of time that the strategy will cover the Local Plan needs to be flexible to allow for potential changes and this was supported.

Specific types of employment: While there was a general agreement of the concept there needs to be a balance between specific and general requirements.

Windfalls: There was a mixed response to the suggestion that housing could be provided through windfall sites. There was a consistent response from the house building industry that windfalls should not be considered in accordance with Government policy.

Densities: The general view was that there should be a range of densities informed by the character of an area.

Mixed Communities: There was a general consensus that there should be a policy relating to the mix of house types but this should not be prescriptive and is not necessarily appropriate for small and medium sized sites.

Affordable Housing Thresholds: There was a general view that Government thresholds should apply unless evidence suggests otherwise. Clear guidance should be provided as to the requirements for affordable housing including number of units, type and tenure.

Housing for the Elderly: General agreement that there should be a specific focus of providing for an ageing population but this should not be prescriptive.

Provision for Gypsies and Travellers: general acceptance that provision for Gypsies and Travellers should be considered.

Protection of Employment Areas: General view was that there should be flexibility informed by the general economy.

Upgrading the Towns' Infrastructure: There was a general agreement that the existing infrastructure in the town required improvement. In addition adequate infrastructure should be in place to support new development, however potential alterations to the road network to accommodate the car should be balanced against improvements to other more sustainable forms of transport.

Travel Plans for Residential Sites: This was generally supported.

Congestion around Ventura Park/Jolly Sailor Retail Area: Various suggestions were put forward.

Contributions from Developers for Training: There was a mixed response but a general query as to how effective and appropriate a policy would be.

Community Use of Schools: There was a consensus that schools should be a focus for community life through the provision of community facilities.

Environmental Education: This was fully supported as an objective requiring policy support.

Safeguarding Local Facilities: There was agreement that local facilities should be safeguarded through a core policy, and a range of facilities were identified as being important.

Protection and Enhancement of Open Spaces: various types of open space where suggested and how they could be improved.

New Open Space: General agreement that open space should be provided through new development but not for all types of development.

Local Distinctiveness: Various suggestions were advanced as to what makes the town distinctive.

Conservation Areas: There was a general view that all conservation areas should be improved and suggestions were put forward as to where new areas could be designated in particular the canal.

Biodiversity: This was supported as an important area for protection and enhancement.

Climate Change: Various views were put forward as to how we should mitigate against climate change versus the view that the town should adapt to change.

Flooding: There was concern over the impact of development on flooding and various comments were made as to what should be done to alleviate flooding in the future.

Generic Development Management: There was general support for the range of matters that should be covered but that the number of policies should not be too extensive.

Representations which were carried forward within the subsequent Options Document included:

- the inclusion of a range of different densities for new housing development to reflect different sites and local characteristics
- greater support for dual use of community facilities
- the inclusion of a policy to protect and enhance biodiversity assets
- a greater emphasis on the role of developer obligations policy to deliver necessary infrastructure

Following this consultation and having regard to the mixed comments on the options put forward, it was considered that the next stage of the process should be on the basis of developing an options document incorporating amendments to the issues, vision, spatial objectives and core policies to prepare a preferred strategy for consultation purposes.

Stage 3: Options Document

An Options Report was produced for consultation during March 2009. The document set out an amended vision for how: the Borough is to develop, Spatial Objectives to address the key issues identified and a spatial option for how growth could be managed, and draft policies that would support the delivery of the Strategy. It also included development management policies. It focused firstly on locating growth within the existing urban area before considering greenfield land, the greenbelt and even outside the Borough.

Once again an exhibition about the option and core policies was displayed in the Customer Service area of Marmion House and the 2nd floor of Tamworth Library. This was accompanied by a Newsletter which contained summary information about the Options consultation and current progress on the Local Plan.

39 respondents made representations and these comprised a mixture of developers, government agencies and individual members of the public. It was clear from the responses that a broad consensus on the future development of Tamworth was not achieved.

The following provides an overview of the responses received in relation to key questions:

The Vision: The majority of respondents supported the vision, those that suggested changes were often minor changes to reflect their organisations remit or to strengthen references to particular issues.

Spatial Objectives: Generally there was support for the objectives, and where amendments were suggested these were often wording suggestions to strengthen references to particular issues.

Delivery of Development: There was a mixed response to the sequential approach identified, with those suggesting changes to ensure that Greenbelt, greenfield and sites outside of the Borough boundary were considered at the same time based on sustainability grounds.

Core Policies & Development Management Policies: There was a mixed response to individual policies. It was suggested that these should be subdivided and they should be locally distinctive and based on evidence.

The Issues and Options and Option Report consultations did not achieve consensus as to the most appropriate approach for Tamworth. The views expressed at these consultations, together with the evidence that had been produced however informed the preparation of the Preferred Spatial Strategy version of the Local Plan. Representations influenced the subsequent stages and resulted in the following changes:

- utilisation of the then ongoing Joint Development and Infrastructure Study to assess the potential of sites within and outside the borough to meet future housing need
- greater emphasis on improving linkages within and out of the town centre
- a need for further work to evidence renewable policies
- suggested infrastructure to include within the Infrastructure Delivery Plan
- a greater emphasis on the infrastructure required to deliver Anker Valley

The responses received resulted in further amendments being made for incorporation within the next stage of the Local Plan's production process: The Preferred Spatial Strategy.

Stage 4: The Preferred Spatial Strategy

The Proposed Spatial Strategy, published in October 2009, was the result of consideration of responses to the Option Document consultation and understanding of a range of emerging evidence. The document included a Spatial Portrait, which set out the context and described how the present day borough has been shaped, taking account of its history and social, economic and environmental developments. A revised Vision was included, along with the key issues- set out as 12 Strategic Objectives. The preferred Spatial Strategy and policies were included to show how these will be addressed.

An exhibition was displayed at Marmion House and Tamworth Library, and were accompanied by a series of roadshows across Tamworth which were open to members of the public to come and ask questions and talk to officers about the Strategy.

Tues 6 October	Ankerside Shopping Centre (10am to 2pm)
Wed 7 October	The Arch, Kerria (3pm to 7pm)
Thurs 8 October	Sure Start, Glascoate (3pm to 7pm)
Fri 9 October	St Martins Church, Stonydelph (3pm to 7pm)
Tues 13 October	Coton Green Primary (3pm to 7pm)
Wed 14 October	Fazeley Town Hall (3pm to 7pm)
Thurs 15 October	Wilnecote Parish Hall (3pm to 7pm)

Mon 19 October	Dosthill Primary School (3pm to 7pm)
Wed 21 October	Ankermoor Primary School (3pm to 7pm)
Thurs 22 October	The Arch, Exley (3pm to 7pm)
Sat 24 October	Ankerside Shopping Centre (10am to 2pm)

Copies of the main documents were made available in Tamworth Library, Glascoate Library, Wilnecote Library and the mobile library. All the documents could be accessed and downloaded from the Council's website.

63 respondents made representations and these comprised a mixture of developers, government agencies and individual members of the public.

An initial article appeared in the Tamworth Herald advertising the exhibitions with a follow up article towards the end of the exhibitions. A positive outcome of the exhibitions related to the ones held at the Ankerside Shopping Centre where officers spoke to over 50 people on each day. In total, it was estimated that over 150 people attended the exhibitions.

Members of the public concerns remained over the development proposal for the Anker Valley, however with this exception it was considered that there were no fundamental issues raised about the overall strategy. The following provides an overview of the responses received in relation to key questions and how they were taken forward in the subsequent Pre-Submission Publication Document:

The Vision: Disparity between being considered too aspirational and not ambitious enough. The vision was amended to reflect these concerns.

The Spatial Strategy: It was suggested that this could form the basis of an overarching policy and include references to Greenbelt and Flooding which would not require separate policies. This was incorporated within an overall policy.

The Town Centre: There was support for promoting town centre regeneration, although there was concern about impacting on the character of the historic centre. Some respondents questioned when the Gungate Precinct scheme will go ahead and others felt that parking charges discouraged visitors. The policy attempted to achieve a balance between town centre regeneration and the need to preserve its historic features.

Housing: There remained opposition to development in the Anker Valley in respect of the loss of agricultural land, highway impact, the impact on the countryside and Amington Hall Estate Conservation Area. There also remained questions over its deliverability. However some felt it would be preferable to Green Belt release. There was support for brownfield development before Greenfield. It was not proposed to release green belt, rather a focus was on sustainable development utilising urban locations and Anker valley as this represented the only large strategic allocation in the borough.

Economic Development and Enterprise: Regeneration of existing employment areas was favoured over Greenfield release. There was support for improvements to existing areas to safeguard existing jobs and provide additional opportunities. A mixture of the two approaches underpinned the subsequent strategy.

Sustainable Neighbourhoods: Overall support for a new community leisure centre was recorded, although some questioned the location and suggested it should be in the town centre. A flexible policy regarding its potential location was taken forward.

Design and Heritage: General support for policies although recognition that they were not locally distinctive. Suggestions were made for using SPD to provide detail. This approach was taken forward.

Sustainable Resource Management: There was a difference of opinion on the need for a flooding policy with suggestions that it could be redrafted to focus on wider local water issues. There was a similar response about the need for a Green Belt policy. Both policies were included.

Sustainable Transport: There was support for improvements to sustainable transport infrastructure and support for a park and ride. Some respondents felt that the links between housing, services, employment areas and the town centre need improving. Emphasis was added to improving linkages and connectivity across the borough.

Development Management: A number of respondents suggested that this policy could be omitted and that reference to the West Midlands Sustainability Checklist would be better. The Checklist was an online tool that identified a range of different economic, social and environmental sustainability issues covered in National Guidance and the West Midlands Regional Spatial Strategy and enabled users to assess to what extent a development site proposal would deliver on the different aspects of sustainability.

Other representations which were addressed through policies contained in the subsequent Pre-Submission Document include:

- the inclusion of local policies on addressing flood risk and green belt protection
- a greater emphasis on green infrastructure and connectivity between green spaces; set out as delivering an 'urban green' linkages
- focus on neighbourhood regeneration through the identification of regeneration priority areas
- emphasis on protecting high quality open space and focussing on enhancing quality of existing
- stronger emphasis on cultural and leisure offer within the town centre
- defining the boundary of out of town retail parks
- stronger emphasis on improving the linkages between Anker Valley allocation and the town centre, removal of the park and ride proposal, increase in its boundary to demonstrate maximum flexibility in terms of capacity and mitigation measures to address impact on Amington Hall Conservation Area.

Following the analysis of the consultation responses, a review of the preferred spatial strategy commenced. The responses identified a missing up to date evidence gap in relation to housing needs, together with the outcome of two significant pieces of work in relation to housing viability and an assessment of the potential broad locations for housing outside of Tamworth's boundary. It was therefore agreed to re-draft the housing policies and subject them to a further period of consultation.

Stage 5: Housing Policy Consultation

In February 2011, the Council re-drafted its housing policies from the 2009 Proposed Spatial Strategy document and carried out a 6 week consultation. The re-drafted policies reflected an important piece of evidence on affordable housing viability which enabled the setting of realistic targets for affordable housing. Advice obtained from Gypsy and Traveller representatives facilitated a more responsive policy to be drafted.

The housing policies included establishing targets where appropriate and supported by evidence and included:

H1 - Revised policy on housing delivery

H2 - Unchanged policy for Anker Valley

H3 - Revised policy on affordable housing

H4 - New policy on housing need setting out targets for sizes of dwellings, including an approach to delivering 'flexi care' accommodation

H5 - New policy on housing density

H6 - Revised policy on Gypsy and Travelling Showpeople accommodation

Copies of the documents were made available on the Council's website. Organisations and statutory consultees on the consultation database were informed of the consultation and invited to submit representations.

In total, 34 respondents, including statutory bodies, members of the community and adjoining local authorities submitted 134 individual representations on the policies.

The responses suggested broad support for the strategic approach to housing delivery, including proposed generalised locations for potential housing growth to meet Tamworth's needs in neighbouring authorities. However, further discussions were planned with Lichfield & North Warwickshire Councils to agree how this would be delivered through their respective Core Strategies. Support was received for the proposed targets in relation to affordable housing and housing density, accompanied by requests for a degree of flexibility to address site specific issues. The targets for dwelling sizes and numbers and flexi care accommodation received a number of objections on the basis of being overly prescriptive and failing to comply with government guidance. On this basis it was agreed to commission a more up to date evidence base of housing need to support establishing tenure type and mix and location in the context of government's housing, welfare and health reforms.

This version of the plan was prepared alongside the sustainability appraisal, with each policy assessed alongside one realistic alternative option. They were assessed as they were drafted for the consultation and are set out as Option 1 in the appraisal framework. The total scores for each policy show that Option 1 scored highest in every instance, which provided an endorsement that the preferred Housing Policy approach was the most appropriate, in terms of delivering sustainability objectives for Tamworth.

Stage 6: Tamworth Local Plan Pre-Submission Publication June 2012 (withdrawn March 2013)

The Tamworth Local Plan Pre-Submission Publication, published in June 2012, was the result of consideration of responses to all previous stages of consultation, incorporating new evidence into the plan making process and responding to the Localism Act 2011, the National Planning Policy Framework.

An exhibition was displayed at Marmion House and Tamworth Library, and were accompanied by a series of roadshows across Tamworth which were open to members of the public to come and ask questions and talk to officers about the Strategy, including:

Wednesday 20 th June	Marmion House – internal drop in
Wednesday 20 th June	Marmion House – external drop in
Tuesday 26 th June	Glascote Library
Wednesday 27 th June	Marmion House – internal drop in
Wednesday 27 th June	Tamworth Library
Friday 29 th June	Wilnecote Library
Saturday 30 th June	Ankerside Centre

Copies of the main documents were made available in Tamworth Library, Glascote Library, Wilnecote Library and the mobile library. All the documents could be accessed and downloaded from the Council's website.

Between the 8th June and 20th July 2012 the consultation on the Pre-Submission Publication Local Plan was carried out. As a result of this consultation, a total of 528 individuals or organisations made 738 representations; of which 478 were received from Stoneydelph, Amington and Belgrave residents. Representations were received from a wide range of consultees: residents, landowners, developers and statutory bodies. Both sound and un-sound representations were made on all areas of the plan; the main issues presented through the consultation were with regard to housing, employment and retail. It was considered that none of the representations received were fundamental to the soundness of the Local Plan. However, some comments led to the suggestion of some minor amendments which accompanied the submission of the Local Plan.

Responses to the previous stages of this document can be found in the Consultation Statement which accompanied the Tamworth Local Plan Pre-Submission Publication (withdrawn from examination March 2013).

The following provides an overview of the responses received in relation to the four tests of soundness and the legal compliance on that pre-submission consultation:

The pre-submission publication consultation complied with all the statutory requirements and met the requirements set out in the Council's own Statement of Community Involvement. All policies of the Local Plan were put through a full Sustainability Appraisal whereby these issues regarding deprivation, proximity of amenity were addressed. There were no strategic housing allocations in those areas, however sites were identified within the Local Plan's evidence base (SHLAA) which could come forward to meet Tamworth's housing needs. These proposals would have been determined against the Local Plan once adopted by Council.

Local Plan – General comments made throughout the plan.

Several responses supporting the Council's approach to the duty to co-operate were received, in particular from Lichfield District Council regarding the MoU. Other representations believed that the duty to co-operate had not been met and that key stakeholders were not met with: the legal obligation of the duty to co-operate had been met and this could be demonstrated with evidence, the key stakeholder in question was the Highways Agency. A meeting was held with the Highways Agency where their comments to the Local Plan were discussed and positive action was taken.

Some representations believed that the consultation was too short and did not allow for full comments to be made: the consultation complied with all the statutory requirements and met all the requirements set out in the Council's own Statement of Community Involvement.

Representations were received which stated that deadlines set out in the Local Development Scheme for the progression of the Local Plan were missed. This is correct, however the progression of the Local Plan was delayed by changes to national planning policy guidance through the release of the National Planning Policy Framework.

Representations were received which broadly supported the policies to regenerate and revitalise the town.

Representations were received which argued that insufficient land had been allocated for housing and employment needs, that housing needs were higher, that more land should be allocated, and that the evidence base used to support policy was inaccurate. The evidence base used by the Council was robust and justified the level of housing and employment growth the Council was aspiring to achieve. Expanding upon this, representations were received stating that the Green Belt should be reviewed to allow for the release of land for housing. The Green Belt had been reviewed in light of the proposed revocation of the RSS and the requirement to do so in the NPPF, these was no need to release land from the Green Belt for housing.

Representations were received which questioned the plan period of the Local Plan 2006 to 2028, and suggest it should be changed to 2012 to 2032. The plan period did not need to be changed: from the anticipated year of adoption 2013, the Local Plan would have covered a 15 year period up to 2028. National Planning Policy Framework guidance states that the plan period should preferably cover a period of 15 years.

Chapter 1 – Introduction

Only wording change suggestions were received on this chapter of the Local Plan.

Chapter 2 – Spatial Portrait, Vision and Strategic Priorities

Representations were received which supported the Local Plan as it balanced growth with the protection of the natural environment and was appropriate for sustainable development in the borough.

Chapter 3 – A Spatial Strategy for Tamworth Borough Council

Representations were received which supported policy within this chapter.

Chapter 4 – A Prosperous Town

Representations were received which supported this chapter, in particular the Gungate development. However, other representations were received which questioned the viability of the town centre retail allocations and stated that the borough's retail aspirations would not be met. Policy within this chapter sought to provide development in the most accessible and sustainable locations, the town centre is the most accessible location in the borough. The NPPF states that Local Plans should pursue policy to support the viability and vitality of the town centre, and that land should be allocated to meet any retail need.

Other representations were received which stated that proposed policy was too restrictive on out of town retail development and that the retail parks' contribution to

the economy had been ignored. The evidence base showed the need for new retail floor space and that the most sustainable location for this is the town centre. The NPPF states that Local Plans should pursue policy to support the viability and vitality of the town centre, policy in the Local Plan intended to restrict the growth of the out of town retail parks and promote the growth of the town centre. Local Plan policy would have allowed for small scale expansion of existing units and improved the linkages to the town centre which would be of mutual benefit to both the retail parks and town centre. Representations were also received which supported these policies.

English Heritage were in general support of policy within this chapter, but suggested that changes should be made to better recognise the heritage assets of the town centre.

The Environment Agency were in general support of policy and allocations within this chapter, but suggested that policy could be re-worded and perhaps further work undertaken to ensure that employment allocations are not subject to any flood risk.

Chapter 5 – Strong and Vibrant Neighbourhoods

Representations were received that stated the housing requirement for Tamworth should be increased to 5,660 over the plan period and therefore more housing land should be allocated to meet this increase. The evidence base had established the housing needs for South Staffordshire and apportioned part of this to Tamworth to set out its need over the plan period. Through the MoU it had been agreed that some of this need (1,000) would be delivered in adjoining authorities. The SHLAA had established the capacity of deliverable and developable housing sites available in the borough and that land use allocations had been made to promote development.

Representations were received which stated that the Anker Valley site was unviable, and therefore should not be allocated and that other sites within the borough and outside of the borough should be allocated instead. The evidence base showed that Anker Valley was a viable site and that other land within the urban area of the borough was viable for housing development. Representations were received from Network Rail stating that a link road over the railway line would be possible and that they were willing to work with developers to achieve this piece of infrastructure.

Representations were received regarding affordable housing, dwelling size and site density policy in particular the flexibility of these policies to allow for sites to remain viable. All policies in question were flexible in that they stated: if a proposal is unviable, then policy requirements could be negotiated at the planning application stage.

Representations were received by specialist housing developers suggesting that policy should be amended to reflect that there is a need for specialised and sheltered housing for the elderly. Policy is not required for this, however other policy reflected the changing demographics of Tamworth Borough: proposed policy required new sites to have a range of housing types from one bed to four bed, and that where it could be proven there is need and demand for different groups within a community this too should be met.

Representation was received stating that the proposed Gypsy and Traveller policy was not justified, that there was no evidence base to show that Gypsy and Traveller sites would come forward in the next five years. The borough has a limited supply of unconstrained land and no proposals for Gypsy and Traveller sites were brought forward throughout the preparation of the Local Plan. The intention of the policy was

to deal with Gypsy and Traveller sites on a proposal by proposal basis whilst also seeking the possibility of opportunities in neighbouring authorities to meet the need.

Chapter 6 – A High Quality Environment

Representations were received stating that the most recent study into open space provision should be used. This study was not adopted by the Council as it used an excessive level of detail for the methodology, resulting in inaccurate results being produced.

Representation was received suggesting that wording should be changed requiring that compensation for sports pitches should be of equal or better quantity as well as quality than that which is lost. The quality element was already within the policy, however it is not always possible to replace the quantity of that which is lost, particularly if the site which could be lost is of a poor quality and there is already sufficient quantity in the surrounding area.

Chapter 7 – A Sustainable Town

Representations were received stating that it is not clear how infrastructure will be brought forward to support the retail park linkages, the links to the town centre and the relief road proposed for Anker Valley. These different packages had been identified to meet transport needs of the Local Plan, it was intended that these would be brought forward through developer contributions, Community Infrastructure Levy receipts and other sources of funding, such as New Homes Bonus and LTP funding.

Representations were received stating that the growth patterns outlined in the Local Plan were not sustainable. The Sustainability Appraisal had assessed all proposed policy and strategy; the Local Plan was sustainable.

Chapter 8 – Monitoring and Implementation

Only wording change suggestions were received on this chapter of the Local Plan.

Mapping – Policies Map and figures within Local Plan

Representations were received stating that the Policies Map and figures within the Local Plan should be made clearer. This was taken into consideration and the mapping key, colouring and shading were changed before the Local Plan was submitted.

Sustainability Appraisal

Representations were received stating that the Sustainability Appraisal meets all the Strategic Environmental Assessment regulations, and the Local Plan concentrates growth in the urban area which is the most sustainable option. Other representations were received which found the Sustainability Appraisal to be un-sound as it did not present the most sustainable option.

Summary of Representations Received

The following tables breakdown how the Local Plan was responded to.

Summary of Local Plan Responses by Chapter

Local Plan Chapter	Number of Responses
Local Plan – General	500
Chapter 1	2
Chapter 2	22
Chapter 3	12
Chapter 4	42
Chapter 5	66
Chapter 6	23
Chapter 7	24
Chapter 8	5
Mapping	7
Evidence Base	3
Appendices	27
Sustainability Appraisal	5
TOTAL	738

Summary of Local Plan Responses by Legal and Soundness Test

	Yes	No	Don't Know	Yes/No	No Response	Total
Duty to Cooperate	51	58	1	0	628	738
Legal and Procedural Requirements	52	529	1	1	155	738
Positively Prepared	69	75	0	0	594	738
Justified	81	85	0	0	572	738
Effective	63	557	0	0	118	738
Consistent with NPPF	72	77	2	4	583	738

Stage 7: Draft Tamworth Local Plan March to May 2014

In November 2012 the Council submitted the 2006-2028 Local Plan to the Secretary of State for examination. The appointed Planning Inspector identified areas of concern, notably a requirement to make more specific and detailed land use allocations for housing, employment and town centre uses. This would ensure that a supply of deliverable housing and employment sites are identified to meet the borough's future needs. To address these concerns the Council proposed to modify the Local Plan by making additional allocations. To do this, the Council would have needed to carry out a Sustainability Appraisal (SA) on all proposed sites and suitable alternatives. In February 2013 the Inspector called an Exploratory Meeting. Following this meeting the Inspector issued the Council with a letter which recommended a withdrawal of the Local Plan from examination due to the high risk of a legal challenge; the concern was over the scale of the required changes and the need for public consultation on the Sustainability Appraisal work that would support the proposed changes.

The Council chose to withdraw the Local Plan and set up a cross party working group to support the process of amending the Local Plan.

After withdrawing the Local Plan from examination new evidence was prepared and existing work updated and refreshed, this work has informed the draft Local Plan.

Under Regulation 18 of the 2012 Regulations the draft Local Plan and Sustainability Appraisal consultation was carried out from 30 March to the 12 May 2014. Letters and emails were sent out to persons on the Local Plan consultation database, a public notice and press release were placed in the Tamworth Herald and regular updates were made on the Council's website and Twitter feed. The draft Local Plan and supporting evidence base was made available on the Council's website and key documents were placed at the Council office and libraries in the Borough.

In addition to this several consultation events were carried out by the Development Plan team around the Borough. A total of 289 people attended the consultation events around the Borough, of which 213 attended the Ankerside event.

Glascote Library	Thursday 17 th April between 10am and 4pm
	Tuesday 29 th April between 1pm and 5pm
Tamworth Library	Monday 7 th April between 4pm and 7pm
	Thursday 10 th April between 10am and 4pm
Amington Community Centre (ARCH)	Tuesday 15 th April between 4pm and 7pm
Wilnecote Library	Wednesday 16 th April between 2.30pm and 5pm
	Wednesday 30 th April between 4pm and 7pm
Ankerside Centre	Saturday 26 th April between 10am and 4pm

In total 133 representations were made during the public consultation. The responses were made by members of the public, statutory consultees, landowners and the development sector. Throughout the consultation period the Development Plan team responded to e-mails and had telephone conversations with interested persons to discuss the draft Local Plan and evidence base.

The following tables summarise the comments made on the Local Plan by chapter and how the Council responded to issues where necessary.

General

Issue	Response
N/A	Sustainability Appraisal to be updated – to take account of any changes to the Local Plan and help to inform changes to policy or with site selection
Further clarity and the mechanisms to ensure that Tamworth’s unmet needs are delivered outside of the Borough and that Lichfield and North Warwickshire need specifying. There should be a positive approach to preparing their Local Plans.	Further work with North Warwickshire, Lichfield and the GBSLEP regarding strategic planning issues and the duty to co-operate will be carried out. An officer group has been established and Members from all three authorities will be meeting soon.
Dissatisfaction with how the draft Local Plan and supporting evidence can be accessed	We will look into how access to information can be increased. However all the evidence is published on the Council’s website which can be downloaded and printed if required from any computer.

Chapter 4

Issue	Response
Local and Neighbourhood centres are all different, their strengths and weaknesses should be listed to better support their future development.	Further detail and information about Local and Neighbourhood Centres to be added to policy and the supporting text.
The Retail Impact Assessment thresholds are not justified and are too low.	Evidence which supports the thresholds is to be added to the evidence base which supports the thresholds in the Local Plan

Chapter 5

Issue	Response
The Council should deliver more housing on brownfield sites before releasing Greenfield land	We will work with landowners and statutory consultees to increase amount of land available for housing development within Tamworth particularly on brownfield sites.

	A Strategic Flood Risk Assessment (SFRA) Level 2 could be carried out. By carrying out this work it would ensure that possible new housing sites within Flood Zones could deliver housing to meet housing needs. Officers would work with colleagues at the Environment Agency to ensure this work is robust and will not increase the chance of flooding to existing communities or allow housing to be developed that has a high risk of being flooded.
The Strategic Housing Market Assessment is out of date and needs updating. The Local Plan does not accurately reflect the needs of the Borough – there are arguments for higher and lower housing needs.	We will Update the evidence which supports Tamworth’s objectively assessed housing needs based upon the latest census release (May 2014) Preparing a Housing Strategy to support the delivery of housing within Tamworth
Green Belt sites should be released as other sites within the Borough are not deliverable. Other views stated that the Green Belt should be protected.	The existing Green Belt Review will be updated where necessary which supports the current position on Green Belt.
The deliverability and sustainability of the urban extension sites is uncertain. Other sites should be allocated.	Further detailed work will be done to demonstrate how the sites are deliverable and sustainable. This will strengthen the reasons for allocating these sites. Existing work done and new work will be brought together to demonstrate, what will be included within the site, where the site is located and the local context, when the site and necessary infrastructure can be delivered and how it will be delivered.
The affordable housing policy should be monitored closely to ensure that policy is responsive to the market and viability issues.	The affordable housing policy will be monitored and a review of that policy will take place if required.

