

**NAME OF COMMITTEE**

Cabinet

**DATE OF COMMITTEE**

31/8/2011

**REPORT OF THE PORTFOLIO HOLDER; CORPORATE DIRECTOR; ASSISTANT DIRECTOR;**

Report of the Portfolio Holder Economic Development and Enterprise

**REPORT OF THE****TITLE OF REPORT**

Tamworth Core Strategy: Proposed Housing Policy Consultation Responses

**EXEMPT INFORMATION**

N/A

**RECOMMENDATIONS**

That Members endorse responses to the Core Strategy Housing Policy Consultation and approve the suggested Borough Council responses outlined in Appendix A of this report, along with the accompanying Sustainability Report as set out in Appendix B.

**PURPOSE**

For Members to consider the responses to the consultation on the Core Strategy Proposed Housing Policies carried out between February-April 2011 and the next stage in the process to deliver a sound Core Strategy.

**RESOURCE IMPLICATIONS**

On the basis of responses received, it has been 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 is being commissioned jointly with Lichfield DC & Cannock Chase DC. The cost of this work (estimated to be up to £50k) will be apportioned between the 3 authorities; on the basis of tenders received to date, it is unlikely that Tamworth's costs will exceed £20k. TBC's Housing Strategy Team is leading the commissioning of this work and the cost will be met by their budget. If it is found that there is insufficient budget to cover the cost of the work, there are sufficient funds within the LDF budget to cover any shortfall.

**LEGAL/RISK IMPLICATIONS BACKGROUND**

None identified

**SUSTAINABILITY IMPLICATIONS****EXECUTIVE SUMMARY:**

The Housing Policies have been subjected to a formal sustainability appraisal (attached as Appendix B). This ensures that sustainability issues are given full consideration in the preparation and adoption of refining policies. The sustainability

appraisal considers all the revised housing policies, which are H1, H3, H4 and H5. Policy H2 was unchanged and although H6 was amended its intent remained the same. The policies were assessed as they were drafted for the consultation and are set out as Option 1 in the appraisal framework. In addition, each policy has been assessed alongside one realistic alternative option (option 2). The total scores for each policy show that Option 1 has scored highest in every instance, which provides a sound endorsement that the preferred Housing Policy approach is the most appropriate, in terms of delivering sustainability objectives, for Tamworth.

## **CONCLUSIONS**

The consultation exercise generated a number of useful representations from stakeholders which will be used to justify the approach taken by the Council to housing delivery at the Core Strategy's subsequent examination. Suggested objections and amendments to the proposed policies have been considered and, where considered appropriate, will be incorporated within the policies contained within the published version of the Core Strategy, or have resulted in further work being commissioned to provide further robust evidence to support policies which refer to addressing housing need and type. The Council's suggested responses to the representations, including justifications for discounting representations, are set out in Appendix A which following Cabinet approval will be published on the Council's website.

## **BACKGROUND INFORMATION**

In February this year, the Council re-drafted its housing policies from the 2009 Proposed Spatial Strategy document and subjected them to a 6 week consultation period. 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

In total, 34 respondents, including statutory bodies, members of the community and adjoining local authorities submitted 134 individual representations on the policies. These have in turn been summarised, analysed and responses drafted. This report seeks approval to agree and publish the responses, along with an accompanying sustainability assessment of the policies.

The responses suggest 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 are planned with Lichfield & North Warwickshire Councils to agree how this will 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 has been 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. The brief

for this piece of work has been agreed and is currently being distributed. It is anticipated that the total cost of the work will be around £50k which will be apportioned between the 3 authorities. The Tamworth Borough Council proportion will be met from the Housing Strategy budget.

**REPORT AUTHOR**

Jon Lord

**LIST OF BACKGROUND PAPERS**

Proposed Housing Policy Consultation Responses: Summary of issues raised and responses

**APPENDICES**

Appendix A contains a summary of the responses received and a suggested Borough Council response whilst The sustainability appraisal of the housing policies is set out in Appendix B.

## Appendix A: Summary of the responses received and suggested

### H1 Do you agree with the approach to housing delivery?

Respondent	Main Issues Raised	Council's Response
Highways Agency	We recognise and welcome the approach to concentrate housing in the most sustainable locations	Support noted.
Gary Heritage	In relation to the Anker Valley, the Housing Key Diagram is very misleading. It shows an outline of development in purple which I take to be HSG4, together with Land to the North of Anker Valley for any potential growth. However H2 still reverts back to the Anker Valley being unchanged as Proposed Spatial Strategy, which shows Anker Valley potential growth to go east of HSG4 up to the Amington Hall Conservation Area. Which map shows the correct land allocation in this area to meet the housing delivery? i.e. North of HSG4 or East of HSG4	Comments noted. The final version will include a clear boundary of the Anker Valley proposal.
Forestry Commission	Welcome commitment to sustainable communities and sustainable development. This should include explicit commitment to high quality greenspace/green infrastructure – the detail is lacking in the policy doc but maybe held elsewhere.	Support noted. The published version of the Core Strategy will include linked green infrastructure & greenspace policies which will set the expectation that new housing development will contribute towards enhancing and/or delivering green space/green infrastructure.
Polesworth Parish Council	The land along the M42 Corridor in Warwickshire should be reserved for North Warwickshire BC's housing needs and used only when that Council's core strategy demonstrates a need to develop the land. There is adequate land to meet Tamworth BC's proposed housing needs at Anker Valley, Lichfield DC's land beyond Rawlett School and infill sites within its administrative area, without the need to acquire land within Polesworth or elsewhere within the Borough of North Warks. Consequently Polesworth Parish Council is vehemently opposed to any proposals by Tamworth BC to acquire land anywhere within the Borough of North Warks	Comments noted. Discussions are ongoing with N Warwicks & Lichfield DC regarding land to deliver Tamworth's future housing need.
Brooke Smith Planning	<ul style="list-style-type: none"> <li>• Concerned about the strategic allocation of Anker Valley for housing development. In light of paragraph 4.46 of Planning Policy Statement 12 – 'Local Spatial Planning' it is imperative that Core Strategies are flexible to deal with changing circumstances. This need for flexibility was highlighted in the WMRSS Phase 2 Revision EiP which considered that the Anker Valley development maybe unviable due to heavy infrastructure costs. Likewise Tamworth Future Development and Infrastructure Study assessed the site and was ranked sixth out of seven potential areas for development.</li> <li>• In accordance with the allocation of Anker Valley Allocation it is considered that alternative sites in suitable locations that are deliverable should be</li> </ul>	<p>The Anker Valley site is considered to be the most sustainable and appropriate strategic site within the Borough to meet RSS housing requirements. Work is currently being undertaken with the Anker Valley Consortium to test its viability and to identify infrastructure requirements. The outcomes of the study will be used to inform both the published Core Strategy and associated infrastructure delivery plan.</p> <p>The emerging SHLAA has been updated and includes a range of sites within the Borough boundary which predominantly focuses on</p>

	<p>incorporated into the 5 year housing trajectory. From the evidence within the Tamworth Future Development and Infrastructure Study, it is considered appropriate that Greenfield sites both within and adjacent to the Borough, such as the site at Mile Oak, should be incorporated into the Core Strategy as a suitable and deliverable alternative to the Anker Valley development.</p>	<p>Brownfield land but does include some Greenfield sites. This has identified an appropriate supply of suitable and deliverable sites and therefore it is not considered that any further Greenfield sites need to be identified within the Core Strategy.</p>
Morston Assets	<ul style="list-style-type: none"> <li>Support the Council's target of delivering at least 2,900 dwellings in the Borough during the period 2006-2026 and the aspiration of providing 60% of new housing on previously developed land. Whilst we acknowledge that there is a need to allocate Greenfield land (to the northeast of the town) to meet identified housing needs within the Borough, we firmly support measures that will facilitate the release of Brownfield sites during the early part of the plan period, and in advance of any Greenfield release</li> </ul>	<p>Support noted.</p>
William Davis Ltd	<ul style="list-style-type: none"> <li>Support the approach to housing delivery outlined in the Housing Policy Consultation document and welcome the provision for a sustainable urban Neighbourhood in the Anker Valley.</li> <li>Welcome the Housing Key Diagram included in the document which supports the strategic approach outlined in Policy H1. Concerned the boundary of the Anker Valley allocation is not clear and conflicts with the boundary outlined in Policy H2 which has not been amended from the original proposed strategy consultation in October 2009. More clarification is needed on what boundary for the Anker Valley allocation is being taken forward in the Core Strategy. A boundary in line with that of the Housing Key Diagram should be used, a boundary which represents the full extent of the Anker Valley allocation in terms of the area's capability of accommodating up to 1400 dwellings. Such an approach would not only help identify the role of the Anker Valley in meeting long term housing needs in Tamworth but would also conform with the SHLAA and Development and Infrastructure study which both include the full extent (up to 1400 dwellings) of the Anker Valley site.</li> <li>In line with the above approach Policy H2 of the Core Strategy should be amended. The element of phasing included in Policy H2 should be removed and that the policy should include the full extent of the Anker Valley site. Establishing an Anker Valley allocation capable of delivering up to 1400 units from the outset of the plan is the best way to provide the recognised need for flexibility in housing provision in the borough. The Key Diagram of the Core Strategy should include the full extent of the Anker Valley allocation and our</li> </ul>	<p>Support noted.</p> <p>The final boundary of Anker valley will be contained within the finalised SHLAA.</p>

	suggested alteration to Policy H2 would conform to this approach.	The full extent of the site and the maximum number of units will be incorporated within the final policy for Anker Valley.
Bromford Housing Group	<ul style="list-style-type: none"> <li>• Whilst the Plan states that future growth is not required in neighbouring areas until after 2020, the likely timescale for a number of the identified sites outside the Tamworth boundary is significantly earlier than this and therefore will precede the 2017 Core Strategy review.</li> <li>• Greater emphasis and reference could be placed on sustainable transports role in housing development.</li> <li>• The emphasis on the use of brownfield sites is welcome.</li> <li>• The comment about zero carbon development is disappointing - Tamworth could provide a more specific and local view on the role that Code for Sustainable Homes is deemed to play in housing priorities and delivery in the Borough</li> </ul>	<p>A review of the Core strategy will be triggered once 2900 dwellings have been delivered which may result in sites outside of Tamworth's boundary being developed. This will have to be agreed with neighbouring authorities.</p> <p>Noted. This will be set out within relevant policies in the publication version.</p> <p>Support noted.</p> <p>Work is continuing on ascertaining whether local standards are appropriate for Tamworth.</p>
North Warwickshire BC	<ul style="list-style-type: none"> <li>• North Warwickshire Borough Council objects to the identification on the Key Diagram of all the land between Tamworth Borough boundary and the western edge of Polesworth and Dordon as potentially available to deliver Tamworth's future housing needs.</li> <li>• With reference to the Tamworth Future Development and Infrastructure Study findings it is noted that the option for the Anker Valley was supported as the most sustainable and appropriate location for development to meet Tamworth's needs. However, it should be stressed that North Warwickshire Borough have not formally accepted the studies recommendations, specifically in terms of the land between east Tamworth and Polesworth/Dordon. There is significant local concern to maintain this important gap between a major urban area and two rural settlements. The land to the east of Tamworth, between Tamworth's current boundary and the M42 (not the entire rural gap as shown on the Key diagram, including land north of B5000) should only be considered as a last resort option, and only if all the other available options (including sites identified within Lichfield District) have been delivered, developed or cannot physically be developed. The Borough Council would exclude the inability of achieving access infrastructure</li> </ul>	<p>Comments noted. Further discussions with both North Warwickshire BC and Lichfield DC are ongoing to identify the issue of Tamworth's future needs including accommodation.</p>

