

CABINET

10 March 2010

Report of the Portfolio Holder Economic Development and Enterprise

Core Strategy : Proposed Spatial Strategy Consultation : Responses

Purpose

For Members to consider the responses to the consultation on the Core Strategy Proposed Spatial Strategy Document carried out in October 2009 and the next stage in the process to deliver a sound Core Strategy. Approval is also sought to undertake further public consultation on Affordable Housing policies.

The report is not a key decision.

Executive Summary

In October and November of 2009 a consultation was undertaken in respect of the Proposed Spatial Strategy for Tamworth. 63 respondents made representations and these comprised a mixture of developers, government agencies and individual members of the public. There remain concerns over the development proposal for the Anker Valley, however with this exception there does not appear to be any fundamental issues raised about the overall Strategy.

The majority of evidence gathering is now complete and this report seeks approval to consult separately on Affordable Housing Policies to be included in the Core Strategy.

The Regional Spatial Strategy was considered at an Examination in Public in 2009 and the Panel have since reported back their findings and recommendations which included 1000 homes to be accommodated in Lichfield District to the North of Tamworth. This was unexpected and officers have been awaiting the publication of the 'proposed changes' from the Secretary of State to see if the recommendation has been carried forward. This was expected in December 2009 but at the time of writing this report no modifications have been published.

Policy, Capital & Revenue Budget Background

There are no policy, capital or revenue budget issues arising from this report.

Recommendations

1. That Members note the responses to the Core Strategy Proposed Spatial Strategy Document and approve the suggested Borough Council responses outlined in Appendix A of this report.
2. That Members approve the preparation of policies relating to Affordable Housing and subject to approval from the Portfolio Holder for Economic Development and Enterprise and the Portfolio Holder for Quality of Life that these policies are consulted upon.

If Members would like further information or clarification prior to the meeting please contact Matthew Bowers Ext. 279 or Ray Vanstone Ext. 276.

<i>Background Papers</i>	<i>Report to Cabinet 15 October 2008, minute number 310</i>
	<i>Report to Cabinet 11 February 2009, minute number 518</i>
	<i>Report to Cabinet 11 June 2009, minute number 61</i>
	<i>Report to Full Council, 15 September 2009, minute number 243</i>

Core Strategy : Proposed Spatial Strategy Consultation : Responses

Background

The Local Development Framework (LDF) is a collection of Development Plan Documents (DPD's) and Supplementary Planning Documents (SPD's) which collectively delivers the spatial strategy for an area. The Core Strategy is the key document within the LDF and will contain a vision and strategic objectives for the Borough as well as Core Policies that will set the basis for directing change in the Borough for the next 15 to 20 years. It is a requirement of the process that we should have continuous engagement with all those who have an interest in the future of Tamworth.

In October and November last year a consultation was undertaken in respect of the Proposed Spatial Strategy Document which set out the 'vision' for the Core Strategy, the spatial objectives, how growth could be managed and the Core Policies that support the delivery of the Strategy.

During the consultation period officers staffed an exhibition at 11 venues which were open to members of the public to come and ask questions and talk to officers about the Strategy. 63 respondents made representations and these comprised a mixture of developers, government agencies and individual members of the public. This was higher than previous consultations but the level of responses was still disappointing. The exhibitions were on the whole poorly attended which was most likely a result of poor publicity. An initial article appeared in the Tamworth Herald advertising the exhibitions but despite several press releases and request, follow up articles did not take place until towards the end of the exhibitions. A positive outcome of the exhibitions were the ones held at the Ankerside Shopping Centre where officers spoke to over 50 people on each day. In total, it was estimated that over 150 people attended the exhibitions.

Overview of the responses received.

Appendix A contains a summary of the responses received and a suggested Borough Council response. The following provides an overview of the responses received in relation to key questions:

The Vision: Disparity between being considered too aspirational and not ambitious enough.

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

The Town Centre: There was support for promoting town centre regeneration, although there was concern about impacting on the character of the historic centre. Some respondents questioned when the Gungate Precinct scheme will go ahead and others felt that parking charges discouraged visitors.

Housing: There remains opposition to development in the Anker Valley in respect of the loss of agricultural land, highway impact, the impact on the countryside and Amington Hall Estate Conservation Area. There also remains questions over its deliverability. However some feel it would be preferable to

Green Belt release. There was support for brownfield development before Greenfield.

Economic Development and Enterprise: Regeneration of existing employment areas is favoured over Greenfield release. There was support for improvements to existing areas to safeguard existing jobs and provide additional opportunities.

Sustainable Neighbourhoods: Overall support for a new community leisure centre, although some questioned the location and suggested it should be in the town centre.

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

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

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

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

With the exception of concerns over the development of the Anker Valley, there were no fundamental issues raised about the overall Strategy. The key issues that will need to be addressed between now and the Publication version of the Core Strategy are identified as follows:

- Can an Anker Valley development, which includes good accessibility and linkages to the town centre, be delivered? We will need to be certain that the development is viable before proceeding with the Strategy.
- How can Town Centre regeneration be delivered?
- The need to identify all necessary infrastructure requirements and the mechanisms for delivery.
- How Tamworth's employment land requirements can be met.

Evidence Base

In order to be found sound the Core Strategy needs to be based on a credible and robust evidence base.

The majority of the identified required evidence base is now complete with 3 major pieces of work outstanding that are nearing completion (see Appendix B). The first is a study into the impact on viability of different levels of affordable housing requirement on a residential development. This is due to be complete in early March and following this, a policy will be drafted and then consulted on. The early findings from this Study are outlined below. It is proposed that the two relevant Portfolio Holders are authorised to approve

that policy for consultation. The second piece of work is being undertaken on a County wide basis with the other Staffordshire Authorities to examine the potential for renewable energy. This document which is expected to be complete in March will inform the policies on building requirements. The final piece of work, a water cycle study, is being undertaken with Lichfield DC, Cannock Chase DC, South Staffs DC and Stafford BC. This is expected to be complete in Spring and will advise the Authorities about water requirements as a result of new development.

Affordable Housing Viability

The draft findings of the aforementioned study recognise that the local market broadly reflects the type of conditions which are being experienced throughout the UK. Property sales volumes are down, and have been falling month on month from Winter 2008, but more recently there has been a stabilisation in the trend. Alongside this, the current economic climate has also contributed to the housing need situation worsening. However, it will not be possible to provide the levels of affordable housing that the needs evidence justifies.

A balance will need to be struck between the opposing tensions of housing need and viability. Whilst the current market conditions will need to be considered, these are likely to change in some way over a short period of time in relation to the planning periods being considered. If strategic policies and targets are set based on the current market, it is likely to mean that these would have to be reviewed and varied regularly, leading to potential inequalities and requirements that are uncertain. The policy needs to create certainty and clarity of expectations, but the policy will need to be applied flexibly where needed. This could mean prioritising certain planning obligations or other requirements within overall objectives and targets.

It is suggested that a target proportion of 30% could be applied to schemes of 15 dwellings or more with various sliding scale options including the potential for financial contributions beneath that. A framework will be worked up in partnership with Strategic Housing and this report seeks approval to consult on this framework subject to agreement of the two relevant portfolio holders.

Regional Spatial Strategy (RSS)

The Core Strategy will need to be in general conformity with the Regional Spatial Strategy. The current RSS was adopted in 2004 as Regional Planning Guidance but is being revised in 3 phases. The first phase concentrated on the Black Country and is now complete. The second phase examines housing numbers, town centres, employment land, transport and waste. The third phase was scheduled to look at critical rural services, culture/recreation provision, environmental issues and providing a framework for Gypsy and Traveller sites. In the summer of 2009, an Examination in Public (EiP) considered the Draft Phase Two Revision of the RSS. Following this the independent Panel prepared a Report of findings and made recommendations to the Secretary of State. The Secretary of State has considered the Report and intended to publish the 'proposed changes' to the submitted RSS Phase 2 Revision in December 2009. However, Government Office have published the following statement:

Issues have arisen during the drafting of the Proposed Changes on which we require a legal view to ensure the final RSS will be robust. Given the large amount of material which Counsel will have to consider this is expected to take until the end of January. We hope to be able to publish soon after that.

At the time of writing this report the Proposed Changes had not been published. There are a number of issues of relevance to Tamworth Borough Council arising from the Panels Report including:

- Increasing the housing requirement from 2900 to 4000, with at least 1,000 to be within Lichfield District to the north of Tamworth;
- Increasing the Employment Land requirement from 42ha to 56ha. However, part of the provision may need to be located in Lichfield or North Warwickshire Districts.

Any targets in the final adopted RSS will need to be reflected in the spatial strategy for Tamworth. Whilst these increases to housing and employment figures may be accommodated outside of Tamworth's administrative boundary, our Core Strategy needs to take account of where and how this will be delivered and what infrastructure may be required within Tamworth to support the development. This work has yet to be undertaken at any great detail with neighbouring authorities and there is concern from those authorities about the Report recommendations. This uncertainty, particularly over the reference to 1000 homes to the north of Tamworth in Lichfield District has led Lichfield District Council to put its Core Strategy on hold as this did not feature in their proposed spatial strategy. This has a knock on effect for Tamworth as we will need to demonstrate we have taken account of neighbouring authority's plans.