Chapter 6

Issue	Response
The Local Plan should emphasise improving green and blue links across the borough and into adjoining countryside. The Green Belt should be protected and existing open space should be improved.	The Green Infrastructure Strategy will be incorporated into the next version of the Local Plan. Green Belt review comments as above

The Sports Strategy should be updated to inform the Local Plan and set out what new sports facilities are required in the Borough across the plan period.	We will work with Sport England to update the 2009 Sport Strategy where necessary
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Chapter 7

Issue	Response
Concerns were raised that existing traffic problems are not being dealt with; the reasoning behind specific junction improvements and safety measures should be explained; is there a potential opportunity for road/cycle route adjacent HS2, Borrowpit Lake and over the narrow part of the River Tame? Safety and congestion problems at Ventura should be looked at	We will work with County Council to ensure mitigation measures are put in place where a highways issue could arise. The Council has been working with SCC to ensure that new development is located in a sustainable location and that new public transport can be provided if necessary. Accessibility mapping of the borough will be produced, this will show travel times by public transport and by walking to key facilities, such as schools, GPs and the Town Centre.
Anker Valley link road is needed and should be publicly funded	The evidence base supporting the Anker Valley SUE and the Ashby road / Gungate transport corridor shows that a link road is not required for a development of 500 or 700 units. A link road would be unviable and not cost effective.

Stage 8: Pre-submission Local Plan October to December 2014

Following on from the draft Local Plan consultation earlier in 2014, updates to the evidence base were prepared and changes to Local Plan were made to address concerns and comments raised. In accordance with the 2012 planning regulations and the SCI the Pre-Submission Local Plan and Sustainability Appraisal consultation was carried out from 22 October to 3 December 2014. Letters and emails were sent out to approximately 900 persons on the Local Plan consultation database, a public notice and a press release were placed in the Tamworth Herald and regular updates were made on the Council's website and Twitter feed. In addition to this throughout the consultation period, the Plan was publicised on the Tamworth and Lichfield Business and Enterprise website, facebook page and twitter feed, which have over 600 unique followers in the business community.

The Pre-submission Local Plan and supporting evidence base was made available on the Council's website and key documents were placed at the Council office and libraries in the Borough.

In addition to this, several consultation events were carried out by the Development Plan team around the Borough. A total of 258 people attended the consultation events around the Borough.

Venue	Number of people
Tuesday 28 th October – 09:30-15:30 – Tamworth library	49
Saturday 1 st November – 09:30-15:30 – Ankerside	135
Friday 7 th November – 10:00-14:00 – Glasgote Library	6
Tuesday 11 th November – 16:00-19:00 – Tamworth Library	5
Wednesday 19 th November – 16:00-18:45 – Wilnecote Library	4
Tuesday 25 th November – 09:30-15:30 – Ankerside	59

A total of 177 representations were made to the consultation with regards to soundness or legal compliance issues. These representations were made by a total of 51 persons or organisations.

Summary of Representations by Chapter

Local Plan Chapter	Number of Responses
Chapter 1	1
Chapter 2	11
Chapter 3	24
Chapter 4	35
Chapter 5	46
Chapter 6	21
Chapter 7	22
Chapter 8	3
General	10
Appendices	4
TOTAL	177

Summary of Representations by Legal and Soundness Test

	Yes	No	No Response	Total
Duty to Cooperate	48	37	92	177
Legal and Procedural Requirements	56	27	94	177
Positively Prepared	53	32	92	177
Justified	48	45	84	177
Effective	35	55	87	177
Consistency with NPPF	43	50	84	177

A total of 17 unique persons have requested to take part in the examination hearing sessions, some of which wish to attend hearing sessions regarding more than one chapter.

Summary of persons wishing to attend examination hearings

Local Plan Chapter	Persons wishing to attend
Chapter 1	0

Chapter 2	2
Chapter 3	11
Chapter 4	5
Chapter 5	7
Chapter 6	2
Chapter 7	1
Chapter 8	1
General	3

Organisations such as English Heritage, Sport England, various sections of Staffordshire County Council, Lichfield District Council and several landowners have suggested minor changes to the Local Plan. In some instances these changes could be supported by the Council as they will add further detail or clarity to the policy or supporting text. These changes which the Council supports are in Appendix 3

The following table summarises the comments made on the Local Plan by chapter; the Council's response to each representation made can be found in Appendix 2.

Local Plan Chapter	Summary of Representations
Chapter 1	No major issues raised
Chapter 2	No major issues raised
Chapter 3	Objectively assessed housing need should increase and be at least 265dpa Objectively assessed housing need should decrease, it should be recalculated using Staffordshire Observatory figures Tamworth should meet all of its housing need in the Borough and release land within the Green Belt to do this Tamworth should support the Arkall Farm development in Lichfield District If not releasing Green Belt land Tamworth should support Arkall Farm in Lichfield Less reliance should be placed upon Lichfield and North Warwickshire to bring forward land to meet Tamworth's needs.
Chapter 4	Land should be brought forward in adjoining LPA to meet Tamworth's employment needs Tamworth's employment needs should be higher EMP1 allocation should allow for a range of employment uses and retail uses, not just B class The commitment for the council to review the retail need over the plan period by 2021 should be moved into policy not just left in as a commitment within supporting text Retail space will not come forward in the Town Centre,

	<p>restrictions on development taking place at Ventura / out of centre should be relaxed or removed. The retail parks should be included in the town centre hierarchy to promote their growth and recognise their function in Tamworth</p>
Chapter 5	<p>Objection to site allocation 496</p> <p>More housing should be built on brownfield land</p> <p>Should specify a Gypsy and Traveller site and have underestimated the need arising from Tamworth</p> <p>No need to allocate the Golf Course as the housing need is too high</p> <p>More affordable homes should be provided</p> <p>Make changes to the affordable housing requirement re: PPG update</p>
Chapter 6	<p>Impact on the loss of the Golf Course SUE, on nearby LNR and SSSI</p> <p>Impact of Dunstall Lane SUE on Canal environment</p> <p>Impact of Dunstall Lane SUE to Hopwas (Lichfield)</p>
Chapter 7	<p>Traffic problems and congestion arising from Golf Course and Anker Valley SUEs</p> <p>Gungate and Fountains junction problems associated with Anker Valley SUE</p> <p>Traffic problems arising from Dunstall Lane SUE in Hopwas village (Lichfield)</p> <p>Increased level of CO2 across the Borough</p> <p>Lichfield, Tamworth and SCC should work together to address transport issues in North of Tamworth area</p> <p>No justification to close the Golf Course or justification to stop use for sports and leisure</p>
Chapter 8	No major issues raised
General	<p>Difficult to read for the lay person</p> <p>Poor consultation with the Amington Residents Association</p>

Appendix 1 – Who Has Been Involved

Organisations & Individuals consulted through the various stages of the Local Plan's production

Statutory Organisations/Agencies

NHS and CCG – various agencies through the stage	The Highways Agency
Countryside Agency	Staffordshire Police & Fire and Rescue
English Nature	Forestry Commission
English Heritage	Inland Waterways Association
Environment Agency	Network Rail
English, Welsh & Scottish Railways (EWS)	Homes and Communities Agency
Sport England	Local infrastructure providers – gas, water, electric, sewerage
Staffordshire and Warwickshire Wildlife Trusts	

Government

Department of Trade & Industry	DEFRA
Government Office West Midlands	Department of Transport

Local and Regional Government

Lichfield District Council	Staffordshire County Council
North Warwickshire BC	Birmingham City Council
Tamworth Borough Councillors	Warwickshire County Council
West Midlands Regional Assembly	Greater Birmingham and Solihull LEP
Stoke and Staffordshire LEP	Coventry and Warwickshire LEP
Parish Councils in neighbouring districts	

Additional Consultees

The Local Plan consultation database has over 900 consultees, representing national and local organisations and also members of the public and individuals with an interest in planning. These local organisations include; local business groups, charities, canal groups, older person groups, housing associations, resident groups, ethnic minority groups, conservation groups, amenity groups, civic societies and community groups.

Appendix 2 – Pre-Submission (stage 8) Summary of Representations and Council Response

Representation Number	Representor	Wish to appear at examination	Section of plan commented on	Which Test(s) of soundness is challenged / legal compliance	Summary of Comments Made and suggested change	Council's comment	Suggested Change reference
LP001	National Grid				Site reference 406: Land North of Coton Lane is crossed by National Grid's high voltage overhead electricity line ZF 400kV route. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in situ. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity equipment when planning developments.	Noted, the Council considers the power lines can be addressed in the detailed design of a proposal for site 406 at the planning application stage.	
LP002	British Pipeline Agency Ltd.				We have looked on line at The Local Plan Consultation page and on inspection have found that the sites listed do not affect BPA Pipeline interest in Tamworth. So BPA have no comments to make at this time.	Noted	
LP003	Equality and Human Rights Commission	N/A	N/A	N/A	Insufficient resources to comment on consultations that do not raise issues of strategic importance. Local and other public authorities obliged to consider the effect of their policies and decisions on people sharing particular protected characteristics.	Noted	N/A
LP004	The Coal Authority		Chapter 5, Policy HG1		Support the identification in Table 5.1 of those housing sites which fall within the defined Development High Risk Area and the confirmation that proposals will need to be supported by a Coal Mining Risk Assessment.	Support noted	
LP005	The Coal Authority		Chapter 7, Policy SU5		Support the inclusion of this policy which identifies consideration of land instability, requires relevant reports to be submitted to support planning applications, identifies a commitment to consult the Minerals Planning Authority and The Coal Authority on the existence and extent of mineral and coal reserves and identifies the benefits of mineral extraction in advance of development where	Support noted	

Representation Number	Representor	Wish to appear at examination	Section of plan commented on	Which Test(s) of soundness is challenged / legal compliance	Summary of Comments Made and suggested change	Council's comment	Suggested Change reference
					practicable and environmentally acceptable		
LP006a	Smith	No	Policy EC2 and paragraph 4.35	Effective, consistent with national policy and complies with the duty to co-operate	A number of linkages proposals are included within the policies and Infrastructure Delivery Plan (supported by evidence base document E1 "Tamworth Linkages"). An additional linkage should be added to these proposals with the inclusion of a footpath around Borrowpit Lake and a footbridge between it and Ventura Retail Park.	The suggestion made can be considered alongside any update to the Gilesbies Linkages Report and the Infrastructure Delivery Plan.	
LP006b	Smith	No		Effective, consistent with national policy and complies with the duty to co-operate	A number of linkages proposals are included within the policies and Infrastructure Delivery Plan (supported by evidence base document E1 "Tamworth Linkages"). An additional linkage should be added to these proposals with the inclusion of a footpath around Borrowpit Lake and a footbridge between it and Ventura Retail Park.	The suggestion made can be considered alongside any update to the Gilesbies Linkages Report and the Infrastructure Delivery Plan.	
LP006c	Smith	No		Effective, consistent with national policy and complies with the duty to co-operate	A number of linkages proposals are included within the policies and Infrastructure Delivery Plan (supported by evidence base document E1 "Tamworth Linkages"). An additional linkage should be added to these proposals with the inclusion of a footpath around Borrowpit Lake and a footbridge between it and Ventura Retail Park.	The suggestion made can be considered alongside any update to the Gilesbies Linkages Report and the Infrastructure Delivery Plan.	
LP006d	Smith	No		Effective, consistent with national policy and complies with the duty to co-operate	A number of linkages proposals are included within the policies and Infrastructure Delivery Plan (supported by evidence base document E1 "Tamworth Linkages"). An additional linkage should be added to these proposals with the inclusion of a footpath around Borrowpit Lake and a footbridge between it and Ventura Retail Park.	The suggestion made can be considered alongside any update to the Gilesbies Linkages Report and the Infrastructure Delivery Plan.	
LP006e	Smith	No		Effective, consistent with national policy and complies with the duty to co-operate	A number of linkages proposals are included within the policies and Infrastructure Delivery Plan (supported by evidence base document E1 "Tamworth Linkages"). An additional linkage should	The suggestion made can be considered alongside any update to the Gilesbies Linkages Report and the Infrastructure Delivery Plan.	

Representation Number	Representor	Wish to appear at examination	Section of plan commented on	Which Test(s) of soundness is challenged / legal compliance	Summary of Comments Made and suggested change	Council's comment	Suggested Change reference
					be added to these proposals with the inclusion of a footpath around Borrowpit Lake and a footbridge between it and Ventura Retail Park.		
LP006f	Smith	No		Effective, consistent with national policy and complies with the duty to co-operate	A number of linkages proposals are included within the policies and Infrastructure Delivery Plan (supported by evidence base document E1 "Tamworth Linkages"). An additional linkage should be added to these proposals with the inclusion of a footpath around Borrowpit Lake and a footbridge between it and Ventura Retail Park.	The suggestion made can be considered alongside any update to the Gilesbies Linkages Report and the Infrastructure Delivery Plan.	
LP006g	Smith	No		Effective, consistent with national policy and complies with the duty to co-operate	A number of linkages proposals are included within the policies and Infrastructure Delivery Plan (supported by evidence base document E1 "Tamworth Linkages"). An additional linkage should be added to these proposals with the inclusion of a footpath around Borrowpit Lake and a footbridge between it and Ventura Retail Park.	The suggestion made can be considered alongside any update to the Gilesbies Linkages Report and the Infrastructure Delivery Plan.	
LP006h	Smith	No		Effective, consistent with national policy and complies with the duty to co-operate	A number of linkages proposals are included within the policies and Infrastructure Delivery Plan (supported by evidence base document E1 "Tamworth Linkages"). An additional linkage should be added to these proposals with the inclusion of a footpath around Borrowpit Lake and a footbridge between it and Ventura Retail Park.	The suggestion made can be considered alongside any update to the Gilesbies Linkages Report and the Infrastructure Delivery Plan.	
LP006i	Smith	No		Effective, consistent with national policy and complies with the duty to co-operate	A number of linkages proposals are included within the policies and Infrastructure Delivery Plan (supported by evidence base document E1 "Tamworth Linkages"). An additional linkage should be added to these proposals with the inclusion of a footpath around Borrowpit Lake and a footbridge between it and Ventura Retail Park.	The suggestion made can be considered alongside any update to the Gilesbies Linkages Report and the Infrastructure Delivery Plan.	
LP007	Jennings	No	Chapter 5, Policy HG2	Effective	There appears to be no consideration of the knock on effect of heavily increased traffic flow in Tamworth/Amington Road	Potential impacts of allocations, including to highways, were considered when sites were selected as summarised in the	

Representation Number	Representor	Wish to appear at examination	Section of plan commented on	Which Test(s) of soundness is challenged / legal compliance	Summary of Comments Made and suggested change	Council's comment	Suggested Change reference
					<p>from Mercian Way, and Glascote Road from Marlborough Way into Town Centre. The Golf Course site has no direct access to eastbound traffic going towards M42 or Polesworth.</p> <p>Suggest third access to Golf Course site to Sandy Way or B5000 and to consider completion of Amington Link Road</p>	<p>Tamworth Borough Council Pre-submission Local Plan 2006-2031 Site Selection Paper (2014). The local highway authority contributed to the process and indicated 2 points of access are required for the Golf Course site.</p> <p>A report was published as part of the pre-application public consultation for the Golf Course based on 2 points of access: Proposed Mixed Use Development at Tamworth Municipal Golf Course Interim Transport Assessment (2014), which indicates that impacts to the local highway network will be acceptable, with mitigation measures to one junction.</p> <p>Policy SU2 requires all proposals to be supported by proportionate transport assessments and mitigation measures where required.</p> <p>The Anker Valley Link Road including the Amington link has been removed from the Local Plan since withdrawal from the last examination. The link is not viable and not required for the Golf Course site.</p> <p>Suggested changes are not supported by the Council.</p>	
LP008	Wigginton & Hopwas Parish Council		Chapter 5, Policy HG2	Justified; Duty to Cooperate	<p>In accordance with the policy in the developing Wigginton and Hopwas Neighbourhood Plan there must be no vehicular access from the development to the village of Hopwas along Dunstall Lane to protect the conservation area of Hopwas and to reduce any potential increase in traffic.</p> <p>In page 89, 5.8, bullet point 8 of the text on Dunstall Lane please amend to say "must establish two points of vehicular access with no direct vehicular access to</p>	<p>A transport assessment will look at the detailed impact off the proposal at the planning application stage, in accordance with Policy SU2.</p> <p>Suggested change is not supported by the council as there is currently no evidence that the increased traffic to Hopwas and the Hopwas Conservation Area would be unacceptable.</p>	

Representation Number	Representor	Wish to appear at examination	Section of plan commented on	Which Test(s) of soundness is challenged / legal compliance	Summary of Comments Made and suggested change	Council's comment	Suggested Change reference
					or from the village of Hopwas".		
LP009	Wigginton & Hopwas Parish Council		Chapter 5, housing allocations 387, 390 and 406 on the Policies Map	Duty to Cooperate	The Parish Council wishes to stress its view that this development will adversely increase traffic problems in North Tamworth and the villages of Hopwas and Wigginton. The Parish Council also objects to the loss of greenfield agricultural land, building on land at risk of flooding, and close proximity to a sewage works	<p>Transport assessments will look at the detailed impact off the proposals at the planning application stage, in accordance with Policy SU2. There is currently no evidence that the traffic impacts would be unacceptable.</p> <p>The adverse impact of loss of greenfield land was taken into consideration in the Site Selection Paper and Sustainability Appraisal.</p> <p>The allocations are supported by a Level 2 Strategic Flood Risk Assessment (2014) and Policy SU2 requires developments to be safe from the risk of flooding and not increase flood risk elsewhere.</p> <p>Site 406 is adjacent to the sewage works. The site promoters have proposed a site layout based on an odour survey that would limit the impact.</p>	
LP010	SCC Minerals Policy	No	Chapter 7, para 7.18 and Policy SU3		Supportive	Support noted	
LP011	SCC Minerals Policy	No	Chapter 7, para 7.38 and Policy SU5		Supportive	Support noted	
LP012	Highways Agency		Chapter 7		<p>Highways Agency is content that the transport evidence base which underpins the Local Plan and which has informed the Infrastructure Delivery Plan provides adequate assurance that the proposed development is capable of being delivered alongside the requisite infrastructure to ensure the acceptability of impacts on the M42 and A5.</p> <p>A minor modification to the wording in the IDP and the section 7.8 and 7.6 regarding detailed transport assessments should</p>	<p>Support noted.</p> <p>The Council would support the modifications requested to make reference to national guidance.</p>	<p>MOD001</p> <p>MOD002</p> <p>MOD003</p>

Representation Number	Representor	Wish to appear at examination	Section of plan commented on	Which Test(s) of soundness is challenged / legal compliance	Summary of Comments Made and suggested change	Council's comment	Suggested Change reference
					reflect the requirements of DfT Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development' to ensure a consistent reference to future assessment work – and the key criteria which the Highways Agency can be expected to apply.		
LP013	The Theatres Trust	No	Policy EC5	None	Policy EC5 is supported as it will safeguard existing cultural facilities. However, use of word "viable" would not protect facilities which provide a valuable service to the community but which require public subsidy.	Support wording change. Policy EC5 part (a) should read: "Safeguard existing cultural facilities that are serviceable or which continue to provide a service to the community, and support the expansion of the Assembly Rooms as the centrepiece of the emerging Creative Quarter".	MOD004
LP014	The Theatres Trust	No	Policy SU6	None	Policy SU6 is supported as it seeks to protect existing community facilities.	Support noted.	
LP015	Brown	No	Chapter 5	Legal Compliance, Positively Prepared, Justified, Effective, Consistent with National Policy, Duty to Cooperate	Believe the plan is obscure and difficult to understand and the explanation and consultation in advance has been inadequate, secretive and lacking proper debate in relation to the plan and the Anker Valley site. Suggest that the process of preparation needs to be subject to a public inquiry as does not express wishes of electorate.	Consultation has been carried out at different staged of the preparation of the Local Plan since 2007 as described in the Statement of Consultation. The plan was debated at Full Council prior to the pre-submission consultation. In addition for the Anker Valley site, the site promoters carried out a pre-application consultation in June 2013 as described in the Planning Statement for the application and the planning application was publicised for consultation in 2014 (ref 0105/2014).	
LP016	Madge	Yes	Chapter 3	Legally compliant, positively prepared, justified, effective, consistent with national policy	Population growth projection is incorrect as previous years show slower rate of growth. Staffordshire Observatory Figures for 2012 show population growth of 3% since 2001. This does not correspond with projected Local Plan period growth of 11.6%. Therefore suggest that a review of the projected population growth, and subsequently housing figures, is required. Following on from this, if the housing figure is reduced, taking account of Local Plan statement that the east side of	Staffordshire Observatory figures are taken from the 2013 Mid-Year Population Estimates of Local Authorities in England and Wales by the Office for National Statistics (ONS). These estimates are made by predicting change based on figures from the last census, applying assumptions about what proportions of different age groups will reproduce, migrate or die. The SHMA similarly uses a number of modelled forecasts of population change to produce a range of scenarios from which the most	

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					<p>Tamworth has a shortage of leisure facilities and a lack of open space, it is suggested that provision for open space and leisure facilities to the east of Tamworth should be increased by making use of the golf course to provide this facility.</p> <p>Flooding reasons for not using the golf course as a leisure or public open space facility are contradicted by the proposal to allocate the site for 1100 houses.</p>	<p>appropriate is selected. The predicted population increase may not be large but housing numbers are also driven by changing needs of the existing population, such as new household formation and 'under occupation' by the elderly.</p> <p>Part of the Golf Course SUE will be public open space. The golf course as a leisure facility was not public open space and therefore the closure of the golf course and the provision of public open space with the housing allocation will increase the amount of publically accessible open space in this locality.</p> <p>With regard to the flood risk concerns, there are no known flood risk issues on the Golf Course SUE, which is within Floodzone 1. Surface water runoff is dealt with on this site under policy HG2 (f) and Policy SU4, to be managed by sustainable drainage measures.</p>	
LP017	Sport England	No	Chapter 5, Policy HG1, site 509	N/A	Support policy and requirement for appropriate community infrastructure. None of the allocations lead to loss of playing fields. Site 509 leads to the loss of sports facilities but requires replacement.	Support noted.	
LP018	Sport England	No	Chapter 5, Policy HG2	N/A	<p>Welcome policy and clear reference to sports provision requirements. Concerned that increased demand for school places and school expansion may lead to loss of existing playing fields. Developer should bear burden of funding compensatory provision. Recommended text change for each SUE section:</p> <p><i>"....A new primary school and contributions to secondary school and any playing field compensation arising from school extensions"</i></p>	<p>The County Council Education Team supports the principle of community use of school sports facilities providing it does not affect the operation of the school or its ability to grow. It recommends that school sites on the SUEs are sufficiently large to accommodate dual use and school requirements.</p> <p>Note comments made by Sport England and the County Council Education Team on this issue, resolve at examination.</p>	

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					Do not object to loss of golf course for urban extension, site has been proven to be unsustainable and there are alternative local facilities.	Note no objection to golf course closure.	
LP019	Sport England	No	Chapter 8, Policy IM1	N/A	Support policy.	Support noted.	
LP020	Sport England	No	Chapter 3, Strategic Spatial Priority SP7	N/A	Strongly support strategic spatial priority.	Support noted.	
LP021	Sport England	No	Chapter 7, Policy SU7	N/A	<p>Generally support policy but concerned about part c). Emphasis should be protection and then compensatory provision which should be of equal or higher quality and quantity. No need to refer to need for facility. Recommended text change:</p> <p>“c) Protecting and enhancing existing sport and recreational facilities. Sport and recreation facilities should not be built on unless where a need for the facility remains and where feasible, any loss should be is compensated by the provision of an equal or higher quantity and standard of facility and in an accessible location or the development is for alternative sports and recreation provision, the needs for which are clearly set out in the Sports Strategy Update.”</p> <p>No need to require provision of separate reception and changing facilities in part d). Recommended text change:</p> <p>“d) Supporting the dual use of new and existing school sites in accordance with the following criteria:</p> <ul style="list-style-type: none"> • Where it would not be detrimental to existing and proposed facilities on the school site. • Provides separate reception and changing facilities from the school or a design and layout that allows separation through site 	Council notes and supports suggested changes to parts c) and d).	MOD005 MOD006

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					management. “		
LP022a	Mitchell	Yes	Chapter 7		The improvements to fountain junction, recently completed, have not provided any improvement to the junction performance and the physical congestion and some aspects are worse. The entrance to Landau Forte Sixth Form Academy at Fountain Junction is being used for student drop-off in contravention of the planning conditions.	<p>Works have now been completed at Fountain junction and the junction between Upper Gungate and Croft Street. Works have just started at the junction between Aldergate and Lichfield Street. Adjustments to the traffic signals at Offadrive and Hospital Street are still to be made along with the linking of all the traffic signals involved, to optimise journey times. The work is not completed yet and therefore it is not reasonable to make any judgments at this early stage as further improvements will be introduced over the next few months. However since the works have been completed to date the site is being monitored and early indications suggest that improvements have been gained in terms of both delays and journey times through the corridor.</p> <p>The work carried out has been in accordance with the recommendations of a very detailed and credible analysis by produced by acknowledged experts in this field. The full benefits of the overall scheme will not be seen until all elements are completed and the operation of the traffic signals is linked.</p> <p>With regard to the contravention of the planning conditions, this issue is already known and is being dealt with by the Council's planning enforcement officer.</p>	
LP022b	Mitchell	Yes	Paragraph 3.37		There is a need for Lichfield District Council and Tamworth Borough Council to work together in respect of the broad location to the north of Tamworth, due to the significant impact on surrounding communities and for the proposed SUEs to be brought forward in a timely manner.	<p>The Duty to Co-operate Paper sets out the joint working and co-operation that has occurred between Tamworth Borough Council and Lichfield District Council, as well as other organisations.</p> <p>The work carried out has lead to the</p>	

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					There has not been a joint approach so far as evidenced by the outcome of the Brown's Lane application and the final hearing session of the Lichfield District Council Local Plan.	<p>Anker Valley outline planning application coming forward. It has been demonstrated that the area to the north of Tamworth can accommodate up to 700 houses with specific highways measures and the Anker Valley SUE and the Brown's Lane site together would bring forward a total of 700 dwellings.</p> <p>Tamworth Borough Council, Lichfield District Council and North Warwickshire Borough Council continue to work together through the duty to co-operate.</p>	
LP022c	Mitchell	Yes	Chapter 4		<p>Concerned with the demise in the retail offer in the town centre and the negative impacts of out of town retail development, including the impact of Ventura Retail Park on the ability to bring forward the Gungate development.</p> <p>The Plan identifies that while Tamworth enjoys low unemployment, a majority of that employment is low paid and low skilled. The Plan should reflect this situation.</p>	<p>Note comments and consider that Chapter 4 and the policies within it adequately address the issues raised.</p> <p>Policies EC1 and EC2 will provide suitable protection to ensure the Gungate development can come forward in the short term and this site benefits from planning permission.</p> <p>The expansion and protection of the strategic employment areas, and partnership working with other authorities and organisations within the economic geographical area will help to ensure the deliver of economic growth and prosperity.</p>	
LP022d	Mitchell	Yes	Policy HG2		The Anker Valley link road should remain as part of the plan and should be accommodated in any application for reserved matters for the Anker Valley SUE housing development.	The evidence supporting the Plan, in particular the Anker Valley Sustainable Urban Extension Transport Package Appraisal (BWB), and the outline planning application for Anker Valley SUE demonstrates that the Anker Valley link road would not be a viable option.	