	<p>and /or service issues as part of that assessment. This is because it is vital that Tamworth caters for its own needs and avoids the coalescence of the three settlements.</p>	
Merevale & Blythe Estates	<ul style="list-style-type: none"> <li>• Support Tamworth BC approach to housing delivery.</li> <li>• The Pennine Way site is the largest site within the urban area. A planning application is currently being prepared for submission in June 2011 following discussions with Council Planning Officers. This site is available for development, it is in a highly sustainable location in terms of access to public transport, services and community facilities and is capable of delivering a mix of dwellings and tenures.</li> </ul>	<p>Support noted.</p> <p>Discussions on The Pennine Way site are continuing and we understand that a planning application is due to be submitted in the near future.</p>
Bloor Homes	<ul style="list-style-type: none"> <li>• Pleased to see the retention of the Anker Valley strategic allocation and can confirm that the relevant developers, including ourselves, are engaged in a number of activities with the Council in relation to the delivery of this site in line with Council's aspirations.</li> <li>• It is reassuring to see that there is an intention to cooperate with adjoining authorities in relation to the growth associated with Tamworth both within the Borough boundary and beyond. The approach to coordinate the Anker Valley and North of Tamworth broad location are clearly a very sensible proposal. However, we are concerned that the decision regarding a commitment to the broad location is to be made in a subsequent review of the Core Strategy. We do not believe that this is consistent with the advice set out in paragraph 4.46 of PPS12 which cautions against using a review to deal with matters that can be foreseen.</li> <li>• As regards Housing Policy H2, we note that the Council is not intending any changes to this policy and as mentioned above we can confirm our ongoing support for this strategic allocation</li> </ul>	<p>Continued support for Anker Valley noted.</p> <p>Comments noted. Further discussions with both North Warwickshire BC and Lichfield DC are ongoing to identify the issue of Tamworth's future needs including accommodation. This will need to be addressed in all 3 LPA's respective Core Strategies.</p>
Joint Commissioning Unit	<ul style="list-style-type: none"> <li>• Welcome the emphasis on mixed communities and the need for accessibility to enable residents to participate fully in their communities. Improving health outcomes and tackling health inequalities is clearly linked to good design which you clearly reference but it might be worth pulling out key design requirements at this point in the document also to reinforce the point.</li> <li>• Pleased to see clear reference to the need for supported units for independent living for a range of client groups as this is a key priority for us</li> </ul>	<p>Support noted. The published version of the Core Strategy will include linked design policies which will set the expectation that all new housing development will conform to high standards of design.</p> <p>Support noted</p>
Ken Forest	Yes - however there are details and aspects on the charts, diagrams and	The Council have taken a considered approach to the trajectory

	<p>explanatory text that will need to be revised (detailed analysis is supplied)</p>	<p>which takes into account specific sites and agreed build rates via the emerging SHLAA, this may be subject to change through continued monitoring.</p> <p>Comments are noted, the Council are developing an interactive PDF within the SHLAA which will demonstrate whether a site is 'deliverable', 'developable' or 'not currently developable' in accordance with guidance, this document will subsequently make recommendations to be considered in the Core Strategy. The document itself may also feature a diagram reflecting the trajectory of housing on a site by site basis.</p> <p>The wording suggestions have been noted and will be considered where developing the final policies.</p>
TBC/SSPCT	<ul style="list-style-type: none"> <li>The approach is agreeable as the houses are not congested into one area of Tamworth which may lead to a 'ghetto' set up. Although the numbers identified for Anker Valley and the others may not warrant a new GP/Dental and other health facility it must be stressed that access to a branch surgery/health centre must be considered if the future tenants of these properties are of mixed age groups or the availability of affordable public transport</li> </ul>	<p>Support noted. The indicative Anker Valley masterplan includes provision for a community facility; discussions are ongoing as to the potential amount of healthcare to be provided</p>
Lichfield District Council	<ul style="list-style-type: none"> <li>Broadly agree with the proposed approach to housing delivery. The District Council is committed to working with Tamworth Borough Council and North Warwickshire Borough Council to consider cross boundary issues. It is recognised that the latest household projections, prepared by Staffordshire County Council for the period 2008 – 2033, indicate a scale of growth which exceeds the capacity of deliverable and developable sites identified within your SHLAA. It should be noted that the most up-to-date household projections and indeed those published by the Office for National Statistics, are trend based and do not consider the impacts of policy changes or the economic climate. These headline figures also do not highlight the complex migration patterns that have occurred historically and are likely to occur in the future. Migration data for the period 2004-2009 shows that there has been significant in-migration into Lichfield District from Tamworth Borough – therefore a level of Tamworth Borough's need is already assumed within the</li> </ul>	<p>Comments noted. Further discussions with both North Warwickshire BC and Lichfield DC are ongoing to identify the issue of Tamworth's future needs including accommodation</p>

	<p>County Council's household projection of 8,892 for Lichfield District 2008-2028.</p> <ul style="list-style-type: none"> <li>• It is agreed that any housing to meet Tamworth's needs outside of the Borough's boundary could be considered through the review of the Core Strategy. This date should be agreed with Lichfield District Council and North Warwickshire Borough Council so Core Strategies are consistent approach. It is suggested that the review should commence no earlier than 2017.</li> <li>• Housing Key diagram: Whilst it is appreciated that this is diagrammatic, it is considered appropriate to identify Wigginton and Bonehill</li> </ul>	
Network Rail	<ul style="list-style-type: none"> <li>• In relation to Anker Valley proposal, in principle Network Rail are prepared to grant access/air rights over the railway line, subject to agreement to Heads of Terms, Network Rail's operational approval and regulatory approvals and completion of a BAPA and Tripartite Works Agreement for the proposed bridge.</li> <li>• The development also indicates a park and ride to the north of Tamworth station on the Anker Valley land and at our meeting the Council talked about creating a link/second entrance to the station. Network Rail have advised the Council/developers that any such arrangement could create revenue protection issues for London Midland.</li> </ul>	<p>Comments noted.</p> <p>Discussions regarding the redevelopment of the station, including potential access arrangements are ongoing.</p>
Tetlow King representing WM Harp Planning Consortium	<ul style="list-style-type: none"> <li>• Whilst we support the setting of an overall housing target as a minimum, we consider that the setting of a 60% target to be achieved on brownfield land may be overly ambitious, especially considering the finding of the viability assessment which states <i>"Brownfield/town centre sites suffering the worst and proving to be the most challenging to bring forward in the current climate ..."</i> We strongly recommend that the Council adopt a more flexible approach to the delivery of housing on brownfield land, taking into consideration the difficulties in funding affordable housing delivery.</li> </ul> <p>Support the Council's intention to work jointly with neighbouring districts to</p>	<p>Comments noted. Whilst Tamworth BC seeks to make the most efficient use of its limited supply of land, the policy will be reviewed in the context of the outcomes of the updated SHLAA and the government's emerging National Planning Policy Framework.</p>

	<p>ensure housing delivery to meet local needs. We recommend a rewording of the fourth paragraph to read: <i>“this will be achieved by providing a mix of dwellings of the right size, type, affordability and tenure to meet local needs as evidenced by an up to date assessment, including the SHMA”</i>. This policy should then be linked in with Policy H4 – Housing Needs</p>	
<p>Sport England</p>	<p>In principle agree with the approach but have some concerns about the broad locations for potential housing growth:</p> <ul style="list-style-type: none"> <li>• North of Tamworth (Lichfield District) – the Housing Key Diagram on Page 5 appears to include the land now purchased by SCC and with planning permission for a playing field extension at Rawlett School (delivered as compensation for playing field loss from the two Tamworth academy’s). This land should be EXCLUDED from the Sustainable Urban Neighbourhood area on the basis that it should be protected as playing field, particularly as it was so difficult to secure replacement playing field in the Borough in the first place and this site now develops the school as a sports college. This is supported by the Lichfield Playing Pitch Strategy (although this document is now just out of date and needs a refresh).</li> <li>• East of Tamworth (North Warwickshire) - the Housing Key Diagram on Page 5 appears to includes several sites of importance to sport: <ul style="list-style-type: none"> <li>a. Polesworth Sports Ground – a cricket pitch with artificial wicket and outdoor nets and football pitch</li> <li>b. Birchover Football pitch</li> <li>c. Poleworth School Playing Fields – 7- 9 football/rugby pitches, an athletics track and cricket pitch</li> <li>d. Goodere Drive Pitches – 4 pitches</li> <li>e. Tamworth Karting Race Track</li> </ul> </li> </ul> <p>All these sites should be EXCLUDED from the housing development allocation on the basis that it would be opposed to national policy in PPG17 in general and par. 15 in particular where playing fields are affected.</p> <ul style="list-style-type: none"> <li>• Pennine Way – there are several playing field/sports sites along Pennine Way</li> </ul>	<p>Comments noted. Further discussions with both North Warwickshire BC and Lichfield DC are ongoing to identify the issue of Tamworth’s future needs. Until these are finalised the broad locations for potential future housing need cannot be confirmed.</p>