Infrastructure Delivery Plan

A key part of the Core Strategy will be an Infrastructure Delivery Plan to show how policies and proposals can be implemented. It is recognised that to create sustainable communities providing housing and employment opportunities alone is not sufficient. There is a need to provide the necessary supporting 'infrastructure' including utility services, transport, schools, open space, community, health and leisure services. These services are provided by a range of organisations and the preparation of an integrated infrastructure delivery plan is essential for Local Authorities and their partners to fulfil their place shaping role. To be found sound, the Core Strategy must identify the infrastructure requirements for its area, who will provide them and when. This is not something the Borough Council can do alone and it will need to work closely with its partners to prepare the infrastructure delivery plan.

Work has begun on establishing a baseline position and the next stage will be to utilise the Local Strategic Partnership to identify more detail before consulting wider with the private sector and in particular with utility providers.

Next steps

A policy on affordable housing will be drafted upon completion of the Viability work and this will then be consulted upon. The outcome of this consultation

will influence the final policy in the Core Strategy as will the remaining evidence when complete.

Work will also continue on the production of the Infrastructure Delivery Plan.

Given the evidence to date, it is still considered that the proposed overall strategy to be the correct and most sustainable choice for Tamworth.

It is anticipated that the final Core Strategy will be produced in late Spring, however, given the delays to the RSS and the forthcoming elections, it is unlikely that a Draft Core Strategy will be able to be taken to a meeting of Full Council for consideration until the summer. Subject to approval a final Draft Core Strategy will then be published (Regulation 27) in order for representations (relating to issues of soundness) to be made. The document will then be submitted (Regulation 30 and 31) to the Secretary of State for examination in the late Autumn of 2010. It is a likely that an Examination will be held in early 2011.

It is intended to supplement the Core Strategy with Supplementary Planning Documents (SPD). These will cover a variety of topics including developer contributions, design and more significantly the locality working areas, including the town centre. These will be linked in to policies in the Core Strategy and so although they will not be able to be adopted until after the Core Strategy is adopted, work can and is envisaged to start on some of these SPD in the summer 2010.

Appendix A

Summary of Comments to Proposed Spatial Strategy and Council's Responses

Respondent	Main issues raised	Council's Response
Mrs C. R. Arnold	<ul style="list-style-type: none"> • No consideration has been given to the impact of Anker Valley development on existing estates, roads, facilities and residents. • Gypsy and Traveller communities show no respect for existing communities, do not pay Council tax and local residents have to pay for cleaning up sites. • More local sites for community leisure centres rather than just one strategic site. • Transport priorities should be more reliable public transport that extend into evenings, particularly in Amington. 	<p>The impact of the Anker Valley has been assessed through the Sustainability Appraisal. Policy H2 sets out the level of facilities and services that will be required on-site to serve the needs of the development.</p> <p>Where regulated Gypsy and Traveller sites are established, the residents will pay local taxes. Government policy requires us to ensure that there are sufficient sites to meet the identified need.</p> <p>The Joint Sport Strategy identifies a need for a range of facilities including a swimming pool, health and fitness stations and sports halls. It would make sense to provide these in one main purpose built facility (Policy SN4). However, the study also highlights the contribution that facilities based in schools and community centres can make to providing recreation and exercise classes in the neighbourhoods. Policies SN1 and SN2 support this.</p> <p>Other comments noted.</p>
Dorothy Ansell	<ul style="list-style-type: none"> • Brownfield land should be looked at first. • Protect important green spaces, less valuable spaces could be built on. • Leisure centre should be closer to the town centre. • Build flood defences and build on flood plain. • Improve bus services in terms of access to bus shelters, 	<p>The Council's strategy comprises a mixture of development within the existing urban area and greenfield development. It would not be possible to conform to the RSS in terms of meeting development targets without using greenfield sites.</p> <p>The Council is in the process of updating its open space audit and assessment. This will update the picture of</p>

	<p>service frequency, times and drop kerbs.</p>	<p>deficiency and surplus across the Borough. The general approach will be to protect open spaces that already make a positive contribution to the needs of the local area or are capable of making such a contribution (Policy SN3).</p> <p>All four potential sites for a leisure centre have been subject to sustainability appraisal and the proposed site to the east of the town centre scored equally as well as the town centre site. It has the benefit of being located close to areas of need and being easily accessible.</p> <p>Other comments noted.</p>
<p>Mr B. Edwards</p>	<ul style="list-style-type: none"> • Town cannot cope with existing level of housing. Additional 2900 homes will overload roads and increase flooding. • Most important objective should be to retain surviving historic buildings and not to over develop the town. • Town centre looks tired and jaded and would benefit from an upgrade. It needs a focal point and cheaper parking. • Anker Valley would represent over development. • Gypsies and Travellers do not contribute to taxes, they could buy a home or land. • Improved employment areas safeguard current jobs and offer further job opportunities. • Town centre offices would help local businesses. Need for close monitoring of traffic flows and parking. • Important to retain green spaces with regard to carbon emissions and also because they offer opportunities for health/well being, walking, sport and play. • Need proper flood defences for the town centre and Lichfield Road. • Council should set an example with regard to climate change technologies. 	<p>The RSS stipulates the quantum of housing required for each district. The Council will be preparing an infrastructure delivery plan, which will be in place by the time the Core Strategy is published. This will ensure that the necessary infrastructure will be in place when it is needed.</p> <p>The cost of running and maintaining the car parks are assisted by revenue from the parking charges. If parking was free, these costs would need to be met from other sources. Similar town centres to Tamworth also charge for parking and our rates are comparable. A review of car parking, both supply and charging in the town centre will be undertaken in the future.</p> <p>Where regulated Gypsy and Traveller sites are established, the residents will pay local taxes. Government policy requires us to ensure that there are sufficient sites to meet the identified need.</p> <p>The Borough still retains a wealth of historic assets, which is</p>

	<ul style="list-style-type: none"> • Computer mapping for flooding is not as important as local knowledge. • Effective transport/road planning is important. No further development should be allowed until this is carried out. • Assess all infrastructure implications before development takes place. 	<p>evident from the number of listed buildings, scheduled ancient monuments, conservation areas and locally listed buildings. The Council acknowledges the importance of preserving and enhancing these assets and ensuring that development is sympathetic, as reflected in Policies TC2, DH, DH2 and DH3.</p> <p>The intention is that regeneration of the town centre with a stronger retail mix, new office development, leisure, residential uses and an enhanced environment, will achieve a vibrant and attractive town centre and bring more people into the centre. Parking will be an important element in achieving this and consideration will be needed of the number of spaces and charging. It is not always controlled by the Borough Council.</p> <p>Computer mapping for flooding provides a useful method of understanding past trends. Computer modelling is helpful in predicting how development will impact on the environment in terms of run-off and flooding.</p> <p>Other comments noted. The Council will be re-drafting the core policies in the light of consultation responses and emerging evidence.</p>
Polesworth Parish Council	<ul style="list-style-type: none"> • Tamworth has enough land to meet its needs at Anker Valley and in Lichfield District. Strongly oppose any development in North Warwickshire to meet Tamworth's needs. 	<p>Depending on the outcome of the RSS Phase 2 Review or if the Anker Valley site cannot be delivered, alternative sites will have to be considered to meet Tamworth's needs. This would include consideration of sites in Lichfield and North Warwickshire, some of which scored relatively highly in the Tamworth Future Development and Infrastructure Study.</p>
J. Brundrit	<ul style="list-style-type: none"> • Amington village cannot take any more traffic. A more direct route into town is needed to accommodate additional 	<p>The Amington Link will provide an alternative route into the town centre.</p>

	<p>traffic.</p> <ul style="list-style-type: none"> • Brownfield sites should be developed first. • High quality design is important to protect the town's character. • Cleaning up the town centre should be a priority. 	<p>The Council's strategy comprises a mixture of development within the existing urban area and greenfield development. It would not be possible to conform to the RSS in terms of meeting development targets without using greenfield sites.</p> <p>Other comments noted.</p>
Brenda Dainter	<ul style="list-style-type: none"> • Important to attract more quality retail outlets into the town otherwise it will remain a 'cheap' town. Existing town centre is depressing with all activity at Ventura. • Should consider facilities for young people. • Would object to loss of football pitches to the Anker Valley development as these are needed by young people. • Anker Valley transport proposals are not sufficiently well thought out. • Anker Valley does not appear to have any community provision, it should not be just housing. Needs to be addressed in more depth. • A transient population does not contribute to the town and it is hard to appreciate why accommodating them should be one of the town's priorities. • Good future employment prospects would attract people. • Important to create sustainable new employment. • Offices would create day time life in the town centres. • Local and neighbourhood centres should be an integral part of the community and be well used by all. • Sport and recreation are important for health. • Support the location for community leisure centre, but should not ignore the potential offered by local/neighbourhood provision. • Concerned about delivery of transport strategy because problems with phasing could cause chaos. 	<p>The intention is that regeneration of the town centre with a stronger retail mix, new office development, leisure and residential uses and an enhanced environment, will achieve a vibrant and attractive town centre, which will bring more people into the centre.</p> <p>If football pitches are lost through development (not just the Anker Valley), there will be a requirement for suitable compensatory provision to be made in a convenient location, as reflected in Policy SN4.</p> <p>Physical linkages need to be provided to ensure that the site is highly accessible to services and facilities, the town centre and station. The Council considers that the Anker Valley and Amington Links are needed in connection with the strategic housing allocation. There will also be an emphasis on the provision of sustainable forms of transport including a park and ride facility at the railway station, footpaths and cycleways.</p> <p>The Anker Valley policy H2 includes development principles which include a range of community facilities including a primary/junior school, local centre, health facilities and community centre.</p>

