

CABINET

20th October 2010

Report of the Portfolio Holder Economic Development and Enterprise

REVOCATION OF THE WEST MIDLANDS REGIONAL PLAN – IMPLICATIONS FOR TAMWORTH BOROUGH

Purpose:

To identify the implications of the revocation of the West Midlands Regional Plan on Tamworth Borough and to agree how the Council should respond to these.

Executive Summary:

On the 6th July 2010 the Secretary of State for Communities and Local Government announced the revocation of Regional Strategies with immediate effect. This includes the West Midlands Regional Spatial Strategy (RSS) (January 2008).

Previous advice from the Government has advocated ensuring the Development Plan at the local level (the current Local Plan and future Local Development Framework) does not duplicate policies from the National or Regional level. Therefore, the revocation of the RSS leaves a gap in policies for determining planning applications and for preparation of the Local Development Framework.

The removal of the RSS means that Local Authorities will no longer be given targets for the provision of housing, employment land, retail floorspace etc. but will be responsible themselves for determining how best to reflect local people's aspirations and decisions. However, any policies will need to be based on justifiable and robust evidence. The government advises that this could include the evidence used in the preparation of the RSS Phase 2 Revision, evidence from the Examination in Public and the subsequent Panel Report.

Tamworth's Local Development Framework will now need to incorporate the policies from the RSS where relevant. The evidence base will need updating to ensure policies are robust. This additional work will impact on the timetable for the production of the Core Strategy. Each of the policies from the RSS Phase 2 Revision have been listed in Appendix A and a recommendation to address the implications on Tamworth's LDF is made.

There are a number of overarching issues that have arisen as a result of the revocation of the RSS which will impact on the Local development Framework as follows:

a) Cross Boundary Working

Tamworth has a limited supply of unconstrained available land that is suitable for development. If development is to happen to meet Tamworth's needs then it is likely that some will be required to take place outside of the Tamworth Borough Council administrative boundary. This will require adjacent Local Authorities to take this into account in their Local Development Frameworks.

b) Housing

It should be recognised that building new houses is still a key Government objective. However, the Government does not wish to see these imposed on communities from the top, but should be determined at the local level. It is recommended that the RSS Phase 2 Revision Preferred Option is used as the basis for setting housing targets.

c) Employment Land

The targets in the RSS Phase 2 Revision Preferred Option (14ha every 5 years) were based on past trends of completed employment land. It is considered that these estimates are not completely robust but at present no further evidence is available. The Economic Strategy for Tamworth is being prepared and is expected to be complete by April 2011, this will be informed by updated data on land estimation from the County Council. The RSS Panel Report recommended identifying a 10 year supply of residential land to allow flexibility. It is therefore recommended that until the land estimation figures are adjusted by the County Council and until further detail on the Economic Strategy emerges, that 28ha is identified for the first 10 years of the plan period, with an acknowledgement that future growth may occur outside of the Borough.

d) Retail and town centre uses

The RSS Phase 2 Revision Preferred Option recommended that the Council plan for 35,000 sq.m. of additional comparison retail floorspace in the period 2006-2026. It also required the Council to plan for an additional 30,000 sq.m. of office floorspace in the town centre. Recent changes to Government Guidance (PPS) require Local Authorities to consider setting targets and thresholds for a variety of uses. It is therefore proposed to undertake further work on updating the Retail Evidence Base.

e) Gypsy and Traveller Needs

Requirements for Gypsies, Travellers and Travelling Showpeople pitches was intended to be covered by the RSS Phase 3 Revision. When it became clear that this would not be undertaken a series of Interim Policy Statements were produced, including one on Gypsies, Travellers and Travelling Showpeople. This took the sub-regional assessment that was carried out and increased the figures for Tamworth. It is considered that

the reasons for increasing the numbers for Tamworth were not sufficiently robust or deliverable. It is recommended that an 'enabling policy' is developed which recognises the numbers contained within the sub-regional Gypsy and Traveller Accommodation Assessment (GTAA) as an aspiration, and again looks to adjacent authorities to assist with meeting needs for Tamworth.

f) Green Belt

The Guidance issued by DCLG following the announcement of the revocation of the Regional Strategy reinforced the Government's commitment to protection of the Green Belt but stated that "planning authorities should consider the desirability of new Green Belt or adjustment of an existing Green Belt boundary" as part of the preparation of DPD's. It is recommended that based on the Anker valley site coming forward, no release of the Green Belt is needed at present and that in order to secure the long term integrity of the Green Belt, then an agreed strategy for accommodating Tamworth's needs in Lichfield and North Warwickshire Councils is required. However, the Core Strategy may need to recognise the need to consider Green Belt release beyond the plan period if the other more sustainable options fail to come forward.

Financial Implications:

The additional work required will have an associated financial cost that will be met from the existing Local Development Framework budget.

Recommendations:

1. That Members note the report and authorise officers to finalise production of the Draft Core Strategy reflecting the 'proposed way forward' conclusions for each policy area as listed in Appendix A.
2. That Members authorise the Deputy Chief Executive to write to Lichfield District Council and North Warwickshire Borough Council requesting their agreement to work together with Tamworth to :
 - a. address the issue of meeting development that may be required to meet Tamworth's needs within their administrative boundaries through their Core Strategies;
 - b. consider potential opportunities to progress all three Core Strategies concurrently with a view to sharing costs associated with Public Examination.

If Members would like further information or clarification prior to the meeting please contact Matthew Bowers Ext. 279 or Rob Mitchell Ext. 616.