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LP023	National Federation of Gypsy Liaison Groups	No	Chapter 5, paragraphs 5.40 and 5.41 and Policy HG7	Positively Prepared, Justified, Effective, Consistent with National Policy	<p>Paragraph 5.41 states that applications for Traveller sites "will be subject to the same criteria as other types of development. This is unrealistic and is not compliant with National policy as set out in PPTS.</p> <p>Disagree with Policy HG7 and believe the GTAA significantly underestimated need and does not represent a robust and reliable guide to the need for sites. The policy is not compliant with National policy as set out in PPTS in that it only deals with meeting identified need. PPTS and NPPF require all applications to be considered on merit. The policy needs to make it clear that the criteria that are set out are to be applied to proposals which come forward, even where there is no identified need.</p>	<p>Para 10 and 11 of Planning Policy For Traveller Sites (2012) require development plans to set fair criteria based policies where a need is identified and for other proposals that come forward. The Council consider that the criteria set in HG7 are consistent with this guidance and the policy wording does not restrict their application to proposals beyond the identified need.</p> <p>National planning guidance does not define a detailed methodology for assessing need for traveller sites, however the Council are confident the methodology employed in the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment: Lichfield and Tamworth (2012) is consistent with para 8 of Planning Policy For Traveller Sites.</p>	
LP024	Bellway	No	Chapter 5, Policy HG2	Justified, Effective	<p>The requirement of Policy HG2 Anker Valley (sixth bullet point) to, where feasible, direct development to land that is not best and most versatile agricultural land is not justified or effective.</p> <p>4ha of the application site in two locations is best and most versatile agricultural land (Grade 3a).</p> <p>This land falls centrally within the proposed allocation, and there is no evidence that using these small areas within the residential development for agriculture would be viable or feasible.</p> <p>Suggest deletion of requirement.</p>	<p>Comment acknowledged by the Council and agree that the evidence and indicative masterplan for the outline permission suggest it would not be feasible to retain these areas in agricultural use.</p> <p>Therefore in this case the requirement of policy could be met as retention has been demonstrated to be unfeasible. There is therefore no need to delete the bullet point from the policy.</p> <p>Best and most versatile agricultural land has value as an ecosystem service due to soil quality and biodiversity that could also be retained as an undeveloped area of public open space.</p>	
LP025	Bellway	No	Chapter 5, Policy HG2	Justified, Effective	<p>The requirement of Policy HG2 Anker Valley (second bullet point) for the eastern extent of the site to be reserved for landscaping, low intensity recreational uses, and buffering along remaining</p>	<p>The Council does not support the specific change as landscape impact and the need for sensitive treatment of boundaries to the countryside are relevant to the allocation.</p>	MOD007

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					<p>boundary to the south is not justified by the evidence or effective.</p> <p>Planning application demonstrates no need to reserve land for such uses beyond that identified within the Application Masterplan. This provides an appropriate edge to the development and will minimise any visual impact on the nearby Amington Hall Estate Conservation Area. No evidence additional requirement is deliverable.</p> <p>Suggest deletion of requirement.</p>	<p>However, the Council agrees that the current wording could imply a more onerous requirement than necessary and therefore would support a change to: "The eastern boundary should be landscaped to provide a transition to the countryside and the southern boundary should include landscaping and low intensity recreational uses"</p>	
LP026	Bellway	No	Chapter 5, Policy HG2	Justified, Effective, Consistent with National Policy	<p>The requirement of Policy HG2 e) for the inclusion of flexicare schemes for older people within the Anker Valley Sustainable Urban Extension is not justified, effective or consistent with national policy, as there is no evidence to demonstrate that this would enable the development to be deliverable.</p> <p>Suggest requirement be specifically removed for Anker Valley.</p>	<p>The flexicare policy criteria is flexible, requiring the consideration of its inclusion and does not state that it must be provided. It is not specific to Anker Valley and applies to all 3 sustainable urban extensions.</p> <p>No evidence has been provided to show that a Flexicare element would be unviable for Anker Valley and the suggestions is not supported by the Council.</p>	
LP027	Bellway	No	Chapter 5, Policy HG5	Justified, Effective, Consistent with National Policy	<p>The requirement of Policy HG5 to achieve a specific mix of units is not justified by the evidence, effective or consistent with national policy.</p> <p>The SHMA only provides indicative estimates for mix up to 2028. The policy should refer to specific locations where character, facilities and socio-economic needs vary and require a different mix. The policy is too prescriptive.</p> <p>The second paragraph of Policy HG5 should be deleted and amended to read: 'Proposals for housing development</p>	<p>The Southern Staffordshire Districts Housing Needs Study and SHMA Update (2012) uses a robust methodology to arrive at housing requirements by size and type. As described in section 10 it starts from modelled household types and the housing they would need. These indicative estimates are then adjusted for aspirations and viability using quantitative household surveys and breakdown of existing housing stock and qualitative judgment: "The indicative requirement ... represents a balanced judgement, based on the results of the stock, need, and aspirations categories." The qualitative judgment is explained in</p>	

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					<p>should therefore be informed by the latest available evidence as to housing needs.'</p> <p>The first sentence of the third paragraph should also be deleted.</p> <p>The last sentence of the third paragraph should also be amended to read:</p> <p>'Where it is demonstrated that this is not appropriate, feasible or viable, an alternative mix will be acceptable that matches local needs as far as possible.'</p>	<p>detail relating to each size category to justify the final requirement.</p> <p>The Council consider that as Tamworth is a single settlement that it meets the definition of a specific location in which to set a required housing mix.</p> <p>While prescribing a required mix of unit sizes as a starting point the policy is not rigid and the wording allows the consideration of feasibility, viability and the needs of specialist accommodation providers and includes a trigger to review the policy in response to monitoring.</p>	
LP028	Bellway	No	Appendix A	Justified	<p>The housing trajectory for the Anker Valley Sustainable Urban Extension is not justified. Appendix A refers to 75 dwellings per annum.</p> <p>Bellway Homes Limited who have an interest in the land at Anker Valley, do not expect to complete more than 50 dwellings per annum, having regard to their knowledge of the site and market conditions.</p> <p>The housing trajectory for Anker Valley should be amended to 50 dwellings per annum.</p>	<p>The Council notes the anticipated delivery rates. In a recent meeting Bellway stated that the first 4 units would be completed by July 2016 and the next 50 by June 2017.</p> <p>A revised delivery rate would not damage the 5 year housing land supply position and the site would be completed before the end of the plan period.</p> <p>However, the Council does not consider that the delivery rate must be amended as the site could be built out by multiple developers.</p>	
LP029	North Warwickshire Borough Council	Yes			<p>Support the Plan, but have concerns with respect to housing and employment land numbers and the green belt review.</p> <p>The evidence for the additional housing and employment numbers since the previously withdrawn Plan is unclear. It is unclear how the Plan fits with the ongoing work around the GBSLEP. Solutions should also be sought within the GBSLEP area, beyond the neighbouring authorities.</p>	<p>With regard to the housing and employment figures, these are supported by the evidence base and have been discussed at length during Duty to Cooperate meetings between Tamworth Borough Council, North Warwickshire Borough Council and Lichfield District Council. These figures have been agreed by all three authorities. The agreement of the housing and employment figures, from the supporting evidence base, are confirmed by the signing of an updated Memorandum of Understanding in</p>	

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					<p>Tamworth should cater for its own needs rather than having aspirations for substantial growth.</p> <p>The Green Belt Review should be unaffected by the issues of availability, landscape impact or supply.</p> <p>There is an assumption that circumstances applying to Tamworth's Green Belt will not apply/occur in adjoining authorities.</p>	<p>October 2014 which sets out the situation and the approach to resolving it.</p> <p>The Duty to Co-operate Statement includes the MoU and sets out the details of the co-operation that has taken place between Tamworth, Lichfield and North Warwickshire, as well as the role of the GBSLEP and the work taking place through it.</p> <p>The Green Belt Review is unaffected by issues of availability, landscape impact or other such issues and looks purely at the function of the Green Belt. There are other evidence base documents such as the Site Selection Paper and the Sustainability Appraisal which have analysed the sites in terms of their suitability and availability for development. The Green Belt Review confirms that there are no exceptional circumstances in Tamworth to enable Green Belt release.</p> <p>There is no assumption that neighbouring authorities would have to release green belt land in order to help meet Tamworth's housing and employment land needs. Site promoted in North Warwickshire to help meet Tamworth's un-met housing and employment need are all outside of the Green Belt.</p>			
LP030	Rogers	No	Chapter 5, Policy HG2	Legal Compliance, Positively Prepared, Justified, Effective, Consistent with National Policy, Duty to Cooperate	<p>Housing requirement has doubled since draft Local Plan of 2013 while population change almost flat lined. Tamworth is 10 times more densely populated than neighbours.</p> <p>The Golf Course development land is an area of outstanding beauty, with significant impact to conservation areas and areas of special scientific interest.</p>	<p>While the objectively assessed need has increased since the plan withdrawn in 2013, due to the extended plan period, the housing requirement has decreased due to a more accurate assessment of housing land availability:</p> <table border="1" data-bbox="2053 1707 2608 1843"> <tr> <td data-bbox="2053 1707 2326 1843">Local Plan Withdrawn in 2013</td> <td data-bbox="2326 1707 2608 1843">Pre-submission Local Plan 2014</td> </tr> </table>	Local Plan Withdrawn in 2013	Pre-submission Local Plan 2014	
Local Plan Withdrawn in 2013	Pre-submission Local Plan 2014								

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					<p>The master plan does not propose a replacement of the sports facility.</p> <p>The reason for selling golf course is revenue generation.</p> <p>Golf course is last area of green space in Amington/East of Borough and Amington is most densely populated and deprived. Proposed density is higher than surrounding area. Development would not have necessary facilities.</p> <p>Contaminated area of land would not be suitable for tree planting as proposed.</p> <p>Council have refused to consult with Amington Residents Association, councillors claiming they are a political body.</p> <p>The golf course should be removed from development for housing and the land used for sports and recreational facilities as per the Coal Board covenant when the land was handed over to the Council.</p>	<table border="1" data-bbox="2053 367 2608 745"> <tr> <td data-bbox="2053 367 2326 537">Objectively Assessed Need 2006 - 2028: 5,500</td> <td data-bbox="2326 367 2608 537">Objectively Assessed Need 2006 - 2031: 6,250</td> </tr> <tr> <td data-bbox="2053 537 2326 642">Housing Require-ment: 4,500</td> <td data-bbox="2326 537 2608 642">Housing Require-ment: 4,250</td> </tr> <tr> <td data-bbox="2053 642 2326 745">205 Dwellings per Annum</td> <td data-bbox="2326 642 2608 745">170 Dwellings per Annum</td> </tr> </table> <p>The predicted population increase may not be large but housing numbers are also driven by changing needs of the existing population, such as new household formation and 'under occupation' by the elderly.</p> <p>Built-up area densities produced by the Office for National Statistics from the 2011 census indicate Tamworth falls within the same range as neighbouring areas: Lichfield = 37.9 persons per hectare Tamworth = 39.6 persons per hectare Polesworth = 47 persons per hectare Online at: http://www.ons.gov.uk/ons/rel/census/2011-census/key-statistics-for-built-up-areas-in-england-and-wales/index.html</p> <p>The golf course is not a recognised area of natural beauty, and the impact to nearby ecological designations have been considered through the site selection process and sustainability appraisal.</p> <p>Paragraph 74 of the NPPF does not require replacement of a sports facility where it has been shown to be surplus to requirements as recognised in the updated Joint Indoor & Outdoor Sports</p>	Objectively Assessed Need 2006 - 2028: 5,500	Objectively Assessed Need 2006 - 2031: 6,250	Housing Require-ment: 4,500	Housing Require-ment: 4,250	205 Dwellings per Annum	170 Dwellings per Annum	
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						<p>Strategy Update Paper (2014).</p> <p>The golf course is not publicly accessible open space and areas of public open space exist in Amington.</p> <p>The proposed density of the golf course development is within the minimum range set by Policy HG5 to make the most efficient use of land in Tamworth. The site is of sufficient scale to create a new area of character and is not as sensitive to the density of existing neighbouring development. Building at sufficient densities on development parcels will allow the provision of public open space on the site,</p> <p>The issues of revenue generation and Council elections are not planning matters. However, information relating to the decision to release the site for development is available online at: http://democracy.tamworth.gov.uk/ieListDocuments.aspx?CId=120&MId=505&Ver=4</p> <p>The Geo-environmental Interpretative Report and Remediation Strategy (2014) prepared for the golf course pre-application consultation indicates that only marginal exceedances relating to chemical contamination have been measured and these relate to colliery spoil and not the area of land proposed for woodland.</p> <p>The relationship between Amington Residents Association and Councillors is not a planning matter; however it should be noted that they have been involved in two rounds of Local Plan consultation and a pre-application public consultation from</p>	

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						<p>October 27th to November 2nd 2014 and received advice from officers in addition to meetings held by Councillors beyond statutory processes. At the draft stage when the allocation was first proposed a specific drop-in session was organised in the Amington area.</p> <p>There is no covenant with the Coal Board relating to use of the golf course site for recreation.</p>	
LP031	Baxter	No	Chapter 5, Policy HG1		Support Policy HG1: Housing, and specifically the identification of site 387 (Coton House Farm, Coton Lane) as a potential housing allocation. Mr. Baxter has an interest in part of the allocation. Site is suitable, sustainable and owner is willing to bring forward for development.	Support noted	
LP032	UKIP Tamworth	No	Chapter 3, Chapter 5, Policies HG2, HG4, Chapter 7, Policies SU1, SU3, SU5, Appendix B	Legal Compliance, Positively Prepared, Justified, Effective, Consistent with National Policy	<p>Amount of housing is not supported by figures produced by Staffordshire Observatory. Tamworth already has high density and out-commuting.</p> <p>Real need is for affordable 1 & 2 bed houses as 2000 people on waiting list and single storey provision for elderly; affordable housing should be increased to 25%.</p> <p>Planned quantity and type of housing will attract people from outside borough, increasing future development pressure and out-commuting</p> <p>Development at the golf course will increase CO2 emissions.</p> <p>Existing road network to golf course is already congested at peak times and insufficient air quality and CO2 emissions data are published.</p> <p>Selling golf course will increase land</p>	<p>Staffordshire Observatory figures are taken from the 2013 Mid-Year Population Estimates of Local Authorities in England and Wales by the Office for National Statistics (ONS). These estimates are made by predicting change based on figures from the last census, applying assumptions about what proportions of different age groups will reproduce, migrate or die. A key observation from the Observatory paper is that while births vs deaths are very high, the figures are suppressed by massive net out migration. One possible reason for out-migration is a lack of suitable homes in the area.</p> <p>The SHMA similarly uses a number of modelled forecasts of population change to produce a range of scenarios from which the most appropriate is selected. The predicted population increase may not be large but housing numbers are also driven by changing needs of the existing population, such as new household formation and 'under</p>	

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					<p>values.</p> <p>No reference to CIL guidance in infrastructure plan or commitment to consultation as per regulations.</p> <p>Development will reduce options for future development as Tamworth runs out of development land.</p> <p>Dunstall Lane should be the preferred option as it can provide more affordable housing and is near to town centre.</p> <p>Golf course should be retained for recreational use. No development should be undertaken until roads are improved.</p>	<p>occupation' by the elderly. In other words houses are also required for people already living in the borough.</p> <p>The affordable housing requirement is set at a level that can be viably provided by speculative housing development allowing a buffer for uncertainty and contributions towards infrastructure, based on the Whole Plan Viability, Affordable Housing and CIL Study (2014).</p> <p>Housing for the elderly is supported by flexibility towards extra care schemes in Policy HG5 and by consideration of extra care provision on urban extension in Policy HG2.</p> <p>The housing requirement and housing mix are based on local need and the present low level of net in-migration as shown in the SHMA.</p> <p>There is no evidence to suggest that the development of the golf course would produce higher levels of traffic congestion or CO2 emissions than alternative sites, which would be outside the borough. Policy SU2 requires sustainable transport measures, a travel plan and measures to mitigate impacts to the highway network.</p> <p>It is economically counterintuitive that further restricting housing land supply in the borough would lead to lower land values.</p> <p>The Council is considering implementing a CIL charge and a Preliminary Draft Charging Schedule has been subject to recent public consultation.</p> <p>Support for Dunstall Lane allocation</p>	

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						<p>noted.</p> <p>The Joint Indoor & Outdoor Sports Strategy Update Paper (2014) recognises an earlier report showing the golf course as surplus to requirements. Areas of the site will be retained for recreational use as public open space.</p> <p>Highways improvements will be provided where required by the transport assessment for the golf course, however it is not certain they will be needed prior to commencement of development and could be brought in through phases as the development progresses.</p>	
LP033	Aucott	Yes	Chapter 5, HG2	N/A	<p>Land recently sold to Aucott, which owns the freehold of Dunstall Farm and land adjacent to the SUE. Land extends to approximately 61.07 ha; approximately 22.92 ha developable and 38.15 ha in the flood plain. Representation sets out planning history for B1, B2 and B8 uses, access and flood compensation measures latter work has started. Significant issues influencing deliverability and viability. Intention to submit outline planning application in 2015. Site meets NPPF tests and emerging development plan policy. It is available, in a suitable location and achievable.</p> <p>Support HG1 and broadly support HG2 but need to clarify some issues. Assume that most of the open space and landscaping can be delivered outside developable area in flood zone 3. School provision places burden on the developer which would not be proportionate to the number of children living on the site. Request that percentage of affordable housing is reduced to 20% reflect this, CIL, abnormal foundations and other constraints.</p>	<p>Council notes support for policies and information submitted regarding deliverability and viability. The request for a reduction in affordable housing is noted but the Council does not support a modification.</p>	

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LP034a	English Heritage	N/A	Chapter 1, pages 3, 4 & 5	N/A	Support synopsis of Chapter 6 on page 3 and recognition of Tamworth's heritage assets and their significance. Recommend using word "protects" instead of "preserve" to reflect NPPF. Encourage including reference to value of the historic environment and the need to protect, conserve and where possible enhance on page 4 or 5.	The Council accepts the suggested change to use the word "protects". The strategic priorities and bullet points on pages 4 and 5 have been set by the Tamworth Strategic Partnership for the Sustainable Community Strategy and cannot be changed	MOD008
LP034b	English Heritage	N/A	Chapter 2, pages 12, 18, 19, Policy SS1	N/A	Support recognition of historic environment and reference to evidence. Support inclusion of historic environment in Policy SS1 but amend "historic assets" to "heritage assets".	Support noted. The Council accepts the suggested change.	MOD009
LP034c	English Heritage	N/A	Chapter 3, paragraph 3.33	N/A	Typographical error "assess" instead of "assets".	Noted, the Council will correct the error.	MOD010
LP034d	English Heritage	N/A	Chapter 4, paragraph 4.11, 4.14	N/A	Concerned about impact of retrofitted renewable/low carbon technologies which are referenced in paragraph 4.11. Support reference to protecting and enhancing conservation areas but all heritage assets should be referred to in paragraph 4.14.	Paragraph 4.11 refers specifically to out of centre retail areas which would not impact on the historic parts of the town. Point noted about needing to reference all heritage assets and not just conservation areas. The Council will amend the text.	MOD011
LP034e	English Heritage	N/A	Chapter 4, paragraph 4.27	N/A	Use "heritage assets" instead of "historic assets". Recommend text change: '... and preserving local character, which will be supported '.	The Council accepts the changes and will amend the text.	MOD012
LP034f	English Heritage	N/A	Chapter 4, Policy EC2	N/A	Support reference to historic environment.	Support noted.	
LP034g	English Heritage	N/A	Chapter 4, paragraph 4.33	N/A	Recommended text change: "...includes plans to develop and improve sensitively and appropriately restore the 125 year old Grade II listed Assembly Rooms'.	The Council accepts the recommendation and will amend the text along the lines of the suggested change.	MOD013
LP034h	English Heritage	N/A	Chapter 4, paragraph 4.53, 4.54	N/A	Support reference to heritage tourism.	Support noted.	
LP034i	English Heritage	N/A	Chapter 4, Policy EC5	N/A	Support Policy EC5.	Support noted.	
LP034j	English	N/A	Chapter 4,	N/A	Welcome reference to the historic	Support noted.	

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	Heritage		paragraph 4.61		environment.		
LP034k	English Heritage	N/A	Chapter 5, paragraph 5.5	N/A	Recommended text change: '... where development may result in the loss of archaeological assets, evaluation and mitigation may will be required to record and understand their significance'. Request a link to Policy EN6.	The Council accepts the recommendation regarding requirement for recording. However, it does not consider that it is appropriate to reference Policy EN6 here. Need for heritage statements and archaeological desk based assessment and reference to heritage impact assessments already included.	MOD014
LP034l	English Heritage	N/A	Chapter 5, Policy HG2	N/A	Previously raised concerns about Anker Valley development. Welcomed opportunity to attend SUE workshop.	Comments noted.	
LP034m	English Heritage	N/A	Chapter 6, Policy EN5	N/A	Support recognition of historic environment in Policy EN5.	Support noted.	
LP034n	English Heritage	N/A	Chapter 6, Policy EN6	N/A	Welcome EN6 as a specific historic environment policy. Recommended text change: "Development that affects designated heritage assets including conservation areas, listed buildings, scheduled ancient monuments and non-designated heritage assets including locally listed buildings and undesignated archaeology , will be required to assess the impact of development on the asset through a heritage statement and statement of significance and clearly demonstrate how the significance, including its setting and setting of the asset will be protected , conserved and where possible, enhanced. Proposals will be required to pay particular attention to; ...' 'Reference should be made to the Extensive Urban Survey to identify potential for archaeology. Where potential for archaeology is high exists , the heritage statement should incorporate an archaeological desk based assessment that evaluates surviving	The Council accepts all the recommended changes.	MOD015 MOD016

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					below ground archaeological remains and where necessary, a field based evaluation by an appropriate professional. includes an appropriate mitigation strategy. An appropriate mitigation strategy will also be required, where necessary. ...' Insert clause to require archaeological recording by an appropriate professional where remains may be lost and for recording to be entered into Historic Environment Record.		
LP034o	English Heritage	N/A	Chapter 6, paragraph 6.42	N/A	Replace "Safeguarding" with "protection, conservation and where possible enhancement".	The Council accepts the change.	MOD017
LP034p	English Heritage	N/A	Chapter 6, paragraph 6.46	N/A	Support preparation of local list.	Comments noted.	
LP034q	English Heritage	N/A	Chapter 6, paragraph 6.49	N/A	Support reference to significance of Amington Hall Estate and Dosthill Park.	Support noted.	
LP034r	English Heritage	N/A	Chapter 7, Policy SU3	N/A	Request that impact on significance of heritage assets is taken into account by additional clause.	Policy would not preclude account being taken of Policies EN5 and EN6, but it is not considered proportionate to list all policies that may be relevant.	
LP034s	English Heritage	N/A	Appendix D	N/A	Amend text to clarify it relates to heritage at risk.	The Council accepts the change.	MOD018
LP034t	English Heritage	N/A	Chapter 4, Policy HG1	N/A	Support recognition of historic environment for sites in sensitive locations. EN6 lacking in reference to mitigation and enhancement works; include HIA measures here and for sites in less sensitive areas. Objects to three sites on Spinning School Lane due to the SAM and nationally important archaeology. Not possible to assess impact without a desk based assessment and field assessment.	Support noted. The Council does not consider it necessary to refer to detail and mitigation contained in the HIAs for each site as this would give the impression that heritage issues are more important than other issues. Reference is already made to the HIAs in paragraph 5.5 which is considered to be sufficient. Council acknowledges that although the ground has been considerably disturbed below ground, there is high potential for further archaeology to survive. English Heritage has previously acknowledged that the sites could be developed	

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						providing the archaeological constraint of the site is given appropriate consideration.	
LP034u	English Heritage	N/A	Chapter 4, Policy HG2	N/A	<p>Pleased that Anker Valley allocation boundary has been contained and there is open land between allocation and conservation area. Request reference to conservation area and listed building and importance of views to and from these assets.</p> <p>Include HIA mitigation and enhancement measures for Dunstall Lane regarding bridges and farm buildings.</p>	<p>Regarding the Anker Valley, the Council acknowledges the importance of views to and from the heritage assets and is prepared to make the suggested changes.</p> <p>For Dunstall Lane, it is noted that there is not the same reference to the HIA in respect of the SUEs as there is in paragraph 5.5 for the smaller sites. The Council would be prepared to refer to the need to reference the HIA for the SUEs in the supporting text. In terms of other mitigation, the measures included in the HIA only relate to heritage and there may be other mitigation that is required.</p>	MOD019 MOD020
LP034v	English Heritage	N/A	Chapter 3, paragraph 4.70, Table 4.3	N/A	<p>EMP1 employment allocation should incorporate a positive strategy for protecting, conserving and enhancing the Fazeley and Bonehill Conservation Area. Include mitigation measures/enhancement from evidence base.</p>	<p>Description for EMP1 does not refer to the conservation area whereas housing sites do reference presence or proximity to conservation areas and other heritage assets. Council will make reference to the conservation area in the description.</p>	MOD021
LP035	Woodland Trust	No	Chapter 7, Policy SU4	Positively prepared Justified Effective Consistent with national policy	<p>Policy SU4 does not comply with national policy, in particular the Government's Forestry Policy Statement. Reference made to publications: "Woodland actions for biodiversity and their role in water management"; "Woodland for water: Woodland measures for meeting water framework directives"; Government's Independent Panel on Forestry, the Government's Forestry Policy Statement and "Case for trees in development in the urban environment".</p> <p>Specific reference should be made to trees and woodland due to their contribution to water management and climate change. Recommended text change:</p>	<p>The Council acknowledges the importance of green infrastructure in water management and climate change. The local plan already includes reference to green infrastructure in general in Policy SU4 and Policy EN4 refers to tree planting and protects trees, woodlands and hedgerows from loss through development. It is not considered necessary to reference trees and woodlands separately.</p>	

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					<p>“Development should capitalise on opportunities for incorporating accessible green infrastructure such as trees and woodland, replicating natural systems and improving biodiversity with SuDS.”</p>		
LP036	Dean & McDermid	No	Chapter 5, Policy HG2, site 6.2, 679, 680 Tamworth Golf Course	Consistent with national policy	<p>Objects to allocation of Golf Course which is contrary to NPPF provisions for open space. Need for an assessment of access to high quality open space in the context of the Golf Course. Concerned about lack of evidence that course is surplus to requirements and consultation with the community. Land nearby shows evidence of wildlife, which should be protected. Lack of consultation with residents to allow designation of local green space. No changes suggested.</p>	<p>The Golf Course is a large area of open space but it is not public open space and access was restricted to members and players. Development will offer the opportunity to provide large areas of linked parkland and open spaces, which will be publicly accessible and will link to existing green/blue infrastructure outside the site. It will not have the same status as local green space under the NPPF but will form part of the open space network under Policy EN3.</p> <p>2014 Sports Strategy Update referred to the Golf Course Needs Assessment Report (January 2014) which found that whilst stakeholders and consultees stated a requirement to retain an 18 hole course, the Council was unable to continue subsidising the course in the light of falling membership, operating deficits and the need for housing land. There are alternative courses available in close proximity to Tamworth. Sport England does not actively support the closure of the golf course but it has stated that it does not object to it.</p> <p>An Ecological Impact Assessment found a number of species within or in the vicinity of the site. Mitigation measures have been recommended to ensure minimal disturbance.</p> <p>The Council consulted users of the Golf Course in the course of investigating options for its future and has undertaken pre-application consultation on the</p>	

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						masterplan.	
LP037	Inland Waterways Association	Yes	Chapter 5, Policy HG2	Justified Effective	<p>Objects to Dunstall Lane allocation. Opposed to any development beyond the Bonehill Road employment site. Canal has historic, wildlife, amenity and recreational values; the rural environment is attractive for tourism and brings economic benefits. This would be diminished by badly sited and intrusive development. Important to protect the two listed bridges and their setting. Housing is preferable to industrial development but would still have a significant impact on the landscape and canal environment. Policy EC5 would be undermined by this allocation. Site is only promoted due to the lack of developable land in Tamworth. Site is unsuitable and unsustainable. Would result in loss of agricultural land. It is isolated from housing areas and town centre and will be dependent upon car travel. Site should not be allocated, protect by a Green Belt addition.</p>	<p>The Council is aware of the landscape and heritage considerations of this site; the Sustainability Appraisal and Site Selection Paper considered these issues. The Council considers that the potential impacts on landscape and heritage can be mitigated and Policies HG2, EN1, EN3, EN4, EN5 and EN6 will ensure that development is undertaken in a sensitive way. Site Selection Paper concludes that the principle of development on this site is consistent with the NPPF and that impacts are outweighed by meeting a substantial part of the housing need. The site has constraints on either side in the form of the canal and flood plain but it provides the opportunity to create an attractive development that has a unique setting, with green and blue infrastructure links for people and wildlife. Links will be made into the road network at Ventura Park and it will be possible to extend the existing bus service to the site. Pedestrian links could be made to the north to Lichfield Road.</p> <p>Part of the site has an extant planning permission for employment use and development has commenced by virtue of the construction of flood defences. The site could therefore still be developed for employment. The land is not best and most versatile agricultural land.</p>	
LP038	Forest	Yes	Chapter 3	Consistent with National Policy	<p>Population projections are excessive due to statistical errors and enclosed report suggests housing need for plan period is 5345. [Report alleges no evidence projections take account of falling in-migration rates, the ratio between population and housing growth changes over time and there are</p>	<p>The Council considers that the South-East Staffordshire Housing Needs Study Tamworth Housing Needs Assessment HEaDROOM Update Report (2014) provides a robust justification for the objectively assessed housing need.</p>	