	<ul style="list-style-type: none"> • Priority should be for better road links into town. • Convenient town centre parking is important. 	<p>Where regulated Gypsy and Traveller sites are established, the residents will pay local taxes. Government policy requires us to ensure that there are sufficient sites to meet the identified need.</p> <p>The Joint Sport Strategy identifies a need for a range of facilities including a swimming pool, health and fitness stations and sports halls. It would make sense to provide these in a new purpose built facility (SN4). However, the study also highlights the contribution that facilities based in schools and community centres can make to providing recreation and exercise classes in the neighbourhoods. Policies SN1 and SN2 support this.</p> <p>Other comments noted.</p>
Mrs Maureen Carroll	<ul style="list-style-type: none"> • Change should be in keeping with the character of the historic town to attract people. There are very few historic buildings left and the town looks like other redeveloped towns in the country. • Tamworth Castle is a great asset. • Planners should take account of local residents' views in planning for the town. • Ensure that town centre regeneration produces a distinctive character. Town centre is not easy to access by people with disabilities. • Need shops rather than offices in the town centre. Multi storey flats could be converted into offices and people housed elsewhere. • Anker Valley should not be over developed. Transport is an issue. • Retain sports facilities in public ownership. • Travellers cause mess and destruction, clearing up is 	<p>The Borough still retains a wealth of historic assets, which is evident from the number of listed buildings, scheduled ancient monuments, conservation areas and locally listed buildings. The Council acknowledges the importance of preserving and enhancing these assets and ensuring that development is sympathetic as reflected in Policies TC2, DH, DH2 and DH3.</p> <p>The RSS sets targets of 30,000 sqm of office floorspace and 35,000 sqm of retail development to be provided in Tamworth town centre. Both elements, together with complementary leisure, residential uses and an enhanced environment are needed to achieve a vibrant and attractive town centre and to bring more people into the centre.</p> <p>The Council has adopted a Statement of Community Involvement which sets out how and when it will consult on</p>

	<p>covered by tax payers.</p> <ul style="list-style-type: none"> • Tamworth has lost much of its specialist engineering and industrial estates are being developed for offices. Need to encourage blue collar engineering. Regenerate rather than develop new land. • Need more amenities for young people. • Do not extend the town outwards otherwise it will merge with other settlements. • Bus services are unreliable and need better connections. • Minimising flooding is imperative. 	<p>the local development framework.</p> <p>Where regulated Gypsy and Traveller sites are established, the residents will pay local taxes. Government policy requires us to ensure that there are sufficient sites to meet the identified need.</p> <p>The Council's strategy comprises a mixture of development within the existing urban area and greenfield development. It would not be possible to conform to the RSS in terms of meeting development targets without using greenfield sites.</p> <p>Other comments noted.</p>
<p>A. R. Yarwood, Derby Gypsy Liaison Group</p>	<ul style="list-style-type: none"> • Cannot justify not allocating specific sites. It is contrary to national guidance and Tamworth cannot avoid its responsibilities. • Criteria are too restrictive and appear to have been formulated to ensure that no sites are acceptable. • Proper consultation with stakeholders needs to take place to identify sites. 	<p>Noted. It is the intention to re-establish the steering group of neighbouring local authorities along the A5 corridor to consider the strategic provision of sites.</p>
<p>Mr M. A. Arnold</p>	<ul style="list-style-type: none"> • Improved shopping facilities are essential for the town centre and are more important than offices. • Anker Valley would be better retained as open space. • There is insufficient space in the Borough to accommodate Gypsies and Travellers. • Open spaces are very important as the Borough has become over-populated. Encourage biodiversity and creation of local nature reserves. • School facilities should be used more by the public and support given to the enlargement of Tamworth Football Club's ground. 	<p>The RSS sets targets of 30,000 sqm of office floorspace and 35,000 sqm of retail development to be provided in Tamworth town centre. Both elements, together with complementary leisure, residential uses and an enhanced environment are needed to achieve a vibrant and attractive town centre and to bring more people into the centre.</p> <p>The Joint Sport Study highlights the contribution that facilities based in schools and community centres can make to providing recreation and exercise classes in the neighbourhoods. The sustainable neighbourhood policies</p>

	<ul style="list-style-type: none"> • Safeguard heritage assets. • Do not build in floodplains and retain the Green Belt. • Concentrate on public transport rather than using private cars. • Improving the appearance of places is important, especially areas outside the town centre. 	<p>SN1 and SN2 support this.</p> <p>The focus for regeneration is the town centre, while neighbourhoods will be identified for improvements to the environment and community facilities, with an emphasis on the locality working neighbourhoods.</p>
Natural England	<ul style="list-style-type: none"> • Agrees with the Vision as it makes provision for safeguarding natural assets, encourages sensitive design and a positive attitude to cycleways and footpaths. • Support objectives SO3, SO4, SO5 and SO11 as they are in line with their approach to protecting and managing the natural environment. • Support fostering of local distinctiveness in town centre but consider that there should be reference to enhancing green infrastructure. • Support Anker Valley principles relating to green infrastructure, countryside, waterscape, footpaths and cycleways. • Environmental improvements in connection with regeneration of employment areas should incorporate opportunities for biodiversity enhancement and encourage walking and cycling. • Green spaces should be protected as far as possible so that they can contribute to the wider green infrastructure network. Encourage a net gain by improving the quality and quantity of accessible green spaces. • Would like greater provision for outdoor activities and countryside recreation. • Consider that a separate design policy is essential to set high standards. Village and town design statements are a valuable tool in encouraging quality design and local distinctiveness. 	<p>Noted. The Council will be re-drafting the core policies in the light of consultation responses and emerging evidence.</p>

	<ul style="list-style-type: none"> • Reference should be made to the Staffordshire Landscape Character Assessment. • Support inclusion of local policies on flooding and Green Belt as there may be specific issues that need local solutions. • Sustainable transport priority would be improving the provision of non-motorised transport. • Streetscape improvement policy should be linked to a green infrastructure policy. • Development management policy repeats previous policies and statements. Would be better used as a checklist to sustainable development. 	
<p>Campaign to Protect Rural England</p>	<ul style="list-style-type: none"> • Vision is predominantly aspirational, it ignores forecasts and projections for 2026 and for that reason is unsound, untenable and unjustified. • National target for 80% reduction in carbon emissions is not mentioned in the Vision. Vision is weak in that it does not identify the underlying scenario of climate change, depletion of natural resources/agricultural land and population growth and shifts. • The Council may want to challenge the WMRSS objectives regarding housing growth projections and employment land allocations. • SO2 is too narrow in its interpretation of the historic town centre. Reference should be made to the earliest definition of conservation areas. • SO3 should refer to health and well-being. • SO4 – government guidance may be too inhibiting, too little and too late. • SO6 understates imperative of working towards a sustainable transport network. • Suggest that education and training is deleted from SO9. 	<p>A number of key spatial issues have already been identified for the Core Strategy through earlier consultation. The Strategy covers the period to 2026 and the Vision needs to be ambitious but it is considered to be achievable.</p> <p>Tamworth is unique in having a very tight administrative boundary and limited land resources to meet future growth. The Council's strategy comprises a mixture of development within the existing urban area and greenfield development. It would not be possible to conform to the RSS in terms of development targets without using greenfield sites. The Anker Valley is considered to be the most sustainable site in the Borough that can meet RSS requirements and is allocated as a strategic site for that reason.</p> <p>The Council is awaiting the RSS Proposed Changes document and in the event that additional land needs to be found to meet Tamworth's needs, we will work jointly with adjoining authorities in order to meet this in the most sustainable way. The Proposed Spatial Strategy states in</p>