<i>Background Papers</i>	<i>Report to Cabinet 5 October 2008,</i>
	<i>Report to Cabinet 23 July 2008, minute number 177</i>

Background

On the 6th July 2010 the Secretary of State announced the revocation of Regional Strategies with immediate effect. This includes the West Midlands Regional Spatial Strategy (RSS) (January 2008). They have been revoked under s79(6) of the Local Democracy Economic Development and Construction Act 2009 and no longer form part of the development plan for the purposes of s38(6) of the Planning and Compulsory Purchase Act 2004.

In the longer term the legal basis for Regional Strategies will be abolished through the “Localism Bill” that is being introduced in the current Parliamentary session. The Government envisage passing the Localism Bill by November 2011(see Draft Communities and Local Government Structural reform Plan): <http://www.number10.gov.uk/wp-content/uploads/srp-dclg.pdf>).

The revocation of the RSS has left strategic “policy gaps” within the development plan, both for determining planning applications and for plan-making. The implications of these are discussed below. The Chief Planner at the DCLG has published guidance to local authorities in the form of “question and answer” advice on issues arising from the announcement. The key elements are summarised below with an indication of the impact on the production of Tamworth’s Local Development Framework.

Planning Policy Statements

The Policy Statement on Regional Strategies (PPS11, February 2010) is cancelled and references to Regional Strategies in other Policy Statements are no longer valid but all other PPS’s will continue to apply until they are replaced by the National Planning Framework which is envisaged to combine all existing PPS and PPG into one concise document.

Development Management

Planning applications still need to be determined in accordance with the development plan and have regard to other material considerations such as national policy. In Tamworth this consists of:

- the saved policies of the Staffordshire and Stoke on Trent Structure Plan (1996-2011);
- the saved policies of the Staffordshire & Stoke-on-Trent Minerals Local Plan (1994 – 2006);
- the saved policies of the Staffordshire & Stoke-on-Trent Waste Local Plan (1998-2011); and
- the saved policies of the Tamworth Local Plan (2001-2011).

Other material considerations include national planning policy, the emerging Tamworth Local Development Framework Core Strategy and the evidence that informed the preparation of the revoked Regional Strategies may also be a material consideration, depending on the facts of the case. It is down to Local Authorities to decide how much weight to afford each of these.

Local Development Framework

The Government has made it clear that local planning authorities should continue to prepare their development plan documents that form the LDF although Authorities may decide to revise their emerging policies in the light of the revoking of the RSS.

We understand that the Localism Bill may remove saved Structure Plan policies (and possibly saved Local Plan policies). This means that there is a pressing need to progress the Core Strategy quickly to ensure there is no policy vacuum and that we do not leave ourselves open to unwanted planning applications.

The removal of the RSS means that Local Authorities will no longer be given targets for the provision of housing, employment land, retail floorspace etc. but will be responsible themselves for determining how best to reflect local people's aspirations and decisions. However, any policies will need to be based on justifiable and robust evidence. The government advises that this could include the evidence used in the preparation of the RSS Phase 2 Revision, evidence from the Examination in Public and the subsequent Panel Report. However, some further work will be required, as detailed below, which will impact on the timetable for the production of the Core Strategy. The suggested revised timetable is outlined below, but this could be subject to change dependant on whether any further changes to the Planning System are announced by the Government:

Full Council to consider a Draft Core Strategy	February 2011
Publication period for comments to be made	March 2011 – April 2011
Submit Core Strategy to the Secretary of State	May 2011
Examination in Public	September 2011
Adoption by Full Council	January 2012

It is envisaged that an Allocations of Land document will no longer be required as Strategic Allocations could be made in the Core Strategy, although a final decision will need to be taken following the Examination of the Core Strategy. This would enable a considerable cost saving but may not give the certainty over the types of development on individual pieces of land.

Further Supplementary Planning Documents are intended to be produced on the following topics with indicative completion dates:

Topic	Finish Date
Householder Development	Early 2012
Town Centre	Early 2013
Planning Obligations	Late 2012
Urban Design	Early 2013
Neighbourhoods	Early 2012
Open Space / Green Infrastructure	Early 2013

Policy Issues to be considered in the Local Development Framework

The RSS and the Phase 2 Revision contained a large number of policies from topics such as housing and transportation to the built environment and landscape. A summary of the policies relevant to Tamworth is included in Appendix A together with a comment on available evidence, issues arising and how the Council should respond to these issues.

When preparing the Core Strategy, the Council has previously been advised to ensure that it did not repeat national or regional policy. The loss of the RSS therefore leads to some policy gaps which will now have to be covered in the Core Strategy. Detailed below are some of the key issues that need to be addressed to progress the Core Strategy.

a) Cross boundary working

The RSS Phase 2 Revision and the Panel Report recognised that Tamworth was tightly constrained by its administrative boundary, flood risk areas and Green Belt, leading to limited opportunities for development which may require development to meet Tamworth's needs to be accommodated in neighbouring local authorities.

Without the RSS, neighbouring authorities may decide to give less weight to this issue. Following discussions with the Government Office, we believe this will still be a key issue for Tamworth and when the Core Strategy is examined we will need to demonstrate that we have a deliverable solution to address development to serve Tamworth's needs located in other Local Authorities. This will require working closely with Lichfield District Council and North Warwickshire Borough Council to agree an acceptable solution to enable all three Authorities to progress their Local Development Frameworks.

The topics where cross boundary working will be required are covered in detail below, but it should be recognised that the three authorities have previously undertaken a joint study to examine the options for accommodating housing development to meet Tamworth's needs. The other two authorities have not indicated how they intend to address these issues in light of the evidence to date. It is suggested that Tamworth Borough Council take a lead on these issues and ask Lichfield and North Warwickshire to agree to work together on this issue with us. As detailed below, the challenge will be estimating how much development outside of Tamworth boundaries may be needed.

b) Housing

It should be recognised that building new houses is still a key Government objective. However, the Government does not wish to see these imposed on communities from the top, but should be determined at the local level.