	<p>(e.g. Three Peaks Primary School) and it is not clear where housing is proposed. Clearly no development should take place on playing field or sports land as this would be opposed to PPG17, Tamworth Sports Strategy and other CS policies to protect such facilities.</p> <ul style="list-style-type: none"> <li>• Stormking Site – assuming this is the redevelopment of Stormking Plastics site it looks like it does not have a direct impact on sports facilities. However there is a golf course immediately to the east which would need to be protected from any indirect impacts.</li> </ul> <p>Where these sites fall on the edge of the urban area (all but Birchover Football Pitch) these areas should be excluded from the map, otherwise supporting text should make it VERY CLEAR that all existing playing fields and sports facilities should be protected in accordance with national policy and a suitable buffer provided between those sites and housing development to ensure protection of amenity does not constrain the use of those sites for sport (noise, ball damage etc.).</p>	<p>The Pennine Way site referred to does not contain either playing fields or sports land.</p> <p>Comments noted. The impact would need to be addressed through discussions with potential applicants.</p> <p>Comments noted.</p>
CPRE	<p>CPRE notes that 2006-2010 completions exceeded the nominal trajectory toward the WMRSS preferred option, as do the projected completions up to 2013-14 (Fig p4). This allows the building rate to fall back to about 75 per annum in the subsequent 12 years, a total of about 900-1000 houses. This seems to accord with the 900 units in para 3, p6 of the Housing Policy report.</p> <p>CPRE cannot agree with the “flexibility allowance” put forward in para 4, p6; firstly because 20% is an excessive proportion to introduce, and secondly because that percentage is applied to the whole WMRSS provision, whereas at least 50% of the target figure has already been built or has been secured by planning permissions or allocations up to 2013-14.</p>	<p>The Council consider that it is important to provide flexibility for the duration of the plan period. Furthermore, although we have only identified one strategic ‘green field’ housing site at Anker Valley there will be a significant supply of smaller sites within the urban area. Anker Valley will deliver associated sustainability benefits as a result of its substantial capacity and economies of scale which will benefit those living on the site and existing communities. These benefits may not be accrued from smaller sites. It is important to retain this flexibility as issues may exist in relation to the viability of some smaller sites.</p>

<p>Additionally it has been the experience of LPAs across Staffordshire that despite Strategic Housing Land Availability Assessments being introduced, a very substantial amount of housing comes forward as “windfalls”, more than enough to absorb the flexibility allowance. This phenomenon is confirmed to a large degree by the final paragraph on p6. The additional nominal 600 dwellings must therefore be discounted, or at least offset by the additional 400 houses at Fazeley suggested by Lichfield or other potential “brownfield” resources.</p> <p>CPRE’s concern over the compilation of the Housing target, and its achievement, is motivated by our understandable wish to conserve and protect the countryside and Green Belt for its own sake and the benefit of Tamworth residents. Also now there is emerging a renewed need to retain to the maximum possible extent our finite food and fuel-producing farming land against the emerging global concerns regarding conservation of sustainable resources set against expanding world populations.</p> <p>Consequently we must be deeply concerned regarding the depletion of brownfield sites, and the subsequent transfer of development proposals onto greenfields. We regard with some dismay the prospects of housing development even “within the urban area” being only 60% located on brownfield land compared to Tamworth’s previous excellent achievement of 80% and thereafter predominantly extending onto greenfield sites.</p> <p>We therefore urge the utilisation of brownfield sites to the greatest possible degree and to the greatest possible acceptable density (see later comments on density) thereby deferring the later, greenfield, plan stages.</p> <p>It is further noted that the Anker Valley location has the potential for 1100-1400 dwellings in the longer term. Certainly on the basis of this report, and the UK’s straitened economic circumstances and prospects, CPRE suggests that even the Anker Valley development could await the projected review of the Core Strategy in 2017, and that outward expansion of Tamworth housing into Lichfield District and North Warwickshire Borough could be considered consequent even to that.</p>	<p>Whilst windfalls make up an important contribution to housing provision, it is still not considered that they should be used to discount future provision.</p>
--	---

		Due to the constrained nature of the Borough and the importance of maintaining a balanced supply of land for employment and housing the Council consider that a 60% target for Brownfield land is the most appropriate.
English Heritage	We have no further comments to make on the re-drafted policies at this stage. Our position on the Anker Valley sustainable urban extension remains as outlined in our formal response to the consultation on the Proposed Spatial Strategy in October 2009	Comments noted. Further opportunities to submit comments will exist at publication stage of the document.
Elanor Patrick	I would have liked to see greater improvements and a better infrastructure of the transport system in and around Tamworth and its neighbouring Towns, prior to any development in particular housing development taking place. Although transport has been considered within the document, we all know that unsystematic chaos can and does occur with any additional new development. Access of emergency vehicles is essential to any development as they need to be efficient and effective in service provision to the community	The Core Strategy's proposed strategy will be supported by an Infrastructure Delivery Plan. This will identify the required level of infrastructure required, including transport, to deliver the strategic sites and the overall strategy.
Staffordshie CC	Initial Habitat Regulations Assessment work has indicated that there may be an impact on Cannock Chase Special Area of Conservation (SAC) due to increasing visitor numbers. Whilst a Zone of Influence of recreational impact has been identified (Footprint Ecology 2009), it is acknowledged that this is based on out-of-date and incomplete data. Survey and assessment is ongoing to remedy this and to allow assessment of housing allocations in terms of their location related to the SAC and potential for additional impact. This should be completed during 2011. In the meantime, it should be acknowledged that allocations of substantial numbers of houses require reference to appropriate mitigation, such as Suitable Alternative Natural Green Space (SANGS) and planning obligation contributions.	Further work to identify the exact extent of the zone of influence is ongoing and we await the outcome in order to identify any required mitigation measures.
JVH Planning for Walton Homes	We disagree with the approach to housing delivery, this is fundamentally flawed in a number of ways. Firstly, the strategy is reliant on the Anker Valley, this is not considered deliverable due to its huge infrastructure costs. This view is	The Anker Valley site is considered to be the most sustainable and appropriate strategic site within the Borough to meet RSS housing requirements. Work is currently being undertaken with the Anker

<p>supported by the Future Development and Infrastructure Study, which identifies the cost to be in the region £33,969 per dwelling, which for 900 dwellings equates to £30 million pounds. This amount is exclusive of any ransoms of land and railways, which will see this rise further. In addition the Anker Valley has failed to even be subject to a Planning Application during the highest land values ever known, it is not therefore considered that it is going to come forward now with a £30m plus infrastructure bill. In addition the land identified for the access link at Whitley Avenue is being prepared for a residential planning application in its own right and is therefore unavailable. The current situation with this land and the railway lines effectively sees this land being an Island and it is therefore not a suitable development option. Furthermore the site will not be in a position to provide any affordable housing or other community benefits due to the overall viability concerns outlined above. The scheme is now out of step with modern sustainability criteria and the fundamental aims of delivering new homes in sustainable locations on viable sites.</p> <p>Concern is raised on the reliance upon the level of PDL within the Town and the level of sites available which will be viable to the market. Our experience indicates that there is not an abundance of viable sites here and therefore this source should not be depended upon to deliver the housing needs of the Borough.</p> <p>The other identified broad locations for growth are outside of the Borough and considered unsustainable and heavily dependant upon the private car to enable residents to reach services and employment. Noise vibration and air quality concerns are also considered to be a issue in respect to growth along the M42 which would considerably reduce the area indicated as developable. An alternative approach is therefore required to deliver the Housing Strategy. It is accepted that some development in the Anker Valley could remain a viable option, but this would require to be developed using the existing available infrastructure and should be served off the Ashby Road. Clearly this limits capacity here and sees viable alternatives requiring to be considered.</p>	<p>Valley Consortium to test its viability and to identify infrastructure requirements. The outcomes of the study will be used to inform both the published Core Strategy and associated infrastructure delivery plan.</p> <p>To date, no planning application for the land at Whitley Avenue has been submitted for consideration.</p> <p>Comments noted. However it is still considered that notwithstanding Anker Valley, provision will be made in the main on PDL as this represents the most efficient and effective use of Tamworth's limited supply of land.</p> <p>Comments noted. Further discussions with both North Warwickshire BC and Lichfield DC are ongoing to identify the issue of Tamworth's</p>
--	--

	<p>Support is given to the acknowledgement of the potential for further development at Fazeley and Mile Oak, which we are aware has potential and available sites, which can support Tamworth's housing needs albeit with the majority of this land being within Lichfield.</p> <p>It appears however that the area with the greatest potential to provide growth and make up for the shortfalls identified for above is to the West of Dosthill. This land should be considered and identified as a broad location for growth. This area is considered to be attractive to the market on viability grounds as it is not subject to huge infrastructure costs and has real sustainability criteria. The proximity of this land to Wilnecote Station offers a real alternative to private car use and makes this a viable and sustainable location. The failure of this area to be identified is considered a fundamental flaw to the housing strategy in terms of soundness and this should therefore be reconsidered accordingly in addition to amendments identified above in respect to the Anker Valley and the available levels of PDL within the existing urban area.</p>	<p>future needs including accommodation</p> <p>Whilst it is accepted that Wilnecote Station delivers sustainability benefits, it is considered that Anker Valley's pedestrian proximity to the town centre delivers greater sustainability benefits and accords with promoting development in the town centre.</p>
<p>Turley Associates for Hidgetts Estates</p>	<p>The approach to identify 'broad locations' for future growth is supported. In particular, the conclusion that land to the West of the M42 is most suitable to meet Tamworth's needs is supported (and the subsequent identification of this location for 'future development'); part of this land, immediately to the north of the A5, has previously been considered during the Local Plan review process, and not found to have any insurmountable constraints. More recently (February 2010) part was identified as a site with 'future potential' within the North Warwickshire Strategic Housing Land Availability Assessment. SHLAA site NWAR187, to the west of Dordon, was considered suitable for housing because of its accessibility and as no insurmountable constraints have again been identified. A developable site area of about 15ha was identified by the SHLAA, which could yield about 450 dwellings. Hodgetts Estates control part of this land to the west of Dordon (within the 'broad location' for future growth) and would in principle be prepared to work with the relevant Local Planning Authorities to bring this land forward for development.</p> <p>In terms of the Council's overall approach, appropriate flexibility should be built into</p>	<p>Comments noted. Further discussions with both North Warwickshire BC and Lichfield DC are ongoing to identify the issue of Tamworth's future needs including accommodation</p>