<ul style="list-style-type: none"> • SO10 should include reference to disadvantaged communities and repetitive housing stock. • Strongly object to the principle of greenfield extensions. It will alienate residents from the surrounding rural area, change Tamworth's character and destroy agricultural land needed to feed the population. • Higher building densities, sensitive site planning and mixed uses can reduce the need to expand. Greenfield land take should be the last resort. • Object to reference to the long term need to consider land outside the Borough boundary. This should be amended to state that it will be considered later in the plan period, depending on circumstances. • Whilst enhancement of the town centre may be a physical focus, the core strategy should focus on the town as a whole. • Critical of the proposed amount of office development, the form and appearance is often unsympathetic to the historic environment and it will create traffic and parking issues. • Office and technology centres are dependent upon access to transport hubs and staffing resources. District centres have a role to play in the latter and could help with decentralising services and minimising traffic congestion in the town centre. • Concerned about the greenfield intrusion and land take with regard to the Anker Valley. Accept the planning reasons for this site being selected but it should not come forward until after brownfield sites. Brownfield target should be raised to a minimum of 75%. Development should not obscure the Ashby Road ridge line. • Concerned about the park and ride proposal because of constrained road widths and existing congestion. 	<p>Policy SRM3 that there is no need to develop Green Belt in the short to medium term. There may be a need to consider some Green Belt release in the long term if alternative or additional sites are needed and sustainable sites outside the Borough do not come forward.</p> <p>Re-use of previously developed land is a priority and the national target remains at 60%. The Core Strategy adopts the same target.</p> <p>The Core Strategy presents the means to deliver on locally derived key issues. Town centre and neighbourhood regeneration is a Council priority and was identified as a key issue at an early stage in the Core Strategy's preparation. Although land to meet the RSS employment requirement is generally related to existing employment areas, the local and neighbourhood centres will provide a focus for small scale employment opportunities, as reflected in Policies SN1 and SN2.</p> <p>The RSS sets targets of 30,000 sqm of office floorspace and 35,000 sqm of retail development to be provided in Tamworth town centre. Both elements, together with complementary leisure and residential uses are needed to achieve a vibrant and attractive town centre. All new development will need to be sympathetic and appropriate to the historic setting of the town centre as reflected in Policies TC2, DH, DH2 and DH3.</p> <p>The Council is in the process of updating its open space audit and assessment. This will update the picture of deficiency and surplus across the Borough. The general</p>
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<ul style="list-style-type: none"> • Acknowledge the provision of on-site facilities but consider that provision should also be made for higher education, shopping choice, specialised health and professional services and employment. All require substantial provision and are not available locally. Land take of farming land is unsustainable. Sustainability should not be used as an argument in favour of the Anker Valley site. • Employment sites are contained in the urban area and because of this, industrial development will be in close proximity to residential areas. • Support locating employment close to working catchments to minimise travel distances. Advocate assessing public transport networks to see how they link up residential and employment areas. • All open space should be retained unless there is evidence of under use that cannot be corrected. Disposal is only acceptable if lack of need justifies it. • If there is an apparent over supply of open space, development in the vicinity should be high density to take advantage of the open space, unless there are good environmental reasons for not doing so. • All open areas form part of an interconnected system. • Design should be a separate policy because it is of such importance. • Lack of definition of what constitutes 'quality' under DH1. • Sustainable resource management section should emphasise land conservation and future traffic patterns and mobility. Increase in quality of environment could compensate for this. • Minerals supply has implications for land use transport and construction. • Green Belt policy refers to growth and infrastructure study 	<p>approach will be to protect open spaces that already make a positive contribution to the needs of the local area or are capable of making such a contribution (Policy SN3).</p> <p>Other comments noted. The Council will be re-drafting the core policies in the light of consultation responses and emerging evidence.</p>
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	<p>but does not outline its conclusions and effects. Green Belt should not be treated casually, its status should be upheld and any releases should be wholly exceptional.</p> <ul style="list-style-type: none"> • Consideration could be given to acceptable forms of development within floodplains. • Unconvinced that public transport can be a realistic alternative to the car. Perhaps the Council should be considering alternative forms of private transport e.g. electric cars. • Priority under sustainable transport would be to decentralise community facilities so that they are within easy reach of all communities. Town centres, district centres and employment areas should be located within a PSV traffic grid for convenient access. • Streetscape design is an art form and should be a major part of creating beautiful environments. • Development management policy is limited by its omissions and changes in circumstances. Suggest that the quantity/standard of facilities is considered separately from design. 	
<p>West Midlands RSL Planning Consortium (Tetlow King)</p>	<ul style="list-style-type: none"> • Strategy should be updated to take into account higher RSS requirement. • There should be a specific spatial objective for affordable and specialist housing. • Policy H3 should contain a target (form, size and type) for affordable housing at borough and sub-borough level, including identifying sites for 100% affordable housing. • Ensure that site size thresholds for negotiating affordable housing from private developers are properly derived in light of local housing and land markets. Set out explicit circumstances which justify the site size thresholds. • Object to point viii, which should be a separate policy as 	<p>The Council is awaiting the publication of the Proposed Changes report to the RSS by the Secretary of State, which is due in early 2010.</p> <p>The affordable housing viability work is on-going and will inform the publication version of the Core Strategy, which will incorporate targets as appropriate. As stated in the supporting text to Policy H3, the Council will carry out a separate consultation on this subject when the viability work is complete.</p> <p>Other comments noted. The Council will be re-drafting the</p>

	<p>housing can be highly specialist and have distinct locational requirements. Council should support specialist housing including continuing care retirement communities and extra care housing as separate from affordable housing.</p> <ul style="list-style-type: none"> • Council should consider use of Lifetime Homes. • Affordable housing viability work is essential and should be thoroughly consulted on. It should comprise targets and thresholds. • Reference in SN1 to developer contributions towards new or enhanced community facilities should be fully justified. Development involving the loss of facilities to affordable housing should not be expected to contribute to other projects. • Give specific recognition to advantages of working with RSL's and a flexible approach taken to S106 agreements. • Generally support a separate design policy but object to DH1 as it is too restrictive and not appropriate to small developments. Remove list and state circumstances that will require design and access statements. Building for Life and Lifetime Homes should be considered as well defined measures of design. SPD may be more appropriate for detailed design aspects. • Need to set a timescale for reassessing Green Belt taking monitoring into account and reflecting the aims of PPS3. • Transport policy would benefit from a statement of the circumstances when a travel plan and contributions towards public realm improvements would be required. Only developments likely to significantly impact on local infrastructure should be required to produce a travel plan. Affordable housing schemes do not generate any extra need for improvements. • Object to definition of intermediate affordable housing in 	<p>core policies in the light of consultation responses and emerging evidence.</p>
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	<ul style="list-style-type: none"> • Regularly monitor progress in meeting affordable housing needs. 	
Mrs Suzanne Storr	<ul style="list-style-type: none"> • Town centre redevelopment should look to historic aspects not modern. • Leave fields and Green Belt alone when considering where to develop. • Anker Valley development will lead to worse congestion on Ashby Road. • Travellers are given priority and do not pay rates. • No need for additional employment land. • New offices will invigorate the town centre. 	<p>Successful redevelopment of the town centre will need to combine contemporary design, materials and technology with an understanding and sympathy for the historic setting as reflected in Policies TC2, DH, DH2 and DH3.</p> <p>The Council's strategy comprises a mixture of development within the existing urban area and greenfield development. It would not be possible to conform to the RSS in terms of development targets without using greenfield sites. The Proposed Spatial Strategy states in Policy SRM3 that there is no need to develop Green Belt in the short to medium term. There may be a need to consider some Green Belt release in the long term if alternative or additional sites are needed and sustainable sites outside the Borough do not come forward.</p> <p>Where regulated Gypsy and Traveller sites are established, the residents will pay local taxes. Government policy requires us to ensure that there are sufficient sites to meet the identified need.</p> <p>The RSS stipulates the quantum of development required for each district.</p> <p>Other comments noted.</p>
William Davis Ltd.	<ul style="list-style-type: none"> • Support allocation of Anker Valley as a sustainable urban 	Depending on the outcome of the RSS Phase 2 Review,

	<p>extension. It is the most sustainable location outside the urban area, will help town centre regeneration and provide improved transport connections to the centre.</p> <ul style="list-style-type: none"> • Land north of the Anker Valley in Lichfield District could contribute to the cost of essential infrastructure. • Housing targets do not reflect the RSS Phase 2 panel report, specifically the increase from 2900 to 4000 dwellings of which 1000 should be to the north of Tamworth in Lichfield district. Shortfall can easily be met by extending the Anker Valley site in the first instance. Scale of development should be able to viably deliver infrastructure. • Oppose higher densities in the built up areas. It would result in unsuitably high densities and flats, which is not supported by the market. Protect most green spaces in the borough. • Design policy should not overly constrain residential development. • Evidence base for renewable technologies under SRM1 must be credible and robust. Concerns about viability. • No need for flooding or Green Belt policy if they are just going to follow national guidance. Future Green Belt release will not be needed if the Anker Valley site is extended. 	<p>there may be a need to find land for additional housing to meet Tamworth's need. Consideration of potential sites, which will include those in Lichfield and North Warwickshire, will involve joint working with these authorities, which will be responsible for allocating sites in their core strategies. This will ensure that the necessary infrastructure is provided within Tamworth to minimise impact of any development.</p> <p>The Council is involved in a jointly commissioned renewable energy study in order to assess the potential for all renewable and low carbon energy sources and technologies across Staffordshire. It will also consider viability issues.</p> <p>Other comments noted.</p>
Theatres Trust	<ul style="list-style-type: none"> • Town centre regeneration will have wider benefits such as regeneration, reducing the need to travel by car and improving the built environment. Improving vitality is dependent on more than retail, it should also include leisure and culture. The evening economy is also important. • Re-use and refurbishment of existing buildings is sustainable and should be the first option for Tamworth's historic environment. Town centre section should include enhancement of existing leisure and cultural facilities and 	<p>The Council acknowledges the contribution of leisure, culture and tourism to the local economy.</p> <p>There is a range of development opportunities in the town centre, which include re-use of existing buildings and redevelopment sites. The town centre and design and heritage policies encourage the sympathetic re-use of historic buildings in Policies TC2, DH2 and DH3.</p>