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					<p>insufficient employment opportunities for number of houses] Evidence should be published for public scrutiny.</p> <p>Trajectory should be amended to include affordable/social housing and a combined total.</p> <p>Affordable provision will not meet need, for which figures have also not been updated since 2012.</p> <p>Council has incorrectly assumed all permissions are deliverable, sites with outline permission are not progressing (e.g. Hedging Lane ref 0034/2013).</p> <p>Council is concentrating its efforts on greenfield developments and market housing, which ignores the town centre and is unsustainable with insufficient employment opportunities</p>	<p>Past trends of migration are considered explicitly in Scenarios B and C in the report. They are not considered appropriate however 'given that for much of the past 7 years the economy was in a deep economic downturn, which distorted the flow of migrants both internationally and domestically' and they forecast lower levels than more robust population projections.</p> <p>The relationship between population and households changes over time because the rate at which people head their own household varies between age groups and over time.</p> <p>The local plan aims for a level of employment growth consistent with the housing figures. The Employment Land Review – Stage 2 (2013) estimates the housing target would result in a 28 ha employment land requirement which is a good fit with the 32 ha plan target.</p> <p>The Council notes the desire of the representor to see NLP's full workings published for scrutiny, but considers that the level of detail provided in their reports is proportionate and is confident in their competence and professional integrity.</p> <p>The suggestion to include affordable housing figures in the trajectory is noted. The Council would not object to including the information but the planned affordable housing would be 20-25% of the existing allocated sites and would not increase the total planned housing delivery.</p> <p>The commitments from existing consented housing sites are spread evenly over the first 5 years of the plan</p>	

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						<p>period in the trajectory. This includes 3 sites with major outline permissions; the Council has received a reserved matters application on one (Pennine Way) and a new full application on another (Freasley Lane). Regarding Hedging Lane, the Council will endeavour to work with all landowners and developers across the Borough, in particular bringing forward stalled sites. The Council has been in numerous discussions with potential house builders for this particular site over the past few years.</p> <p>In addition to this, funding and support is available through the GBSLEP which seeks to unlock or 'kick start' stalled sites. The Local Plan has been prepared to be flexible and respond to unexpected change. There is sufficient flexibility in the housing supply of permissions and allocations so that the delivery of this site will not threaten meeting a housing requirement of 170dpa or the 5 year housing land supply</p> <p>All known suitable brownfield sites that are likely to be available have been allocated, including several in the town centre. No preference has been given to greenfield sites.</p>	
LP039	Hallam Land Ltd	Yes	Policy SS1 and paragraphs 2.1-2.10	Legally compliant, effective, consistent with national policy, complies with the duty to co-operate.	<p>Consider that the objectively assessed housing need figure is the minimum to meet the objectively assessed needs over the Plan period.</p> <p>Support the Council's position of being unable to meet need within Borough boundary and relying on neighbouring authorities to provide for at least 2000 dwellings of Tamworth's housing requirement.</p> <p>The Memorandum of Understanding</p>	<p>Note support of the objectively assessed housing need and the Council's position in being unable to meet its objectively assessed needs within the Borough boundaries.</p> <p>An updated Memorandum of Understanding has been produced which sets out the current position and Lichfield District Council and North Warwickshire Borough Council have agreed to work together with Tamworth Borough Council to meeting the remaining 1000 houses</p>	

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					<p>states that North Warwickshire Borough Council and Lichfield District Council will each accommodate 500 houses to help meet Tamworth's unmet housing need, leaving a shortfall of a further 1000 houses from Tamworth's objectively assessed housing need.</p> <p>Consider that the Memorandum of Understanding should be updated to reflect current position of 2100 house shortfall being accommodated within neighbouring authorities.</p>	<p>and 14 hectares of employment land within their authority boundaries. The specific details of what proportion of the additional 1000 houses and where they will be located has yet to be agreed and the Memorandum of Understanding agrees a commitment for all three authorities to continue to work together towards a solution.</p> <p>It is unclear where the additional 100 dwellings proposed by Hallam Land as being needed outside of the Borough boundaries have come from and there is no evidence to support this. As such, the requirement for 2000 houses to be provided outside of the Borough to meet Tamworth's needs is considered to be the correct figure and should not be amended to 2100.</p>	
LP040	Hallam Land Ltd	Yes	Policy HG2 and paragraphs 5.6-5.10	Positively prepared, justified, effective, consistent with national policy, complies with the duty to-co-operate.	<p>Consider it is important to deliver the 2000 dwellings outside of the Borough in suitable and sustainable locations (referencing the Future Development and Infrastructure Study). Policy HG2 fails to identify broad locations for the sustainable location of the unmet housing need outside of the Borough boundaries, such as to the north and east side extending into north Warwickshire as identified within the Future Development and Infrastructure Study. Policy HG2 should identify broad locations where the unmet need could be most sustainably located.</p>	<p>The location of development in North Warwickshire and Lichfield must be determined through their Local Plans. They have signed a Memorandum of Understanding (October 2014) which agrees what Tamworth's needs are, what the unmet need is and agreeing to allocate land to meet Tamworth's unmet need.</p> <p>The MoU includes that the three authorities will work together to seek solutions to deliver the unmet housing and employment needs through a range of options such as Joint Development Plan Document, Joint Strategy, Joint Evidence.</p> <p>The Duty to Co-operate Paper, which includes the October 2014 MoU within an Appendix, sets out the joint working between Tamworth Borough Council, Lichfield District Council and North</p>	

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						Warwickshire Borough Council so far, and as ongoing.	
LP041	Cooke	Yes	Chapter 3	Legally compliant, positively prepared, justified, effective, consistent with national policy	<p>The housing need figure is incorrect as the projected population increase would only result in a need for an additional 204 houses per year. Migration has not been accounted for and by factoring this in it is considered that the housing requirement would be reduced by half.</p> <p>Affordable housing need of 183 dwellings per year cannot be met with a Plan figure of 250 dwellings per year overall.</p> <p>The Council is committed by Motion to the last Full Council to review and reassess the way in which the housing needs figures have been obtained. The Plan should not proceed without such a reassessment.</p>	<p>Staffordshire Observatory figures are taken from the 2013 Mid-Year Population Estimates of Local Authorities in England and Wales by the Office for National Statistics (ONS). These estimates are made by predicting change based on figures from the last census, applying assumptions about what proportions of different age groups will reproduce, migrate or die.</p> <p>The SHMA similarly uses a number of modelled forecasts of population change to produce a range of scenarios from which the most appropriate is selected. The predicted population increase may not be large but housing numbers are also driven by changing needs of the existing population, such as new household formation and 'under occupation' by the elderly.</p> <p>The affordable housing requirement is set at a level that can be viably provided by speculative housing development allowing a buffer for uncertainty and contributions towards infrastructure, based on the Whole Plan Viability, Affordable Housing and CIL Study (2014).</p> <p>There has been a commitment by the Council to review the housing figures at Aspire and Prosper Scrutiny Committee. This committee meeting was held on 20 January 2015. The outcome of this meeting was that the progress made on the Local Plan and the Objectively Assessed Housing Need was supported by the committee.</p> <p>http://democracy.tamworth.gov.uk/ieListD</p>	

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						documents.aspx?CId=173&MId=679&Ver=4	
LP042	Natural England	No	Chapter 6, Policy EN4	Consistent with national policy	Generally support policy, however, suggest change regarding avoidance of harm, mitigation and compensation to bring it in line with NPPF (paragraph 118). Recommended additional text: "Development should not result in a net loss of biodiversity by ensuring that where harm to biodiversity is unavoidable and it has been demonstrated that no alternative sites are suitable, development should be adequately mitigated, or as a last resort, compensated for, then planning permission should and will be refused where there is a harmful impact on biodiversity, unless adequate mitigation can be demonstrated."	The Council is prepared to make the suggested change.	MOD022
LP043	Natural England	No	Policy omission	Consistent with national policy	Welcome point regarding Best and Most Versatile Land (BMVL) in Policy HG2 in relation to Anker Valley. Local Plan should include separate BMVL policy or add to EN4 or SU5. Plan should make it clear that use of lower quality agricultural land would be preferable. Lack of consideration of soil resources, addition would be consistent with NPPF (paragraph 112). Recommended additional text: <ul style="list-style-type: none"> • Safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future. • To avoid development that would disturb or damage other soils of high environmental value (e.g. wetland and other specific soils). Ensure soil resources are conserved and managed in a sustainable way." 	The Council notes national policy on the issue of soil resources, however, the Anker Valley is the only allocation in the local plan containing BMVL and it is considered that the policy wording to HG2 adequately covers the issue on this site. It is not considered necessary to have a separate policy because it is not a significant issue in Tamworth.	
LP044	Natural England	No	Chapter 5, Policy HG2	Effective	Concerned about impact of Golf Course development on Alvecote Pools SSSI.	The Council does not consider it necessary to include the additional text	

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					<p>Further mitigation measures are necessary to reduce impact. Welcome provisions in Policies HG2 and EN4, however, certainty needed over deliverability of mitigation measures. If allocation is retained, a detailed masterplan or development brief should be approved in consultation with Natural England. Council should consult Natural England on any vision statements or development briefs and references to consultation should be made in the policy as well as supporting text.</p> <p>Masterplan/development brief to give clear details of access management measures, green infrastructure enhancement and other solutions to recreational pressure, SUDS and buffering. Natural England to be consulted on long term management and monitoring of mitigation. Recommended additional text:</p> <p>"Must avoid any impact on the nearby Alvecote Pools Site of Special Scientific Interest and mitigation should ensure there is no impact due to waste, surface water run-off, predation or increased recreational use of Alvecote Pools. A detailed Master Plan and /or Development Brief must be provided in consultation with the the statutory consultees and relevant stakeholders to demonstrate how the proposal can be delivered without adverse impact on the SSSI and the long-term management and monitoring of its mitigation."</p>	<p>suggested in the representation, it is very detailed and it is considered that there is sufficient protection for the SSSI in the Local Plan in policies HG2 (including the general introductory criteria for all SUEs) and EN4.</p> <p>The Council has involved Staffordshire and Warwickshire Wildlife Trusts in consultations and the SUE workshops where discussions about mitigation and drainage took place. The Trusts have also had an input into the mitigation strategy.</p>	
LP045	Coventry and Warwickshire Growth Hub				<p>There are significant links between the Pre Submission Local Plan and areas within Coventry and Warwickshire (particularly North Warwickshire).</p> <p>Support the creation of sustainable urban extensions with a mix of housing and</p>	<p>Note the significant links between Tamworth and Coventry/Warwickshire (in particular North Warwickshire).</p> <p>Note support of SUEs and aspirations for job opportunities and employment growth.</p>	

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					<p>community facilities.</p> <p>Aspirations for job opportunities and employment growth are also supported.</p> <p>Concern that the policies regarding the provision of housing and employment land in areas adjoining Tamworth are being promoted in the absence of a sustainable plan to accommodate the growth in those areas.</p> <p>In order to avoid unintended policy consequences associated with the Local Plan, it is considered that the Local Plan would benefit from enhanced evidence regarding links and potential impacts within the Coventry and Warwickshire sub region.</p> <p>The approach taken should look to working with other authorities first within the HMA, in line with the CWLEP approach.</p>	<p>The location of development in North Warwickshire and Lichfield must be determined through their Local Plans. They have signed a Memorandum of Understanding which agrees what Tamworth's needs are, what the unmet need is and agreeing to allocate land to meet Tamworth's unmet need.</p> <p>Consideration of the impacts of potential allocations, county and national-level organisations were consulted as described in the Site Selection Paper and the consideration of impacts in the Sustainability Appraisal is not restricted to the borough. Lichfield and North Warwickshire are members of an officer's group within the Tamworth Strategic Partnership for infrastructure planning.</p> <p>The approach taken by the CWLEP for looking at HMA first for solutions is not this Council's approach or the approach of the GBSLEP of which it is a member. CWLEP makes reference to the significant links between Tamworth and North Warwickshire and this has long been recognised. It is on this basis that they have and are working with the Council to help meet Tamworth's unmet need.</p> <p>The MoU includes that the three authorities will work together to seek solutions to deliver the unmet housing and employment needs through a range of options such as Joint Development Plan Document, Joint Strategy, Joint Evidence.</p>	
LP046	Amington Residents Association	Yes	Chapter 5, Policy HG2	Legal Compliance, Positively Prepared, Justified, Effective,	Concerns plan falls short in confirming what/where/when/how development will be delivered.	The Council is confident that a proportionate level of information is provided by the plan overall as to the	

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				Consistent with National Policy, Duty to Cooperate	<p>Reservations that reports are retrospective following previous consultation. Lack of audit trail connecting reports with different authors/timescales.</p> <p>The objectively assessed need in inconsistent with Staffordshire Observatory figures.</p> <p>The Southern Staffs District Needs Assessment recommends only 570 homes for Amington/Bolehall.</p> <p>Housing needs in Tamworth concentrated in older age group and golf course is not easily accessible for town centre and facilities for older people.</p> <p>Elderly and those living alone not accommodated adequately in planned housing provision, so golf course likely to attract in-migration.</p> <p>Local Plan states East of Tamworth has shortage of leisure facilities and open land, the golf course could satisfy these needs. Policy does not state where sports centre or urban park will be provided. North east of borough is area of deprivation and golf course should be made a park to meet need.</p> <p>Highways considerations for the golf course site have not been adequately assessed.</p> <p>The infrastructure delivery plan does not make clear what infrastructure is required for each phase of development for the golf course. No mention of additional health facilities.</p>	<p>deliverability of proposed development. SS1 sets out 'what' is required at a high level; allocations state 'where' for housing, the housing trajectory estimates 'when'; policy and supporting text detail the mitigation measures for 'how' development will be delivered.</p> <p>The authorship and scope of evidence base reports has necessarily varied during plan preparation, their implications however are drawn together in the Sustainability Appraisal the plan itself.</p> <p>Staffordshire Observatory figures are taken from the 2013 Mid-Year Population Estimates of Local Authorities in England and Wales by the Office for National Statistics (ONS). These estimates are made by predicting change based on figures from the last census, applying assumptions about what proportions of different age groups will reproduce, migrate or die. The SHMA similarly uses a number of modelled forecasts of population change to produce a range of scenarios from which the most appropriate is selected. The predicted population increase may not be large but housing numbers are also driven by changing needs of the existing population, such as new household formation and 'under occupation' by the elderly.</p> <p>The South-East Staffordshire Housing Needs Study Tamworth Housing Needs Assessment HEaDROOM Update Report (2014) does not include objectively assessed need figures at a smaller geography than the borough area. The Council do not consider it deliverable or proportionate to</p>	

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					<p>Reports supporting the Local Plan and golf course pre-application consultation do not provide certainty mitigation is understood and the proposal does not have a comprehensive viability assessment. Monitoring and contingency not sufficient to deal with uncertainty around viability.</p> <p>Allocation of golf course represents loss of open space and sports facilities in contravention of NPPF para 73 and 74 with no provision to replace facility.</p> <p>Heritage Impact Assessment makes no mention of how colliery and brickworks to be mitigated.</p> <p>Demise of golf course has been deliberate and is a financial decision. Consultation on allocation has been no more than box ticking.</p> <p>Sports Strategy is retrospective and merely acknowledges the closure of the golf course. Previous version supported its retention. FMG report supporting closure unfairly weighted and other sports facilities in the borough not been considered in the same way.</p> <p>Public consultation around closure and allocation of golf course has been insufficient in contravention of NPPF para 76 and 77 and Council's Statement of Community Involvement.</p> <p>Work under duty to cooperate has failed to detail where development will be delivered in Lichfield and North Warwickshire will be located and what impacts to golf course allocation will have on those are. Infrastructure investment is</p>	<p>restrict growth in particular areas of the borough based on need as Tamworth is a small geographic area with a restrictively tight administrative boundary and constrained housing land supply.</p> <p>Predicted household growth relates to all age brackets, however it is acknowledged that elderly households will become more significant where they are less common in Tamworth at present. Policy HG2 therefore supports consideration of extra care provision on the golf course site and Policies SU1 an SU2 support improved public transport links with the town centre.</p> <p>Policies HG4 and HG5 will be used to secure a mix of housing and affordable units to provide for the needs of the borough estimated in the SHMA including single occupiers and elderly households.</p> <p>The local plan seeks to secure public open space on the golf course site. Development could support provision of high quality recreational space, available to all whereas the golf course was restricted to golf players. The plan does not allocate an urban park but there are other areas of public open space in the ease of the borough that could play that role if a different type of space is provided on the golf course. The Council do not consider it is necessary to allocate a specific single site for a sports centre. Different potential funding and delivery models exist and these may influence its location.</p> <p>Policy SU2 requires detailed assessment of highways considerations of proposals at the planning application stage. However, the Highway Authority were</p>	

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					not aligned.	<p>consulted as described in the Site Selection Paper and report was published as part of the pre-application public consultation for the Golf Course: Proposed Mixed Use Development at Tamworth Municipal Golf Course Interim Transport Assessment (2014), which indicates that impacts to the local highway network will be acceptable, with mitigation measures to one junction.</p> <p>The detailed phasing for the golf course and supporting infrastructure will need to be established as part of the final masterplan at the planning application stage. Although the views of consultees regarding phasing were explored in design workshops in 2014, the final infrastructure obligations will need to follow detailed reports prepared for the planning application.</p> <p>The Clinical Commissioning Group and NHS England were provided with the emerging plan and evidence base. A meeting was held on 20/08/2014 and they responded that there would be no requirement for new GP or dental surgeries or pharmacies. Hospital provision is a decision of the Burton Hospitals NHS Foundation Trust.</p> <p>The Whole Plan Viability, Affordable Housing and CIL Study (2014) assesses viability at a high level where there is a higher degree of uncertainty, however the Council consider this is a proportionate approach and a buffer is provided for contingency. The viability testing was carried out in line with the Harman guidance. The report does specifically consider the golf course allocation. The constrained nature of land in the borough</p>	

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						<p>does not provide the opportunity for greater flexibility in development locations so design workshops with consultees and developer discussions have been used to demonstrate potential schemes are deliverable for the urban extensions.</p> <p>2014 Sports Strategy Update referred to the Golf Course Needs Assessment Report (January 2014) which found that whilst stakeholders and consultees stated a strategic and requirement to retain an 18 hole course, the Council was unable to continue subsidising the course in the light of falling membership, operating deficits and the need for housing land. There are alternative courses available in close proximity to Tamworth. Sport England does not actively support the closure of the golf course but it has stated that it does not object to it. The golf course is not currently publicly accessible open space.</p> <p>The Heritage Impact Assessment for the golf course indicates that a desk-based assessment is required before determining whether archaeological investigation, recording or protection is required, however the potential for surviving below-ground deposits is low. A desk-based assessment has been published as part of the pre-application consultation and recommends that subject to further evaluation heritage impacts can be dealt with through design of the development.</p> <p>The financial decision-making of the Council is not a planning matter. The Local Plan has been through two rounds of public consultation in 2014 including drop-in sessions across the borough,</p>	

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						<p>including the Amington ARCH. In addition a pre-application public consultation was held from October 27th to November 2nd 2014.</p> <p>The location of development in North Warwickshire and Lichfield must be determined through their Local Plans. They have signed a Memorandum of Understanding to allocate land to meet Tamworth's unmet need. Consideration of the impacts of potential allocations, county and national-level organisations were consulted as described in the Site Selection Paper and the consideration of impacts in the Sustainability Appraisal is not restricted to the borough. Lichfield and North Warwickshire are members of an officer's group within the Tamworth Strategic Partnership for infrastructure planning.</p>	
LP047a	Flatagent		Chapter 3		<p>The spatial strategy will have an impact upon Mile Oak and the surrounding hinterland.</p> <p>Site owned by Flatagent Ltd at Mile Oak represents an appropriate site for the delivery of residential development to serve Tamworth. This site is available in the short term and does not require any significant infrastructure.</p>	Note comments. The Council cannot allocate sites outside of the Borough and it is for Lichfield District Council to determine its own spatial strategy and site allocations. The Council will continue to work with Lichfield District Council and North Warwickshire Borough Council to seek solutions through a range of options to meet Tamworth's unmet needs outside of the borough boundaries.	
LP047b	Flatagent		Policy SS1		Support the inclusion of the need for Lichfield and North Warwickshire to provide 2000 homes over the Plan period to meet Tamworth's housing needs.	Support of Lichfield and North Warwickshire helping to meet Tamworth's needs noted.	
LP047c	Flatagent		Policy HG1		140 of the 765 homes to be provided through housing allocations not forming SUEs are on sites that have been assessed by the Level 2 SFRA. Their delivery cannot be guaranteed due to potential viability issues. If these do not come forward, there will be a greater emphasis on sites inside and outside of	<p>Note support for the inclusion of a reference to the 2009 Tamworth Future Development and Infrastructure Study in paragraph 3.15.</p> <p>The housing sites referred to that required SFRA Level 2 were not included in the housing trajectory and so the</p>	

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					<p>the borough that are not constrained, such as the Flatagent Ltd Mile Oak site. Support the inclusion of paragraph 3.15 which refers to the 2009 Tamworth Future Development and Infrastructure Study.</p> <p>Question the soundness of policy SS1 as it includes an allocation of sites that it acknowledges cannot be relied upon to provide housing.</p>	<p>requirements of the Plan can be met without their delivery.</p> <p>The figures set out in Policy SS1 state that a minimum of 4250 dwellings will be built in Tamworth. The trajectory at Appendix A shows that without the SFRA level 2 sites, there is a net supply of 4721 dwellings.</p> <p>As the SFRA Level 2 sites are included at towards the end of the Plan period, they do not impact on the five year housing supply.</p>	
LP047d	Flatagent		Policy HG2		<p>The delivery of the Anker Valley SUE is in doubt due to difficulties achieving planning permission, the infrastructure costs and the location in floodzone 3b.</p> <p>Notwithstanding this the development of the Flatagent Ltd Mile Oak site is considered to be preferable to any development at Anker Valley by the 2009 Tamworth Future Development and Infrastructure Study and consider this policy to be sound.</p>	<p>Anker Valley SUE planning application S106 agreement is progressing and it is anticipated that the outline planning permission will be granted early in 2015.</p> <p>None of the Anker Valley SUE allocation is within floodzones 2 or 3.</p> <p>Viability assessment has been carried out as part of the Whole Plan Viability, Affordable Housing and CIL Study (2014), as well as part of the planning application. The information provided through the outline planning application has guided the decisions and negotiations of the terms of the s106 agreement and the Council is satisfied that the Anker Valley site is viable and deliverable.</p> <p>The developers have expressed a commitment to commence works on site by late 2015/early 2016.</p>	
LP047e	Flatagent		Policy HG4		Support the approach taken in policy HG4 towards affordable housing in that viability is a key consideration.	Support of policy HG4 noted.	
LP047f	Flatagent		Policy HG5		Consider policy HG5 to be sound.	Support of policy HG5 noted.	
LP047g	Flatagent		Policy HG6		Consider policy HG6 to be sound.	Support of policy HG6 noted.	
LP047h	Flatagent		Policy SU1		Policy SU1 identifies that capacity and safety measures may be required at	Note information provided, but this is for the consideration of Lichfield District	

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					specific road junctions including the A5 Mile Oak junction. A transport assessment has already been undertaken for the proposed development at Mile Oak which demonstrates that the traffic generated by the development of up to 290 dwellings would have no material impact on the operating capacity of the A5 Mile Oak junction. This further demonstrates the deliverability of this site. Consider Policy SU1 to be sound.	Council in the preparation of their site allocations document. Support of policy SU1 is noted.	
LP048	SCC Transport	No	Appendix B		Amendments are required to the Infrastructure Delivery Plan to make it clearer and more accurate. It is recommended that a meeting is arranged between the Borough Council and the County Council to review the details in the IDP.	SCC Transport have been invited to regular meetings to update the IDP, the last meeting was held in September and the next meeting is scheduled for the new year. However, the Council would welcome a meeting to discuss the plan beforehand.	
LP049	SCC Transport	No	Chapter 7, Para 7.3		Paragraph 7.3 and Table 7.1 require amending to include reference to Stoke-on-Trent and Staffordshire Local Enterprise Partnership.	The Council would support the modifications.	MOD023 MOD024
LP050	SCC Transport	No	Chapter 7, Para 7.6		Paragraph 7.6 bullet point 6 concerns the North Tamworth Local Transport Package which is identified in the Tamworth Borough Integrated Transport Strategy. The bullet point identifies development on the Anker Valley site but this should be amended to reflect other development sites in the north of Tamworth. Paragraph 7.6 bullet point 8 concerns Drayton Manor Theme Park. Staffordshire County Council is working with the Highways Agency and Drayton Manor Park to formulate an access strategy to alleviate these conditions. Bullet point 8 identifies potential mitigation measures which have yet to be finalised and should therefore be amended	The Council would support the modifications. In particular it is accepted development to the north of Tamworth could include sites such as Browns Lane and may be better expressed without specific site names.	MOD025 MOD026

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LP051	SCC Transport	No	Chapter 7, Para 7.6		<p>There are no current proposals for a new local train service for Tamworth and it would be very difficult to deliver without infrastructure improvements at Water Orton which are not currently included in Network Rail's Delivery Plans for Control Period 5 (CP5 2014-19). It is therefore recommended that the text in paragraph 7.6 is amended.</p> <p>There are no current proposals to lengthen the platforms at Wilnecote. It is therefore recommended that the text in paragraph 7.6 is amended to reflect that this is just an aspiration.</p>	The Council would support the modifications.	MOD027
LP052	SCC Transport	No	Chapter 5, Policy HG2		Support the proposals for Anker Valley and infrastructure requirements relating to the North Tamworth Local Transport Package. Evidence indicates up to 700 dwellings could be developed to the North of Tamworth with a sustainable transport package. Implementation of the 'Access to Jobs, Training and Services Project' between 2015 and 2021 will support the increase in capacity from 500 to 700 residential units.	Support noted	
LP053	SCC Transport	No	Chapter 5, Policy HG2		Required infrastructure for the Golf Course development site should include improvements to the Glascote Road/Marlborough Way roundabout junction.	The Council would support the modification	MOD028
LP054	SCC Transport	No	Chapter 7, Para 7.5		<p>The Tamworth Borough Integrated Transport Strategy 2014 is currently being refreshed and a further review of the strategy is likely to take place upon completion of the Tamworth Local Plan hearings.</p> <p>Paragraph 7.5 should therefore be revised:</p> <p>'The policy will make the most efficient use of limited funding and help implement</p>	The Council would support the modification.	MOD029

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					Staffordshire County Council's Integrated Transport Strategy for Tamworth (2014) which is regularly reviewed.'		
LP055	SCC Transport	No	Chapter 4, Para 4.35		Paragraph 4.35 specifically mentions the provision of a 'shuttle bus' service between Tamworth Town Centre, Ventura Retail Park and the Jolly Sailor Retail Park. It is felt that this wording could be amended in the interests of clarity to: 'The report proposes the use of Fazeley Road as the main link with a frequent bus service operating on a circular route taking in Ventura Park Road, Bitterscote Drive and Bonehill Road, with.....'	The Council would support the modification.	MOD030
LP056a	WM HARP Planning Consortium	No	Chapter 3. Policy SS1		Concerned about unmet need as North Warwickshire and Lichfield only including 500 dwellings each of 2000 shortfall in current plans. If Lichfield does not make changes as requested by Tamworth at their main modifications consultation, then question credibility of July 2012 Memorandum of Understanding.	An updated Memorandum of Understanding was signed in October 2014 by the 3 authorities to work together to meet the remaining need. North Warwickshire and Lichfield have made commitments to review their Local Plans to deal with unmet need from Tamworth and Birmingham. In regards to Lichfield, the existing 500 dwelling commitment is in their plan which has recently been found sound subject to modifications. Regarding changes requested by Tamworth to the broad development location, Lichfield's plan contains a mechanism in case the final agreed highways evidence restricts development. The inspector stated in his report: 'If it transpires that the Broad Development Location as a whole is not capable of delivering something in the order of 1,000 dwellings then MM1 provides the mechanism through which additional land could be identified either through a review of the Plan or through the preparation of the <i>Lichfield District Local Plan: Allocations</i> document'	
LP056b	WM HARP	No	Chapter 5,		Changes to PPG on planning obligations	The Council notes the point and agree	