	<p>the DPD to ensure that, if required, this land could come forward in advance of 2020, if (for example) there are problems with capacity/delivery associated with either sites within the existing urban area or at Anker Valley.</p> <p>The Council's overall housing delivery target should be expressed as 'at least' 145 dpa, so that the ability to provide additional housing to meet local needs, including the need for affordable housing, is not unnecessarily restricted.</p>	<p>The Council will carry out continual monitoring of the supply and delivery of housing in the Borough and housing market trends which will inform the need to change the approach at any stage for the duration of the plan period.</p>
<p>Cllr Steven Pritchard</p>	<p>My concern with the strategy is the use of previously built on land. I do not imagine that we are knocking over any houses to provide that land so imagine that we are referring to land previously utilised for industrial purposes. How does this assist in making Tamworth a place to live as opposed to some where to travel from to go to work? Is there any provision within the plan to offer land for industrial purposes and to encourage business into Tamworth?</p>	<p>The Core Strategy's objective is to ensure there are sufficient sites to meet Tamworth's future employment needs. An employment land review has been undertaken to identify needs which will identify sufficient sites are identified and protected. TBC is working with the Greater B'ham LEP to develop a strategy for attracting inward investment into Tamworth which may result in 'best premium' sites being identified in a subsequent Enterprise Belt.</p>
<p>Boyer Planning (on behalf of Taylor Wimpey)</p>	<p>The Council's approach to housing delivery is not correct and should reflect the following considerations:  The draft RD Phase 2 (option 1) housing provision of 2900 dwellings is wholly inadequate to meet Tamworth's housing needs. Household projections suggest a provision of 5000 dwellings over 2006-2026 is required and therefore the RS EIP Panel's recommendation of 4000 dwellings should be seen as a minimum. It is accepted that housing capacity within Tamworth is in the order of only 2900 dwellings (assuming Anker valley comes forward) and therefore the remaining provision of at least 1000 dwellings will need to be met outside the borough boundary.  The Tamworth CS should make a policy commitment to ensure the cooperation of Lichfield District council in accommodating this additional requirement. The available evidence demonstrates that this additional provision will definitely be required and that the necessary commitments should be made by the borough council in this Core Strategy not left for a review in 2017.</p>	<p>Comments noted. Further discussions with both North Warwickshire BC and Lichfield DC are ongoing to identify the issue of Tamworth's future needs including accommodation</p>

	<p>Land to the north of Tamworth in Lichfield district has long been established as the preferred location for this additional provision. Land to the east in N Warwickshire is not appropriate and should not be pursued. Provision needs to be made for the development now in order to ensure a satisfactory flow of housing opportunities over the plan period. Land to the north of Tamworth adjoining existing opportunities in Browns Lane is available to make an early contribution of approx 250 dwellings for this purpose without prejudicing longer term decisions regarding development in the area as a whole.</p>	
--	---	--

**H3 Do you agree with the affordable housing targets?**

<b>Respondent</b>	<b>Main Issues Raised</b>	<b>Council's Response</b>
Forestry Commission	The targets appear modest. It is vital that greater commitment to high quality greenspace/ green infrastructure is included in delivery of these targets since this has a key role in increasing quality of life and increased health and well-being – see the Case for Trees	Broad Greenspace/green infrastructure standards for new residential a development will be set out in the relevant Core Strategy policy.
Brooke Smith Planning	Affordable Housing Provision is generally supported	Support noted
Morston Assetts	Consider that the Council's affordable housing policy should contain sufficient flexibility to ensure that previously developed land is not prejudiced from coming forward for housing development where it would be unviable to provide 30% affordable housing. Consider that the affordable housing target should be for 30%, 'where viable'.	Agree-the words 'where viable' will be inserted.
William Davis Ltd	Welcomes the council's production of an Affordable Housing Viability Assessment to support policy H3, in line with the national requirements of PPS3. Also welcome the level of flexibility included in the policy which will allow for negotiation of the level of affordable housing on a site by site basis. The targets established in Policy H3 will result in some sites being unviable, and it is imperative that the council maintain the	The insertion of 'where viable' makes it clear that flexibility is incorporated within the policy.

	<p>flexible approach outlined in Policy H3 to ensure that the housing delivery in the Borough is not overly restricted. To further this flexibility we believe the text of policy H3 should be amended from the council 'requiring' the targets identified to 'seeking' them. In this way the policy text acknowledges the flexibility needed in the policy and that the targets set will not always be achievable in terms of their viability. We support the acknowledgement that an SPD will be produced to provide further guidance on this policy and potential negotiations and look forward to being consulted on the emerging policy of said SPD</p>	
<p>Bromford Housing Group</p>	<ul style="list-style-type: none"> <li>• It is unfortunate that the targets can not be set higher. It isn't clear on what timetable the Affordable Targets are to be reviewed. Viability Assessment's in the current market will set low percentages, but higher proportions will be achievable as the market improves over the Plan lifespan.</li> <li>• The tenure mix guidance is vague in terms of the emerging tenures of Affordable Rent, Shared Equity etc. Is this deliberate?</li> <li>• The Borough Council need to work closely with the County who own significant land in Staffordshire and should be the major contributor to the land release in H3 e).</li> </ul>	<p>Monitoring of affordable housing delivery will identify trends in provision and a period of under provision would trigger a review of the target.</p> <p>Bromford appear to have a blanket policy to introduce AR at 80% of market rent whereas guidance states this can be up to 80% - In Tamworth, 80% may / may not be affordable / meet local need so we will need to keep this under review &amp; enter into discussions with RP partners etc. H3 clearly states 80% AR / 20% intermediate (i.e. Shared equity (Homebuy) – this requires clearly labelling.</p> <p>Noted. Tamworth Borough Council will continue to work with the County to identify potential sites to incorporate into the SHLAA.</p>
<p>North Warwickshire BC</p>	<p>North Warwickshire have no objections to Tamworth's affordable housing targets in view of the recent Affordable Housing Viability &amp; Policy Study (Feb 2010). The only comment is that this target should perhaps be applied flexibly, enabling financial contributions in appropriate and relevant circumstances where delivery of affordable housing on-site is difficult and off-site contributions could deliver a higher percentage of affordable housing on other suitable sites (to which the contributions could be targeted). The need for a flexible approach should also apply to viability and, where evidence indicates, consider reducing the target/requirement where the delivery of housing has other benefits including economic regeneration, increasing diversity of</p>	<p>The insertion of 'where viable' makes it clear that flexibility is incorporated within the policy to allow other factors to be considered on an individual site basis.</p> <p>Off site contributions can be acceptable but emerging experience with NHB suggests these resources might not be utilised to support delivery on other sites but could be used for other, non-housing related purposes.</p>

	supply and tenure and other social or environmental benefits/contributions.	
Merevale & Blythe Estates	It is considered that the affordable housing targets are overly prescriptive by referring to the percentage of affordable housing requirement per site and tenure split. In the current economic climate Policy H3 will make many sites unviable, however it is encouraging that the Council acknowledge this point and are willing to adopt a flexible approach to negotiations and willing to take into consideration viability issues with reference to the overall planning obligation requirements and local needs	Comments noted. The insertion of 'where viable' makes it clear that flexibility is incorporated within the policy.
Bloor Homes	<ul style="list-style-type: none"> <li>• Pleased to see that the Council intends to utilise viability testing in relation to the delivery and quantities of affordable housing to be provided. Nevertheless we believe that the viability exercise should be carried out through the Core Strategy process rather than via a supplementary planning document as suggested. Clearly this would allow the viability of the Core Strategy proposals to be tested at an early and would also allow this exercise to be subject to independent scrutiny. As such we suggest that the Council should review the processes involved and consider progressing this topic through the Core Strategy itself.</li> <li>• The tenure arrangements set out in the Policy, in particular item (d), should reflect the changes in definitions set out in the consultation revision to PPS3.</li> <li>• The policy should also contemplate further changes to tenure and financing models that may be necessary to assist in the delivery of affordable houses.</li> </ul>	<p>Noted. It is proposed that the Core Strategy is subject to a viability testing exercise prior to publication to ensure requests for developer contributions are considered 'in the round'.</p> <p>Comment noted, the policy will be amended in accordance with the latest guidance.</p> <p>Comment in red noted &amp; we are / will work with RPs &amp; other partners to explore innovative funding arrangements &amp; access tenure requirements in the context of site location / balance of the market in a given area etc. – this will be supported by housing needs survey work &amp; findings to develop a more informed view on requirements.</p>
Joint Commissioning Unit	The targets seem sensible in the current climate bearing in mind the point at which people are now able to enter the housing market. We support the split of the affordable housing elements (80% social rented and 20% intermediate) as we are increasingly finding that for the client groups we support shared or outright ownership is ever more difficult to support due to changes in the financial products	Support noted.

	now available to them and therefore renting is the only affordable option. As above we are please to see clear reference to a range of housing to meet needs of older person, people with disabilities and special needs	
Ken Forest	whilst I support the intentions, the targets outlined, I do not consider acceptable. This is explained in more detail in the supplementary submission Appendix 2. INSERT	(b) and (c) The policy related to density will ensure the most appropriate and efficient use of land takes place.  Comments related to the chart have been noted  e) The evidence base will assist in determining the most suitable locations for different types of development.
TBC/SSPCT	The affordable housing targets appear realistic and achievable as demonstrated by previous 2006-2010 deliveries. However, Tamworth still has a high rate of teenage pregnancies this has shown the lack of smaller properties as starter homes for young parents. This in turn does result in overcrowding which could result with long term health problems for the adults and the child such as asthma	Support noted. Further work to identify housing needs for specific groups should identify the type and size of housing for particular groups.
Lichfield District Council	The District Council notes the methodology that underpins the affordable housing target. Whilst this approach is different to that taken by Lichfield District Council, it is considered that the two approaches are complementary and seek to maximise the provision of affordable housing, subject to viability	Support noted.
Tetlow King representing WM Harp Planning Consortium	The target tenure split of 80% social rented and 20% intermediate affordable is not supported. The Government has been consulting on a proposed change to the definition of affordable housing in PPS3 to include affordable rent which is likely to be adopted this year. Tamworth Borough Council is likely therefore to be out of step with adopted national policy if it fails to take this into consideration when setting a target tenure split. The Council should set out a local definition of affordable housing, encompassing this new form and taking into account the local context. The Council should also have regard to the funding difficulties all affordable housing providers are currently and will continue to face, and make allowance for a small element of cross-subsidy in rural areas to support increased affordable housing delivery. The release of surplus land holdings by Registered Providers should be supported as much as possible through the support of the Council, including through small scale cross-subsidy, as mentioned above, where viability is problematic. As with our comments above on Policy H1, we strongly recommend that this policy	Agree we need to be specific & include reference to AR (see comments above). We are looking at use of our / partners land, innovative funding models (cross subsidy etc.) and we are conducting up to date needs assessment which will provide us with relevant data to form a more informed stance – as alluded to above, will we be putting in to policy requirement for developers / planning consultants to provide us with data that they have which potentially contradicts our info as on previous occasions they have questioned our needs data with no real evidence to substantiate their claims. In terms of specialist provision, this again will become more apparent once needs survey has been done – in the meantime we have SCC strategies on Housing Support & Independent Living & Flexi Care Housing which provide information that is informing the Housing & Health strategy & could be used to include in Core Strategy / any SPD we develop in the future.