	<p>protection from loss unless they are no longer needed or accessible compensatory provision can be made.</p> <ul style="list-style-type: none"> • Specific development criteria are essential if a development management policy DPD is not going to be produced. This should encourage the provision of new facilities according to a needs and impact assessment. 	Other comments noted.
Network Rail	<ul style="list-style-type: none"> • Proposals for additional parking at Tamworth station have stalled because of funding. Park and ride proposals seem to be on the agenda although housing developments are longer term. • Network Rail will need to be consulted on planning applications for mineral extraction within 200 metres of a railway line, which will include clay extraction site in Dosthill. Anker Valley open cast site is some distance but transportation by road or rail may need to be considered. 	Noted.
Gordon Knight	<ul style="list-style-type: none"> • Pedestrian areas should extend to all the short stay car parks. Car parks should be developed, with no loss of spaces and run by businesses. • Gold hoard should be provided for. • Keep vehicles out of the town centre between 8.30 and 16.30. • Development of Anker Valley would reduce pressure for greenfield development. • Anker Valley needs new links, upgrading of existing roads for pedestrian safety and community centres. • Gypsies and Travellers should be provided for in a sensitive way. Sites could be provided in industrial areas with careful screening. • Agree with increasing densities within urban areas to safeguard green spaces, providing it is not multi-storey. • Groups who want a new leisure centre should be responsible for its operation and maintenance. 	<p>The Anker Valley strategic allocation is on greenfield land. Policy H2 sets out development principles for this site, which include a range of community facilities such as a primary/junior school, local centre, health facilities and community centre, in addition to the Anker Valley and Amington Links and pedestrian links to the Learning Zone, town centre and railway station ensure that the site is highly accessible.</p> <p>The Joint Sport Strategy identifies a need for a range of facilities including a swimming pool, health and fitness stations and sports halls. This evidence of need is based on the current and projected population as well as consultation with local residents and sporting organisations. The intention is that need will be met by a combination of a new leisure centre and greater use of school facilities and community centres (Policy SN4).</p>

	<ul style="list-style-type: none"> • Priority for sustainable transport would be to increase car park fees and provide at least four park and ride facilities outside the town centre. 	Other comments noted.
Advantage West Midlands	<ul style="list-style-type: none"> • Needs to be a balanced and co-ordinated approach to housing and employment land development. Areas of new housing must provide adequate linkages to employment and service provision, with particular reference to the Anker Valley which makes no reference to providing access to employment areas. • West Midlands Sustainability Checklist is not mentioned anywhere. It would be a useful addition to the Development Management section. • Explanation needed of how prosperity of the tourism and leisure sectors will be achieved. Leisure zone and town centre offer most potential here. Policies should form part of a town centre action plan and SPD. 	Comments noted. The Council will be re-drafting the core policies in the light of consultation responses and emerging evidence.
West Midlands Regional Assembly	<ul style="list-style-type: none"> • Proposed approach to accommodating retail and office provision in the town centre should enhance its role and not significantly threaten other centres. • Approach to housing delivery within administrative boundary is in broad accordance with the RSS revision. Document does not address Panel recommendation regarding housing provision in Lichfield District. Impact of development in Lichfield on Tamworth's infrastructure needs to be considered. • SRM1 not comprehensively compatible with 'Towards a Sustainable Region' chapter in every respect but not seriously in conflict. • Sequential approach to maximising office development within the town centre then looking edge of centre is broadly compatible with RSS revision. • No substantive concern over conformity and much is clearly 	<p>Depending on the outcome of the RSS Phase 2 Review, there may be a need to find land for additional housing to meet Tamworth's need. Consideration of potential sites, which will include those in Lichfield and North Warwickshire, will involve joint working with these authorities, which will be responsible for allocating sites in their core strategies.</p> <p>Other comments noted.</p>

	<p>within parameters of emerging regional policy.</p> <ul style="list-style-type: none"> • Preferred Strategy logically leads to longer term development considerations that might need to be addressed in the submission Core Strategy to ensure conformity with the published RSS. 	
John Ball	<ul style="list-style-type: none"> • Town centre needs updating and better shops. • Anker Valley will worsen traffic congestion on existing roads. It should be developed for employment, housing, leisure, council offices and rural amenity area. • Could consider Anker Valley site for Gypsies and Travellers. Less populated areas are more easily supervised. • No need to build Anker Valley Link Road, use Ashby Road instead. • Priority for sustainable transport would be a better bus service linking retail parks, railway station and bus routes. • Reference to land at Shannon. 	<p>The intention is that regeneration of the town centre with a stronger retail mix, new office development, leisure, residential uses and an enhanced environment will achieve a vibrant and attractive town centre and bring more people into the centre.</p> <p>Physical linkages need to be provided to ensure that the Anker Valley is highly accessible to services and facilities, the town centre and station. The Council considers that the Anker Valley and Amington Links are needed in connection with the strategic housing allocation. There will also be an emphasis on the provision of sustainable forms of transport including a park and ride facility at the railway station, footpaths and cycleways.</p> <p>Other comments noted.</p>
Mrs M. Clarke	<ul style="list-style-type: none"> • Town centre redevelopment important to bring people into the town. • Not sure if more office space is needed, there are vacant offices already. • Roads from Anker Valley should be diverted to Ashby Road rather than Amington Road. • Retain green spaces. 	<p>The intention is that regeneration of the town centre with a stronger retail mix, new office development, leisure, residential uses and an enhanced environment will achieve a vibrant and attractive town centre and bring more people into the centre.</p> <p>The RSS sets a target of 30,000 sqm of office floorspace to be provided in Tamworth town centre. If the RSS requirement cannot be met within the town centre, edge of centre sites will be considered next.</p>

	<ul style="list-style-type: none"> Proposed location of leisure centre would be close to young people to walk to. 	<p>The Council considers that the Anker Valley and Amington Links are needed in connection with the strategic housing allocation. There will also be an emphasis on the provision of sustainable forms of transport including a park and ride facility at the railway station, footpaths and cycleways.</p> <p>The Council is in the process of updating its open space audit and assessment. This will update the picture of deficiency and surplus across the Borough. The general approach will be to protect open spaces that already make a positive contribution to the needs of the local area or are capable of making such a contribution (Policy SN3).</p>
Councillor Lee Bates	<ul style="list-style-type: none"> Generally supportive of Strategy. Clear benefits of offices and retail being located close together to increase retail value. Protect green spaces and Green Belt as it adds value and serves a purpose. Look outside Borough before building on Green Belt. Priority for sustainable transport is better access to public transport routes and cycleways. 	<p>The Council is in the process of updating its open space audit and assessment. This will update the picture of deficiency and surplus across the Borough. The general approach will be to protect open spaces that already make a positive contribution to the needs of the local area or are capable of making such a contribution.</p> <p>The Proposed Spatial Strategy states in Policy SRM3 that there is no need to develop Green Belt in the short to medium term. There may be a need to consider some Green Belt release in the long term if alternative or additional sites are needed and sustainable sites outside the Borough do not come forward.</p> <p>Other comments noted.</p>
Mrs D. Mattison	<ul style="list-style-type: none"> Town centre needs a more vibrant mixture and high profile stores. Need for 2900 new dwellings is questionable, there are brownfield sites, windfalls and flats above commercial 	<p>The intention is that regeneration of the town centre with a stronger retail mix, new office development, leisure, residential uses and an enhanced environment will achieve a vibrant and attractive town centre and bring more people into the centre.</p>

	<p>premises, which should be developed before greenfield areas such as the Anker Valley.</p> <ul style="list-style-type: none"> • Achieving Anker Valley infrastructure depends on planning and finance. • Housing priority should be to provide local and homeless people with affordable housing. • Bonehill employment site is encroaching into green areas. • Always protect green spaces. • Difficult to balance competing needs for development in a limited area. • Proposed site for leisure centre is currently a good location, but future requirements may alter this and green areas and flood plain are constraints. • New development must enhance what remains of town's heritage. • Difficult to implement policy SRM1 because expert opinion on resources, energy, water, flooding and waste are always changing. • Retain the Green Belt. • Solution needed for traffic congestion at Ventura. 	<p>The RSS stipulates the quantum of housing required for each district and the Council's strategy comprises a mixture of development within the existing urban area and greenfield development. There is insufficient land within the urban area to fully meet the RSS, so greenfield sites are needed.</p> <p>The Council will be preparing an infrastructure delivery plan, which will be in place by the time the Core Strategy is published. This will ensure that the necessary infrastructure will be in place when it is needed.</p> <p>The Council is in the process of updating its open space audit and assessment. This will update the picture of deficiency and surplus across the Borough. The general approach will be to protect open spaces that already make a positive contribution to the needs of the local area or are capable of making such a contribution (Policy SN3).</p> <p>The Proposed Spatial Strategy states in Policy SRM3 that there will be no need to develop Green Belt in the short to medium term. There may be a need to consider some Green Belt release in the long term if alternative or additional sites are needed and sustainable sites outside the Borough do not come forward.</p> <p>Other comments noted.</p>
Mr V. Tomson	<ul style="list-style-type: none"> • Tamworth should expand minimally. • Town centre traffic remains a problem, disabled parking should be considered and should be provided free of charge in the shopping centre. • If Travellers want to live here they should buy a house. 	<p>The RSS Phase 2 Review stipulates the quantum of development required for the Borough. The emphasis of the RSS is that housing should be concentrated within the major urban areas where most of the demand is concentrated. However, new housing provision will also need to be made</p>