The Guidance from the Government requires a planning authority to demonstrate that it has a 5 year land supply for housing, and be able to

identify sites and broad areas for development to deliver housing ambitions for at least 15 years from the date the plan is adopted.

The issue the Council needs to address is what evidence it should use to set relevant targets in order to ensure it meets these 5 and 15 year supply requirements. The current development plan contains no target for the number of houses to be provided. The most up to date long term target was contained in the adopted RSS, now revoked, which gave a housing target for Staffordshire as a whole.

The Council has undertaken a Strategic Housing Market Assessment that assessed the housing need and demand in Tamworth. The Council has also undertaken a Strategic Housing Land Availability Assessment which assesses the land available for housing within the Borough. These assessments provide evidence on supply and demand for housing.

The West Midlands Regional Spatial Strategy Phase 2 Revision Preferred Option gave a target of 2,900 residential units to the period 2026 for Tamworth and required Tamworth, Lichfield and North Warwickshire to jointly consider the most appropriate locations for development in relation to Tamworth and Lichfield District.

The Panel report from the RSS Phase 2 Revision Preferred Option Examination recommended that this was increased to 4000, with a minimum of 1000 being provided in Lichfield District.

The evidence underpinning the RSS Phase 2 Revision included detail on projected households to 2026. This suggested the increase in households for the period to 2026 would be 6,000 in Tamworth.

It is clear that the Strategy was to concentrate growth in the Major Urban Areas and so in areas such as Tamworth which act as a pull and encourage moves out of the MUA, the level of housing growth was reduced. Furthermore, it was recognised that there are several barriers to growth in Tamworth, including Green Belt and Flooding areas, and our own administrative boundary.

The most recent evidence the Borough Council has is the RSS Phase 2 Revision Preferred Option. There is no new evidence to suggest that higher levels of growth can be accommodated within the Borough boundary and no evidence to suggest that the proposed level of growth is undeliverable at present. Therefore, it is recommended that the Borough Council plan for a minimum 3045 additional dwellings (net) (100 more than the Preferred Option to provide some flexibility for a 15 year supply). It is also recognised that further growth to meet Tamworth's needs may be required in the future and that may need to be met outside of our administrative area. It is proposed that the most appropriate areas for this growth are identified and that the adjoining Local Planning Authorities acknowledge this and work with Tamworth Borough Council to ensure that this is accounted for in their LDFs to enable its delivery if required. It is recommended that the Deputy Chief Executive

contact Lichfield District Council and North Warwickshire Borough Council in recognition of the importance of this issue.

c) Employment Land

The RSS Phase 2 Revision Preferred Option required Tamworth to make provision for a 5 year reservoir of readily available employment totalling 14ha and a longer term supply to 2026 of 42ha, in effect 14ha multiplied by 3.

The Panel Report recommend that all of the longer term figures were multiples of 4 of the shorter term figure, increasing Tamworth's longer term figure to 56ha. However, the panel report also recommended that "part of the provision may need to be located in Lichfield or North Warwickshire Districts". Again, this is recognition that the development needs of Tamworth may have to be met outside the Borough boundary. The panel report also recommended that:

"In view of the plan, monitor and manage approach and the anticipated recycling of previously developed good quality premises and land there would be no need to identify the full long-term provision in the preparation of Core Strategy DPDs in order to avoid unnecessary release of greenfield land. However, as a minimum the indicative requirement for a 10-year period should be identified in order that land or premises will always be available to top up the reservoir as it is used."

The evidence that informed these figures is the Regional Employment Land background Paper which confirms that figures were based on 'growth rates' and 'average completion rates'. During the process of this evidence gathering, the Council commented on the lack of available sites in the Borough and that we felt the calculation methodology was not robust and that North Warwickshire should be recognised for meeting some of Tamworth's needs. These comments were not taken forward, although the Background Paper does comment that the final employment figures should be consistent with the housing figures. This did not follow through to the final Phase 2 revision.

The figures in the Phase 2 revision are based primarily on past trends and this can skew the requirement. It also is not reflective of any economic strategy and does not consider the current and future skills base and the number and type of jobs required in the future.

The Economic Development Team have started work on a Local Economic Strategy but at present this is in the very early stages of production and there is not enough evidence to assist with this issue at present.

The Borough Council has undertaken an Employment Land Review, in accordance with Guidance produced by DCLG, which provides an assessment of the existing employment land situation and linked to these findings, identifies a portfolio of sites for the future. It also contains an examination of how much employment land may be required for the future

which was undertaken by the County Council. In this section, they use three calculations.

The first approach focused on a 'continuation of past development trends' which analysed employment land completions over recent years to establish annual building rates which were factored towards estimating land requirements. When examining the past 10 years trend (1997/98 to 2006/07), the estimated supply is 59.32ha (2006-2026). If using data over a period of 5 years (2002/03 to 2006/07) a supply of 36.32ha (2006-2026) is estimated. These time periods included a period of large developments in the warehousing sector which skews this calculation.

The second approach looked at 'labour demand' which focused on the amount of employment land required as generated by the demand of forecasted employment change from published employment forecasts. This estimated that the supply required is 22.04ha for the period 2006-2026.

The third approach related to 'labour supply', which focused on the amount of land required, generated by likely changes to labour forces in the district including additional housing growth. This estimated, based on the provision of 2,900 dwellings, a negative requirement of 26.7ha. It is not until 9000 additional homes are built that the supply figure becomes positive at 1.9ha.

The 3 methods yielded quite different results and should be seen as a starting point for considering the future requirements based around an overall strategy. All 3 methods are getting a little outdated and it is hoped that the County Council will be able to provide an update of the estimation of future jobs towards the end of the Autumn.

On balance evidence does not exist at present to set out in detail the required no of jobs that may be required and how this would impact on land use in the Borough.