	<p>make reference to local need being evidenced through up to date assessments of need.</p> <p>As with our previous representations we strongly recommend that the delivery of specialist housing to meet the needs of the elderly is best implemented through a separate policy as at present point g) appears to be an afterthought. Bromsgrove District Council's recent Draft Core Strategy 2 includes a progressive policy on housing and care for the elderly (a copy of which is attached); such a policy should be incorporated into the Tamworth Core Strategy in support of accommodating the increasing ageing local population with a range of C2 and C3 developments.</p> <p>We welcome the indication that affordable housing contributions will be subject to regular review and further guidance in an SPD. Negotiation on a site-by-site basis is also supported as though the three target thresholds are useful, individual sites are likely to require flexibility.</p>	
CPRE	<p>CPRE appreciates that provision of affordable housing must be one of the LPA's first priorities. Concern must be expressed however at the large discrepancy between the SHMA estimate of need at 204/265 dwellings per annum and Tamworth Borough Council target of providing 43. This building rate appears to only provide at best for 1/5th of the need, and in practice means that the majority of those least able to access affordable housing are permanently deprived of this most basic of life's necessities.</p> <p>CPRE concurs strongly therefore with the sentiment in para 4, p9 that delivery of such housing "can not rely (wholly?) on market-driven residential schemes and other key organisations, including the Council, have a role to play in increasing the "supply of affordable units".</p> <p>If however such a drive is successful it has to be provided within the overall housing supply in order to comply with WMRSS targets, or additionally within the 75 houses per year, raising the final target number. It seems therefore (subject to your rebuttal) that in the former case the 45 per annum Affordable Housing forming part of the 75 overall annual provision would need to be raised to approach very close to the 100% provision which is deemed in the report as unviable! Is there not a contradiction, or</p>	<p>Comments noted. The Housing Needs Survey is currently in the process of being updated to ascertain a robust affordable housing need requirement.</p>

	<p>at least a sizeable dilemma here?</p> <p>The consultation document does not elaborate on the criteria by which the “Affordable Housing Viability Assessment” concludes that the delivery of a site is made unviable in supplying its need. It must however be considered a major shortcoming in the Core Strategy that no solutions are offered to satisfying the identified need.</p> <p>CPRE itself is not entirely convinced that the problem is incapable of solution by the market-housing industry. We are of the view that given assured contracts and with the benefits of current technology, a programme could be developed of starter homes of minimum initial sizes but designed for easy future extensibility, bringing into play self-help or smaller-sized building firms. This implies a measure of skill in design, and especially layout that we deal within the section on Housing Density.</p>	
Elanor Patrick	<p>Some elements of this policy and subsequent definition has not been clearly addressed or defined. Please do not let us have another mass area of housing on the scale as the Kerria or Amington.</p> <p>With regards to any housing development, first time buyers will be totally reliant of lenders and any local authority must acknowledge that homelessness can and does occur and must be taken into consideration.</p>	<p>The only large area of housing proposed is Anker valley and this will be subject to a comprehensive master plan to ensure a variety of homes are supplied, in terms of size and affordability together with community facilities and associated supportive infrastructure to assist deliver a sustainable community.</p>
JVH Planning for Walton Homes	<p>Although Policy H3 identifies that a flexible approach in negotiations in respect to affordable homes will be taken, concern is raised as to the setting of different levels of target dependant upon the number of dwellings. This appears to indicate that larger sites can always provide more affordable homes in viability terms when this is not always the case once abnormals have been considered. The way this policy is worded will result in an inefficient use of land contrary to planning objectives as developers will avoid triggering the higher threshold to avoid having to offer more affordable provision. It is considered that the policy as drafted is not evenhanded and will not assist in the provision of affordable homes. This is particularly the case when considered the viability issues on the largest site identified at the Anker Valley, which will not be viable in terms of any affordable provision given the infrastructure costs already identified. This will leave a further shortfall in affordable provision across the</p>	<p>The comments related to viability have been noted and will be set out more clearly within the policy. In terms of the delivery of affordable homes, recent monitoring has demonstrated that an increasing number of applications are for 14 units, which is below the national threshold for providing affordable housing. Therefore it is considered that having a banded approach, alongside the minimum density policy (H5) will ensure an efficient use of land and the provision of affordable homes on smaller sites which themselves are seen as important given the constrained nature of the Borough. Collectively it is considered that this will help to deliver an appropriate number of affordable housing in accordance with identified need.</p>

	<p>Borough and further highlights the flaws of the strategy. In order to attempt to deliver some affordable homes neighbouring Districts such of ESBC have have taken a different approach to achieving development where a 10% level is now sought.</p> <p>In addition any policy must explain and set out the viability formula to be adopted, to ensure that it is workable and reasonable. Without the formula being agreed in policy how will the development industry for example know what levels of profit is acceptable on sites when considering viability. This information must be available so that sites can be properly appraised by developers prior to acquisition to assist in the bring forward of sites and ensuring development.</p>	
Turley Associates for Hidgetts Estates	<p>On the basis that appropriate flexibility is built into any final policy, there is no objection to the approach to affordable housing suggested by draft policy H3. The Council's target for annual delivery should be expressed as 'at least' 43 affordable dwellings, as opportunities exist to secure additional provision, such as through the development of additional mixed tenure sites, and this should be embraced to help meet the level of need identified in the SHMA.</p>	<p>Support noted. Agree that the wording 'at least' be incorporated to make it clear that the 43 affordable housing is a minimum figure to deliver.</p>
Cllr Steven Pritchard	<p>Given the nature of the demographic of Tamworth, the available work and current situation with the economic climate I would suggest that the provision of 43 low cost residences per annum is totally inadequate</p>	<p>Agree that the wording 'at least' be incorporated to make it clear that the 43 affordable housing is a minimum figure to deliver.</p>

**H4 Do you agree with the proposed targets for each size of unit?**

Respondent	Main Issues Raised	Council's Response
Forestry Commission	The proposed targets and rationale seem reasonable. It is vital to ensure for whatever size and mix of units that there is adequate access to high quality greenspace/green infrastructure within a reasonable distance eg using the ANGSt model	Broad Greenspace/green infrastructure standards for new residential a development will be set out in the relevant Core Strategy policy
William Davis Ltd	Paragraph 22 of PPS3 indicates that LPA's should only identify the likely profile of household types requiring market housing and does not support local policy establishing a prescriptive requirement on the range and mix of house types and sizes required. Consequently we object to the proposed requirement for a prescribed provision by type and size of market housing in Policy H4, which is clearly inconsistent with national planning policy. In addition to this paragraph 23 of PPS3 states that "developers should bring forward proposals for market housing which reflect demand and the profile of households requiring market housing". This is important because demand for private market housing does not directly reflect household size, for example small households do not necessarily want to buy small dwellings. It is essential this is recognised in policy or there will be a real danger that the size and type of housing provided will not meet the purchaser's requirements	Agree. The policy will set out a proportion between market and affordable housing provision. The policy related to size of unit will be revised to reflect household type as opposed to size in accordance with Paragraph 22.
Bromford Housing Group	<p>Housing Needs Survey's always highlight a focus of need for small properties. They however do not reflect true demand or sustainability of households. It is our opinion that 1-bed properties do not represent a particularly suitable provision of affordable housing and that any housing supply of this size should be for the private market. From the point of view of Affordable Housing Stock we would wish to see a higher percentage of 3 and 4 bedroom units in line with the importance placed on this type of provision by the Homes and Communities Agency.</p> <p>Bromford Living housing management colleagues have the following queries linked to demand and lettings:</p> <p>Would the Borough Council propose to introduce local lettings plans?            When the last time waiting list information was reviewed?            What was the outcome of the allocations review Tamworth recently completed and has this been taken into account here?            What impact would the new welfare benefit rules have &amp; have the proposals to limit the Local Housing Allowance been taken into account?            Para 1 on page 11 refers to 'extra care accommodation' –we assume this means 'flexi care'?</p>	<p>Agree with 1 bed provision restricted to market housing – as for higher 3 &amp; 4 bed provision, our local data tells us we require 2 beds both from an affordable angle &amp; from market perspective (helping those on lower incomes to access the market) – agree we need to keep under review provision of 3 beds for affordable purposes (see below) – HCA should be supporting local approach &amp; priorities set out in LIP.</p> <p>Local lettings plans have been developed on other sites &amp; this would be good in the future to incorporate social services requirements &amp; ensure manageable &amp; sustainable communities that also meet local need. The waiting list reviewed May 2010.            Allocations review outcome to be taken into account here – looked at use of 2 beds &amp; proposed exploration of use of 3 beds but initial work on this (ongoing) suggests no significant increase demand for 3 beds (but need to keep under review)            Welfare reform / LHA limits &amp; their potential effects locally are</p>