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	Planning Consortium		Policy HG4		should be reflected in Policy HG4 with a threshold of 10 dwellings for contributions. These changes will effect delivery and should be consulted on.	<p>should be discussed through the examination.</p> <p>The Council does not consider however that the delivery of planned affordable housing is threatened as the planned growth in the plan is on allocations of greater than 10 dwellings each.</p>	
LP056c	WM HARP Planning Consortium	No	Chapter 2		Ageing population is a high growth area and the Plan would benefit from its own policy on specialist care and accommodation for the elderly.	The Council notes the point but considers that the proposed policies are sufficiently flexible to support specialist housing. For example: Policy HG2 supports consideration of provision on urban extensions; Policy HG4 requires affordable housing to meet the needs of older people amongst others; Policy HG5 relaxes the housing mix requirement for specialist housing; Policy EN5 takes a criteria-based approach to design that would allow a different approach of the design of specialist accommodation to other housing; Policy SU6 relates the provision of community facilities to the needs generated by that development.	
LP057	Sainsburys Supermarkets Ltd	No	Policy EC1 and supporting paragraph 4.18		Policy EC1(c) and supporting paragraph 4.18 are not in line with the NPPF as the NPPF states that local planning authorities should, in dealing with proposals for main town centre uses outside of existing centres, apply a sequential test and, in certain circumstances, the impact test requiring an impact test for retail applications.	<p>Having regard to the NPPF, the LPA is satisfied that policy EC1(c) is in accordance with paragraph 23 of the NPPF which clearly advises local planning authorities to pursue policies to support the viability and vitality of centres.</p> <p>The evidence base demonstrates that in the short term, up until 2021, the retail need will be met within the town centre by the Gungate development and that after 2021 there is currently a need for 7800sq. metres of comparison goods floorspace and 2,900 sq. metres of convenience goods floorspace. The overall retail need will be monitored and reassessed closer to 2021 and sites within the town centre that are not currently deliverable will also be reassessed to determine their</p>	

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						<p>contribution to the medium and longer term retail needs of Tamworth. As such, whilst Policy EC1 allows for consideration of main town centre uses outside of centres, in the short term the retail need will be met by the Gungate development. As such, it is considered that part of paragraph 4.18 could be amended to reflect this, but not deleted in its entirety.</p>	
LP058	Brown	No	Chapter 5, Policy HG2	Justified, Effective	<p>Concerned about development of golf course at rear of property: removal of mature trees; security to property due to adjacent footpath; flooding from adjacent ditch to proposed footpath; proximity of access to Woodlands Road roundabout; pressure on roads at rush hour; loss of outlooks over golf course and area might be ruined.</p> <p>Suggest lower density housing adjacent Carnoustie and Eagle Drive properties to reflect style.</p> <p>Suggest direct access to B5000.</p> <p>Preservation of natural area would benefit wildlife.</p>	<p>The concerns are noted but they are generally of a detailed nature to be dealt with by detailed consideration at the planning application stage. It should also be noted that although helpful in terms of evidence, the golf course pre-application consultation masterplan is not part of the Local Plan.</p> <p>Proposed Mixed Use Development at Tamworth Municipal Golf Course Interim Transport Assessment (2014), suggest impacts to the local highway network will be acceptable, with mitigation measures to one junction. The highway authority contributed to the technical consultation as described in the Site Selection Paper and are content the development can be accommodated. Although greater connectivity is desirable there is no evidence to suggest that a third access to the site is necessary.</p> <p>The requirements of Policy HG2 as well as design, open space and community facilities policies EN3, EN5 and SU6 have the potential to make the sustainable urban extension an attractive addition to the Amington area with new facilities including high quality public open space</p> <p>Policies HG2 and EN4 require green infrastructure links to existing ecological sites as part of the development for the</p>	

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						benefit of wildlife.	
LP059	St Modwens Developments Ltd	Yes	Policy SS1 and supporting paragraphs 3.25 and 3.28	Positively prepared, justified, effective, consistent with national policy	<p>St Modwens Developments Ltd (SMDL) is promoting land for employment development at junction 10 of the M42 motorway and has an interest in approximately 80ha of land at this strategic location adjoining Tamworth, but within North Warwickshire. The land in question could contribute towards the unmet employment land needs at Tamworth.</p> <p>8.5ha of land adjoining Centurion Park has already been granted planning permission for B class employment use.</p> <p>An outline application for a 25ha employment site to the south east of junction 10 is being prepared for submission.</p> <p>Consider that there is a need for at least 50ha of employment land in Tamworth, rather than the set out objectively assessed need for 32ha, by reason that greater weight should have been applied to the projection based on take up of employment land over the last 16 years (66.49ha) and that any midpoint should fall between this projection and the projection based on the labour demand policy on scenario (32.9ha). Also, concluded that any accommodation of the logistics sector would lead to a larger total requirement greater than 50ha.</p> <p>Raise concerns regarding the uncertainty of delivery of 10ha site allocation at land south of A5, Bitterscote.</p> <p>Overall, suggest that unmet need to be met outside of borough boundaries is greater than 14ha.</p>	<p>The land in question is not within Tamworth Borough and is within North Warwickshire Borough boundaries. Therefore its suitability for allocation must be determined through their Local Plan allocations and/or through the planning application process.</p> <p>Discussions have taken place during the duty to co-operate meetings over the 8ha site at Centurion Park although no formal agreement has been made to date.</p> <p>The approach to determining the sites to be allocated to meet Tamworth's unmet needs is to be agreed between Tamworth Borough Council, Lichfield District Council and North Warwickshire Borough Council and it is likely that this approach will look at all options together, taking account of the sustainability appraisal objectives of each authority or as agreed by a joint evidence/ working.</p> <p>The three authorities have signed a Memorandum of Understanding (October 2014) which agrees what Tamworth's needs are, what the unmet need is and agreeing to allocate land to meet Tamworth's unmet need.</p> <p>The MoU includes that the three authorities will work together to seek solutions to deliver the unmet housing and employment needs through a range of options such as Joint Development Plan Document, Joint Strategy, Joint Evidence.</p> <p>The Duty to Co-operate Paper, which includes the October 2014 MoU within an Appendix, sets out the joint working</p>	

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					<p>Tamworth is well placed to meet demand for both industrial and warehouse premises being strategically located in the centre of the UK and the West Midlands with excellent rail and road connections.</p> <p>The land promoted has been split into 10 areas and each assessed and summarised in terms of their suitability for development and links with nearby housing areas.</p> <p>Recommend that the Council refers specifically to the opportunities of the land being promoted by SMDL in the context of the employment land shortfall, or articulate the criteria it considers should be employed to test the options.</p>	<p>between Tamworth Borough Council, Lichfield District Council and North Warwickshire Borough Council so far, and as ongoing.</p> <p>The objectively assessed employment land need has been determined on the basis of up-to-date evidence and aims to be in line with the objectively assessed housing need. This will ensure that as the population grows it will have access to new jobs, whilst ensuring that a much higher level of employment growth does not drive high levels of in-ward migration which would in turn require further housing growth.</p> <p>A planning application was submitted for the 10ha site at land south of the A5, Bitterscote but this was held up due to Highways Agency concerns. The Highways Agency holding directive has recently been removed and the application is now progressing. The landowners and their agent have expressed their intent to develop the land once permission has been granted and the Council has no reason to doubt this. As such, the Council considers that the site in question is suitable and will be delivered.</p> <p>The summary and assessment of the areas of land being promoted are noted but reiterate that this land is outside of Tamworth's borough boundaries and as such the merits must be determined by the relevant local authority. However, should this land be put forward as site allocations or for planning permission, the Council will continue to make representations to North Warwickshire Borough Council and suitable sites</p>	

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						<p>meeting Tamworth's needs will be supported in those representations, as well as being the subject of ongoing Duty to Co-operate discussions.</p> <p>Note recommendation to refer specifically to the site within the Plan but unless it has been allocated and agreed by the Local Planning Authority for that site this is not a possibility. As stated above, Tamworth Borough Council, Lichfield District Council and North Warwickshire Borough Council are working together to determine the best solutions to meeting Tamworth's unmet need, having signed an MoU to that effect, and will continue working together.</p>	
LP060	Henry Boot Devs Ltd	Yes	Policy EC1 and paragraph 4.22	Justified, consistent with national policy	Reference to specific retail floorspace requirements in supporting text to policy is not justified or consistent with national policy as it does not provide adequate flexibility to allow a rapid response to changes in economic circumstances. The inclusion of this figure could result in out of town retail development being allowed which could prejudice the delivery of the Gungate scheme. Suggest that these figures are not included within the policies or the supporting text and that paragraph 4.22 be revised accordingly.	<p>The floorspace requirements are set out within the supporting text and not within Policy EC1 itself. The supportive text does not set the parameters for development and the wording and structure of Policy EC1 is considered to provide suitable protection of the town centre's retail function and the delivery of the Gungate redevelopment.</p> <p>There is specific wording within policy EC1 for impact assessments to consider the effects of the proposal on the Gungate redevelopment.</p> <p>Policy SS1 does set out the figures for the housing, employment and retail need over the Plan period. However, paragraph's 3.18 and 3.19 supporting that policy clearly state that the Gungate redevelopment will meet the retail need in the short to medium term. The currently identified need for after 2021 will be monitored and potentially reassessed closer to 2021 (para's 3.18 and 3.19).</p>	

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						<p>The retail need figure relates to capacity and therefore no additional retail development outside of the town centre is likely to be justifiable in the short term unless clear and decisive evidence comes to light that the Gungate redevelopment will no longer come forward.</p> <p>As such, the wording of paragraph 4.22 is based on up-to-date evidence and there is no evidence to demonstrate that this is not the case, therefore the wording of paragraph 4.22 should not be revised at this time. This will be reviewed closer to 2021.</p>	
LP061	Henry Boot Devs Ltd	Yes	Policy SS1	Justified, consistent with national policy	Reference to specific retail floorspace requirements in policy is not justified or consistent with national policy as it does not provide adequate flexibility to allow a rapid response to changes in economic circumstances. The inclusion of this figure could result in out of town retail development being allowed which could prejudice the delivery of the Gungate scheme. Suggest that these figures are not included within the policies or the supporting text and that paragraph 3.18 be revised to state that the retail need will be monitored and re-assessed (not just potentially).	<p>Policy SS1 does set out the figures for the housing, employment and retail need over the Plan period. The figures within SS1 are based on up-to-date evidence and there is no evidence to demonstrate that this is not the case. As such, the figures set out within Policy SS1 should remain.</p> <p>Policy EC1 of the Plan is considered to provide suitable protection of the town centre's retail function and the delivery of the Gungate redevelopment. There is specific wording within policy EC1 for impact assessments to consider the effects of the proposal on the Gungate redevelopment.</p> <p>As set out within paragraph's 3.18 and 3.19, the Gungate redevelopment will meet the retail need in the short to medium term and the currently identified need for after 2021 will be monitored and potentially reassessed closer to 2021.</p> <p>The retail need figure relates to capacity and therefore no additional retail</p>	

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						<p>development outside of the town centre is likely to be justifiable in the short term unless clear and decisive evidence comes to light that the Gungate redevelopment will no longer come forward.</p> <p>The Council does not agree with the proposed wording change for paragraph 3.18 to replace "potentially" with "will be" as the monitoring will indicate whether or not a re-assessment is required. This will not definitely be required (see Monitoring Framework at Appendix D).</p>	
LP062	Henry Boot Devs Ltd	Yes	Policy EC2	Justified, consistent with national policy	Reference to specific retail floorspace requirements in policy is not justified or consistent with national policy as it does not provide adequate flexibility to allow a rapid response to changes in economic circumstances. The inclusion of this figure could result in out of town retail development being allowed which could prejudice the delivery of the Gungate scheme. Suggest that these figures are not included within Policy EC2.	<p>Policy EC2 sets out the figures for retail need over the Plan period based on up-to-date evidence. There is no evidence to demonstrate that this is not the case. As such, the figures set out within Policy EC2 should remain.</p> <p>As set out within paragraph's 3.18 and 3.19, the Gungate redevelopment will meet the retail need in the short to medium term and the currently identified need for after 2021 will be monitored and potentially reassessed closer to 2021. This allows for the flexibility required in relation to retail capacity/need projections.</p> <p>The structure of Policy EC1 of the Plan is considered to provide suitable protection of the town centre's retail function and the delivery of the Gungate redevelopment. There is specific wording within policy EC1 for impact assessments to consider the effects of the proposal on the Gungate redevelopment.</p> <p>The retail need figure relates to capacity and therefore no additional retail development outside of the town centre is</p>	

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						likely to be justifiable in the short term unless clear and decisive evidence comes to light that the Gungate redevelopment will no longer come forward.	
LP063a	Neachell	Yes	Chapter 3, Policy SS1	Legal Compliance, Positively Prepared, Justified, Effective, Consistent with National Policy, Duty to Cooperate	<p>No convincing evidence housing need cannot be met in borough. No security additional 1000 dwellings will be delivered by North Warwickshire and Lichfield. No rationale for Tamworth not taking land out of Green Belt if Lichfield is.</p> <p>Not logical to export need to Lichfield and North Warks if all the authorities are in the Greater Birmingham HMA and will need to deal with significant additional requirement.</p> <p>The 2014 Green Belt Review is an after the event justification and there are sites that can be removed from the green belt. Sites selected by council include former employment land and golf course is part of green space network.</p> <p>Maximum OAN figure should have been chosen and should be higher to take account of return to higher household formation and deliver more affordable homes</p>	<p>The Pre-submission Local Plan 2006-2031 Site Selection Paper (2014) sets out the reason for selection or omission of all reasonable housing site alternatives in Tamworth. Lichfield and North Warwickshire have signed an updated Memorandum of Understanding in October 2014 to deliver the remaining unmet need and committed to review Local Plans to meet unmet need from Tamworth and Birmingham.</p> <p>Lichfield is proposing green belt release following the outcomes of their green belt review, it is not their only option to meet Tamworth's unmet need. Tamworth's Green Belt Review (2014) sets out the rationale for not releasing green belt.</p> <p>It is noted that Tamworth and neighbouring authorities are in the Greater Birmingham Housing Market Area. However this is a sub-regional scale and the work being carried out by the GBSLEP is not a SHMA and considers Tamworth's unmet needs in addition to Birmingham's. The outcomes will support the allocation of Tamworth's unmet needs.</p> <p>No evidence has been provided that any sites in the green belt do not perform their function or that exceptional circumstances exist for their release. The consideration of allocated sites is set out in the Site Selection Paper.</p>	

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						<p>Para 3.7 of the pre-submission Local Plan explains the reasoning for choosing an OAN of 250 dpa, It is a target aligned via consistent projections with the employment land strategy that 'will help to ensure; that there is no decline in the working age population, it anticipates an accelerated level of household formation after 2021 in response to an improved economic climate and it seeks to provide a supply-[side] response to redress very high affordability ratio in Tamworth.'</p>	
LP063b	Neachell	Yes	Chapter 3, para 3.57	Legal Compliance, Positively Prepared, Justified, Effective, Consistent with National Policy, Duty to Cooperate	<p>Spatial options considered by the SA state impacts for the allocation of green belt sites, whereas the impact of displacing growth outside the borough is not considered.</p> <p>Consider the impact of the non-delivery of the exported homes or the time delay in their delivery.</p>	<p>It is outside the scope of Tamworth's Local Plan to make decisions where development outside the Borough should be located. North Warwickshire BC has not allocated sites for development in its Core Strategy. Lichfield DC identified a site north of Anker Valley for 1000 homes, 500 of which were to serve Tamworth's needs, and this was included in the SA of the Lichfield Local Plan: Core Strategy. No site has been identified by Lichfield DC for the remaining 500 homes to serve Tamworth's needs. The cumulative impact assessment for the SA of Tamworth's Local Plan noted the Core Strategies for LDC and NWBC and incorporated all available information in these strategies about the proposed locations for residential development to serve Tamworth's needs.</p> <p>The impact of development in other authorities therefore cannot be any more comparably assessed. Regardless of the other impacts the Green Belt Review determined those sites are fulfilling their green belt function and the Council does not consider there are exceptional circumstances to justify their release.</p> <p>Duty to Co-operate Statement</p>	

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						demonstrates how housing need outside Tamworth can be met by 2031.	
LP063c	Neachell	Yes	Chapter 5, Policy HG1	Legal Compliance, Positively Prepared, Justified, Effective, Consistent with National Policy, Duty to Cooperate	<p>Object to quantum and location of housing requirement and export of need to neighbouring districts.</p> <p>Object to all allocations except Whitley Avenue as unlikely to be delivered. Some sites require flood risk assessment, redevelopment or have existing uses.</p> <p>Leaving number of dwellings on each site to trajectory is not transparent.</p> <p>Not clear how Policy SU4 has been applied to direct development away from flood risk zones.</p>	<p>No new evidence has been provided that a greater housing requirement could be delivered within the borough or at alternative locations.</p> <p>The plan recognises the possibility not all allocations might come forward so supply on allocations is greater than requirement to give flexibility. No evidence has been provided that Whitley Avenue is more deliverable than all other allocations. Whilst the Council support the allocation of Whitley Avenue, this site only became deliverable once the Anker Valley Link Road safeguard was removed from this Local Plan.</p> <p>The site capacities in the housing trajectory are based on the Strategic Housing Land Availability Assessment and Site Selection Paper and the Council considers they have been transparently derived.</p> <p>The Level 2 Strategic Flood Risk Assessment (2014) and Site Selection Paper set out how the sequential test for flood risk has been used to direct development to areas at the lowest risk of flooding.</p>	
LP063d	Neachell	Yes	Chapter 5, Policy HG2	Legal Compliance, Positively Prepared, Justified, Effective, Consistent with National Policy, Duty to Cooperate	<p>Object to policy as site 693 is not included.</p> <p>Uncertain that Anker Valley will deliver 500 homes due to highway issues in North of Tamworth area and County Council 700 dwelling maximum figure.</p> <p>Not clear how Policy SU4 has been applied to direct development away from flood risk zones. The need to protect</p>	<p>The reasons for omission of considered sites are given in the Site Selection Paper.</p> <p>Anker Valley can be accommodated in addition to the proposed development at Brown's Lane in Lichfield district without exceeding 700 dwellings. The Arkall Farm application has been resisted by the transport authority.</p>	

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					<p>areas of flood risk (Dunstall Lane) has not been properly weighed against releasing land from the greenbelt.</p> <p>The golf course is currently designated open space and underuse does not negate reuse of area for recreational purposes.</p>	<p>The Level 2 Strategic Flood Risk Assessment (2014) and Site Selection Paper set out how the sequential test for flood risk has been used to direct development to areas at the lowest risk of flooding.</p> <p>The golf course is not publicly accessible open space and Sport England have not objected to its allocation for housing. Development of the site would have positive as well as negative impacts in terms of open space and these can be maximised through protection of biodiversity, design of the development, providing pedestrian/cycle routes and on-site public open space and play facilities.</p>	
LP063e	Neachell	Yes	Chapter 6, Policy EN1	Legal Compliance, Positively Prepared, Justified, Effective, Consistent with National Policy, Duty to Cooperate	No part of Tamworth is identified as sensitive landscape by County Council work and new development in south west of borough would not have an adverse impact.	Landscape impact was not the reason for omitting land in the south west of Tamworth which is part of the West Midlands Green Belt. It should also be noted that the County Council's Supplementary Planning Guidance, Planning for Landscape Change (2000) provides guidance for larger areas than individual sites and does not suggest adverse impacts are not possible in the area.	
LP063f	Neachell	Yes	Chapter 6, Policy EN2	Legal Compliance, Positively Prepared, Justified, Effective, Consistent with National Policy, Duty to Cooperate	Object to green belt and suggest site 693 should be removed. The plan makes no provision for safeguarded land beyond the plan period.	No evidence has been provided that the site does not perform its green belt function or that exceptional circumstances exist for its release. The Council is not required to provide safeguarded land by NPPF para 85.	
LP063g	Neachell	Yes		Legal Compliance, Positively Prepared, Justified, Effective, Consistent with National Policy, Duty to Cooperate	Object to designations ENV 2 Green Belt, SBI 10 and LNR 4 on proposals map.	<p>No evidence has been provided that the proposed amended green belt would not perform its green belt function or that exceptional circumstances exist for release of sites.</p> <p>The ecological designations already exist and are established outside of local plan</p>	

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						preparation.	
LP063h	Neachell	Yes	Annex C of the Sustainability Appraisal	Legal Compliance, Positively Prepared, Justified, Effective, Consistent with National Policy, Duty to Cooperate	<p>Assumptions made in sustainability appraisal of site 693 not consistent with preferred sites in Annex C.</p> <p>LPA failed to enter constructive dialogue with landowners.</p> <p>Education needs can be dealt with and green infrastructure provided on site. Site does not adjoin conservation area or listed building and archaeology could be mitigated.</p> <p>Landscape character is positive. Site lies in Flood Zone 1 unlike some sustainable urban extensions.</p> <p>Location is sustainable and within walking distance of local centre.</p> <p>Initial technical reports from 2013 provided for Highways, Flood Risk, Ecology, Topology and a masterplan</p>	<p>The SA Report explains the process by which the sites were appraised and compared in section 7.1 of the main report, section 1.1 of Annex C and section 1.1 of Annex G. Allocated and rejected sites are compared on an equal basis in Annex G.</p> <p>The site is in proximity to historic assets and there is the potential for negative impacts. It would be expected that archaeological potential would be required to be dealt with in a similar way to other sites, i.e. with a prior assessment to inform how development should be managed to deal with archaeological value in an appropriate manner.</p> <p>The site is assessed as having negative impacts on high quality places because of its green belt status.</p> <p>The site contains areas of flood zones 2 and 3.</p> <p>Possible mitigation measures were considered for all sites as described in the Site Selection Paper and sites are only omitted where they are inconsistent with the NPPF despite possible measures.</p> <p>The Council have been open to dialogue with all site promoters. An initial meeting was attended with JVH planning but the Council received no subsequent requests to meet about this particular site.</p> <p>The Council notes that site may be able to incorporate a school and green infrastructure and is within walking distance of a local centre. However the cost of a new school is circa £4m in addition to land take. This site alone would not generate sufficient school</p>	

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						<p>places or be likely to pay for this on its own.</p> <p>The exact nature of heritage impact is unknown without A a historic environment desk-based assessment.</p> <p>No evidence has been provided to suggest landscape impact would be positive.</p> <p>The technical reports provided have been seen by Council officers in 2013.</p> <p>These issues aside, as shown in the Site Selection Paper, the reason for omission of the site is due to the results of the Green Belt Review.</p>	
LP064a	Aucott	Yes	Policy SS1	Legally compliant, positively prepared, justified, effective, consistent with national policy, complies with the duty to co-operate	<p>There is no appetite for the proposed increase in retail floor space in the town centre, and therefore it is unrealistic that 10,700 sq.m of retail floor space will be delivered there. Town centre should focus on alternative uses.</p> <p>The Gungate scheme is an optimistic aspiration and there is an alternative land use for the Gungate site for housing to fit with particular demographic as per the SHMA. The plan should reconsider the whole concept of this site and the best future use for the land.</p> <p>Consider that new retail floor space should be accommodated at the edge of centre location at Ventura and the adjoining retail parks.</p> <p>Suggest Policy SS1 should be amended to allow for new retail development to be within the retail parks.</p>	<p>There is no evidence that contradicts the existing up-to-date evidence base to support the propose change to allow main town centre uses to be located outside of the town centre within the retail parks, or to demonstrate that the Gungate redevelopment, which has planning permission, will not come forward.</p> <p>The retail policies of the Plan are in line with national policy.</p> <p>Furthermore, there is no evidence to show that there are any available sites within Ventura that could accommodate the 10,700 sq.m of retail floorspace after 2021.</p> <p>The evidence base clearly shows that continued development of the out of town retail parks would be likely to have a negative impact on the viability and vitality of the town centre.</p>	
LP064b	Aucott	Yes	Policy EC1	Legally compliant, positively prepared,	There is no appetite for the proposed increase in retail floor space in the town	There is no evidence that contradicts the existing up-to-date evidence base to	

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				<p>justified, effective, consistent with national policy, complies with the Duty to co-operate</p>	<p>centre, and therefore it is unrealistic that 10,700 sq.m of retail floor space will be delivered there. Town centre should focus on alternative uses.</p> <p>The Gungate scheme is an optimistic aspiration and there is an alternative land use for the Gungate site for housing to fit with particular demographic as per the SHMA. The plan should reconsider the whole concept of this site and the best future use for the land.</p> <p>Consider that new retail floor space should be accommodated at the edge of centre location at Ventura and the adjoining retail parks.</p> <p>Major new retail development within the town centre will not protect the historic environment.</p> <p>Object to the hierarchy defined in policy EC1 as it is a sequential preference rather than a hierarchy. Consider that the hierarchy should be amended to include the retail parks within it.</p> <p>The tests drafted in EC1 are not workable or suitable and if there are be a series of tests, these must include a test that balances the overall benefit of the proposal to the Borough, even where the other tests are not complied with.</p>	<p>support the propose change to allow main town centre uses to be located outside of the town centre within the retail parks, or to demonstrate that the Gungate redevelopment, which has planning permission, will not come forward.</p> <p>The retail policies of the Plan are in line with national policy.</p> <p>Furthermore, there is no evidence to show that there are any available sites within Ventura that could accommodate the 10,700 sq.m of retail floorspace after 2021.</p> <p>The evidence base clearly shows that continued development of the out of town retail parks would be likely to have a negative impact on the viability and vitality of the town centre.</p> <p>Any new development within the town centre would need to be designed in such a way as to protect and where possible enhance the historic environment.</p> <p>The hierarchy sets out the centres by size and function in descending order. The purpose of this hierarchy is to direct the sequential test approach. The retail parks are not part of any defined centre and therefore are not included in the hierarchy of centres.</p> <p>There is no single 'test' that can be applied and the balanced judgement on the basis of the information provided in relation to this policy would be made by the consideration of the Development Management Officer and the decisions of the Planning Committee.</p>	

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LP064c	Aucott	Yes	Policy EC2	Legally compliant, positively prepared, justified, effective, consistent with national policy, complies with the Duty to Co-operate	<p>There is no appetite for the proposed increase in retail floor space in the town centre, and therefore it is unrealistic that 10,700 sq.m of retail floor space will be delivered there. Town centre should focus on alternative uses.</p> <p>The Gungate scheme is an optimistic aspiration and there is an alternative land use for the Gungate site for housing to fit with particular demographic as per the SHMA. The plan should reconsider the whole concept of this site and the best future use for the land.</p> <p>Consider that new retail floor space should be accommodated at the edge of centre location at Ventura and the adjoining retail parks. It is not considered that the town centre can accommodate the new floor space proposed after 2021 and this floorspace should be directed to out of centre retail parks.</p> <p>Consider that the floorspace figure should be at least 15,500 net of comparison goods floor space.</p> <p>Major new retail development within the town centre will not protect the historic environment.</p> <p>Suggest that EC2 should be amended to reflect a positive approach to development that will bring wider economic benefits to the Borough.</p>	<p>There is no evidence that contradicts the existing up-to-date evidence base to support the propose change to allow main town centre uses to be located outside of the town centre within the retail parks, or to demonstrate that the Gungate redevelopment, which has planning permission, will not come forward.</p> <p>The retail policies of the Plan are in line with national policy.</p> <p>There is no evidence to support the suggestion that the identified retail floor space capacity for after 2021 should be increased to at least 15,500sq.m of comparison goods floorspace. The figures within the Plan are based on up-to-date evidence (the Tamworth Town Centre and Retail Study; Study Update).</p> <p>There is no evidence to support the proposed change to the hierarchy to focus new retail development into the out of centre retail parks. The Council's approach seeks to protect the function, vitality and viability of the town centre, in line with national planning policy.</p> <p>Furthermore, there is no evidence to show that there are any available sites within the retail parks that could accommodate the identified retail floorspace capacity after 2021. The evidence base clearly shows that continued development of the out of town retail parks would be likely to have a negative impact on the viability and vitality of the town centre.</p> <p>Any new development within the town centre would need to be designed in such a way as to protect and where possible</p>	