Therefore it is recommended that until the land estimation figures are adjusted by the County Council and until further detail on the Economic Strategy emerges, that 28ha is identified for the first 10 years of the plan period, with an acknowledgement that future growth may occur outside of the Borough.

For example, North Warwickshire has recently granted planning permission for an extension to Birch Coppice which could see as many as 2000 jobs created. Unemployment in North Warwickshire in July 2010 was 1,124 claimants, so even if all of these people were employed in this new development there would still be a residual of nearly 900 jobs to be filled by people from outside of North Warwickshire. Given the proximity to Tamworth it is sensible to assume that some of these jobs may be taken by people living within Tamworth.

Again, close working with Lichfield and North Warwickshire will be required to ensure all 3 LDFs adopt the same approach to meeting Tamworth's needs.

d) Retail and town centre uses

The Regional Spatial Strategy Phase 2 Review (Preferred Options) identified Tamworth as a Centre in Tier 4 and recommended that the Council plan for 25,000sq.m. of additional comparison retail floorspace in the period 2006-2021 and a further 10,000 sq.m. in the period 2021-2026 in Tamworth Town Centre. It also required the Council to plan for an additional 30,000 sq.m. of office floorspace in the town centre.

The Council has previously undertaken retail assessments to support the Local Plan, and further retail assessments were undertaken by developers to support proposals which gained planning permission from the Secretary of State for out of centre retailing at Cardinal Point and at land adjacent to the former Tamworth Herald building in 2006. The Council appointed consultants to also produce a Town Centre Masterplan which was finalised in early 2009. This, along with previous Retail Assessments identified a large capacity for retail expenditure in Tamworth. This has previously been used to justify out of centre growth which has resulted in the expansion of Ventura, Jolly Sailor and Cardinal Point which are now recognised to be bigger in size than the town centre. Government Policy continues to focus retail growth, and other 'town centre uses' such as leisure uses and restaurants to the town centre. It is therefore important to ensure that any policies in the Core Strategy that centre floorspace requirements are robust. The existing retail assessments, both locally and those supporting the RSS predate the economic downturn which will have impacted on the expenditure figures and are becoming dated.

The Council has undertaken a review on office development, which recommended that a lower target of 20,000 sq.m. be set for office development in the town centre in recognition of the supply constraints in the town centre.

It is recommended that further work is undertaken to establish the need for different types of town centre uses, in particular retail floorspace figures. Due to the specialised nature of this work and the importance in Tamworth, it is proposed to commission a consultant to undertake this work. In the interim the figures from the RSS Phase 2 revision should be used for retail and 20,000 sq. m. used for office provision. It is recommended that further growth continues to be focused on the town centre and if capacity is an issue then the expansion of the town centre should be considered.

e) Gypsy and Traveller Needs

Requirements for Gypsies, Travellers and Travelling Showpeople pitches was intended to be covered by the RSS Phase 3 Revision. When it became clear that this would not be undertaken a series of Interim Policy Statements were produced, including one on Gypsies, Travellers and Travelling Showpeople. This required Tamworth to provide for 10 Gypsy and Traveller pitches for the period 2007-2017, 4 pitches for the period 2017-2022 and 4 pitches for the period 2022-2017. It also required Tamworth to provide 5 Transit pitches for the period 2007-2017, and for Staffordshire to provide 23 pitches for

Travelling Showpeople for the period 2007-2012. These figures were based on sub-regional Gypsies, Travellers and Travelling Showpeople Assessments (GTAA's), which for Tamworth looked along the A5 corridor from South Staffs to Rugby. This study recommended that Tamworth, with its history of few legal / illegal sites provided 9 residential pitches for the period 2007-2026 and 5 transit pitches. These figures were increased by the Interim Policy statement that justified the decision on the grounds of a minimum 'viable' community is 14 pitches and that this would distribute the requirements more fairly across the region.

It is considered that this is not a particularly robust methodology in relation to Tamworth, where the level of 'need' is very low and the number of identified available sites is small. The nature of the Borough means that pitches have come forward on the outskirts of Tamworth in both Lichfield and North Warwickshire Districts. The same issues affecting development of Gypsy and Traveller sites are the same as other types of development in Tamworth, i.e. the lack of unconstrained available land.

Notwithstanding this, the Council are engaging with the Gypsy and Traveller community to identify any potential sites that could come forward. To date, none have been identified.

The Government have indicated that GTAAs will be a good starting point for determining the right level of provision for Gypsy and Travellers although local authorities are not bound by them. The Government has indicated that the relevant regulations and guidance on this matter will be reviewed in due course.

It is recommended that an 'enabling policy' is developed which recognises the numbers contained within the sub-regional GTAA as an aspiration, and again looks to adjacent authorities to assist with meeting needs for Tamworth. It must also be recognised that a Government Circular currently requires the Borough Council to consider all options for facilitating the supply of sites, including developing our own land where appropriate. These options should be investigated further.

f) Green Belt

The Guidance issued by DCLG following the announcement of the revocation of the Regional Strategy reinforced the Governments commitment to protection of the Green Belt but stated that "planning authorities should consider the desirability of new Green Belt or adjustment of an existing Green Belt boundary" as part of the preparation of DPD's.

There are Green Belt designations in Tamworth to the south and west of Dosthill and south of Wilnecote and Hockley. These are areas that have had developer pressure in the past and continue to be promoted through the LDF system.

Tamworth, Lichfield and North Warwickshire Councils have undertaken a review of development opportunity sites for strategic growth around the edge of the urban area through a joint study. Sites to the south of the town within Green Belt performed poorly in sustainability terms when compared to sites to the north, east and west of the town.