		currently being worked through with more detail to come from housing Needs project Flexi care (Staffs CC) does indeed refer to extra care Comments noted.
North Warwickshire BC	<p>If the available evidence indicates that the size and type of housing needs are reflected in the H4 table shown the Council have no objections. However, I would raise some concerns over the percentage of 1 to 2 bed properties proposed 80% appears a little high particularly as best practice nationally and tenant surveys locally appear to indicate a preference for 2 bedroom minimum properties, particularly from elderly residents (This is also referred to on the H4 text Explanation). The Borough also notes the difficulties faced with the housing benefit changes currently proposed , reducing benefits for single people to the level of shared house provisions and/or single bedroom unit only costs (dependant on age/circumstances) creating greater market pressure for 1 bed units only (especially for the smaller affordable unit target market). Nevertheless, the current Housing Association approach in the North Warwickshire area and others is to deliver no less than 2 bed units, avoiding 1 bed units if at all possible.</p> <p>Local Authorities should be seeking to deliver best practice and not simply allow lowest common denominator private market delivery. 1 bed units should be the exception or targeted at a specialist market and/or need</p>	Comments noted.
Merevale & Blythe Estates	<p>Policy H4 as it is too rigid and inflexible. The proposal seeks to deliver 80% of all new housing in 1 and 2 bedroom size units, 15% in the form of 3 bedroom size units and 5% in the form of 4 bedroom size units and this is considered far too prescriptive. In the current economic climate the majority of house builders will be unwilling to construct 80% of all the dwellings on a site as small units as there will simply be no market for this level of provision. House builders will require much greater flexibility over the range of size of units and have far more knowledge about the requirements of the housing market than Local Planning Authorities. It is currently extremely difficult for first time buyers to secure a mortgage and fund large deposits required by lenders-it is precisely this group of people who tend to purchase 1 and 2 bedroom units.</p> <p>The rise in one person households does not necessarily mean that 80% of all new properties should be provided as small units as many small households are as a result of family break ups however parents still require larger size properties such as 3 and 4 bedrooms to accommodate children and relatives when they come to stay on a regular basis.</p>	Comments noted. Further work on Housing Needs is currently being commissioned to update the evidence base to inform final policies.

Bloor Homes	<p>The policy as drafted is both inflexible and too prescriptive. Furthermore it can only identify housing requirements at a particular period of time which may not address future changes in requirements over the life of the Core Strategy. We also believe that the conclusions set out in the explanation predicated on the 2006 ONS statistics are out of date given there are now 2008 base date projections.</p> <p>Furthermore it is not credible to solely relate household size to the size of property sought, there may be numerous reasons for choice of property size particularly with newly forming households. The demographic basis for these assumptions does not appear to reflect own experience of developing in Tamworth where there is a strong desire to remain in the area from young families who are looking toward larger houses. As such the policy could unduly restrict such movements and opportunities to retain residents and the existing workforce and skills have in the area.</p>	<p>Suggests need to review targets / approach as commented previously to reflect changing market etc.</p> <p>Agree we need to look at aspiration (area missed by SHMAs) which used to be picked up on in Housing Needs Surveys –However, given the current stock imbalance in favour of 3 &amp; 4 beds, there may be insufficient existing stock to facilitate moves within the borough to those who can afford to do so which could justify more affordable, 2 bed (+ some 3) provision to help those on lower incomes move to meet their needs or access the market so as to assist them to move to larger properties within the existing stock if their circumstances change over time. The Housing Needs review should assist in identifying this.</p>
Joint Commissioning Unit	The emphasis on 1 and 2 bed properties is appropriate for the service users we support	Support noted.
Ken Forest	Broadly yes, however these targets are across the board for Tamworth and some flexibility and research is needed to inform individual site and area needs. It is advocated that guidance parameters be developed in order to assist in informed delivery	Comments noted. Further work on Housing Needs is currently being commissioned to update the evidence base to inform final policies
TBC/SSPCT	Agree with the identified need for smaller units, but would suggest more 2 bedrooms rather than 1. I am not clear about the split in % between 1 & 2 units. As stated previously teenage parents are still of a high percentage and there is an increase in smoking among this cohort at least if they are accommodated in a 2 bedroom unit it will provide the child/children some respite from passive smoking.	Comments noted. Further work on Housing Needs is currently being commissioned to update the evidence base to inform final policies
Lichfield District Council	Yes	Support noted.
Tetlow King representing WM Harp Planning Consortium	<p>We strongly recommend that reference is made to evidence of local need being derived from up to date assessments. It is appropriate in supporting text to make reference to these being any of the SHMA, parish plans and independent developer-lead assessments for specific sites.</p> <p>Whilst the West Midlands Strategic Housing Market Assessment identifies a need for smaller dwellings</p>	<p>Survey to be undertaken as per previous comments.</p> <p>Point taken about people wanting to move on / start families etc. but this movement could be achieved via the existing stock – not just by older people moving into specialist / down sizing, but via the normal workings of the market. The independent living agenda &amp; work with</p>

	<p>the small proportion of 3 bedroom units targeted in this policy does not take into account the significant population of co-habiting couples in Tamworth who may require family dwellings in the future. It is unrealistic to assume that enough larger dwellings will be provided by older residents moving on. The Joseph Rowntree Foundation now recognise that older people may wish to stay in their homes longer and we would be looking to the Council's strategy to promote Lifetime Homes which would allow older people to remain living independently in their homes for as long as they wish. Such a strategy should complement a dual approach also seeking specialist housing and care for the elderly to meet aspirations and need. We are concerned that this policy will be applied too rigidly to all residential development, and in particular on small-scale developments. It would be beneficial for the Council to introduce further flexibility in the policy by noting that this will be subject to individual site negotiation. The final sentence appears to imply that all residential developments will be required to provide an appraisal of the local community housing need context. This will further burden an already paper-heavy planning application validation process and in line with our comments on the application of house type proportions to small scale developments we recommend that this should be clarified to indicate in which circumstances such additional evidence will be required</p>	<p>Staffs CC / other partners in the provision of FCH, adaptations, Home repair assistance loans, Handy person schemes etc. to achieve this but in some cases the current home may not be suitable &amp; downsizing / specialist accommodation may be best - hence need to other housing options (FCH, shared equity bungalows, smaller, lifetime homes to buy &amp; at affordable rent etc.) – point is here (as reflected in housing &amp; Health strategy) is to provide a range of viable housing options for all residents either by making best use of the existing stock or increasing supply to meet known / emerging need.</p> <p>It is considered entirely appropriate to request needs type information that we can cross reference with our needs data etc.</p>
<p>CPRE</p>	<p>CPRE concurs generally with the well-reasoned arguments put forward in this section. We especially agree with the conclusion as to the desirability of aiming for 2-bedroomed dwellings rather than one-bed units. We do suggest, which is partially your own reasoning, that expressed preferences for a one-bedroomed property are more a mark of desperation – or initial need – than longer-term thought, and that this could be at the root of the excessive turnover of such dwellings.</p> <p>We would suggest also that one-bedroom need reflects perhaps the needs of the younger end of the “singles” market rather than the “retirees”, who may increasingly need an extra bedroom for “carers”.</p>	<p>Support noted.</p>
<p>JVH Planning for Walton Homes</p>	<p>Targets should not be too prescriptive and developers are often far more knowledgeable as to what is required and will be marketable in local areas. This information is based on more up to date local market research and information than</p>	<p>Comments noted. Further work on Housing Needs is currently being commissioned to update the evidence base to inform final policies</p>

	<p>household projects and will ensure needs are met as ultimately they are unlikely to build homes which they can't sell. In addition to needs, market conditions and the availability of finance is key to what will ultimately be constructed by the industry. As although a need may exist and have been identified, this will still require to be paid for. Although construction for the private rental market has previously occurred and has been seen as a good investment opportunity for private individuals the current economic climate and many well documented situations have resulted in people exercising caution in this area particularly where an over supply of flats and small dwellings has then resulted in high vacancy rates and negative equity. Tamworth has so far avoided this situation but this could occur if the market is flooded with too many small units and the population is unable to finance their acquisition. Flexibility is therefore considered important to any targets set in respect to Housing needs to enable housing mixes to adapt to market conditions.</p>	
Staffs CC Adult Social Care	Good to focus on two bed from consideration of data presented	Support noted.
Turley Associates for Hidgetts Estates	The Council's suggested approach of requiring 80% of new developments to be 1 and 2 bed units is overly restrictive, will negatively impact on development viability and will restrict choice and flexibility.	Comments noted. Further work on Housing Needs is currently being commissioned to update the evidence base to inform final policies
Cllr Steven Pritchard	Why is it seen as necessary to build 1 or 2 bedroom properties. One bed occupants very often find they have need for 2 bedroom properties, the one bedroom property not meeting the needs of young families. Would it be ridiculous to consider building properties with a study/ hobby room usable as a 2nd bedroom from the start, Many of the complaints about our inability to house young families might go away	Comments noted.
Morston Assets	Whilst we support the Council's aspiration for achieving high standards of design, we would question the need for overly prescriptive planning policies in terms of mix, tenure and size of new housing development. H4 is overly prescriptive and lacks sufficient flexibility to respond to changing market conditions and housing need within the borough.	Comments noted. Further work on Housing Needs is currently being commissioned to update the evidence base to inform final policies

**H4 Do you agree with the approach to meeting the need for flexi care accommodation?**

<b>Respondent</b>	<b>Main Issues Raised</b>	<b>Council's Response</b>
Forestry Commission	The proposed targets and rationale seem reasonable. It is vital to ensure for whatever size and mix of units that there is adequate access to high quality greenspace/green infrastructure within a reasonable distance e.g. using the ANGSt model	Comments noted.
Morston Assetts	Whilst we recognise the need to provide housing to meet all sections of the community, including the elderly population, we do not consider that it is appropriate to apply rigid policy requirements for Flexi Care Accommodation. Instead, we believe that the mix and type of housing that is provided as part of a scheme should be based upon up-to-date housing market data, rather than rigid policies that can easily become out of date	Comments noted. Comments noted. Further work on Housing Needs is currently being commissioned to update the evidence base to inform final policies
Bromford Housing Group	Are the general flexi care numbers to en-compass all types of Supported Housing including needs groups with younger clients such as Learning Difficulties? Does the reference to 'extra care accommodation' in Paragraph 1 on page 11 relate to the flexi care units, we assume this is the case. The mixed tenure approach is our preferred delivery option for this type of scheme and is vital for their economic viability for this type of scheme and is vital for their economic viability.	Not all supported housing is covered under the FCH banner but within that there will need to be specialist provision (for dementia for example). Other, broader supported housing requirements will need to be referenced as well (& will hopefully become more apparent in wake of needs survey) Mixed tenure provision of FCH is reflected in Staffs CC FCH strategy
North Warwickshire BC	The Borough agree with the approach to meeting the need for Flexi Care Accommodation as the increasing age of the population is an issue that needs addressing. This situation also reinforces the need for minimum 2 bed units to enable carer, friends, family and other elderly support staff/services to stay and support elderly residents in flexicare homes where/when necessary. The delivery of new smaller flexi care homes to enable/encourage elderly residents to re-house may also help release larger family properties into the market	Comments noted. This highlights need for smaller units.
Merevale & Blythe Estates	Object to Policy H4 which contains the approach for meeting Flexi Care accommodation. The approach is too rigid. It is accepted that the population of those over 65 is growing however not all sites will be suitable for the provision of flexi care accommodation and some sites may be more suitable to family accommodation in terms of access to local schools and facilities. The provision of flexi care accommodation is provided by specialist organisations and in the current economic climate funding may simply not be available for the construction of this type of development	The policy will set out a criteria and site size threshold based policy setting out preferred locations for supported housing. This will be identified in the housing need update survey.