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						<p>enhance the historic environment.</p> <p>Policy EC2 sets out the figures for retail need over the Plan period based on up-to-date evidence. There is no evidence to demonstrate that this is not the case or that a different strategy for retail development would be more appropriate. As such, Policy EC2 should not be amended.</p>	
LP064d	Aucott	Yes	Policy EC6	Legally compliant, positively prepared, justified, effective, consistent with national policy, complies with the Duty to Co-operate	<p>The allocation of site EMP1 is supported. However, object to the restriction of the site to B1(b), (c), B2 and B8 uses and consider that the use of the site for B1(a) offices should be included. The plan has no specific office allocation and restricts new office development to the town centre. Previous permission on the site included a B1 office development. The use should also be widened to include sui generis uses such as car dealerships.</p> <p>Suggest amend policy EC6 to take a more rounded approach to what land uses create employment and include B1a and sui generis uses and reconsider the logic of the currently limited allocations.</p>	<p>The employment needs have been demonstrated through the evidence base and the site is specifically allocated towards meeting Tamworth's employment needs.</p> <p>This does not preclude land in suitable locations from being granted permission for service sector employment such as leisure, offices and retail – it is only a fraction of the job market that requires b class land and it is for that component that the employment land is being allocated for.</p> <p>The Employment Land Review Stage 2 breaks employment down into its different sectors and sets out the requirements in relation to them. No specific need was identified for offices so there is no need to relax policy EC6 to allow for specific alternatives.</p> <p>The application of the sequential test in policy to look at town centre first for office uses is in line with National Policy.</p> <p>Furthermore, policy EC7 allows for flexibility where it can be demonstrated that a site is no longer required for employment purposes falling within the B1 (b,c), B2 and B8 categories.</p>	
LP065a	Shiple Baxter	Yes	Policy SS1	Legally compliant,	There is no appetite for the proposed	There is no evidence that contradicts the	

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				positively prepared, justified, effective, consistent with national policy, complies with the duty to co-operate	<p>increase in retail floor space in the town centre, and therefore it is unrealistic that 10,700 sq.m of retail floor space will be delivered there. Town centre should focus on alternative uses.</p> <p>The town centre cannot accommodate the new floor space proposed after 2021 and the plan should concentrate on maintaining the existing floor space and allowing new floor space to be accommodated at the edge of centre location at Ventura and the adjoining retail parks.</p> <p>The floor space figure should be at least 15,500 net of comparison goods floor space).</p> <p>Major new retail development within the town centre will not protect the historic environment.</p> <p>The Gungate scheme is an optimistic aspiration and there is an alternative land use for the Gungate site for housing to fit with particular demographic as per the SHMA. The plan should reconsider the whole concept of this site and the best future use for the land.</p>	<p>existing up-to-date evidence base to support the proposed change to allow main town centre uses to be located outside of the town centre within the retail parks, or to demonstrate that the Gungate redevelopment, which has planning permission, will not come forward.</p> <p>The retail policies of the Plan are in line with national policy.</p> <p>Furthermore, there is no evidence to show that there are any available sites within Ventura that could accommodate the 10,700 sq.m of retail floorspace after 2021.</p> <p>The evidence base clearly shows that continued development of the out of town retail parks would be likely to have a negative impact on the viability and vitality of the town centre.</p> <p>Any new development within the town centre would need to be designed in such a way as to protect and where possible enhance the historic environment.</p>	
LP065b	Shipleigh Baxter	Yes	Policy EC1	Legally compliant, positively prepared, justified, effective, consistent with national policy, complies with the duty to co-operate	<p>There is no appetite for the proposed increase in retail floor space in the town centre, and therefore it is unrealistic that 10,700 sq.m of retail floor space will be delivered there. Town centre should focus on alternative uses.</p> <p>Consider that new retail floor space should be accommodated at the edge of centre location at Ventura and the adjoining retail parks.</p> <p>The floor space figure should be at least</p>	<p>There is no evidence that contradicts the existing up-to-date evidence base to support the proposed change to allow main town centre uses to be located outside of the town centre within the retail parks, or to demonstrate that the Gungate redevelopment, which has planning permission, will not come forward.</p> <p>The retail policies of the Plan are in line with national policy.</p> <p>Furthermore, there is no evidence to</p>	

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					<p>15,500 net of comparison goods floor space).</p> <p>The Gungate scheme is an optimistic aspiration and there is an alternative land use for the Gungate site for housing to fit with particular demographic as per the SHMA. The plan should reconsider the whole concept of this site and the best future use for the land.</p> <p>Major new retail development within the town centre will not protect the historic environment.</p> <p>Object to the hierarchy as defined in EC1 as it is not a hierarchy but a sequential preference. The retail parks should be included in the hierarchy.</p> <p>The limits set out for Impact Assessments for out of centre parks of 250sqm not evidenced as the background papers include no justification as to how this figure has been arrived at. (Changed in the previous version of the plan with no explanation.)</p>	<p>show that there are any available sites within Ventura that could accommodate the 10,700 sq.m of retail floorspace after 2021.</p> <p>The evidence base clearly shows that continued development of the out of town retail parks would be likely to have a negative impact on the viability and vitality of the town centre.</p> <p>Any new development within the town centre would need to be designed in such a way as to protect and where possible enhance the historic environment.</p> <p>The hierarchy sets out the centres by size and function in descending order. The purpose of this hierarchy is to direct the sequential test approach. The retail parks are not part of any defined centre and therefore are not included in the hierarchy of centres.</p> <p>Evidence base document "Threshold policy for main town centre uses: impact assessment evidence report (Nov 2013)" clearly sets out and justifies the thresholds identified within policy EC1 for when an impact assessment will be required. This has not changed from the previous version of the Plan (the Draft Local Plan 2013).</p>	
LP065c	Shipleigh Baxter	Yes	Policy EC2	Legally compliant, positively prepared, justified, effective, consistent with national policy, complies with the duty to co-operate	<p>There is no appetite for the proposed increase in retail floor space in the town centre, and therefore it is unrealistic that 10,700 sq.m of retail floor space will be delivered there. Town centre should focus on alternative uses.</p> <p>The town centre cannot accommodate the new floor space proposed after 2021 and the plan should concentrate on</p>	<p>There is no evidence that contradicts the existing up-to-date evidence base to support the propose change to allow main town centre uses to be located outside of the town centre within the retail parks, or to demonstrate that the Gungate redevelopment, which has planning permission, will not come forward.</p> <p>The retail policies of the Plan are in line</p>	

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					<p>maintaining the existing floor space and allowing new floor space to be accommodated at the edge of centre location at Ventura and the adjoining retail parks.</p> <p>The floor space figure should be at least 15,500 net of comparison goods floor space).</p> <p>Major new retail development within the town centre will not protect the historic environment.</p> <p>The Gungate scheme is an optimistic aspiration and there is an alternative land use for the Gungate site for housing to fit with particular demographic as per the SHMA. The plan should reconsider the whole concept of this site and the best future use for the land.</p> <p>Policy EC2 should be amended to reflect a positive approach to development that will bring wider economic benefits to the Borough.</p>	<p>with national policy.</p> <p>There is no evidence to support the suggestion that the identified retail floor space capacity for after 2021 should be increased to at least 15,500sq.m of comparison goods floorspace. The figures within the Plan are based on up-to-date evidence (the Tamworth Town Centre and Retail Study; Study Update).</p> <p>There is no evidence to support the proposed change to the hierarchy to focus new retail development into the out of centre retail parks. The Council's approach seeks to protect the function, vitality and viability of the town centre, in line with national planning policy.</p> <p>Furthermore, there is no evidence to show that there are any available sites within the retail parks that could accommodate the identified retail floorspace capacity after 2021. The evidence base clearly shows that continued development of the out of town retail parks would be likely to have a negative impact on the viability and vitality of the town centre.</p> <p>Any new development within the town centre would need to be designed in such a way as to protect and where possible enhance the historic environment.</p> <p>Policy EC2 sets out the figures for retail need over the Plan period based on up-to-date evidence. There is no evidence to demonstrate that this is not the case or that a different strategy for retail development would be more appropriate. As such, Policy EC2 should not be amended.</p>	

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LP065d	Shipleigh Baxter	Yes	Policy EC6	Legally compliant, positively prepared, justified, effective, consistent with national policy, complies with the duty to co-operate	<p>The land east of EMP2 and north of Ventura Park Road should not be allocated for employment purposes with the restrictions that apply in the policy. This land enjoys a close and functional relationship as part of the existing retail parks and should be reallocated for retail purposes. Currently these two land areas are islands within a retail environment and could be allocated as an area for flexible economic growth where appropriate land uses could locate.</p> <p>The policy as drafted is overly restrictive. Changes of use proposed within existing employment areas should take account of the age of the existing employment estate, the relationship to other uses, the function of the area and the need to sustain employment opportunities which are not restricted to B1, B2 and B8. Many jobs are created in the service sector through leisure, retail and other service activities. A flexible approach is required.</p>	<p>Tamworth is unable to meet its employment land needs and is relying on neighbours to provide the unmet need of 14ha. The Gungate development will meet the retail needs up to 2021. The site in question is within an existing strategic employment area and is entirely suitable for employment use. As such, there is no justification for the loss of the employment allocation which would put further pressure on neighbouring authorities to provide additional employment land to help meet Tamworth's identified need and there is no justification for its replacement with a retail allocation for which the needs are being met in the town centre in line with the sequential test and national policy.</p> <p>The employment needs have been demonstrated through the evidence base and the site is specifically allocated towards meeting Tamworth's employment needs.</p> <p>This does not preclude land in suitable locations from being granted permission for service sector employment such as leisure, offices and retail within the town centre. It is only a fraction of the job market that requires b class land and it is for that component that the employment land is being safeguarded.</p> <p>The Employment Land Review Stage 2 breaks employment down into its different sectors and sets out the requirements in relation to them. There is no need to relax policy EC6 to allow for specific alternatives as the identified need relates to the uses specified.</p> <p>Furthermore, policy EC7 allows for</p>	

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						flexibility where it can be demonstrated that a site is no longer required for employment purposes falling within the B1 (b,c), B2 and B8 categories.	
LP066	Walton Homes	Yes	Chapter 5, Policy HG1, site 358	N/A	Support allocation of site 358.	Support noted.	
LP067	Lichfield District Council	Yes	Chapter 6, Policy EN2.	Justified	<p>Policy makes provision for minor Green Belt changes but not for development. Justify why constraints on Tamworth's Green Belt sites are insurmountable. Cannot say there are no exceptional circumstances to release Tamworth's Green Belt and expect neighbouring authorities to release theirs. Not supporting non-Green Belt Broad Location/larger Anker Valley puts pressure on Green Belt in Tamworth and neighbouring authorities. Reference in submission to context for Broad Location, Lichfield's examination hearings and Duty to Co-operate discussions regarding Tamworth's increased housing requirement. Lichfield district is also highly constrained.</p> <p>Reference 2014 Review as G2A on core document list.</p> <p>Level of objectively assessed need and constraints are sufficient to provide exceptional circumstances for Green Belt to be released. If exceptional circumstances do not exist for Tamworth, it does not exist for other districts.</p> <p>Land parcels need to be broken down further.</p>	<p>2012 Green Belt Review was undertaken by Lichfield District Council for Tamworth in order to satisfy the NPPF that Green Belt boundaries should be considered when preparing local plans. It considered whether the boundaries had the necessary degree of permanence to endure beyond the plan period and whether any exceptional circumstances would warrant changes. The 2014 review was undertaken by Tamworth Borough Council in the context of NPPG that land may need to be released to meet Tamworth's objectively assessed housing and employment needs. It thoroughly examined Green Belt against the five statutory purposes of Green Belt, plus permanence, sustainable patterns of development, defining boundaries, promoting positive uses and preserving the rural landscape. Urban edges were also examined. The review concluded that apart from a small number of minor amendments there were no exceptional circumstances to release land. This is supported by the Sustainability Appraisal and Site Selection Paper. Objectively assessed need is not a reason on its own for Green Belt release.</p> <p>Inspector for Lichfield local plan examination indicated in initial findings that Lichfield District Council (LDC) had provided for insufficient overall growth and needed to provide for 900 additional dwellings and extend the plan period to</p>	

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						2029. LDC identified that options for meeting scale of housing requirement would potentially impact on the Green Belt. LDC's supplementary Green Belt Review Addendum states that it may be necessary to safeguard land around Lichfield and to identify minor amendments within the Land Allocations DPD. Any potential release of Green Belt land is therefore driven by LDC and not because Tamworth has requested or pushed for it.	
LP068a	Lichfield District Council	Yes	Policy SS1 and paragraphs 3.6 - 3.16	Justified	<p>There is not a clear audit of housing supply information. Paragraph 3 appears to demonstrate that Tamworth is unable to meet its objectively assessed need with a shortfall of 1,529 not the 2,000 dwellings discussed at Paragraph 3.13. Subsequent discussions with Officers at Tamworth Borough Council the have explained this inconsistency which is to include 10% flexibility in the housing requirement. This should be clearly explained in the text and justified through the evidence.</p> <p>The SFRA Level 2 sites should be included in the overall supply.</p> <p>Some sites identified in the SHLAA as 'deliverable' or 'developable' but not allocated nor discounted through the Pre-submission site selection paper, whilst small, form an identifiable urban capacity shown within the evidence which is not considered within the Local Plan. This could reduce Tamworth's reliance on neighbouring authorities to deliver the levels of housing discussed within the Plan.</p>	<p>Paragraph 3.10 refers to 10% flexibility in housing figures which explains the housing figures in the paragraphs following on from it.</p> <p>The NPPF is clear that Local Plans should be sufficiently flexible and be able to respond to change (paragraph 14) and that <i>policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances</i> (paragraph 21).</p> <p>Furthermore the need for a robust buffer is clarified by paragraph 47 of the NPPF which states that "to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to</p>	

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						<p>provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land”.</p> <p>Because of the constraints to supply in Tamworth and being unable to meet the objectively assessed housing need, it is clear that without sufficient flexibility built into the Local Plan the Council would not be able to respond to change rapidly. If no flexibility is built into the plan to meet a housing requirement it would require further strategic planning discussions with neighbouring authorities to deliver more of Tamworth’s housing need. Such discussions are not rapid.</p> <p>The Plan could include a caveat or mechanism which would allow for the SFRA Level 2 sites to be removed from the overspill number if they come forward within the Plan period.</p> <p>With regard to the SHLAA sites referred to, the SHLAA does not have a site capacity threshold and as set out in chapter 3 of the Site Selection paper, the initial screening of the SHLAA set a capacity of 10 or more dwellings. The 124 remaining sites were subject to a further screen in order to put forward potentially developable sites which were then assessed through the site selection paper. In testing the assumptions made, the smaller SHLAA sites with a capacity of between 5 and 9 dwellings were re-screened (as described in Chapter 3 of the site selection paper) but none of the 47 sites re-screened were able to be added to the list of potential allocations.</p> <p>Allocating these SHLAA sites which have no certainty over their deliverability or</p>	

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						developability over the plan period would create uncertainty in the Plan and Tamworth Borough Council needs to be certain of the housing supply.	
LP068b	Lichfield District Council	Yes	Policy HG1 and paragraph 5.5	Justified	In terms of being proactive about delivering housing growth within the Borough's boundaries, and decreasing reliance upon its neighbours, Policy HG1 Housing should contain similar wording to that which promotes economic growth. Policy EC6 Sustainable Economic Growth states: 'Proposals for new employment development outside of an allocated employment site or strategic employment area will be supported provided that the proposed employment development is: accessible to public transport / would be compatible with its surrounding uses and would not have an adverse impact on the amenities and character of the surrounding area / is supported by necessary infrastructure / meets the requirements of the Local Plan where applicable'	Policy HG1 doesn't limit housing development to allocations or SUEs and the requirement of 4250 dwellings is a minimum. However, for clarity something similar to the wording in Policy EC6 could be added to Policy HG1. However the Council does not consider that a specific annual supply could be attributed to this.	
LP069	Lichfield District Council	Yes	Policy SS1 and paragraphs 3.6 – 3.16	Justified	Lichfield District Council accepts that there is a requirement to deliver a proportion of the objectively assessed need for housing (2000 houses) outside of the Borough Boundary as per the Memorandum of Understanding (MoU) between LDC, TBC and NWBC which was signed in October 2014. However, the Plan is not currently clear in how it justifies the amount of 'overspill' which it requires neighbouring authorities to deliver, as there are no explicit links to the evidence base. The Plan is not clear in justifying selecting the mid rather than the lower end of the OAN range: the narrative explains the reasoning (ie retaining the working	Note acceptance of requirement to deliver a proportion (2000 houses) of the objectively assessed need for housing outside of the Borough boundary. The Pre-submission Local Plan 2006-2031 Site Selection Paper (2014) sets out the reason for selection or omission of all reasonable housing site alternatives in Tamworth. Lichfield and North Warwickshire have signed an updated Memorandum of Understanding in October 2014 to deliver the remaining unmet need and committed to review Local Plans to meet unmet need from Tamworth and Birmingham. Para 3.7 of the pre-submission Local Plan	

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					population, encouraging regeneration – an approach supported by Lichfield District Council), but does not provide clear links to the evidence. Needs to be looked at in terms of housing supply (see previous representation).	explains the reasoning for choosing an OAN of 250 dpa, It is a target aligned via consistent projections with the employment land strategy that 'will help to ensure; that there is no decline in the working age population, it anticipates an accelerated level of household formation after 2021 in response to an improved economic climate and it seeks to provide a supply-[side] response to redress very high affordability ratio in Tamworth.'	
LP070	Lichfield District Council	Yes	Policy EC1	Effective, Consistent with National Policy	Policy EC1: Hierarchy of Centres for Town Centre uses is generally supported, but does not take account of the potential for impact outside the Borough so is not consistent with NPPF paragraph 26 and the related Planning Practice Guidance (PPG) which sets the frame for decision taking in relation to impact tests.	Note support and comments. Suggest the last but one paragraph of the Policy could be amended to state "The impact assessment should consider the cumulative effects of the proposal on the town centre, local centres, neighbourhood centres and, where appropriate, other town centres outside of the Borough. Where appropriate the impact assessment should consider the impact of any recently completed retail development, including, and in particular, the Gungate development."	MOD031
LP071	Mawby	Yes	Chapter 5, Policy HG1 Annex C of the Sustainability Appraisal	Positively Prepared, Justified, Effective, Duty to Cooperate	<p>Object to housing site 496.</p> <p>No consideration of value of neighbouring properties, privacy, cleanliness or health.</p> <p>Other sites could be used.</p> <p>Already highways issues on Wilnecote Lane. What access, parking and traffic easing will be provided? Existing issues with heavy vehicles accessing businesses on site down narrow private road next to home. Will underpinning be funded and who will maintain the private road?</p> <p>Already sewerage issues in area requiring flushing.</p>	<p>Neighbouring house price changes are not a planning matter. Detailed issues of amenity impact to neighbours will be detailed matters for a planning application.</p> <p>The Site Selection Paper indicates there is insufficient reasonable capacity in Tamworth so other sites are not available.</p> <p>Policy SU2 requires a transport assessment and mitigation measures for proposals on the site. There are a number of possible access points to this site so exact highways measures will need to be determined based on a detailed proposal. The Council accepts that the unadopted link to Wilnecote Lane would have to be carefully measured</p>	

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					<p>Neighbouring properties were not contacted directly for consultation.</p> <p>Are additional teachers to be provided to increase school capacity.</p>	<p>before judging its suitability to be improved for this purpose.</p> <p>Under the Water Industry Act 1991 sewerage undertakers have an obligation to provide capacity for future domestic development liaising with the Environment Agency to manage environmental impacts; this infrastructure is not provided through the planning process. However, sewerage impacts were considered as part of the sustainability appraisal and site selection processes.</p> <p>Two rounds of public consultation including this housing allocation were undertaken in 2014. Letters were sent to all individuals and organisations with a stated interest in the plan recorded on a database. In addition a notice was placed in the local newspaper and press release made during consultations. There is no requirement through the Council's Statement of Community Involvement to write directly to individuals who live adjacent to potential land use allocations.</p> <p>A contribution is required from a developer to fund expansion of existing schools in the area under policies HG1, SU6 and IM1.</p>	
LP072	Birmingham City Council				Birmingham City Council requested that the plan made reference to GBSLEP Spatial Plan for Recovery and Growth (SPRG) and that Tamworth is an active participant in its preparation. The City Council is satisfied that paragraph 3.38 in the Pre- Submission document satisfies its request and that it is consistent with the Duty to Cooperate Agreement signed by both parties as part of the recent Birmingham Development Plan	Support for paragraph 3.38 is noted.	

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					examination.		
LP073a	SCC Education	No	Chapter 5, Policy HG2 Paras 3.34 and 7.42 Appendix B	Effective	Dual use of school sites for community leisure could limit their ability to expand. Suggest change to Policy HG2 for primary school requirement for all 3 urban extensions to take account of Policy SU7: 'New primary school in line with other policies of the Local Plan and the Infrastructure Delivery Plan and contributions to secondary school.'	The Council considers that the proposed change could be made, however other policies in the plan would apply regardless of the amendment. It should be noted there is no requirement in the plan for schools to include dual use sports facilities so their ability to expand would not necessarily be threatened.	
LP073b	SCC Education	No	Chapter 7, Policy SU7 Paras 3.34 and 7.42 Appendix B	Effective	Dual use of school sites for community leisure could limit their ability to expand. Suggest change to part d) of Policy SU7 adding the criteria: <ul style="list-style-type: none"> • Where it would not prejudice the future expansion of the school. • The site is of suitable size to accommodate delivery of the curriculum and facilitate dual use or additional land is provided to the school to allow wider use of sports facilities.' Land requirements in IDP for schools should be increased to allow dual use.	The Council considers that the additional criteria for dual use are acceptable; however it is not clear how compliance would be established as part of a planning application. As dual use is not a requirement of the schools on urban extension sites, the specific areas do not need to be updated in the IDP.	
LP074	SCC Public Health	No	Chapter 5, Policy HG2	Effective	Opportunity to provide community orchards or growing spaces to support healthy eating, social cohesion and mental health is being missed. Suggest HG2 point (e) should be amended by adding the following sentence after the sentence ending '...social cohesion' – The provision community growing spaces and/or community orchards should be considered as part of the development, and be accessible to those with restricted mobility.	Orchards and growing spaces would be a welcome addition to open space. However, there is no evidence that they are necessary as a specific requirement of the urban extension sites to make them deliverable. There are a number of ways that design and provision of public open space can support public health.	
LP075a	Staffordshire	No	Chapter 2,	No response	SP8 refers to historical values of local	Policy EN6 missed in error, add to final	MOD032

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	County Council Historic Environment		strategic spatial priorities		landscape. Include reference to Policy EN6 in final column or refer to Extensive Urban Survey (EUS) in Chapter 6 Landscape Character.	column. Council is prepared to make change to text in paragraph 6.5 to provide additional information about historic landscape character.	MOD033
LP075b	Staffordshire County Council Historic Environment	No	Chapter 5, Policy HG1	No response	<p>Welcome paragraph 5.5 as there is potential for archaeological remains to survive across many of the housing allocations. Description for sites 347, 349 should refer to high archaeological potential. Refer to the need for early discussion with conservation officer and SCC Environmental Advice Team (Historic Environment).</p> <p>Sites 387 and 390 have high heritage values and development should have regard to values identified in the EUS. Archaeological potential the same for 390 as 387.</p> <p>Former school buildings on Site 488 are included in the Historic Environment Record and should be a material consideration in determining a planning application. Remove references to late prehistoric potential in respect of site 504.</p> <p>Reference potential for below ground archaeology for site 550.</p>	<p>The Council is prepared to include reference in site descriptions to high archaeological value for sites 347 and 349. The Council is also prepared to amend paragraph 5.5 to refer to consultation with the conservation officer, SCC Environmental Advice Team and Historic Environment Record where sites are of high archaeological potential and where they are located in the historic core.</p> <p>Point noted about high heritage value of sites 387 and 390. The Council is prepared to add to site descriptions and amend the site description for 390 to refer to nearby heritage assets.</p> <p>The Council is prepared to make reference to the unlisted former school buildings in the description for 488.</p> <p>Point noted about distance from area of high archaeological potential for site 504, the Council will remove this reference.</p> <p>Point noted about potential for above ground archaeology for site 550, the Council will amend the text.</p>	<p>MOD034 MOD035 MOD036 MOD037 MOD038 MOD039 MOD040 MOD041</p>
LP075c	Staffordshire County Council Historic Environment	No	Chapter 5, Policy HG2	No response.	Additional bullet point to reference incorporation of elements of significant landscape character into design of sustainable urban extensions as identified in EUS and Heritage Impact Assessment: "Incorporate elements of significant historic landscape character into their overall design as identified in the	General point about historic landscape character is currently missing from the first part of this policy. There are references against each SUE to specific designated and non designated assets but not to landscape. The Council is prepared to change the text to reflect the representation.	MOD042

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					Extensive Urban Survey and the Borough Heritage Impact Assessment".		
LP075d	Staffordshire County Council Historic Environment	No	Chapter 6, paragraph 6.5	No response.	Reference EUS section 3 as a supporting document for urban fringe areas.	Noted, the Council is prepared to change the text to provide additional information about historic landscape character. This change would require further modifications, however SCC has not made a specific request for these changes. The changes will be taken up through the examination.	MOD033
LP075e	Staffordshire County Council Historic Environment	No	Chapter 6, Policy EN5	No response.	Developments to consider de-cluttering and use of street furniture where it does not work against health and safety.	This policy refers to new development as opposed to existing development. Reference is made to de-cluttering in Policy EN6 with specific reference to the historic environment.	
LP075f	Staffordshire County Council Historic Environment	No	Chapter 6, paragraph 6.39	No response.	Consider sympathetic re-use of historic buildings alongside new and innovative design.	Fourth paragraph of Policy EN6 already actively encourages re-use of listed and locally listed buildings. The Council would be prepared to amend this to refer to all historic buildings.	MOD043
LP075g	Staffordshire County Council Historic Environment	No	Chapter 6, paragraph 6.41-6.42	No response.	Reference to be made to considering undesignated heritage assets in accordance with NPPF. Recommend additional text to expand on historical context: "Although Tamworth has expanded significantly during the 20 th century, elements of the town's historic medieval core still survive including its medieval castle and market place, the line of the Saxon and medieval street pattern. Many of these monuments are designated as being of national importance and much of the town centre has been designated as conservation areas. The recent Tamworth Extensive Urban Survey has considerably informed our understanding of the historic development of this regionally important settlement. Outside the town centre there are conservation areas based on the historic village cores of Wilnecote, Dosthill and Amington and the Amington Hall Estate parkland."	Noted, the Council would be prepared to change the text.	MOD044

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LP075h	Staffordshire County Council Historic Environment	No	Chapter 6, Policy EN6	No response.	EUS can provide additional historic character information for sites, particularly those outside conservation areas. Developers to consult SCC Environmental Advice Team Historic Specialists at an early stage where sites are within the historic core. Reference the Historic Environment Record as it holds the most up to date information. Reference "above ground" remains.	Noted, Policy EN6 already refers to the EUS, however, the Council is prepared to make additional references to the SCC Environmental Advice Team and the Historic Environment Record. The Council is prepared to change EN6 to refer to above ground remains.	MOD016 MOD045 MOD046
LP076	SCC Flood Risk	No	Chapter 7, para 7.32		Suggested reference to SuDS approving body be removed following government consultation to change process nationally	Comment noted, and Council would accept the change however the existing wording is flexible as it would only come into effect if the approving body is established.	MOD047
LP077	SCC Safe & Strong Communities	No	Chapter 5. Policy HG5	Effective	Suggested that all new homes should be built to a Lifetime Home standard so that as people age or perhaps become disabled their home can easily be adapted to meet their changed circumstances. Policy HG5 should be amended to include the following: All new housing should be constructed to a Lifetime Homes (or any successor) standard unless it can be demonstrated this is not viable. On larger sites a proportion of new houses should be built to a wheelchair accessible standard, based on local need. In paragraph 5.30 the final sentence should read '...meet the need of Extracare accommodation' and not Flexicare accommodation. The terminology Flexicare is used by the County Council to refer to our own Extracare schemes	The government's housing standards review has signalled their intention to remove locally set technical standards with incorporation into building regulations. DCLG have recently announced their intentions to implement this through regulations by June 2015. The Council would support the second amendment to correct the mistaken use of extracare/Flexicare terminology.	MOD048
LP078	Gladman	Yes	Chapter 3, Policy SS1	Legal Compliance, Positively Prepared, Justified, Effective,	A target of 465 dpa would be required to meet economic growth forecasts, 915 dpa to meet affordable housing needs in full,	The 465 dpa figure from the South-East Staffordshire Housing Needs Study	