At the Examination in Public of the RSS Phase 2 Revision, the issue of Green Belt release was considered. The Panel concluded that “we can see no current justification for recommending that significant Green Belt release may be appropriate in relation to Tamworth. However, should the Anker Valley development still prove non-viable, notwithstanding our recommendations, that matter would need to be reconsidered”.

The argument put forward by the developers for the land in the south is that the Anker Valley site is unviable and there are insufficient sites within Tamworth administrative boundary to meet its needs. However, as discussed above, if the growth of Tamworth is restrained to assist with the regeneration of the MUA, it is felt that the Anker Valley site and other sites within the urban area can meet this requirement. The Anker Valley consortium state that the development is viable if the size is not artificially constrained. The consortium have been asked to provide the necessary evidence to support the Core Strategy. If a greater number of homes is needed, then more sustainable sites than those offered in the Green Belt exist outside the Borough boundary.

It is therefore recommended that based on the Anker valley site coming forward, no release of the Green Belt is needed at present and that in order to secure the long term integrity of the Green Belt, then an agreed strategy for accommodating Tamworth’s needs in Lichfield and North Warwickshire Councils is required. However, the Core Strategy may need to recognise the need to consider Green Belt release beyond the plan period if the other more sustainable options fail to come forward.

Appendix A

On the 6th July Steve Quartermain of CLG wrote to Chief Planning Officers to inform them that the Secretary of State had announced the revocation of Regional Strategies with immediate effect. Attached with the letter was a 'question and answer' advice sheet on immediate issues that may arise from this announcement.

The key message is that the Government want Local Authorities to continue preparing their LDF Core Strategies and other DPDs. LA's will be responsible for establishing the right level of local housing provision in their area, and identifying a long term supply of housing land. LA's will need to justify their housing numbers in line with PPS3.

Although the RSS has been revoked the evidence supporting it is still relevant Government have advised and it is for Local Authorities to decide how best to use the data. Indeed, they have suggested that LA's may base their housing targets on the RSS Phase 2 Revision Preferred Option, supplemented by more recent information as appropriate. The Panel Report could also be considered to be evidence but it will be for us to determine the weight given to this.

LA's still have to provide a 5 year land supply and identify sufficient sites and broad areas for at least 15year supply.

The Government have indicated that GTAAs will be a good starting point for determining the right level of provision for Gypsy and Travellers. However, the Government has indicated that the regulations and guidance on this matter will be reviewed in due course.

LA's should also consider the desirability of new Green belt or adjustment of an existing Green Belt boundary.

<u>RSS Phase 2 revision PO</u>	<u>Other Evidence</u>	<u>Comment</u>	<u>Proposed way forward</u>
Plan Period to 2026	PPS3 requires LPA's to set out in Local Development Documents their policies and strategies for delivering the level of housing provision,	The Core Strategy will not be adopted before March 2011, and therefore will need to set out its housing numbers to 2027.	Further consideration of time period needed, majority of evidence covers period to 2026, to have longer Core Strategy period will require

Appendix A

RSS Phase 2 revision PO	Other Evidence	Comment	Proposed way forward
	including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption		further evidence to support with cost and time delay implications. It is proposed that flexibility is shown with regards to housing numbers to cover a period to 2027.
SR1 – Climate Change General policy on sustainable development	PPS1 and supplement on Climate Change requires Sustainable Development to be treated in an integrated way.	Covered in Proposed Strategy	It is proposed to have an overarching Strategy Policy which incorporates Sustainable Development principles.
SR2 – Creating Sustainable Communities General policy on sustainable development	As above	Covered in Proposed Strategy	It is proposed to have an overarching Strategy Policy which incorporates Sustainable Development principles.
SR3 sustainable Design and Construction LPAs should ensure all new buildings are designed and constructed to the highest possible standards and work towards carbon neutral developments	PPS1 & supplement; PPS22 PPS1 requires planning policies to promote high quality design inclusive design in all development. Supplement requires new development to be planned to make good use of opportunities for decentralised renewable or low carbon energy	There are a wide range of criteria and schemes such as Code for Sustainable Homes, Building for Life and the West Midlands Sustainability Checklist. Given the length of the Core Strategy, reference to these may not be appropriate. Evidence is currently being prepared on a Staffordshire	Make reference to national schemes and requirements rather than specific schemes. Use the Staffordshire Renewables Study to inform local policy development.

Appendix A

<u>RSS Phase 2 revision PO</u>	<u>Other Evidence</u>	<u>Comment</u>	<u>Proposed way forward</u>
	<p>PPS1 requires the prudent use of natural resources and to reduce amount of waste produced</p> <p>The Staffordshire and Stoke on Trent Waste Core Strategy Preferred Option proposes policies to minimise waste through design changes</p>	basis that may suggest Tamworth specific targets.	
SR4 Improving air Quality for sensitive ecosystems		Not an issue in Tamworth	No Change required
UR1 Implementing Urban Renaissance – the MUAs		Tamworth outside MUA	No Change required
<p>UR2 Towns and Cities Outside Major urban areas.</p> <p>A. LA and other agencies should seek to improve prospects in the following local regeneration areas, Tamworth is listed</p>		This is already a corporate priority and reflected in Proposed Strategy	No Change required. Continue to promote regeneration of town centre and the 4 locality areas as in Proposed Strategy
UR3 Enhancing the role of City, Town and District Centres	PPS4	Objectives enshrined in National Policy and already in Proposed Strategy	No Change required
<p>UR4 Social Infrastructure</p> <p>A. Service providers should work with local authorities and</p>		A. Being undertaken through LSP and Infrastructure Delivery	No Change required