Joint Commissioning Unit	Whilst we are happy to see the inclusion of the number of units based on our needs analysis these should be viewed alongside local information and the suitability of sites and ability of the market to respond for this type of provision and should not necessarily be seen as absolute targets to be achieved. What is clear is that there is a need for more for sale and shared ownership options in the district for this type of accommodation to meet the needs of Tamworth's increasing elderly population	Support noted. This will be reviewed in the update of the housing need survey.
Ken Forest	This is a new more recent proposal which I personally support. However, experience and observations with care system indicates that this may not deliver on expectations. We need to identify and provide a retirement village such as exists in Lichfield and near the Beggars Bush in Erdington. Proposed locations close to Town Centre	Comments noted. Comments noted. Further work on Housing Needs is currently being commissioned to update the evidence base to inform final policies
TBC/SSPCT	The strategy to provide flexi care accommodation is good as it will meet the needs of the emerging elderly population, but health intelligence does also demonstrate that there will be more people will be living with a long term disability (physical, medical, mental) longer. So the provision within a Flexi care setting need to be a combination of residential and nursing home provision, before there is a reduction in these service provision.	Support noted.
Lichfield District Council	Yes	Support noted.
Tetlow King representing WM Harp Planning Consortium	Whilst we support reference to provision of specialist housing for the elderly, this is neither specific nor wide-ranging enough to fully support meeting local needs. Though the supporting text on page 10 indicates that a growing need for smaller accommodation to meet the needs of older single person households in the future, not all of this need should strictly be met by an increase in smaller general market housing. As with our comments above, reference to Flexi Care accommodation should be amended to read specialist housing for the elderly and linked in to a separate policy encouraging the delivery of a wide range of housing and care accommodation across the C2 and C3 spectrum.	Comments noted. Further work on Housing Needs is currently being commissioned to update the evidence base to inform final policies.
CPRE	Without knowing in detail the exact terms of Flexi-care Accommodation, CPRE agrees very much with this approach which acknowledges the demographic shift in family sizes, the social changes in family relationships and reflects national policy for moving emphasis from institutional care to care in the home. Added advantages can also be both the integration of the aged within the community and the environmental value of mixed development (in the social sense) in providing interest and variation in each neighbourhood's appearance from the changes in built accommodation and	Support noted.

	the setting of each type of development	
JVH Planning for Walton Homes	Homes should be designed so as to maximise their suitability for all age groups and abilities thereby extending their practicality along homes for life principles	Comments noted. Evidence suggests there is a requirement for specialist accommodation for a growing elderly population.
Staffs CC Adult Social Care	From the strategy it is apparent Tamworth has a high number of new units to deliver and a specific challenge to deliver some owner occupied choice as there is an extremely limited offer at Standon Gardens at present .It has been noted by the joint flexicare allocations panel that there have been some owner occupiers allocated rented flexicare units as they require this type of accommodation in the area and there has been no private option. The numbers of units predicted as needed look a very challenging target especially as we are a long way off the 2010 target now, meaning we need to catch up	The numbers needed have been identified by Staffs CC (JCU)



		schemes. The emerging SHLAA has used lower densities of between 30-40dph which is considered to be more appropriate.
Bromford Housing Group	Density figures seem appropriate for the general context of the Borough and in line with existing levels	Support noted
North Warwickshire BC	Agreed - no comments	Support noted
Merevale & Blythe Estates	Object as it is too prescriptive and rigid. House builders will seek to maximise the net developable area but they will also consider the sites characteristics, constraints, location, price of land and surrounding developments when preparing housing layouts. They have years of expertise and skill in preparing layouts and this is a more appropriate way of making efficient and effective use of land than relying on a crude assessment by the Local Planning Authority	The policy includes a caveat of 'where viable & appropriate' and '40 dwellings or more'. It is proposed that density bands be established to include broad figures and site criteria.
Bloor Homes	<p>Not convinced that the size of unit policy is well based. As such this will have a direct correlation with the densities that can be achieved on the development sites. Furthermore the application of density policies no longer features significantly in national policy.</p> <p>In light of these comments, even adopting a net developable area approach, would seem to be a somewhat abstract concept without reference to a specific site characteristics or considerations. As such we would believe that the approach to achieve 40 per net hectare is flawed. Similarly the method of calculation of density is inconsistent with the advice set out in the annex to PPS3 and potentially could cause difficulties in calculations.</p> <p>We therefore suggest the Council should critically review this and perhaps adopt a banded figure for the purposes of policy expression</p>	The net developable area/density ratios have been agreed with the SHLAA panel set up for the emerging SHLAA.
Ken Forest	Density should be set to respect the character of the area taking into account the need for garden areas, private amenity space and the size of the dwelling. The aforementioned table based on size area shows no evidence base. This should be based on data from existing page 11. Known developed areas, the figures will undoubtedly vary, therefore a range of guidance figures should give flexibility.	The approach to net developable area set out in the aforementioned table was agreed by the SHLAA panel.
TBC/SSPCT	Not informed sufficiently about this to provide an appropriate answer. Questions will the units all be living accommodation or will there be retail provision as well among them. Are they going to single units or flats?	Comments noted. The majority of schemes will be solely residential with the exception of mixed use schemes located in centres.
Lichfield District	No view. Appropriate density targets should be considered locally.	Comments noted.

Council		
CPRE	<p>If Tamworth is to follow the policy of a large percentage of 1 or 2 bedroomed houses and is to encourage such initiatives as starter homes, the necessary economies to be made will not allow of the looser arrangement of larger gardens in low density estates. CPRE advocates here that careful and imaginative grouping and arrangements contrived for effect, surprise, enclosure etc must be the essence of site planning, and utilises architectural and planning skills to the utmost. The mix of types of accommodation outlined above will, properly employed, give the variations of building heights so absent in orthodox layouts and facilitate architectural groupings of “space and place”.</p> <p>It is suggested that by the above means average housing densities could be increased from 40 dwellings per hectare of the net developable site area to 50-60 dph without any environmental detriment and indeed with great benefit.</p> <p>CPRE cannot at this stage however agree with the table, p11, which shows how the net developable area is related to the gross site size. 0.4 has (1 acre) to 2 has (5 acres) hardly merits a reduction in developable area of 20%, and 2 has (5 acres) and above do not justify a reduction in developable area of nearly half (40%). Some justification of these figures seems to be called for, involving the definition of net and gross site areas. The definition of net density which we use includes “the curtilage of the dwellings, access roads and minor open spaces plus half of the boundary road up to a maximum of 20ft”. With current and anticipated dwelling occupancy rates proportional allocation of public open space and school sites, which are the largest space users, based upon number of residents should not equate to the proportion envisaged in the Table.</p>	<p>Comments noted. The application of design policies and the assessment of proposals on an individual site basis will ensure that such good design principles are delivered.</p> <p>The methodology was agreed by the SHLAA panel and is consistent with the approach of neighbouring authorities. We do not propose to amend the approach taken.</p>
JVH Planning for Walton Homes	<p>Density should be considered on a site by site basis, the removal of minimum density targets in national policy is an acknowledgement that since PPG 3’s introduction town cramming has resulted in some poor quality development and therefore this should again be flexibly considered. It is obvious that higher densities should be sought near sustainable transport nodes and town centre’s where higher density apartment schemes are more suited. It is however considered that such flexibility can be achieved by including for a range of density levels across the borough. i.e. 35 to 40 dwellings per hectare in areas away from the town centre and transport nodes. Such flexibility is considered important to enable sites to have</p>	<p>Comments noted. It is proposed that density bands be established to include broad figures and site criteria.</p>

	adequate space for both amenity and parking provision thereby achieving a higher quality living environment fro residents	
Turley Associates for Hidgetts Estates	The Council's approach to calculating 'net developable areas' is crude and unlikely to enable an effective assessment of the density of new development schemes, and therefore deliver robust policy for the efficient/effective use of land; reference should be made to the definition of 'net dwelling density' given in PPS3. In some circumstances a net dwelling density of 40dph will not be appropriate; given that flexibility is required in all cases, to respond to local character and site specific circumstances (including ensuring overall development viability), a Borough wide target for density should not be set.	The net developable area/density ratios have been agreed with the SHLAA panel set up for the emerging SHLAA. The comments related to making reference to the definition of 'net dwelling density' in accordance with latest guidance have been noted and will be applied to the revised policy.
Cllr Steven Pritchard	We must not allow the building of the next generation of ghetto. There must be in built security for property owners and residents alike. There should be due consideration to ensure adequate services and facilities.	The overall objective of the Core Strategy is to create mixed sustainable communities with a mix of housing types, with good access to local services and supported by a quality environment. This should avoid the creation of single tenure and size developments.

**H5 Do you think we should seek to identify different density targets for different parts of the town?**

<b>Respondent</b>	<b>Main Issues Raised</b>	<b>Council's Response</b>
Forestry Commission	Whatever density is agreed, there must be adequate and appropriate provision of high quality greenspace/green infrastructure within easy reach of housing	Broad Greenspace/green infrastructure standards for new residential a development will be set out in the relevant Core Strategy policy
Morston Assetts	Consider that any policy should provide sufficient flexibility to allow for variation to reflect the particular circumstances of a site. We do therefore consider that it is appropriate to apply rigid density targets for different parts of the town, unless these allow sufficient scope for deviation	Comments noted. Agree that the wording 'where viable and appropriate' be included within the final wording of the policy.
William Davis Ltd	The appropriateness of housing density will certainly vary depending on the characteristics of different parts of Tamworth. We would support a policy which seeks higher density development within the town centre, with lower density development in suburban areas. As the density plan included in the consultation document indicates, higher densities (30dph and above) are found in the central areas of the town. Consequently requiring such densities within the town centre	Support noted. A banded density criteria will be produced to illustrate the different density levels appropriate to different sites across the borough.