	<ul style="list-style-type: none"> • Housing requirement should be in line with natural increases by the residents. • New employment land is not needed, it will increase the population and demand for housing. • Leisure and sport facilities should be located in all areas and cater for all ages. 	<p>in other parts of the Region, including market towns to meet local need.</p> <p>The employment land requirement is assessed alongside the need for new housing and the aim is to provide a balanced portfolio of good quality sites that will support future sustainable development in the Borough.</p> <p>The Joint Sport Strategy identifies a need for a range of facilities including a swimming pool, health and fitness stations and sports halls. It would make sense to provide these in one main purpose built facility (SN4). However, the study also highlights the contribution that facilities based in schools and community centres can make to providing recreation and exercise classes in the neighbourhoods. The sustainable neighbourhood policies SN1 and SN2 support this.</p>
<p>Tamworth Congregations of Jehovah's Witnesses</p>	<ul style="list-style-type: none"> • Core Strategy should recognise that faith groups have limited resources and experience difficulties finding suitable sites in a commercial market. • Allocate sites for community uses, to include places of worship. 	<p>The Strategy's intention is that local services and facilities will be focused within the local and neighbourhood centres (SN1 and SN2). Policy H2 makes provision for a new local centre, which could include a place of worship in association with the Anker Valley strategic housing allocation.</p>
<p>English Heritage</p>	<ul style="list-style-type: none"> • SO3 should refer to historic value. • All assets are important, irrespective of whether they are designated and this should be reflected in the section dealing with achieving the Vision. • A future town centre action plan and SPD should draw on conservation area appraisal, management plan and Extensive Urban Survey (Staffordshire County Council). • Give consideration to a co-ordinated public realm strategy for the town centre. 	<p>Note concerns about the impact of the Anker Valley development on the Amington Hall Estate Conservation Area. Policies H2 and D3 acknowledge the potential impact and the need for development to have regard to the character and appearance of the conservation area and its setting.</p> <p>The Council will be re-drafting the core policies in the light of consultation responses and emerging evidence.</p>

	<ul style="list-style-type: none"> • TC1 should refer to protecting key views. • Strategic office allocations should be identified in the core strategy. • Concerned about later phase of Anker Valley because of its proximity and potential impact on Amington Hall Estate Conservation Area. Justification should be expanded as an integral requirement for further development. Map is misleading because it implies that development could extend to conservation area boundary, which is likely to be unacceptable. Mitigation may involve less intensive development along this boundary. Later phase should be shown as an outlined boundary. Include scope for enhancement to the Amington Hall Estate Conservation Area under H2. • New town centre office development should have regard to impact on historic assets and character. Height of edge of centre developments may need specific consideration because of impact on key views. • Quality and accessibility of green space is important to increase use. • DH1 is not sufficiently locally specific. Policy could include improving the image, conserving and enhancing the valued historic character of specific places in the borough, seeking to improve the sustainable design and functioning of recent additions, key views, high standards and integration with existing built environment. • DH2 and DH3 can be made more locally specific. This could include an expansion and strengthening of the overall statement regarding the management strategy for the historic environment. Retain locally specific measures regarding setting of Amington Hall Estate Conservation Area, canal conservation area designation, local list review 	
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	<p>and tackling heritage at risk and management plans. Include some aspects under the town centre framework. More detailed aspects would be appropriate for an SPD.</p> <ul style="list-style-type: none"> • Content of SRM1 should have regard to the RSS Phase 2 Sustainable Region policies. • Flooding and Green Belt could be covered as part of the overall strategy for the borough. • DEVMAN1 does not add to the other core strategy policies. A separate development policy may be useful depending on how the other policies are reworked. 	
Lichfield District Council	<ul style="list-style-type: none"> • Support Anker Valley as a strategic housing allocation. It could accommodate additional dwellings as outlined in the Development and Infrastructure Study and its potential for expansion should be explored further. • Maximise the redevelopment of brownfield land. 	<p>Depending on the outcome of the RSS Phase 2 Review, there may be a need to find land for additional housing to meet Tamworth's need. Consideration of potential sites, which will include those in Lichfield and North Warwickshire, will involve joint working with these authorities, which will be responsible for allocating sites in their core strategies.</p> <p>It is anticipated that the Borough will achieve an average of 60% of development on previously developed land over the lifetime of the Strategy.</p>
Cedar House Investments (Signet Planning)	<ul style="list-style-type: none"> • Policy that seeks to resist the loss of all employment uses may not be appropriate. There may be locations within existing employment areas that are unsuitable for continued employment use and may be used to secure other objectives of the spatial strategy. Some non-B1, B2 and B8 uses can generate significant levels of employment. 	<p>As currently worded, Policy EC1 states an intention to protect existing employment areas from significant loss of B1, B2 and B8 floorspace. It does allow for small scale change of use in certain circumstances.</p>
Bellway Homes (West Midlands) Ltd., Bloor Homes and Redrow	<ul style="list-style-type: none"> • Consortium is still committed to delivering Anker Valley allocation. It is central to the achievement of the Council's strategy. • Vision should include increasing the supply of 	<p>The Council considers that the Anker Valley and Amington Links are needed in connection with the strategic housing allocation. There will also be an emphasis on the provision of sustainable forms of transport including a park and ride</p>

<p>homes (Midlands) Ltd. (Barton Willmore)</p>	<p>market housing.</p> <ul style="list-style-type: none"> • SO1 should also refer to meeting the RSS housing and employment needs. • SO10 should not focus on the old, young and less able, there are other aspects to Tamworth's housing need. • Redeveloping the town centre is not the only focus for the strategy. Make reference to delivering new housing to meet Tamworth's needs in short and medium term through the Anker Valley. • Encourage greater integration between the railway station and town centre and connections to Anker Valley. • Anker Valley development should not wholly fund the Anker Valley link roads. All development benefiting from the link road should contribute. Consider pooled contributions from all new developments to deliver infrastructure. Tariff policy or SPD required to ensure that all relevant developments make contribution to required infrastructure. • Anker Valley development should not be required to provide the Amington Link as the level of housing that can be provided on the allocated site would not trigger the need for the link. Provide clarification on the trigger points for delivery of the link roads. • Access to town centre and learning zone require third party agreement. Potential access to station for park and ride dependent upon Network Rail. • Capacity of the Anker Valley site should not be limited to 1150. • Required infrastructure under H2 is more extensive and prescriptive than under the local plan. 	<p>facility at the railway station, footpaths and cycleways. Physical linkages need to be provided to ensure that the site is highly accessible to services and facilities, the town centre and station. The Consortium has not suggested any other way of linking the site with the town centre in the past. At the present time, the Anker Valley is the only development that will produce a direct need for the link roads. Infrastructure should not be looked at in terms of trigger points in terms of units, the development should instead be viewed as a whole, which will include a package of SMART travel choices that seek to reduce the number of trips and the number of vehicle trips.</p> <p>The Council will consider how infrastructure is funded through the infrastructure delivery plan. The Council has a role to play in delivering the site and is keen to work with the Consortium.</p> <p>The Council is involved in a jointly commissioned renewable energy study in order to assess the potential for all renewable and low carbon energy sources and technologies across Staffordshire. It will also consider viability issues.</p> <p>The alignment of the Anker Valley Link can only be indicative at this stage.</p> <p>Policy H2 states that the community facilities and services will be to meet locally generated needs, i.e. generated by the development. Location of the site adjacent to the open countryside would not meet all open space requirements generated by the development, for example amenity open space, formal sport or play areas. The exact nature of any</p>
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<ul style="list-style-type: none"> • Road alignment should be shown as indicative, it is different to that in the Local Plan. Confirm new alignment. • On-site infrastructure and facilities should only meet requirements generated from the development and not make up for existing shortfalls. • Existing site (as identified in the Local Plan) would not impact on the conservation area, only the land identified for future flexibility would. • Object to the need to contribute towards sport or open space because it is located next to significant green areas. • Small scale offices could be provided as part of the Anker Valley development adjacent to the railway station. • Area identified for future flexibility is also shown on the key diagram as a green area. Delete it from key diagram to be consistent. • Future open space SPD should be in accordance with Circular 05/2005. Standards should take account of existing provision and not be applied rigidly. • Anker Valley Link Road will necessitate loss of open space. Policy SN4 should make provision for circumstances where loss of open space is acceptable in order to deliver other community benefits. • Requirements of DH1 should have a proviso of where they are appropriate and applicable. Object to some of the requirements because the policy does not explain how they will be measured. • There are issues of viability and feasibility when considering renewable energy technologies and energy efficiency measures. 	<p>open space and recreational needs and how they will be met will need to be discussed.</p> <p>One of the key features of the Amington Hall Estate Conservation Area is its open countryside setting and long distance views into the Conservation Area. Development of the existing site has the potential to impact on its character and appearance. Policies H2 and DH3 acknowledge the potential impact and the need for development to have regard to the character and setting of the conservation area.</p> <p>The Council would support mixed use development which provides employment alongside residential, providing access is provided to the town centre and railway station.</p> <p>Other comments noted.</p>
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	<ul style="list-style-type: none"> • Priority for sustainable transport would be increased access to the railway station including park and ride with associated development and improved pedestrian and cycle access. • Development management policy unnecessarily duplicates other policies. • Developer contributions SPD would be useful. 	
Ronald A. Skett	<ol style="list-style-type: none"> 1. Does not agree with the Vision because it includes greenfield development. 2. Tamworth is not identified in the RSS as a focus for long term strategic housing development. 3. Gypsies and Travellers are only a small proportion of the population yet they are vocal in stating their needs. 4. Employment areas should not use greenfield land. 5. Building on Anker Valley is not a good idea because of potential for flooding. 	<p>The RSS stipulates the quantum of development required for the Borough. The emphasis of the RSS is that housing should be concentrated within the major urban areas where most of the demand is concentrated. However, new housing provision will also need to be made in other parts of the Region, including market towns such as Tamworth, to meet local need.</p> <p>The Council's strategy comprises a mixture of development within the existing urban area and greenfield development. It would not be possible to conform to the RSS in terms of meeting development targets without using greenfield sites.</p> <p>Acknowledge that the development could have an impact on the floodplain of the Anker because of the increase in impermeable surfaces. It is important that the development incorporates appropriate mitigation measures.</p>
Homes and Communities Agency	<ol style="list-style-type: none"> 1. Town centre regeneration and improving disadvantaged areas will encourage more people to visit, move closer and businesses to locate there. 2. No greenfield development, protect green spaces as much as possible without over burdening the built up areas. 3. Proposed area for new leisure centre may attract other interests which may help in regenerating the area. 	<p>The RSS stipulates the quantum of development required for the Borough. The Council's strategy comprises a mixture of development within the existing urban area and greenfield development. It would not be possible to conform to the RSS in terms of meeting development targets without using greenfield sites.</p>