Appendix A

RSS Phase 2 revision PO	Other Evidence	Comment	Proposed way forward
<p>community organisations, in partnerships and through Local Strategic Partnerships, to demonstrate how their activities contribute to the delivery of urban renaissance consistent with the Spatial Strategy. Local authorities should facilitate the co-ordination of land use and investment decisions of providers</p> <p>B. Local authorities should take account of the impact of proposed developments on the health of local communities based on an assessment carried out in liaison with Strategic Health Authorities and Primary Care Trusts.</p>		<p>Plan</p> <p>B. further work may need to be undertaken with PCT although they have been engaged with the process. No formal HIA required</p>	
RR1 - RR4 Rural Renaissance Policies		Not relevant for Tamworth	No Change required
CF1 Housing within the Major Urban Areas		Not relevant for Tamworth	No Change required
CF2 Housing beyond Major Urban Areas		Sets out strategy for housing growth	No Change required
<p>CF3 Level and Distribution of New Housing Development</p> <p>In certain circumstances, the most sustainable form of housing development</p>	Data presented at Examination suggested household change to 2026 in Tamworth is 6000 households.		The Core Strategy should plan for the provision of 3045 additional dwellings (net) (145 more than the Preferred Option to allow

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RSS Phase 2 revision PO	Other Evidence	Comment	Proposed way forward
<p>may be adjacent to the settlement but cross local authority boundaries. Where housing market areas cross local authority administrative boundaries, co-operation and joint working will be necessary to ensure that sites are released in a way that supports sustainable development. In the following locations, local authorities must jointly consider the most appropriate locations for development before producing or revising LDDs:</p> <p>vi) Tamworth, Lichfield and North Warwickshire in relation to Tamworth and Lichfield Districts</p> <p>Tamworth should make provision for 2900 additional dwellings (net) to be built for the period 2006-2026.</p> <p>Of the figure of 8,000 for Lichfield, dependant upon the outcome of further local studies, some of the allocations could be made relating to Tamworth and Rugeley.</p>	<p>The Panel Report recommended that the number for Tamworth should be a minimum of 3000 units, with a further 1000 to be located in LDC. The Panel recognised that the need/demand was around 6000, but kept the figure at 3000 due to tight constraints. They did suggest that if Anker Valley could not be delivered then <i>significant</i> Green Belt release <i>may be appropriate</i> to be considered.</p> <p>Joint Infrastructure study identifies land in North Warks as the most sustainable to meet Tamworth needs.</p>		<p>flexibility for a 15 year supply). It should also identify land to the north and east as potential areas for growth outside TBC and that TBC will work with LDC and NWBC to deliver growth and infrastructure to meet its needs. We may also have to indicate when a review of Green Belt would be required (i.e. if AV did not come forward).</p> <p>These levels of flexibility would enable a 15 year supply of housing to be identified.</p> <p>We would have to get agreement to this approach from both LDC and NW and ideally set a date for review – based on our 5 year supply.</p> <p>Suggest initial CMT level discussions held with neighbouring authorities</p>

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<p>CF4 Phasing of new development</p> <p>Previously Developed Land should be phased prior to Greenfield. Green belt sites should be phased late in the plan period and after further investigation to see if they constitute the most sustainable form of development</p>	<p>PPS3 guidance requires identification of sites up to 15 years into plan period.</p> <p>Panel report revised wording – take account of lead times for large sites</p> <p>06-11: 15% 11-16: 22% 16-21: 30% 21-26: 33%</p>	<p>Given scale of AV this will need to be brought forward in plan period to ensure maintain a 5 year supply.</p> <p>06-10 completions = 30% in Tamworth</p>	<p>Further research on projected housing market position. Then provide a trajectory based on this and panel report, and known developer interests for at least first 15 years of plan using PDL first.</p> <p>AV to be made available early in plan period</p>
<p>CF5 the re-use of land and buildings for housing</p> <p>Priority should be given to development of brownfield land, minimum target of 60%</p>	<p>PPS3 - The priority for development should be previously developed land with a national target of 60%</p>	<p>This will be difficult in Tamworth given lack of deliverable brownfield sites identified and size of Anker Valley.</p>	<p>Consider trajectory and phasing as above</p>
<p>CF6 making efficient use of land</p> <p>LA's should set out density policies in their DPDs. High density development should be encouraged on sites within and close to strategic town centres and close to public interchanges</p>	<p>Panel report suggests re-wording to allow LA's to set policies to reflect local circumstances</p> <p>PPS3 changes removes minimum density</p>	<p>In Tamworth, greater densities will enable less Greenfield land to be required.</p>	<p>Undertake research on past completions and density achieved. Refer to initial SHLAA work densities.</p>
<p>CF7 Delivering affordable housing</p>	<p>Panel report suggested that the regional target should be</p>	<p>Re-drafting housing policies for further public</p>	<p>Await outcome of consultation work.</p>

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<p>Should keep under review the need for AH based on local or sub-regional housing market and housing needs assessments. Opportunities within existing stock should be sought. Set an overall target which is minima Set targets for social rent and intermediate Set out circumstances in which AH will be required Consider how own land resources and those of strategic partners can be used to support a higher level of social rented and intermediate</p>	<p>35%. Minima targets in light of economic viability assessments should be between 25% and 40%.</p> <p>SHMA suggested need was between 77% and 100%.</p> <p>Viability work undertaken suggests maximum target of 30% and different qualifying thresholds</p>	<p>consultation inc AH policy.</p>	
<p>CF8 delivering mixed communities</p> <p>Set out general mix of accommodation taking account of housing needs and supply</p>	<p>SHMA – need for rented accommodation</p> <p>Viability work suggests 80:20 split could be achieved</p>		<p>Await further consultation work</p>
<p>CF9 sites for gypsies and travellers</p> <p>Ensure adequate provision is made for suitable sites to accommodate gypsies and travellers reflecting the order of demand in the area.</p>	<p>Local GTAA undertaken suggested 9 residential pitches and 5 transit pitches.</p> <p>Informed RSS Phase 3 Policy Statement which required TBC to provide 18 pitches to 2027 and 5 transit</p>	<p>Historic issue of not having had illegal camps in Tamworth</p> <p>No sites been put forward during process and through G&T liaison officer no further sites identified</p>	<p>Develop an enabling policy</p>