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				Consistent with National Policy, Duty to Cooperate	<p>or 256 dpa to take account of suppressed household formation and market signals. 250 dpa target could constrain economic growth. The Council should be planning for a level of housing need that at the least falls at the upper end of 240-265 dpa.</p> <p>Council should ensure it has fully considered extent to which sites could come forward in the borough and balance housing requirement against function of the Green Belt.</p> <p>Further work should be undertaken to explore how Lichfield and North Warwickshire will provide unmet dwellings.</p> <p>Tamworth should be planning to accommodate Birmingham's needs in addition to its own.</p>	<p>Tamworth Housing Needs Assessment HEaDROOM Update Report (2014) is from an economic led job growth scenario for how the local economy could perform if unconstrained, however it was reasonably rejected as outlined. The 250 dpa target is still greater than the 241 dpa job stabilisation scenario. The Employment Land Review – Stage 2 (2013) estimates this would result in a 28 ha employment land requirement which is a good fit with the 32 ha plan target.</p> <p>The 915 dpa is a theoretical figure based on the market meeting the full affordable housing need at a 20% target, has no basis in population or job growth forecasts and is an extreme outlier.</p> <p>The 256 dpa figure is one of a number of demographic scenarios factoring a catch up in household formation compared to recessionary years. The 250 dpa target is also greater than the 178 dpa trend without increased household formation.</p> <p>A figure of 250 dpa has been chosen as this will help to ensure: that there is no decline in the working age population; it anticipates an accelerated level of household formation after 2021 in response to an improved economic climate and it seeks to provide a supply-side response to redress a high affordability ratio in Tamworth.</p> <p>The Council considers that a robust consideration of housing land availability in the borough is set out in the Site Selection Paper.</p> <p>The Duty to Cooperate Statement sets out the ongoing work with neighbouring</p>	

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						<p>authorities. A Memorandum of Understanding has been signed with Lichfield and North Warwickshire to carry out joint working and evidence preparation to meet the unmet need.</p> <p>The GBSLEP have acknowledged Tamworth's deficit and agree the borough cannot accommodate additional need. The work being carried out by the GBSLEP considers Tamworth's unmet needs in addition to Birmingham's. The outcomes will support the allocation of Tamworth's unmet needs.</p>	
LP079	Barwood	No	Chapter 6, Policy EN3	N/A	Supports links between green spaces providing they are integrated into developments. Land north of Ashby Road provides opportunity for green links to other parts of Tamworth.	Support noted.	
LP080	Barwood	Yes	SS1	Legally compliant, effective, complies with the duty to co-operate	Tamworth Borough Council should positively engage with Lichfield District Council to facilitate the delivery of development at Arkall Farm, where an outline planning application for 1000 new homes has been made (ref 14/00516/OUTMEI). The delivery of this scheme is critical and fundamental to meeting Tamworth's housing needs (500 of which are planned to meet Tamworth's needs) and to support the objectives for sustainable development in Tamworth. Whilst the Tamworth Local Plan makes reference to the Duty to Cooperate the Council's actions do not match this. They should withdraw their objections to the Lichfield Local Plan and their objections to Barwood's outline planning application.	<p>The Duty to Co-operate Paper sets out the joint working and co-operation that has occurred between Tamworth Borough Council and Lichfield District Council, as well as other organisations.</p> <p>The work carried out in relation to the area to the north of Tamworth has demonstrated that without the substantial public investment, the capacity for development would be limited to 500 dwellings by completing the highways improvement works outlined in the JCT report or to 700 dwellings by implementing the transport solutions set out within the BWB report apart from the Anker Valley link road. The addition of the Anker Valley link road would allow capacity to increase to 1350 houses.</p> <p>The requirement for the Anker Valley link road would render any development above 700 houses in this location unviable. Taking into account the</p>	

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						<p>permission at Brown's Lane for 165 houses and the Planning Committee resolution to approve 535 houses on the Anker Valley SUE, the proposal for a further 1000 houses would be over and above the maximum capacity in this area even with the Anker Valley link road.</p> <p>The Council's objection to the Barwood's application was on the basis of this evidence and, in particular, stated:</p> <p>"If this proposal for 1,000 dwellings were to be approved it would take all existing capacity on the Gungate corridor and would therefore raise serious questions over how the Anker Valley site could be delivered and what, if any infrastructure could be provided to mitigate transport impacts. The proposal has the potential to render the Anker Valley allocation completely undeliverable and therefore has serious implications for the wider delivery of Tamworth's emerging Local Plan.</p> <p>Not only this, but it would leave the Arkall Farm development no longer connected to the urban fabric of the town and as the Lichfield Inspector said in his initial findings:</p> <p><i>It is also the case that without the Anker Valley scheme, the development of the land to the east of the railway within Lichfield would result in a salient of built form jutting into the countryside and poorly related to the urban area."</i></p> <p>Tamworth Borough Council, Lichfield District Council and North Warwickshire Borough Council continue to work together through the duty to co-operate to resolve the issue of Tamworth's unmet housing need and the potential options</p>	

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						for achieving this are set out within the October 2014 MoU.	
LP081	Barwood	Yes	IM1	Positively prepared, effective	<p>The supporting text to policy IM1 (Para 8.11) highlights that <i>'Further work will be required to identify appropriate infrastructure to help deliver and mitigate the impacts of Tamworth related development located outside of its boundary. This may involve Tamworth, in partnership with Lichfield District Council, North Warwickshire Borough Council, infrastructure providers and landowners to bring forward infrastructure through future development plans, master plans and planning applications.'</i></p> <p>Tamworth borough Council rely on the BWB report which states that further, more-detailed studies may find increased capacity. These have now taken place and the policy is unsound because it does not take account of these and so is not positively-prepared, nor effective.</p>	<p>The further technical work carried out by Barwood's (submitted with their planning application) has failed to demonstrate that the proposed 1000 houses could be accommodated at Arkell Farm without unacceptable detrimental impacts to the highway network. The comments received from Staffordshire County Council Highways Department recommend refusal and summarise that: "The proposed development fails to demonstrate the following:</p> <ul style="list-style-type: none"> - Delivery and approval of the proposed footbridge over the West Coast Main Line - Adequate level of parking provision - An adequate trip rate and traffic distribution - Acceptable traffic modelling scenarios - No consideration has been given to the construction traffic - The suggested off site highway works have not been accompanied with RSA 1 or swept path analysis" <p>Objections were also received from Network Rail and a holding order had been placed on the application by the Highways Agency.</p> <p>The modelling used intended to evidence increased capacity is therefore not accepted and, as such, there is no evidence at present to support an increased capacity above 700 houses in the area to the north of Tamworth.</p>	
LP082	Barwood	Yes	Policy HG2	Positively prepared, effective	<p>Support the principle of sustainable urban extensions to meet the housing needs of the Council.</p> <p>The significant reduction in housing numbers on the Anker Valley SUE places</p>	<p>The evidence commissioned by the Council in preparing the Local Plan in relation to the area to the north of Tamworth has demonstrated that without the substantial public investment, the</p>	

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					<p>greater dependence by the Council on the delivery of allocations outside the Borough. The Lichfield Local Plan, in its 'Broad Development Locations' (BDL) proposes 1000 new homes north of Ashby Road, directly opposite Anker Valley, 500 of which are to meet Tamworth Borough Council's requirements.</p> <p>To be positively-prepared, HG2 should make specific reference to the North of Tamworth BDL and should state Tamworth Borough Council's support for this</p> <p>Lichfield District Council Local Plan allocation.</p> <p>The Technical Note, prepared for Barwood (by Peter Brett Associates, PBA) submitted with May 2014 representations, included a review of the Anker Valley Transport Package Appraisal and its limitations. Since the May 2014 submission, Barwood's outline planning application has included further supporting evidence in relation to transport capacity in North Tamworth. This includes Transport Assessment work and Barwood's consultant's evidence to the October 2014 Lichfield Local Plan reconvened Examination. This evidence should be taken into account by Tamworth Borough Council in their Local Plan.</p>	<p>capacity for development would be limited to 500 dwellings by completing the highways improvement works outlined in the JCT report or to 700 dwellings by implementing the transport solutions set out within the BWB report apart from the Anker Valley link road.</p> <p>The addition of the Anker Valley link road would allow capacity to increase to 1350 houses.</p> <p>The requirement for the Anker Valley link road would render any development above 700 houses in this location unviable. Taking into account the permission at Brown's Lane for 165 houses and the Planning Committee resolution to approve 535 houses on the Anker Valley SUE, the proposal for a further 1000 houses would be over and above the maximum capacity in this area even with the Anker Valley link road.</p> <p>The further technical work carried out by Barwood's has failed to demonstrate that the proposed 1000 houses could be accommodated at Arkell Farm without unacceptable detrimental impacts to the highway network.</p> <p>The comments received from Staffordshire County Council Highways Department in relation to their planning application recommend refusal and summarise that:</p> <p>"The proposed development fails to demonstrate the following:</p> <ul style="list-style-type: none"> - Delivery and approval of the proposed footbridge over the West Coast Main Line - Adequate level of parking provision - An adequate trip rate and traffic 	

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						<p>distribution</p> <ul style="list-style-type: none"> - Acceptable traffic modelling scenarios - No consideration has been given to the construction traffic - The suggested off site highway works have not been accompanied with RSA 1 or swept path analysis" <p>Objections were also received from Network Rail and a holding order had been placed on the application by the Highways Agency.</p> <p>The modelling used intended to evidence increased capacity is therefore not accepted and, as such, there is no evidence at present to support an increased capacity above 700 houses in the area to the north of Tamworth.</p>	
LP083	Lycett Mallaber Hodson-Walker		2.32-2.33		Support the principle of delivering a proportion of Tamworth's housing need within adjoining local authorities including within Lichfield District as this approach would be consistent with national policy, justified and effective.	Support for the principle of meeting unmet needs outside of the Borough boundary noted.	
LP084	Lycett Mallaber Hodson-Walker	Yes	2.36		<p>The number of homes referred to in the first sentence of paragraph 2.36 should be modified to reflect a revised objectively assessed housing need for Tamworth.</p> <p>The second sentence of the paragraph should be modified to read: The key challenge for the strategy will be to increase the delivery of the right type of housing in appropriate locations in order to create sustainable and mixed use communities.</p>	The objectively assessed housing need is based on up-to-date evidence and no evidence to counter the recommendations and aspirations within the Plan has been put forward. Paragraph 3.7 of the pre-submission Local Plan explains the reasoning for choosing an OAN of 250 dpa, It is a target aligned via consistent projections with the employment land strategy that 'will help to ensure; that there is no decline in the working age population, it anticipates an accelerated level of household formation after 2021 in response to an improved economic climate and it seeks to provide a supply-[side] response to redress very high affordability ratio in Tamworth.' As such the Council considers that the	

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						<p>objectively assessed housing need is justified and appropriate and should not be altered.</p> <p>The proposed modification to the wording of this paragraph is not considered to be necessary as the appropriateness of location of development will be determined by sustainability which is already referenced and other material planning matters are subsequently covered by the policies within the Plan which will be applicable to new development.</p>	
LP085	Lycett Mallaber Hodson-Walker		2.50-2.51		We support the Local Plan vision set out in paragraph 2.50 and the Strategic Spatial Priorities set out in paragraph 2.51, in particular Spatial Priority SP1 which recognises that an element of future development will be provided by neighbouring authorities.	Note support of the Local Plan vision.	
LP086	Lycett Mallaber Hodson-Walker		Chapter 5, Policy HG1		Support statement development to meet Tamworth's needs will be set out in Lichfield and North Warwickshire's Local Plans	Support noted	
LP087	Lycett Mallaber Hodson-Walker	Yes	Policy SS1, paragraphs 3.6 – 3.15		<p>The potential range of housing need based on 240 and 260 dwellings per annum, so at the upper end of the range a further 250 dwellings may be required over the Plan period. Further, the Tamworth Housing Needs Assessment Update Report (NLP, October 2014) considers that the OAN range is 240dpa – 265dpa, and therefore a further 375 dwellings beyond the 'chosen' objectively assessed need may be required over the Plan period.</p> <p>Consider that the objective assessment of Tamworth's housing need is not sufficiently justified, robust and policy compliant in respect of taking account of all the relevant factors, in particular any</p>	<p>The objectively assessed need of 250 dwellings per annum has been determined on the basis of up-to-date evidence which recommended a range of between 240 and 265 dwellings per annum. 250 dpa will ensure that there is no decline in the working age population, anticipating an accelerated level of household formation after 2021 in response to an improved economic climate and seeking to provide a supply-side response to redress the very high affordability ratio in Tamworth. Tamworth is unable to meet the objectively assessed housing need within its boundaries and as such is relying on its neighbours to deliver 2000 houses for Tamworth over the Plan period. Any</p>	

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					<p>unmet housing requirements from neighbouring authorities.</p> <p>Consideration currently being given to how the shortfall of unmet housing need for Birmingham can be accommodated within the wider Sub-Region, including in Tamworth, has implications and consider that the projected 6,250 dwellings over the Plan period of 2006-31 will not fully meet the objectively assessed needs for market and affordable housing in Tamworth.</p> <p>Support unmet need being met outside of Borough boundaries in neighbouring authorities and consider that there are appropriate sustainable locations which can be identified within these adjoining authorities, in particular site to the north of Tamworth at Gillway Lane. Lichfield's SHLAA Assessment concluded that the site was suitable, available and developable and that (at the time) it would be likely to come forward in 6-10 years.</p> <p>Support the findings of the Tamworth Joint Infrastructure Study (2009) which shows that there is capacity in several locations on the boarder of Tamworth but within Lichfield and North Warwickshire.</p>	<p>increase the objectively assessed housing need would add to the pressure on neighbouring authorities to help meet Tamworth's needs as the number of houses to be delivered outside of the borough boundaries would be increased.</p> <p>With regard to Birmingham's unmet need, Tamworth Borough Council is part of the GBSLEP and the 2000 houses for Tamworth are within the overall cumulative housing number being dealt with by the LEP. The LEP has agreed that Tamworth does not need to accommodate any of the Birmingham City Council unmet need on the basis that it has its own capacity issues and unmet needs.</p> <p>Note support for unmet need being met outside of Borough boundaries and promotion of site within Lichfield district. As the land in question is not within Tamworth Borough its suitability for allocation must be determined through the relevant local authority's Local Plan allocations and/or through the planning application process.</p> <p>The approach to determining the sites to be allocated to meet Tamworth's unmet needs is to be agreed between Tamworth Borough Council, Lichfield District Council and North Warwickshire Borough Council and it is likely that this approach will look at all options together, taking account of the sustainability appraisal objectives of each authority or as agreed by a joint evidence/ working.</p> <p>The three authorities have signed a Memorandum of Understanding (October 2014) which agrees what Tamworth's</p>	

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						<p>needs are, what the unmet need is and agreeing to allocate land to meet Tamworth's unmet need.</p> <p>The MoU includes that the three authorities will work together to seek solutions to deliver the unmet housing and employment needs through a range of options such as Joint Development Plan Document, Joint Strategy, Joint Evidence.</p> <p>The Duty to Co-operate Paper, which includes the October 2014 MoU within an Appendix, sets out the joint working between Tamworth Borough Council, Lichfield District Council and North Warwickshire Borough Council so far, and as ongoing.</p>	
LP088	Lycett Mallaber Hodson-Walker		Policy SS2		Support Policy SS2 which sets a presumption in favour of sustainable development. Consider that land north of Gillway Lane would deliver sustainable development and could be planned and designed to accord with development plan policies. Please refer to our representations in relation to Policy SS1.	Note support for policy SS2. As per previous response, allocations within Lichfield District will need to be considered by the relevant Local Planning Authority.	
LP089a	Environment Agency				Would like to see some further minor modifications to the policies and supporting. Once the modifications have been undertaken can confirm that the local plan is (i) Justified, (ii) Effective and (iii) Consistent with national policy. Welcome the amendments to the previous draft of the Local Plan in line with our comments.	Comments noted. (See following sections for detail on EA's proposed modifications).	
LP089b	Environment Agency		Paragraph 2.50		The term 'balance' suggests that the harm to the natural environment can be permitted if there is a good economic justification for doing so. Recommend the following wording: "Economic growth should not be at the expense of protecting and enhancing the natural	The Council is satisfied that the use of the word "balance" would not allow for harm to the natural environment and is more consistent with the NPPF and the wording provides a more positive description of the role of the Plan than is proposed by the wording by the Environment Agency.	

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					environment, or compromise the delivery of sustainable development. It will be important; to protect and enhance biodiversity, geodiversity; that flood risk is managed and reduced; new development is resilient to climate change; all resources are used efficiently and the quality of green and blue infrastructure is improved across the Borough".	<p>The policies within the Plan demonstrate how this balance will be achieved and the policies within Chapter 6 show clear guidance for the protection of the natural environment in line with this vision.</p> <p>As such, the proposed modifications to paragraph 2.50 are not accepted by the Council.</p>	
LP089c	Environment Agency		Paragraph 2.51		<p>Strategic Priority SP8 does not mention the river and floodplain but refers to policy SU4 Flood Risk and Water Management. There should be a specific priority for rivers and flood plain, making reference to the EU Water Framework Directive and the River Basin Management plan. This should state that "Tamworth relies on the function of the flood plain and the defences in place. It provides an essential 'ecosystem service' that benefits the town as well as provides space for nature conservation, ecological network and landscape value that are all listed'. 'waterbodies currently failing the Water Framework Directives targets should aim to meet Good Ecological Status by 2027 and also ensure no deterioration from any elements used in their classification".</p> <p>Welcome the inclusion of the replacement of the objective text (as outlined within our previous response) within SP8, as detailed below: "To protect and enhance statutory and non-statutory areas of nature conservation, ecological networks and landscape value on the doorstep of Tamworth residents, for their biodiversity, geological, historical and visual value and for the opportunities they provide for education and leisure." This extends to the rivers and their important functioning floodplains.</p>	<p>The Council considers that the Environment Agencies proposed wording change to SP8 would be too detailed but that at the end of the current wording, the sentence "This extends to the rivers and their important functioning floodplains" as recommended by the Environment Agency could be added to SP8.</p> <p>The Proposed wording change to SP11 is accepted but that the inclusion of the detailed list/examples "including green roofs and walls, swales and balancing ponds" is not necessary or appropriate in this instance.</p>	MOD049 MOD050

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					<p>We recommend that the text within SP11 be expanded to reference green infrastructure (including green roofs) and the use of Sustainable Drainage Systems, (including swales and attenuation ponds). This priority should also support opportunities to encourage the retrofitting of such systems in existing developments.</p> <p>"To minimise the causes and adapt to the effects of climate change by encouraging high standards of energy efficiency, sustainable use of resources and use of low carbon/renewable energy technologies as well as on site green infrastructure including green roofs and walls, swales and balancing ponds."</p>		
LP089d	Environment Agency		Policy SS1		<p>Recommend the re-instatement of paragraph from Draft Local Plan and include wording to specify that: "only water compatible development will be allowed within the functional flood plain, and that this land should be protected flood risk management infrastructure, amenity, open space, nature conservation and biodiversity." This would demonstrate that the local plan had given due regard to the flood risk vulnerability and flood zone compatibility table, and gives due regard to the sensitivity of Tamworth to flooding.</p>	<p>The Draft Local Plan Policy SP1 (now SS1) included the following "Proposals will promote sustainability by minimising and or mitigating pressure on the natural, built and historic environment, natural resources, utilities and infrastructure whilst also mitigating and or adapting to climate change and reducing pollution. Tamworth has a significant amount of land identified as being at risk of flooding, and as such, development in flood risk areas will be appropriately designed and shall include mitigation measures. Where appropriate and necessary development will be resisted altogether in these areas."</p> <p>The Council would not wish to re-introduce this paragraph as it is considered to be too detailed for this Policy and the matters are covered within later policies.</p>	
LP089e	Environment Agency		Policy EC1		<p>EC1(a) refers to the 'Sequential Test'. Question whether this meaning relates to retail or flood sequential test.</p> <p>Many of the potential development sites</p>	<p>The Council can confirm that EC1(a) relates to the retail sequential test and not the flood risk sequential test.</p> <p>If it is considered necessary then the</p>	

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					including Jolly Sailor Retail Park are located within a flood risk area. We therefore request that the following bullet point is included within this policy: "e) It will be safe and resilient from the impacts of flooding, and not increase the flood risk to third party land."	<p>wording of EC1(a) could be amended to state "Compliance with the sequential test for town centre uses".</p> <p>There are no allocations within the retail parks and new development requiring planning permission will be determined in line with the policies of the Plan, including SU4 (Flood Risk and Water Management).</p> <p>Policy EC1 is directly concerned with the hierarchy of centres to guide the sequential test for main town centre uses and therefore there is no need to refer to flood risk within this policy.</p> <p>Flood risk, and the need for flood risk sequential test, is covered by Policy SU4 within Chapter 7 of the Plan. As such, the Council does not accept the proposed insertion of bullet point (e) as recommended by the Environment Agency.</p>	
LP089f	Environment Agency		Policy EC5		<p>Comment on the importance of improving physical and visual access to rivers and the important role that green infrastructure can play.</p> <p>Suggest following text is added as bullet points to the policy: "l) - Where development lies adjacent to the river corridors or their tributaries every opportunity will be sought to benefit the river by reinstating a natural, sinuous river channel. m) - All development proposed adjacent to the river corridors and their tributaries should be designed to take account of its proximity to the river. The river provides an ideal focus for development outside of the floodplain (where ground levels permit this)."</p>	<p>The Council does not consider the inclusion of bullet points (l) and (m) as recommended by the Environment Agency to be appropriate or necessary. Reference is made to rivers and canals in bullet point (j). The list is not criteria for development but a list of aims for culture and tourism.</p> <p>The recommendations made by the Environment Agency in their points (l) and (m) are covered by other policies within the Plan (in particular policies EN3 and SU4) and do not need to be re-iterated within this policy in addition to bullet point (j).</p> <p>The Council therefore does not accept the additions to policy EC5 proposed by</p>	

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						the Environment Agency.	
LP089g	Environment Agency		Policy HG2		<p>Anker Valley: The supporting text should identify the flood risk from the River Anker and statement that any development must respond to the fluvial flood risk constraint through the sequential allocation of development within the site boundary (i.e. no development within the floodplain and/ or compensation/ betterment for loss of floodplain storage).</p> <p>Recommend the inclusion of the following text within the bullet points within the policy wording: “- A minimum 8 metre riparian easement for biodiversity and access purposes must be maintained adjacent to the River Anker. -Development proposals will need to demonstrate that the strategic network of environmental infrastructure will be protected, enhanced and expanded at every opportunity. This will be achieved by resisting any development that compromises the integrity and quality of environmental infrastructure.”</p> <p>Recommend the inclusion of the following text within bullet point f): “Development must ensure that surface water runoff is managed using sustainable drainage measures to limit discharge rates from the site to the pre-development (i.e. Greenfield) condition, to ensure no increase in flood risk to off-site areas.”</p> <p>Recommend that the supporting text highlight any specific policy recommendations and proposals included within the emerging Green Infrastructure Strategy.</p>	<p>Anker Valley: The Anker valley SUE allocation does not include any land within flood zone 2 or 3. As such, the assertions are incorrect and the supporting text does not require amendment.</p> <p>The Council does not accept the proposed text as the requirements are covered by policy SU4 of the Plan and do not need to be repeated here.</p> <p>With regard to bullet point (f), the Council notes the Environment Agencies support for this wording.</p> <p>There are currently no recommendations within the emerging Green Infrastructure Strategy that can be included within the supporting text as recommended by the Environment Agency.</p> <p>The Anker Valley Link Road is not required and therefore, whilst the Environment Agency comments in respect of this are noted, there is no need to add or amend anything within the policy or supporting text.</p> <p>Golf Course: The proposed text is largely covered by HG2(f) and specific requirements in relation to the SSSI can be dealt with through the detailed consideration of any future planning application. The Council is satisfied that HG2(f) and the bullet points under the Golf Course section of this policy do not require amendment or addition.</p> <p>The second proposed bullet point relating to the strategic network of environmental infrastructure is covered by Policy SU2 of</p>	

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					<p>Note that previous proposals for redevelopment at this location have included a new road will require that crosses the flood plain of the River Anker. This road will require consent from the EA in accordance with Section 109 of the Water Resources Act 1991. Road must be designed to EA standards and should not detrimentally affect the floodplain at this location or make the situation worse for third parties.</p> <p>Golf Course: Recommend the inclusion of the following text be included within the bullet points within the policy wording: "Development must ensure that surface water runoff is managed using sustainable drainage measures to limit discharge rates from the site to the pre-development (i.e. Greenfield) condition, to ensure no increase in flood risk to off-site areas in lower return periods, but in larger storm events replicating the existing drainage regime to ensure the protection of Alvecote Pools SSSI. • Development proposals will need to demonstrate that the strategic network of environmental infrastructure will be protected, enhanced and expanded at every opportunity. This will be achieved by resisting any development that compromises the integrity and quality of environmental infrastructure."</p> <p>Dunstall Lane: The supporting text should identify the flood risk from the River Tame and the Birmingham and Fazeley Canal. Recommend the inclusion of the following bullet point: "Any development must respond to the fluvial flood risk constraint through the sequential allocation of development within the site boundary (i.e. no</p>	<p>the Plan and the Council does not consider that there is any need to repeat this here.</p> <p>Dunstall Lane: With regard to the proposed bullet point inclusion, the Council can confirm that the site allocation has been re-drawn since the Draft Local Plan consultation and now excludes flood zone 3. For the parts of the site within flood zone 2, the policy includes the requirement for mitigation measures within the "required infrastructure" section. As such, the Council does not accept the proposed additional bullet point recommended by the Environment Agency.</p> <p>The additional bullet points proposed do not need to be included as part of policy HG2 as these matters are already covered by policy SU4. As such, the Council does not accept the proposed additional bullet points.</p>	

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					<p>development within the floodplain and/ or compensation/ betterment for loss of floodplain storage). Furthermore, the development must take account of the residual risk of flooding from the canal.”</p> <p>Recommend the inclusion of the following text be included within the bullet points within the required infrastructure policy wording: “A minimum 8 metre riparian easement for biodiversity and access purposes must be maintained adjacent to the River Anker. Development must ensure that surface water runoff is managed using sustainable drainage measures to limit discharge rates from the site to the pre-development (i.e. Greenfield) condition, to ensure no increase in flood risk to off-site areas. Development proposals will need to demonstrate that the strategic network of environmental infrastructure will be protected, enhanced and expanded at every opportunity. This will be achieved by resisting any development that compromises the integrity and quality of environmental infrastructure”.</p>		
LP089h	Environment Agency		Policy EN3		<p>Recommend the inclusion bullet point: “Deliver priorities of the EU Water Framework Directive and the Humber River Basin Management Plan to ensure that River Anker and River Tame meet Good Ecological Status by 202”.</p> <p>Other key actions for meeting the targets of WFD would therefore be opening up culverted watercourses, re-aligning and naturalising watercourses where possible when development is taking place and putting water at the heart of a community wherever possible.</p>	<p>Whilst the Council does not object to the inclusion of a paragraph regarding delivering the priorities of the EU Water framework Directive, it is considered that this paragraph would be better suited to policy EN4 which relates to the protection and enhancement of biodiversity. As such, the Council suggests including the recommended bullet point as a paragraph within Policy EN4 of the Plan.</p> <p>With regard to the key actions for meeting the targets of WFD, such as opening up culverted watercourses, re-aligning and naturalising watercourses, could also be referred to within this additional</p>	MOD051

