

From: Fox, Mike
Sent: 30 March 2015 09:32
To: External Email for Programme Officer
Cc: Phillips, Rebecca (Inspector)
Subject: Tamworth Local Plan Examination

Dear Mr Roberts,

Tamworth Local Plan Examination

Thank you for your e-mail of 26 March 2015. My answers to your questions are as follows:

Q1 You ask for clarification on "*an SA option which assessed the impact of the full OAHN for Tamworth being delivered*". One of the realistic options needs to be the full OAHN to meet the housing needs of the Borough. The evidence clearly points to a proportion of the OAHN having to be met on sites outside the Borough. It would be inappropriate for this Plan to assess individual housing sites outside the Borough, but what the SA needs to do is assess the impact of these sites – or the quantum of housing from the sites – on the sustainability of the Borough. It would be admissible in my view to make some broad assumptions on the indicative locations of the bulk of the housing provision within the neighbouring LPAs, so as to get an idea on which would be the principal roads which would be affected. Therefore I am looking for the sum of these impacts, for example on the highway network, demand for community services, retail provision, and any environmental impact.

Q2 You ask for clarification on "*maximising new housing (and other issues such as employment) on sites within Tamworth*". I note your comments on why you have not included a windfall allowance, and this is at the heart of my concern here. You need to look at the windfall rate on small sites (and for guidance I would consider a threshold of 0.5ha) over the last 10 years, and project it forward over the rest of the plan period. Experience in many areas shows that windfalls keep on coming, especially on small sites; LPAs are often surprised by the continuing emergence of windfalls. I think that an inclusion of an estimate for this potential source of additional housing, even if you consider it unlikely, needs to be looked at using the broad principles I have just outlined. Clearly where there is a heavy reliance on potential housing sites outside Tamworth, it is essential that it can be demonstrated that the potential does not exist within Tamworth.

Q3 You ask for clarification on "*examining the impact on Tamworth of the remaining quantum of housing and employment land which would need to be delivered elsewhere*"; whilst I agree that the development will need to be delivered in adjacent LPAs, what I need to know is the impact on Tamworth of these developments, and I have given you my answer to this in my response to Q1 above.

Finally, I consider that an Addendum to the SA needs to be prepared to look at the full OAHN option, and clearly it needs to undergo a 6 week public consultation.

Regards
Mike Fox
INSPECTOR