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RSS Phase 2 revision PO	Other Evidence	Comment	Proposed way forward
	<p>each Local Planning Authority (LPA) should identify the location of specific sites within their Development Plan Documents (DPD's), to ensure the requirements set out in the regional Interim Policy Statement (see ODPM Circular 01/2006) are met. These locations must be attractive to Gypsies and Travellers and take into account factors such as: impacts on significant environmental assets, access to the highways network and key services, any local evidence in relation to unauthorised encampments and historical patterns of travel and annual events.</p> <p>Criteria-based Policies – criteria-based policies can accompany site allocations in DPDs but these should be supplementary only</p>	<p>Work being undertaken on corporate asset review which could identify sites</p> <p>GOWM suggested an enabling policy</p> <p>Letter from DCLG and guidance notes suggests using GTAA as a starting point. Relevant regulations and guidance to be reviewed.</p>	

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RSS Phase 2 revision PO	Other Evidence	Comment	Proposed way forward
	<p>Identification of a Range of Sites – each LPA is encouraged to identify a range of sites within their DPDs, which will meet the variety of accommodation needs, required by Gypsies and Travellers.</p> <p>Consultation with Travelling communities -LPAs are expected to consult with the Travelling communities within their respective areas, as part of their LDF process</p>		
CF10 Managing housing land supply	Panel report recommended deleting policy and merging it with CF4		No change
PA1 Prosperity for All General policy on economic growth	PPS4 provides national context		No change
PA2 Urban regeneration Zones		Not relevant to Tamworth	No change
PA3 High Technology corridors		Not relevant to Tamworth	No change
PA4 Higher Education DPDs should facilitate the needs of higher/further education institutions		Identified area in Core Strategy for growth of learning institutions	No change

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and research facilities to grow and expand			
PA5 Employment areas in need of modernisation and renewal A. working with AWM etc. improve significantly and maintain the physical and business environment B. LPAs should consider designation of employment areas in need of improvement backed up with implementation plans drawing on relevant powers and funding regimes C. existing companies should be encouraged to participate in the revival of their local business ;communities' and to establish local partnerships	Employment Land review identifies those estates in need of improvements	RDAs to be abolished. May also need to consider release of employment land for other uses Economic Development team are vehicle to establish local communities through BEP. LEP will have role to play	Consider identifying relevant estates in Core Strategy.
PA6 portfolio of employment Land and Premises Provide and maintain a range and choice of readily available employment sites PA6A employment land provision Make provision for a 5 year reservoir of readily available employment land outside of town centres - 14ha and a longer term employment requirement of 42ha.	Panel Report suggests longer term should be 56ha Recognition of the need for North Warks and/or Lichfield to also meet provision Employment Land review conducted by TBC and SCC estimate land required in 3 ways, ranging from minus	No requirement to actually specify a target in PPS4. Could consider planning for increases in terms of job numbers or floorspace figures. This may require further data capture and analysis with resource implications. SCC revising future land	Await report for SCC but anticipate maintaining current strategy. Give further consideration to putting some employment land to back of plan period and consider releasing some employment areas and other proposed allocations for alternative uses.

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	26.7 ha to 59.32 ha. National policies on economic development can be found in PPS4	estimates North Warks consider they could support some growth in North Warks to meet TBC needs. Growth at Birch Coppice could also be counted now.	
PA7 regional investment Sites		Not relevant to Tamworth	No change
PA8 Major investment sites		Not relevant to Tamworth	No change
PA9 regional Logistics sites	Panel report considered Birch Coppice as RSL	Now could count some growth at Birch Coppice as meeting Tamworth's needs	Make reference to birch coppice in policy
PA10 Tourism and Culture			No change
PA11 The Network of Town and City centres Tamworth tier 4. Preferred location for major retail, uses which attract large numbers of people, large scale offices			No change
PA12 Birmingham's role as a global city		Not relevant to Tamworth	No change
PA12A Comparison Retail Floorspace Plan for construction of 25,000sq.m additional gross comparison retail floorspace 2006-2021 and	PPS4 guides retail development to town centres PPS4 also sets what the evidence base should inform.	PPS4 introduced new issues to consider, and in Tamworth Ventura issue is key. May need to undertake work to evidence policies to	Undertake further evidence gathering to address PPS4 requirements. Scope options and costs for undertaking further work.

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<u>RSS Phase 2 revision PO</u>	<u>Other Evidence</u>	<u>Comment</u>	<u>Proposed way forward</u>
10,000sq.m 2021-2026 in town centre		restrict further growth at Ventura	Need to have formal proposals in order to identify longer term sites at middle entry / coop and ankerside
PA12B non-strategic centres		Not relevant to Tamworth	No change
PA13 out of centre retail development Not envisaged that any further large scale (10,000sqm) out of centre developments or extensions will be required to meet comparison retail needs	PPS4 allows local authorities to set thresholds	Further evidence required to set lower threshold	See above
PA13A Office development requirements Plan for construction of 30,000 within or edge of each centre	PPS4 directs offices to town centres RSS background evidence suggested 20000 was needed Council Office Background Paper highlighted difficulty in meeting target and suggested a lower target of 20,000 used	Always a difficult target to meet, suggesting lower target is set based on RSS evidence	Consider lower target aligned to RSS evidence Discuss with Economic Development Team and agents re viability of town centre offices and consider exception policies based on sustainability of site proposed. Consider larger town centre area
PA13B large scale office development outside strategic centres	See above	See above	See above