	<p>would be appropriate in that location. However much lower densities (0 to 30dph) are mainly found in the suburban areas. Therefore William Davis support different density targets being identified within the Core Strategy for different parts of town. We consider that 30dph would be a suitable density level for suburban areas including the Anker Valley Strategic Allocation</p>	<p>Parts of the Anker Valley are close to the town centre and public transport interchange which makes it a sustainable location to justify higher densities. Different density levels could be applied through the master plan for the site.</p>
Bromford Housing Group	<p>Individual sites should be assessed on their own merits and not tied rigidly to density targets which should only be seen as averages. A mid point set of targets based on smaller geographic areas would not necessarily be able to be specific enough to be appropriate to all sites</p>	<p>Comments noted. It is intended that the final policy will include an element of flexibility to address individual site characteristics and constraints.</p>
North Warwickshire BC	<p>Potentially this would be a better solution and would help to reflect local character and protect amenity in lower density areas. However, this may be difficult to determine in mixed development areas and would need to be considered alongside any open space, amenity and recreation land availability, needs and existing provision to avoid increasing densities over that which should be considered sustainable for a localised area. Where opportunities can be grasped for increasing densities, such as Town centres and Town centre edges the policy should allow for higher densities to be achieved. The main issue is to retain flexibility to be able to address housing needs, reflect local character and protect amenity/open space provision yet still achieve the average densities sought and deliver the amount of housing needed</p>	<p>Comments noted. It is intended that the final policy will include an element of flexibility to address individual site characteristics and constraints.</p>
Merevale & Blythe Estates	<p>The house building industry will naturally deliver different densities on sites in various locations around Tamworth. The housing density on a site will be dependent on location, characteristics, price, constraints and the surrounding development and it is unnecessary for the Local Planning Authority to seek to identify different targets as again it is too prescriptive and rigid</p>	<p>Comments noted. Whilst we are looking to set a banded density criteria in order to make the most efficient use of land across the borough, It is intended that the final policy will include an element of flexibility to address individual site characteristics and constraints.</p>
Ken Forest	<p>Density targets should be set to ensure we deliver high quality housing to minimal density. Acceptable should it be found in practise then Tamworth has gained, if set too high then we could have problems in refusing unacceptable high density low quality proposals. Whilst this likely increases additional land identification problems</p>	<p>Comments noted. A balance needs to be achieved between the effective use of land and ensuring that development is appropriate in its context and viable. The proposed banded density policy will ensure that appropriate densities are achieved to deliver</p>

	so be it. It is preferable to err on the safe side	sustainability objectives but have sufficient flexibility to deliver viable schemes.
TBC/SSPCT	Yes, as it may contribute to better community cohesion	Support noted
Lichfield District Council	No view. Appropriate density targets should be considered locally	Comments noted.
CPRE	CPRE considers that in the interest of emphasising and reinforcing the town's character and avoiding any tendency to overall monotony, different density zones should be identified, and that these zones should be of substantially different densities and character. We read this into the final paragraph (p12) the LPA intention, which we endorse, especially indicating if it relates to response to historic areas as well as taking advantage of principal public transport routes. CRPE would not suggest pedantic minor differences in densities for their own sake, but only as a component reinforcing a particular local identity	Support noted. Whilst we are looking to set a banded density criteria in order to make the most efficient use of land across the borough, it is intended that the final policy will include an element of flexibility to address individual site characteristics and constraints.
JVH Planning for Walton Homes	If specific levels are to be set these should not necessarily mirror existing density patterns, which may not reflect modern requirements, such as areas where houses were constructed prior to residents owning cars and some dwellings being constructed without gardens. A failure to take account of this is likely to result in parking issues and potential danger as emergency vehicle routes are blocked by residents who have been forced to park inappropriately due to a lack of sensible off road parking as a result of town cramming. A flexible approach should be adopted to density levels across the Borough.	Comments noted. A balance needs to be achieved between the effective use of land and ensuring that development is appropriate in its context and viable. The proposed banded density policy will ensure that appropriate densities are achieved to deliver sustainability objectives but have sufficient flexibility to deliver viable and appropriate schemes which address modern requirements.
Cllr Steven Pritchard	I believe we need to have a consistent density approach towards housing across the town, this prevents some areas being looked down upon because of the high volume and density of housing provided which brings with it its own set of social/economic problems	Comments noted. A balance needs to be achieved between the effective use of land and ensuring that development is appropriate in its context and viable. The proposed banded density policy will ensure that appropriate densities are achieved to deliver sustainability objectives but have sufficient flexibility to deliver viable schemes

**H6 Do you agree with the approach to meeting the needs of Gypsies, Travellers and Travelling Showpeople?**

<b>Respondent</b>	<b>Main Issues Raised</b>	<b>Council's Response</b>
Forestry Commission	Welcome the commitment to space for play, residential amenity and landscaping – there must be adequate and appropriate provision of high quality greenspace/green infrastructure within easy reach	Support noted.
North Warwickshire BC	The Council agree with the Criteria based approach to identifying and enabling Gypsy and travellers sites to come forward for consideration subject to a more detailed needs assessment being undertaken in the future (following on the recommendations of the Southern Staffordshire and Northern Warwickshire Gypsy and Traveller Accommodation Assessment). The Council note the low figures for proposed pitches and understand the reluctance of some of the Gypsy and Traveller community to locate in Tamworth but there are some concerns that these targets/figures may be too low and not accurately reflect Tamworth's sustainable location and position on the Highway network used by the travelling community along the A5 trunk road and close to M6 and M42 junctions	Support noted. The Council is of the opinion that the figures contained within the GTAA represent the most appropriate evidence base to support the policy.
TBC/SSPCT	Are the established sites spread across Tamworth or are they all in one area. I realise that they need to have access to facilities could one of the facilities be named as GP/ Dentist.	There are currently no established sites within Tamworth's boundary. Whilst the policy does not propose to allocate specific sites it sets out a criteria based approach to assessing the suitability of applications for sites.
Lichfield District Council	Lichfield District Council does not agree with the approach set out for meeting the needs of Gypsies and Travellers. The approach set out suggests that suitable land is limited within Tamworth and that opportunities in neighbouring District's will be sought. It is suggested that Tamworth Borough Council undertake further work to consider the opportunities that are present within the Borough to inform any cross boundary discussions. In terms of transit pitch requirements, it is our view that this could be considered at a sub-regional level. The GTAA apportioned 5 transit pitches to each borough/district and there may be benefits in sharing/pooling provision and any costs associated with the ongoing maintenance of such sites. The GTAA did set out a number of recommendations for continued consideration of gypsy, traveller and travelling showpeople provision across the A5 corridor sub-region. It is suggested that these recommendations underpin any cross boundary considerations	The ongoing update of the SHLAA emphasises the lack of opportunities to allocate strategic sites as a result of the restricted number and size of available sites within the borough. Tamworth Council is of the opinion that the figures contained within the GTAA represent the most appropriate evidence base to support the policy, however, in the spirit of the forthcoming duty to co-operate, Tamworth Council will continue to work with neighbouring authorities and partners to identify any cross boundary opportunities to consider potential delivery arrangements.
Derbyshire Gypsy Liaison Group	<ul style="list-style-type: none"> <li>• 'Gypsy' should read 'Gypsies'</li> <li>• The wording 'to enable the development of pitches' implies that Tamworth Borough Council still do not intend to actually allocate a site to meet identified</li> </ul>	The approach conforms to the approach contained within the emerging proposed Planning Policy Statement 'Planning for Traveller Sites' which, on adoption, will replace the existing

	<p>need in the area, contrary to current government policy in Circular 01/2006. There needs to be a stronger emphasis on delivery in order to ensure the policy is effective.</p> <ul style="list-style-type: none"> <li>• The wording 'Proposals will be expected to contribute to the creation of sustainable mixed communities' is vague.</li> <li>• Criterion C should be amended to read 'The site must be capable of providing adequate on site services for water supply, drainage, sewage disposal and waste disposal' for clarity</li> <li>• Criterion D should be amended to read 'The site should be reasonably accessible to schools, shops and other local facilities'</li> </ul>	<p>Circulars. It allows local authorities to set their targets based on historical demand it is therefore likely that there will be no identified need for Tamworth. Where this is the case the proposed policy allows criteria based policies in plans that will be used for determining applications if they come forward. Agree. This will be deleted from the final policy.</p> <p>Comments noted. These will be considered when compiling the final policy.</p>
CPRE	<p>The LPA needs to respond to a specific need, and we believe draft Policy H6 adequately defines the criteria needed for considering any proposal where National guidance (and Regional guidance where applicable) is available. We do not consider at this stage that the Needs Assessment is unduly onerous as concerns numbers, subject to detailed consideration at application stage.</p> <p>CPRE is, however, concerned at the situation likely to arise within the Plan period from a potential major influx from the EU of the communities concerned at a level incapable of pursuing their traditional employment and resistant to integration and assimilation with host communities. We suggest that the situation merits a rolling review and assessment in conjunction with partner authorities.</p>	<p>Support noted.</p> <p>Any future planning applications would be assessed against the criteria established.</p>
Elanor Patrick	<p>I was also pleased to see that Tamworth Borough Council has revised their policy on Gypsy and Travelling people. It would have been nicer to have read that this minority group had actually been consulted. Many of us are aware that these minority groups of people have long been persecuted and we must all make an effort to ensure persecution does not continue. Provision to integrate this group of people to make them feel less isolated or excluded from society is a role that local authorities housing strategy can include and make provision for. Social progress</p>	<p>Support noted. Representatives of the Gypsy, Travellers and travelling Showpeople communities have been consulted on the emerging policies and have submitted representations for consideration.</p>

	which recognizes the needs of everyone is achievable within the objectives.	
Cllr Steven Pritchard	Travelling people live a particular type of life style. That being of a transient nature. I would happily provide facilities for the travelling community, but should the travelling community fail to provide sufficient care in the upkeep of those said facilities the fixed residential population should not carry the financial burden of doing so.	Comments noted.
Gary Heritage	Agree that Tamworth has a limited supply of land and that neighbouring districts should be looked at to accommodate these needs if at all required.	Support noted
Ken Forest	Agree	Support noted