	<ol style="list-style-type: none"> 4. Design policy must be related to local character and design. 5. Priority for sustainable transport would be to improve the frequency of buses and trains and construction link roads to alleviate traffic congestion, free buses and more cycle routes. 	<p>The Council is in the process of updating its open space audit and assessment. This will update the picture of deficiency and surplus across the Borough. The general approach will be to protect open spaces that already make a positive contribution to the needs of the local area or are capable of making such a contribution (SN3).</p> <p>Other comments noted.</p>
<p>Mr M Neachell (JVH Town Planning)</p>	<ol style="list-style-type: none"> 1. Vision is not deliverable. It relies on the Anker Valley which has huge infrastructure costs and will not be able to finance community facilities, affordable housing or that for the old, young and less able in addition to open market housing. Infrastructure costs are in addition to ransom and railway issues. Planning application was not received during times of high land values, it is unlikely to come forward now with such costly infrastructure. 2. Anker Valley is not the most sustainable and appropriate way for Tamworth to meet RSS requirement. 3. Building a road across the floodplain is not sustainable when alternative sites exist outside the floodplain. Building infrastructure across the floodplain should only be considered as a last resort. 4. Park and ride will not materialise at the Anker Valley, other locations should be explored. 5. Town centre is important but will not deliver the focus of the strategy. It requires a balance across other land uses. 6. Support identification of Dosthill High Street as a local centre, strategic development here will support the centre and ensure its long term viability. 7. Do not agree with green space strategy. Expansion of urban area to west of Dosthill can provide new homes 	<p>The Council will be preparing an infrastructure delivery plan, which will be in place by the time the Core Strategy is published. This will ensure that the necessary infrastructure will be in place when it is needed.</p> <p>The Council considers that the Anker Valley and Amington Links are needed in connection with the strategic housing allocation. There will also be an emphasis on the provision of sustainable forms of transport including a park and ride facility at the railway station, footpaths and cycleways. The Council will consider how infrastructure is funded through the infrastructure delivery plan.</p> <p>The Anker Valley site was considered to be the most sustainable and appropriate strategic site within the Borough to meet RSS housing requirements. It is located close to the town centre and will support regeneration of the centre. If it cannot be delivered alternative sites will have to be considered, which will include those in Lichfield and North Warwickshire.</p> <p>Site put forward by objector is in the Green Belt. The Strategy states in Policy SRM3 that there will not be a need to develop Green Belt in the short to medium term. There</p>

	<p>and new recreational opportunities. Key diagram fails to show green spaces in Dosthill and should be amended to show Dosthill Park.</p> <p>8. No need for separate design and heritage policies as they duplicate national planning policy and guidance.</p> <p>9. Green Belt should be amended to remove potential development sites to west of Dosthill. Anker Valley is undeliverable and the Council needs to find alternative land for 900 dwellings. This would be in keeping with PPG2. Even if the Council does not recognise the sites as short term opportunities the need to demonstrate a flexible approach to the longer term, which means dealing with Green Belt amendments.</p>	<p>may be a need to consider some Green Belt release in the long term if alternative or additional sites are needed and sustainable sites outside the Borough do not come forward.</p> <p>Other comments noted.</p>
Aucott Group (JVH Town Planning)	<p>1. Key diagram is inaccurate and incomprehensible, it is not at a scale where major sites can be properly identified. Ventura Park is not identified as a major retail land use and forms part of the urban area. Ventura and Jolly Sailor parks are major employers and retail destinations and should not be ignored.</p> <p>2. Two new strategic retail allocations are not indicated on the key diagram, Gungate and 'another site' are not strategic allocations. Whole town centre strategy relies on Gungate Precinct redevelopment and it is unlikely that the scheme will progress in the current economic climate. A better approach would be to maximise the historic benefits of the town centre with the vibrancy of Ventura to achieve a co-ordinated deliverable vision.</p> <p>3. Town centre should try and attract smaller quality shops, food and entertainment, making full use of historic assets. Accept that major retailers want to be close to competitors at Ventura. Land adjacent to the Tamworth Herald will attract a major named retailer to a large purpose</p>	<p>Acknowledge that the key diagram needs to be refined. Its purpose is to provide a broad indication of the locations of strategic allocations, designations, infrastructure and constraints. It is a diagram not a map and for that reason does not use an Ordnance Survey base. The two shopping proposals at Gungate Precinct and Middle Entry are currently indicated on the Town Centre Key Diagram.</p> <p>The Council's priority is to regenerate the town centre, to consolidate and strengthen it by encouraging a strong retail mix, accommodating new office development and complementing this with leisure uses and an enhanced environment. It is acknowledged that Ventura and Jolly Sailor Retail Parks are popular destinations despite their location beyond the town centre boundary. Rather than compete, the intention is that the town centre and retail parks should complement each other, hence the emphasis on improving the physical linkages between the areas under Policies TC2 and ST1.</p>

	<p>built building.</p> <p>4. Land south of the A5 should be commercial and not restricted to B1, B2 and B8. It is within walking distance of major retail opportunities and lends itself to a wider allocation. Dunstall Lane phase 1 provides plenty of B1 and B8 development.</p> <p>5. 30,000 square metres of office development is unrealistic for the town centre, in terms of location and market. Land south of A5 would be a better location. Figure likely to be reduced in the approved RSS.</p> <p>6. Anker Valley is unlikely to deliver a park and ride as it is unlikely to be developed. There are locations for this facility. Document does not indicate how a sustainable transport link will be made between the town centre and retail parks.</p> <p>7. Developer contributions for highway works should be more transparent. Transport strategy should relate to the type and level of contributions and deal with major congestion areas.</p>	<p>The sequential test still applies under revised PPS4, so the town centre would be the preferred location for main town centre uses before edge of centre and out of centre locations are considered.</p> <p>If the RSS office requirement cannot be fully met within the town centre, edge of centre sites will be considered next as set out in Policy TC1.</p> <p>Other comments noted.</p>
Walton Homes Ltd. (JVH Town Planning)	<p>1. Residential planning application is being prepared for the Whitley Avenue site.</p>	<p>Noted.</p>
Highways Agency	<p>2. Currently reviewing the Tamworth future development and infrastructure study and would like to meet with officers and Staffordshire County Council.</p> <p>3. Surprised that Vision states that employment will be concentrated along the A5. Strategic employment allocations may be logically located close to existing employment areas, however, new allocations should be underpinned and supported by a technical assessment of their impact on the strategic road network in order to</p>	<p>Noted, the Council welcomes the opportunity to work with the Highways Agency and Staffordshire County Council to produce a sustainable transport strategy for the Borough.</p>