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						paragraph to be inserted into policy EN4, or within the supporting text to that policy.	
LP089i	Environment Agency		Policy EN4		<p>Recommend the inclusion of the following wording within the policy text: "In line with the requirements of the EU Water Framework Directive, Development will not be permitted that could negatively impact the River Anker, River Tame and their associated tributaries, that would degrade the classification of the waterbody (as specified in the Humber River Basin Management Plan)".</p> <p>Recommend the inclusion of the following wording within the policy text: "New development must pay due regard to the Green Infrastructure Plan, developments that compromise its outcomes will not be permitted".</p>	<p>The Council notes the comments and considers that the proposed wording in respect of the requirements of the EU Water Framework Directive should be included within Policy EN4.</p> <p>With regard to the proposed text referring to the Green Infrastructure Plan, there is no current Green Infrastructure Plan to which this could relate and therefore the Council does not consider that the inclusion of this wording would be appropriate.</p>	MOD052
LP089j	Environment Agency		Policy EN5		<p>In bullet point g), recommend that flood risk be included: "g) Incorporate measures to mitigate environmental impacts such as noise, pollution and flooding on existing and prospective occupants".</p> <p>Recommend an additional bullet point is included: "k) Consider the impacts of any waste facilities within close proximity of housing and businesses and future housing and employment land allocations".</p> <p>Consider that the Plan should include a policy setting out where any additional waste facilities within the Borough will be located. This Policy should seek to allow complimentary facilities to be built alongside each other and to avoid conflicting land uses. Facilities should be well designed and fit in well with their surroundings, the design itself should be appropriate for the site, and enhance the</p>	<p>With regard to the proposed amendment to EN5(g), the Council considers that the words "and flooding" should be added.</p> <p>With regard to the proposed new bullet point (k), the Council considers that this matter is already included within EN5(g) which refers to consideration of impacts of pollution, which relates to all types of pollution and would include odour nuisance.</p> <p>The Borough Council is not the authority for waste and therefore references to waste management and waste facility requirements for the future are not relevant to the Tamworth Borough Council Local Plan.</p> <p>As such, the Council does not consider that a policy setting out where new waste facilities should be located or for the protection of existing waste facilities should be included in the Local Plan.</p>	MOD053

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					<p>sense of 'place'.</p> <p>The Local Plan should include a policy that will protect existing waste management sites or land allocated for waste management uses from encroachment by incompatible land uses.</p> <p>The evidence base should look at the current waste disposal capacity, and predicted waste arising to identify any capacity gaps. It should identify current management of waste and what facilities will be required in the future. National Planning Policy and the National Planning Policy for Waste, and the Staffordshire County Council Waste Management Plan should be transposed into the local plan to reflect the local needs and circumstances as identified within the evidence base.</p>	<p>The Staffordshire County Council Waste Management Plan identifies the gaps and future needs for waste management and will be implemented by the County Council. It is not considered that any evidence is required to be produced by Tamworth Borough Council in the production of its Local Plan with regard to matters of waste management and the plans and evidence produced by Staffordshire County Council will guide any future waste development or considerations within the Borough. As a statutory consultee, the County Council would be consulted when necessary with regard to new development proposed within 250m of a waste facility and their comments/response would guide the Borough Council in determining whether or not the proposals comply with the requirements of policy EN5(g) with regard to impacts of pollution (such as odour nuisance).</p>	
LP089k	Environment Agency		Policy SU3		<p>Support the inclusion of "d) New development will not be permitted if it compromises existing green and blue corridors and linear habitats" in policy SU3.</p> <p>There is very little reference to water efficiency. It only appears in policy SU3. There is reference to a Design SPD in policy EN5. Recommend that water efficiency measures will be included within the final Plan.</p> <p>Recommend the inclusion of the text: "i) All development proposals should demonstrate high levels of water efficiency. All new housing developments must be water efficient and, as a minimum, reach Code for Sustainable</p>	<p>Note support of bullet point (d) within policy SU3.</p> <p>The comments regarding water efficiency are noted and these can be considered in the production of the design SPD.</p> <p>With regard to the proposed inclusion of bullet point (i) into the text of policy SU3, having regard to the Housing Standards Review for housing it is unlikely that the Council will be able to use these standards in the future. Therefore the Council does not wish to set any requirement to meet with BREEAM standards within policy.</p>	

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					Homes Level 4 or achieve equivalent sustainability standards for buildings as directed by national policy. Non residential development should demonstrate water efficiency of the relevant BREEAM 'Good' standard. Grey water harvesting and rainwater harvesting schemes should be used unless it can be demonstrated that it is not appropriate at a specific location".		
LP089l	Environment Agency		Policy SU4		Support this policy and its wording and actively encourage the use of SuDs at new developments, subject to consideration of potential impacts on ground water quality and contamination risks.	Comments and support of policy SU4 are noted.	
LP089m	Environment Agency		SU5		Support the requirements of 'SU5 – Pollution, Ground Conditions and Minerals' which aim to address Government Policy, as detailed in the National Planning Policy Framework (paragraph 120). The Environment Agency's Groundwater Protection Policy seeks to prevent potentially polluting developments from taking place on the identified principal and secondary A and B aquifers.	Support of policy SU5 is noted.	
LP089n	Environment Agency		IM1		<p>Recommend the inclusion of the following text within the policy:</p> <p>"n)- to support the delivery of the Green Infrastructure Strategy.</p> <p>o)- to support the delivery of new flood defences and to contribute to the maintenance of existing flood defences where they benefit new development, or infrastructure used by a new development e.g. transport infrastructure and schools".</p> <p>Highlight the positive relationship that Tamworth Borough Council has with EA in relation to developing a comprehensive infrastructure delivery plan.</p>	<p>There is no current Green Infrastructure Plan supporting the Local Plan and as such the Council does not consider that the inclusion of bullet point (n) would be appropriate or necessary.</p> <p>With regard to the inclusion of bullet point (o) as recommended by the EA the Council considers that new flood defences would fall within the definition of 'water management measures' which are already covered by bullet point (g) of policy IM1 and therefore the Council does not consider that the inclusion of recommended bullet point (o) is necessary or appropriate in this instance.</p>	

Representation Number	Representor	Wish to appear at examination	Section of plan commented on	Which Test(s) of soundness is challenged / legal compliance	Summary of Comments Made and suggested change	Council's comment	Suggested Change reference
LP090a	Peer Freeholds Ltd		Paragraph 2.41		Reiterate support for the Economic Vision which proposes to ensure a vibrant and viable Town Centre through a thriving retail and leisure offer as set out in paragraph 2.41. The Economic Vision is supported by Spatial Priorities and support Spatial Priority SP2 making Tamworth Town Centre a priority for regeneration.	Note comments and support of paragraph 2.41 and Strategic Spatial Priority SP2.	
LP090b	Peer Freeholds Ltd		SS1		Support Policy SS1 (Spatial Strategy for Tamworth in relation to the strategic focus on the Town Centre for retail, leisure and tourism development, plus appropriate housing development.	Support of policy SS1 is noted.	
LP090c	Peer Freeholds Ltd		Paragraph 4.10		Support paragraph 4.10 in that the out of centre retail parks have become too dominant compared to the town centre and that the balance needs to be redressed.	Support of paragraph 4.10 is noted.	
LP090d	Peer Freeholds Ltd		Paragraph 4.26		Support the statement within paragraph 4.26 in that the regeneration and economic development of the town centre should be a key council objective which will drive the wider regeneration of Tamworth. Agree that there is a need to diversify the offer within the town centre including new developments to improve its attractiveness and image.	Support of paragraph 4.26 is noted.	
LP090e	Peer Freeholds Ltd		Paragraph 4.16		Support paragraph 4.16 that concentrating new retail within the town centre best satisfies the sequential approach to site selection and benefits from developing brownfield. Within the NPPF's 'Core Principles' section it is stated that the re-use of 'brownfield' urban land is encouraged, provided that it is not of high environmental value.	Support of paragraph 4.16 is noted.	
LP090f	Peer Freeholds Ltd		Paragraph 4.22		Support the Councils inclusion at Paragraph 4.22 of the strategically important committed development of Gungate (20,660 square metres of A1 retail and 732 car parking spaces) approved 29th November 2013. Consider	Note comments and support of paragraph 4.22.	

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					the scheme is critical and a catalyst for major regeneration of the Town Centre. The scheme is in line with the NPPF and will improve the viability and vitality plus the attractiveness of the Town Centre.		
LP090g	Peer Freeholds Ltd		EC1		Support the hierarchy set out in Policy EC1 and the proposed thresholds for an impact assessment. The thresholds are necessary to support and protect the Town Centre from potentially harmful out of centre development which compete with the town centre. It is considered that policy EC1 is in compliance with NPPF chapter 2 'Ensuring the vitality of town centres' and recognises that town centres are the heart of communities. Policy EC1 is in principle in line with NPPF guidance, paragraph 24.	Note support of Policy EC1.	
LP090h	Peer Freeholds Ltd		EC2		Support that any new floorspace in the plan period should be located in centre. The figures can quickly become outdated and there is a need to carefully monitor the retail requirements within the town centre and suggest that a review of retail need be conducted before 2020. Suggest that a new Retail Study or update is required as part of the monitoring process before 2020 and ask that the Council include this in the Plan and within policy EC2.	Retail floorspace will be monitored annually as set out within the Monitoring Framework at Appendix D. Commitment to update retail evidence base is clearly stated within the Plan at paragraphs 3.18 and 3.19. In addition, the Monitoring Framework at Appendix D includes a contingency for policy SS1 that "should retail development take place outside of the town centre uses hierarchy before 2021, the retail needs for Tamworth should be re-assessed. This may lead to a policy review." The Council does not consider that reference to this commitment would be appropriate within policy EC2 and that the reference to reviewing the retail figure before 2021 within Chapter 3 and the Monitoring Framework at Appendix D is sufficient to address this.	
LP090i	Peer Freeholds Ltd		EC3		The Retail Study update (2014) states that the Council should expect "that not less than 75% of uses will fall within Use	There is no specific guidance on the figure used to protect the primary frontages. This was recommended within	

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					Class A1 (Shops)". However the study does not clarify the method by which this figure was chosen. The growth, range and size of out of centre retail development less than a mile from Tamworth Town Centre over the previous plan period has had a significant detrimental impact on the Town Centre. If the Plan is to revitalise and boost the vitality and viability of the Town Centre it is important that other town centre uses as defined by the NPPF are not restricted.	the Retail Study as a reasonable percentage to ensure that primary means primary. The use of a figure of at least 75% is long standing best practice and the Council considers that a lower percentage would undermine the primary frontages role as the main location for retail development within the town centre. The designated primary frontages are only a small proportion of the town centre and other town centre compatible uses are allowed and encouraged throughout the remainder of the town centre, including within the secondary frontages. Policy EC3 is in line with the NPPF of which paragraph 23 requires local planning authorities to "define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations".	
LP091	GVA	No	EC1		Support the employment policies of the plan and in particular, the inclusion of the site as an extension to the Relay Park Strategic Employment Area under Policy EMP8. The site is surrounded by existing commercial premises and is very well related to the strategic highway network. Re-iterate the owner's intent to develop the site in due course.	Note support of the employment policies and employment land allocations. Note developer intent to develop the site at Relay Park.	
LP092	CAMRA				Suggest inclusion of strong pub protection policy as nationally 69% of adults believe pubs are an important community facility, 31 pubs are lost per week and they add to the economy.	Comments regarding the value of pubs noted, however the Council considers that Policy SU6 provides consistent and proportionate protection to a variety of community facilities including public houses as referenced in the supporting text.	
LP093	SCC Transport	No	Chapter 5, Policy HG2		Visography Tracc analysis shows improved pedestrian and cycle links from Dunstall Lane north to A51 Lichfield road	The evidence provided suggests the proposed link would make the on-site primary school accessible to existing	MOD054

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					<p>would significantly increase accessibility.</p> <p>The following should be included in the required infrastructure list:</p> <ul style="list-style-type: none"> - Provision of improved pedestrian and cycle connections to the A51 Lichfield Road from the north of the development site. 	<p>residential areas and would make employment at Lichfield Road accessible from the site. The Council would support the proposed change and inclusion of the link in the infrastructure delivery plan.</p>	

Appendix 3 – Proposed Minor Modifications

Modification Ref	Local Plan Para/Policy	Suggested Change	LP Rep Ref
MOD001	Para 7.6, 7 th bullet point	Capacity and safety improvements to junctions on the A5(T) (Mile Oak, Ventura Way, Marlborough Way, Stoneydelph) and M42 (Junctions 10 and 11) will be delivered following a more detailed understanding of any particular development. The requirements for mitigation of significant highway impacts on any of the local junctions in the Strategic Road Network will be determined at the planning application stage where proportionate to the proposal, in accordance with Department for Transport Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development' .	LP012
MOD002	Para 7.8	Assessments of the impact on the Strategic Road Network will be requested as part of Transport	LP012

		<p>Assessments at the planning application stage where required by the Highways Agency, in accordance with Department for Transport Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development'. Any assessment should take account of existing traffic flows and consider the development alongside other planned development</p>	
MOD003	<p>Appendix B: Infrastructure Delivery Plan 'Physical Infrastructure Required' 16th Item, 4th Column</p>	<p>Junction improvements where required by the Highways Agency following detailed development proposals to reduce or prevent further congestion and queuing, in accordance with Department for Transport Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development'.</p>	LP012
MOD004	Policy EC5(a)	Safeguard existing cultural facilities that are serviceable	LP013

		or which continue to provide a service to the community, and support the expansion	
MOD005	Policy SU7(c)	Protecting and enhancing existing sport and recreational facilities. Sport and recreation facilities should not be built on unless where a need for the facility remains and where feasible, any loss should be compensated by the provision of an equal or higher quantity and standard of facility and in an accessible location or the development is for alternative sports and recreation provision, the needs for which are clearly set out in the Sports Strategy Update.	LP021
MOD006	Policy SU7(d)	Supporting the dual use of new and existing school sites in accordance with the following criteria: <ul style="list-style-type: none"> • Where it would not be detrimental to existing and proposed facilities on the school site. • Provides separate reception 	LP021

		and changing facilities from the school or a design and layout that allows separation through site management.	
MOD007	Policy HG2, 'Anker Valley', 2 nd bullet point	Eastern extent of site should be reserved for landscaping, low intensity recreational uses and buffering along remaining boundary to the south. The eastern boundary should be landscaped to provide a transition to the countryside and the southern boundary should include landscaping and low intensity recreational uses.	LP025
MOD008	Paragraph 1.6, Table 1.1, Chapter 6	Through positive planning and understanding of the significance of Tamworth's heritage assets, development will achieve high quality design that preserves protects and enhances Tamworth's historic character.	LP034a
MOD009	Policy SS1	The focus for these areas will	LP034b

		be on protecting and enhancing environmental and historic heritage assets whilst ensuring that development has a positive impact on local amenity and character.	
MOD010	Paragraph 3.33	Designated and non-designated assess assets will be a priority for safeguarding and enhancing.	LP034c
MOD011	Paragraph 4.14	As a result of limited land supply, the need to focus a variety of uses, including retail, leisure and residential, and constraints related to the historic fabric and need to protect and enhance the conservation areas all heritage assets , it is considered that any future office space will be delivered in form of mixed-use development.	LP034d
MOD012	Paragraph 4.27	Protecting and enhancing the historic assets heritage assets of the town will assist in defining Tamworth's unique streetscape, fostering local distinctiveness and preserving	LP034e

		local character.	
MOD013	Paragraph 4.33	It includes plans to develop and improve sensitively and appropriately restore the 125 year old Grade II listed Assembly Rooms.	LP034g
MOD014	Paragraph 5.5	Where development may result in the loss of archaeological assets, evaluation and mitigation may will be required to record and understand their significance.	LP034k
MOD015	Policy EN6, part 1	Development that affects designated heritage assets including conservation areas, listed buildings, scheduled ancient monuments and non-designated heritage assets including locally listed buildings and undesignated archaeology , will be required to assess the impact of development on the asset through a heritage statement and statement of significance and clearly demonstrate how the significance, including its setting and setting of the asset will be protected , conserved	LP034n

		and where possible, enhanced.	
MOD016	Policy EN6, part 2	Where potential for archaeology is high exists , the heritage statement should incorporate an archaeological desk based assessment that evaluates surviving above and below ground archaeological remains and where necessary, a field based evaluation by an appropriate professional. includes an appropriate mitigation strategy. An appropriate mitigation strategy will also be required, where necessary. Where archaeology may be lost through development, there will be a requirement for archaeological recording to be undertaken by an appropriate professional and entered in the Historic Environment Record.	LP034n & LP075h
MOD017	Paragraph 6.42	They are a priority for safeguarding protection, conservation and where possible enhancement and enhancing where possible to	LP034o

		better reveal their significance.	
MOD018	Appendix D EN6	1. Decrease in heritage assets at risk and no net increase in heritage assets at risk .	LP034s
MOD019	Paragraph 5.8 through careful design, layout and landscaping. The Local Plan Heritage Impact Assessment (2014) provides further information about heritage assets affected by the Sustainable Urban Extensions and should be consulted.	LP034u
MOD020	Policy HG2 Anker Valley	Minimise any visual impact and protect long distances views to and from on the nearby Amington Hall Estate Conservation Area and listed buildings .	LP034u
MOD021	Paragraph 4.70, Table 4.3to the Bitterscote Strategic Employment Area. The site is adjacent to the Fazeley and Bonehill Conservation Area and the Birmingham and Fazeley Canal forms the western boundary. Highway access can be made.....	LP034v
MOD022	Policy EN4 incorporates existing landscape features.	LP042

		<p>Development should not result in a net loss of biodiversity by ensuring that where harm to biodiversity is unavoidable and it has been demonstrated that no alternative sites are suitable, development should be adequately mitigated, or as a last resort, compensated for, then planning permission should and will be refused where there is a harmful impact on biodiversity, unless adequate mitigation can be demonstrated.”</p>	
MOD023	Para 7.3	<p>Policy SU1 supports Staffordshire County Council, Stoke-on-Trent and Staffordshire Local Enterprise Partnership and Greater Birmingham and Solihull Local Enterprise Partnership plans to improve the transport network for all users and to support the local economy. The policy will help to mitigate the impact of development proposed in the Local Plan on the transport</p>	LP049

		network and prioritises travel by more sustainable transport modes.	
MOD024	Table 7.1, 2 nd and 3 rd items, 3 rd column	Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP), Stoke-on-Trent and Staffordshire Local Enterprise Partnership (SSLEP) Bus and Rail Companies, SCC, TBC GBSLEP, SSLEP , SCC, Highways Agency, TBC, Developers	LP049
MOD025	Para 7.6, 6 th bullet point	The North Tamworth Local Transport Package will accommodate the Anker Valley development residential development to the north of Tamworth within the Borough and ease operation of the Gungate corridor, a heavily trafficked key radial route. It will deliver improved traffic control to link signal controlled junctions and pedestrian facilities,	LP050

		<p>increased junction capacity and traffic management. Bus connectivity improvements and extended pedestrian and cycling connectivity are also proposed. Improved connectivity to Anker Valley residential development sites to the North of Tamworth could include a new pedestrian footbridge over the Cross Country railway line which would enhance links to the rail station, town centre and education facilities, including the post-16 Academy.</p>	
MOD026	Para 7.6, 8 th bullet point	<p>Drayton Manor Theme Park is an important visitor destination near Tamworth. On a small number of days per year the activities of Drayton Manor Theme Park lead to severe congestion on the surrounding highway network. Staffordshire County Council has committed to working with the Highways Agency and</p>	LP050

		<p>Drayton Manor to formulate and deliver an access strategy to mitigate these conditions. This will include consideration of junction improvements to several existing junctions including the main access to the park, and revisions to signage from the strategic highway network.</p>	
MOD027	Para 7.6, 3 rd bullet point	<p>Staffordshire County Council will be producing a Rail Strategy in 2014 to complement the Integrated Transport Strategy. There are currently proposals for a new local train service for Tamworth to be introduced between 2014 and 2019 There is an aspiration to provide a new local train service for Tamworth which may be achievable with infrastructure improvements at Water Orton. This will provide additional capacity for local commuters and will include</p>	LP051

		<p>capacity enhancements to the line between Birmingham and Tamworth and a turnback siding at Tamworth. Further improvements at Tamworth Rail Station will cover access, public realm and car parking. Pedestrian facilities to improve access to Wilnecote Rail Station will be delivered. In the longer term there are proposals to lengthen the platforms at Wilnecote to accommodate longer trains.</p>	
MOD028	Policy HG2, 'Golf Course'	<p>[Additional bullet point to required infrastructure]</p> <ul style="list-style-type: none"> - Modifications to the Glascote Road/Marlborough Way roundabout junction. 	LP053
MOD029	Para 7.5	SU1 will continue the focus of recent years on making the best use of the existing	LP054

		<p>highway network, concentrating on maintaining its condition and ensuring that reductions in road casualties continue. The policy will make the most efficient use of limited funding and help implement Staffordshire County Council's draft Integrated Transport Strategy for Tamworth (2014) which is regularly reviewed. This will deliver the following key strategic priorities:</p>	
MOD030	Para 4.35	<p>A report entitled 'Tamworth Town Centre and Out of Town Linkage Proposals' (Town Centre Links Project) was prepared for the Council in December 2010 to assess the linkages between the town centre and the out of centre retail areas and leisure offer. The report considers linkages between the town centre and Ventura Retail Park and the Snowdome in particular. The report concludes that</p>	LP055

		<p>significant potential exists to enhance the route along Fazeley Road by creating a unified character, improving the quality of the public realm, upgrading crossings and introducing wider connectivity. The report proposes the use of Fazeley Road as the main link with a shuttle bus frequent bus service operating a circular route taking in Ventura Park Road, Bitterscote Drive and Bonehill Road, with bus stops providing direct access between shops in the town centre, Ventura Retail Park and Jolly Sailor Retail Park. A new pedestrian crossing at the River Drive and Fazeley Road junction could be integrated into proposed highway works to this junction. A stronger emphasis should be placed upon the pedestrian north-south linear axis linking the town centre to the retail parks.</p>	
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MOD031	Policy EC1 (paragraph 6, "the impact assessment...")	The impact assessment should consider the cumulative effects of the proposal on the town centre, local centres, neighbourhood centres and, where appropriate, other town centres outside of the Borough. Where appropriate the impact assessment should consider the impact of any recently completed retail development, including, and in particular, the Gungate development.	LP070
MOD032	Paragraph 2.51 SP8	Local Plan Policy EN6 (Protecting the historic environment)	LP075a
MOD033	Paragraph 6.5county derived landscape policy types. In terms of the historic environment in the urban fringe areas, the Extensive Urban Survey (2011) includes a useful assessment of the legibility of the historic features of the landscape.	LP075a, LP075d
MOD034	Paragraph 5.5	...and archaeological desk based assessment. Where sites are located in a	LP075b

		<p>conservation area or an area of high archaeological potential, particularly the historic town centre core, the Council's conservation officer and Staffordshire County Council Environment Team (Historic Environment) should be consulted at an early stage.</p>	
MOD035	Paragraph 5.5, Table 5.1, site 347	<p>The site is partially within two conservation areas (Tamworth Town Centre and Hospital Street), and in proximity to grade II listed buildings and lies in an area of high archaeological potential.</p>	LP075b
MOD036	Paragraph 5.5, Table 5.1, site 349	<p>There are listed buildings in the surrounding street scene and the sites lies within the Tamworth Town Centre Conservation Area, in an area of high archaeological potential.</p>	LP075b
MOD037	Paragraph 5.5, Table 5.1, site 387	<p>Large open post-war field systems have resulted in a loss of historic landscape character. The site has high heritage values. Despite the removal</p>	LP075b

		<p>of a small number of field boundaries, the wider landscape retains its overall historic planned character.....Hopwas Conservation Area. Previous evaluation of the area by the Environment Agency has recovered evidence close to the site for late prehistoric activity and also for a series of large undated ditches, one prehistoric ditch and a large burnt mound through to date to the Broze Age. Iron Age/Roman cropmarks to north of site.</p>	
MOD038	Paragraph 5.5, Table 5.1, site 390	<p>Large open post-war field systems have resulted in a loss of historic landscape character. The site has high heritage values. Despite the removal of a small number of field boundaries, the wider landscape retains its overall historic planned character.</p>	LP075b
MOD039	Paragraph 5.5, Table 5.1, site 488	The site is located on brownfield land and contains a youth centre and public sector	LP075b

		offices. These are housed in unlisted former school buildings, which are included in the Historic Environment Record.	
MOD040	Paragraph 5.5, Table 5.1, site 504or enhanced. Development within this area has the potential to impact upon late prehistoric archaeological remains and may encounter waterlogged features which may preserve important palaeoenvironmental remains.	LP075b
MOD041	Paragraph 5.5, Table 5.1, site 550	The EUS identifies a number of undesignated heritage assets including areas of ridge and furrow, planting elements associated with the landscape park, possible man made mounds and potential for below ground archaeology.	LP075b
MOD042	Policy HG2	g) Incorporate elements of significant historic landscape character into their overall design as identified in the Extensive Urban Survey and the Borough Heritage Impact Assessment.	LP075c

MOD043	Policy EN6, part 4	The Council will support proposals that promote the use of vacant, under-used listed and locally listed historic buildings	LP075f
MOD044	Paragraph 6.41	<p>Although better known as an expanded town, Tamworth contains areas of historic environment, notably the town centre where the medieval street pattern and a large number of heritage assets have survived. Although Tamworth has expanded significantly during the 20th century, elements of the town's historic medieval core still survive including its medieval castle and market place, the line of the Saxon and medieval street pattern. Many of these monuments are designated as being of national importance and much of the town centre has been designated as conservation areas. The Extensive Urban Survey has considerably informed our understanding</p>	LP075g

		of the historic development of Tamworth.	
MOD045	Policy EN6, part 1and where possible, enhanced. Where sites are located in a conservation area or an area of high archaeological potential, particularly the historic town centre core, the Council's conservation officer and Staffordshire County Council Environment Team (Historic Environment) should be consulted at an early stage. Proposals will be required.....	LP075h
MOD046	Policy EN6, part 2	Reference should be made to the Historic Environment Record for up to date information and the Extensive Urban Survey to identify potential for archaeology.	LP075h
MOD047	Para 7.32	SuDS use a wide range of drainage techniques such as grassed swales, retention ponds, soakaways and permeable pavements. Where appropriate their design should be informed by	LP076

		<p>a hydrological assessment. Infiltration and soakaways of surface water must be investigated as the first and primary means of draining surface water from a site. In addition to reducing flood risk and risk of pollution, SuDS can have wider amenity benefits where they are incorporated into the green infrastructure network and can result in improvements in biodiversity value. When Staffordshire County Council is established as the SuDS Approving Body, their approval for all SuDS will be required.</p>	
MOD048	Para 5.30	<p>Staffordshire County Council Flexicare Strategy 2010-2015 (2010) estimates that the growth in population of those aged 65 and over between 2010 and 2030 will be 72% in Tamworth, the largest growth in Staffordshire. Extra care housing, including Flexicare housing, provides an opportunity for people to live</p>	LP077

		<p>in their own accommodation with the security of care and support being available when needed. The Strategy identifies the level of units required to meet demand in Tamworth (823) and how many need to be available for rent or purchase. By the 1st April 2014, 142 Flexicare housing units were delivered. It is expected that Flexicare housing will lead to a diversion from residential placements reducing the number of residential care beds required and limiting the growth in nursing beds. It is important to meet the need of Flexicare extra care accommodation alongside other needs for specific groups in the population identified in the future.</p>	
MOD049	Paragraph 2.51 SP11	To minimise the causes and adapt to the effects of climate change by encouraging high standards of energy efficiency, sustainable use of resources and use of low	LP089c

		carbon/renewable energy technologies as well as on site green infrastructure.	
MOD050	Paragraph 2.51, SP8	To protect and enhance statutory and non-statutory areas of nature conservation, ecological networks and landscape value on the doorstep of Tamworth residents, for their biodiversity, geological, historical and visual value and for the opportunities they provide for education and leisure. This extends to the rivers and their important functioning floodplains.	LP089c
MOD051	Policy EN4	Add new paragraph after MOD052: Development should exploit opportunities to deliver priorities of the EU Water Framework Directive and the Humber River Basin Management Plan to ensure that River Anker and River Tame meet Good Ecological Status by 2027. This could include opening up culverted	LP089h

		watercourses and re-aligning and naturalising watercourses where possible when development is taking place.	
MOD052	Policy EN4	<p>Add new paragraph after last paragraph:</p> <p>In line with the requirements of the EU Water Framework Directive, Development will not be permitted that could negatively impact the River Anker, River Tame and their associated tributaries, that would degrade the classification of the waterbody (as specified in the Humber River Basin Management Plan).</p>	LP089i
MOD053	Policy EN5(g)	<p>Minimise or mitigate environmental impacts for the benefit of existing and prospective occupants of neighbouring land. Such impacts may include loss of light, privacy or security or unacceptable noise, pollution, flooding, or sense of</p>	LP089j

		enclosure.	
MOD054	Policy HG2, 'Dunstall Lane'	[Additional bullet point to 'required infrastructure'] - Provision of improved pedestrian and cycle connections to the A51 Lichfield Road from the north of the development site.	LP093