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Sets tests for out of centre proposals			
PA13C regional Casinos		Not relevant to Tamworth	No change
PA14 Economic Development and the Rural economy		Not relevant to Tamworth	No change
PA15 Agriculture and Farm Diversification		Not relevant to Tamworth	No change
QE1 conserving and enhancing the environment		Already have a proposed sustainable resource policy	No change
QE2 restoring degraded areas and managing and creating high quality new environments		Already proposing policies to promote environmental improvements	No change
QE3 creating a high quality built environment for all		Already proposing policies to promote high quality built environments	No change
QE4 greenery, urban greenspace and public spaces		Already proposing policies to protect greenspace networks	Completion of open space assessment will add more detail to current policy and enable missing links to be identified.
QE5 protection and enhancement of the historic environment		Already proposing policies that protect and enhance Tamworth's historic assets and environment	No change
QE6 The conservation, enhancement and restoration of the Regions landscape		Already proposing policies that protect and enhance Tamworth's urban landscapes.	Include reference to conserving, enhancing and restoring rural landscapes
QE7 Protecting, Managing and		Already proposing policies	Update policy to include

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Enhancing the Regions Biodiversity and Nature Conservation Resources		that protect Tamworth's Biodiversity resources. Have since undertaken further work with Staffs Wildlife Trust	most recent information from SWT
QE8 Forestry and Woodlands		Already recognise the green corridors in Tamworth but not specific about trees	No Change policies on biodiversity should cover
QE9 The Water Environment		Working with the EA on a Water Cycle Study that will inform final policy	Update policy to reflect findings of the water cycle study
EN1 Energy Generation		Working with Staffordshire CC on a renewable study that will suggest policy options	Update policy to reflect findings of the Renewables Study
EN2 Energy Conservation		Already include policies to encourage energy efficiency	No change
M1 Mineral Working for Non-Energy Minerals		Staffs CC is the Minerals Authority and they will work up detailed policies in their Minerals Core Strategy.	No change
M2 Minerals – Aggregates		Staffs CC is the Minerals Authority and they will work up detailed policies in their Minerals Core Strategy	No change
M3 Minerals – The Use of alternative sources of materials		Staffs CC is the Waste Authority and they will work up detailed policies in their	No change

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<u>RSS Phase 2 revision PO</u>	<u>Other Evidence</u>	<u>Comment</u>	<u>Proposed way forward</u>
		Waste Core Strategy	
M4 Energy Minerals		Already include policies to encourage energy efficiency Staffs CC is the Minerals Authority and they will work up detailed policies in their Minerals Core Strategy	No change
W1 Waste Strategy		Staffs CC is the Waste Authority and they will work up detailed policies in their Waste Core Strategy	No change
W2 Targets for Waste Management		Staffs CC is the Waste Authority and they will work up detailed policies in their Waste Core Strategy	No change
W3 The need for waste management facilities		Staffs CC is the Waste Authority and they will work up detailed policies in their Waste Core Strategy	No change
W4 Protection of Existing Management Facilities		Staffs CC is the Waste Authority and they will work up detailed policies in their Waste Core Strategy	No change
W5 The location of new waste management facilities		Staffs CC is the Waste Authority and they will work up detailed policies in their Waste Core Strategy	No change

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<u>RSS Phase 2 revision PO</u>	<u>Other Evidence</u>	<u>Comment</u>	<u>Proposed way forward</u>
W6 sites outside the major urban areas and other larger settlements		Staffs CC is the Waste Authority and they will work up detailed policies in their Waste Core Strategy	No change
W7 Waste Management Facilities and Open Land		Staffs CC is the Waste Authority and they will work up detailed policies in their Waste Core Strategy	No change
W8 Hazardous Waste – Safeguarding Sites		Staffs CC is the Waste Authority and they will work up detailed policies in their Waste Core Strategy	No change
W9 Construction and Demolition Waste		Staffs CC is the Waste Authority and they will work up detailed policies in their Waste Core Strategy	No change
W10 Sites for Contaminated Soils		Staffs CC is the Waste Authority and they will work up detailed policies in their Waste Core Strategy	No change
W11 New Sites for Landfill		Staffs CC is the Waste Authority and they will work up detailed policies in their Waste Core Strategy	No change
W12 Hazardous Waste – Final Disposal Sites		Staffs CC is the Waste Authority and they will work up detailed policies in their Waste Core Strategy	No change

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T1 Developing accessibility and mobility within the Region to support the Spatial Strategy		Already include policies to improve accessibility	No change
T2 Reducing the need to travel		The proposed pattern of development will reduce the need to travel	No change
T3 Walking and cycling		Policies to provide greater opportunities for walking and cycling are already proposed. Further work is being undertaken in the context of open space	Update existing policies to reflect further work
T4 Promoting Travel awareness		Already include policies to reflect PPG13	No change
T5 Public Transport		Policies already developed that support the aims and objectives of this policy	No change
T6 Strategic Park and Ride (Tamworth not mentioned)	The Panel Report recommends that Tamworth is included in the list of strategic locations for a park and ride following representations from Centro	Policies are already included which support the provision of park and ride as part of the Anker valley development.	No change
T7 Car Parking Standards and Management	PPS4 states "Local planning authorities should, through their local development frameworks, set maximum parking standards for non-residential development in their area, ensuring alignment		Work with Staffordshire County Council on the development of car parking standards

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	with the policies in the relevant local transport plan”		
T8 Demand Management		Already working with HA to ensure policies are robust	No Change
T9 The management and development of national and regional transport networks		Already working with HA to ensure policies are robust	No Change
T10 Freight		Already working with HA to ensure policies are robust	No Change
T11 Airports		Not applicable to Tamworth	No Change