	<p>understand measures necessary to mitigate impact.</p> <p>4. Transport Strategy should be in accordance with 'Delivering a Sustainable Transport Strategy' in order to deliver sustainable growth and redevelopment.</p> <p>5. Concerned about the congestion, queuing and backing up onto the A5 at Ventura Park/Jolly Sailor retail parks, particularly at the weekends. This situation is likely to increase unless a comprehensive and effective transport strategy is put in place. This would include significant transport related improvements. Prepared to assist the Council to identify impact and mitigation measures.</p> <p>6. If the Anker Valley link road is going to make the site undeliverable, the HA would work with the Council to assess alternative sites.</p> <p>7. Identify how smarter travel choices will be promoted and enforced.</p> <p>8. Refer to Circular 02/07 and DfT guidance on transport assessments which provide advice on thresholds for submission of travel plans.</p> <p>9. Impact of offices on transport should be robustly assessed to ensure that the necessary mitigation measures can be identified and implemented.</p> <p>10. If site comes forward for new leisure centre, policy should be in place to ensure that it is well served by public transport to mitigate any impact on the A5. HA to be involved in pre-application discussions.</p> <p>11. Easing congestion and promoting sustainable modes of transport are recognised ways of tackling climate change.</p> <p>12. Greater detail needed regarding the proposed measures in the transport strategy, including cost, how they will be delivered and by whom. Infrastructure delivery plan</p>	
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	<p>will have to be produced alongside the Publication Draft. HA can assist in its preparation. A robust transport evidence base is essential to identify priorities, without it the Core Strategy could be unsound.</p>	
<p>Christopher Cooke</p>	<p>Proposals do not match up with the objectives. Town centre decline is inevitable because cars are discouraged from entering and will continue as out of town retail parks offer free parking. Town centre parking should be free as should a park and ride scheme.</p> <p>Anker Valley site is only termed 'strategic' to get the link roads built. This gives it special privileges over other greenfield sites. It is only strategic if the development goes ahead, the development is not strategic to Tamworth. If the site remains as 'strategic' it will be developed ahead of brownfield sites.</p> <p>Developers will not build the Amington Link, it should have been built by County Highway resources, the County is still responsible for this road, not the developers. Anker Valley road must be built before the development. Link roads will not be delivered for at least 10 years.</p> <p>Questions whether the Council will be able to deliver on its vision for sporting facilities. Support the new leisure centre, its location is good for traffic, sustainability and reasons of need but would be concerned if it was privately operated in terms of affordability. Do not see how the Council can stop or compensate for loss of school swimming pools or playing fields.</p> <p>Tamworth has lost too much employment land in order to build housing. Need to encourage employment locally so that residents can work close to home.</p> <p>Town centre rents and rates are very expensive and conservation rules make it unattractive to many types of</p>	<p>The aim is that the regeneration of the town centre with a stronger retail mix, new office development, leisure, residential uses and an enhanced environment will bring more people into the centre. The improved physical linkages between the town centre and out of centre retail parks referred to in Policies TC2 and ST1 will encourage visitors to visit both destinations.</p> <p>The cost of running and maintaining the car parks are assisted by revenue from the parking charges. If parking was free, these costs would need to be met from other sources. Similar town centres to Tamworth also charge for parking and our rates are comparable. A review of car parking, both supply and charging in the town centre will be undertaken in the future.</p> <p>The Anker Valley is termed 'strategic' because its implementation is essential to the delivery of the Strategy. If it did not go ahead, alternative strategic sites would have to be found, either within the Borough or in neighbouring authorities. Being strategic does not mean that it will be developed before brownfield sites.</p> <p>It is unlikely that the link roads will be funded by public money. The Council will consider how they will be funded through the infrastructure delivery plan.</p>

	<p>offices.</p> <p>Tamworth is slowly losing its parks and open spaces so support protection. Support commitment to more allotments.</p> <p>Tamworth does not need more housing because its population is slightly declining. We do need more local authority housing.</p> <p>No mention of publicly provided community centres. They would be a focus for community affairs and the Council should support them.</p> <p>Design and heritage assets policies are well intentioned but too general.</p> <p>Support sustainable resource management policies but not for climate change reasons. Council should focus its efforts on efficient resource conservation rather than carbon footprint reductions.</p> <p>Need to address issues of development and removal of natural vegetation, which cause flash flooding.</p> <p>Sustainable transport policy is anti-car and will discourage more people from visiting the town centre. Buses are more polluting than cars and fares are expensive. They should be free and operated by the local authority.</p> <p>Need a strategy for youth involvement in the town's affairs and a strategy for helping the infirm and elderly.</p>	<p>If pitches or sports facilities are lost through development there will be a requirement for suitable compensatory provision to be made in a convenient location. It may be better to provide a new facility like a swimming pool as part of a new modern leisure centre rather than try to improve existing outdated facilities. (Policy SN4)</p> <p>The Strategy through Policy EC1 aims to protect the defined existing employment areas from significant loss of B1, B2 and B8 floorspace.</p> <p>Many of the existing town centre offices are located in historic buildings, there are relatively few purpose built offices, but there is a range of opportunities for office development. All new development will need to be sympathetic and appropriate to the historic setting of the town centre, as reflected in Policies TC2, DH1, DH2 and DH3.</p> <p>The RSS stipulates the quantum of housing required for each district.</p> <p>The local and neighbourhood centres will be the focus for community facilities and services as set out in Policies SN1 and SN2.</p> <p>Other comments noted.</p>
<p>Staffordshire County Council (Development Services)</p>	<p>Anker Valley policy should refer to the need for a comprehensive masterplan, including a transport assessment. This will review the need for the link roads and desirability of car parking to serve the railway station. Provision of roads would be inconsistent to concept of a</p>	<p>Proposed Policy H2 requires a masterplan to be prepared for the site. The Council welcomes the opportunity to work with Staffordshire County Council to finalise the wording for this policy to ensure the relevant transport requirements are met.</p>

	<p>sustainable urban extension. If traffic is successfully contained, there may be insufficient residual traffic to justify roads although routes may still need to be protected. Development may not be able to deliver all infrastructure specified in policy.</p> <p>Make reference to sustainable links to the QEMS BSF development.</p> <p>Purpose of park and ride is to provide additional parking in the Anker Valley to serve railway station, not improving sustainable links to learning zone and town centre.</p> <p>Sustainable transport policy should be amended to take into account the need to assess the need for the Anker Valley highway links. Transport assessments needed to determine transport implications and mitigation.</p> <p>Consult with Network Rail about rail services and joint vision. Visual quality should be added to SO3 and DEVMAN1.</p> <p>Consider preparing landscape/biodiversity and planning obligations SPDs.</p> <p>Separate design policy is essential because of the heritage issues. Suggest separate SPDs for advertisements/ shopfronts, conservation areas and listed buildings.</p> <p>Heritage assets policy can be tailored to specific local issues and concerns.</p> <p>Anker Valley policy is vague with regard to green space and biodiversity habitat provision. It should be more specific about the quantum of green space required for the development.</p> <p>Make a direct policy reference to contributing towards Biodiversity Action Plan targets. All development should deliver biodiversity benefit. LDF should be informed by biodiversity opportunity mapping that identifies priority areas for habitat protection and expansion and suitable</p>	<p>The Council considers that the Anker Valley and Amington Links are needed in connection with the strategic housing allocation. There will also be an emphasis on the provision of sustainable forms of transport including a park and ride facility at the railway station, footpaths and cycleways.</p> <p>Reference is made in Policy H2 to ensuring access to the Learning Zone, which includes the QEMS site. In order to achieve access the County Council will need to work with Tamworth Borough Council and the developer and many need to assist in providing relevant infrastructure.</p> <p>The Council will be undertaking biodiversity opportunity mapping with the County Council and Staffordshire Wildlife Trust.</p> <p>Other comments noted. The Council will be re-drafting the core policies in the light of consultation responses and emerging evidence.</p>
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	<p>habitats to give optimum biodiversity benefit.</p> <p>Design and construction of the Anker Valley Link Road should minimise and compensate for damage to the Warwickshire Moor SBI.</p> <p>Extensive Urban Survey will cover a large part of the borough but will leave a gap, which should be filled with a HECA.</p> <p>Core Strategy should consider major sites or broad locations for new waste management facilities, including major employment areas. Local businesses should be self sufficient in providing necessary on-site recycling facilities to provide energy.</p>	
Warwickshire County Council (Environment and Economy)	<p>Target of zero waste to landfill by 2020 is overly ambitious. Concerned about the cumulative impact of housing and employment development in Lichfield, Tamworth, North Warwickshire, Nuneaton and Bedworth, Hinckley and Bosworth and Ruby on the A5. The Highways Agency should be in a position to advise in 2010.</p>	<p>Noted. The Council will be re-drafting the core policies in the light of consultation responses and emerging evidence.</p>
Mobile Operators Association (Mono Consultants Ltd.)	<p>No mention of telecommunications. There should be a policy in the LDF that supports and encourages the provisions for mobile ICT. Text for model policy supplied.</p>	<p>It is not considered necessary to have a separate core policy on telecommunications.</p>
Government Office for the West Midlands	<p>Document overall reads well, it has a good structure and is reasonably succinct. Some policies and supporting text are very lengthy.</p> <p>Consider including a short executive summary and a spatial strategy policy which sets out the overall strategy (as in Chapter 4 and including flooding and green belt).</p> <p>Ensure that government agencies are supportive before publishing and consider whether a policy is needed so that it is distinctive and not repeating national policy.</p> <p>What are the implications of the Building Schools for the Future programme?</p>	<p>The Council already works jointly with its neighbouring authorities of Lichfield and North Warwickshire and this approach will continue to ensure that Tamworth's needs are met in the most sustainable way.</p> <p>Other comments noted. The Council will be re-drafting the core policies in the light of consultation responses and emerging evidence.</p>

	<p>Green Belt is actually the 'West Midlands Green Belt'. Tackling neighbourhood deprivation should be more aspirational.</p> <p>Key diagram should contain more contextual labelling e.g. disadvantaged areas, rivers, employment areas, retail parks, key landmarks and safeguarded views, hospital, Fazeley and Mile Oak.</p> <p>Consider including the Learning Zone and Leisure Zone in the town centre.</p> <p>If Council is not going to provide for 30,000 sq m of office development in the town centre it needs to be clearly evidenced. Need to be more specific about locations for offices.</p> <p>Are both town centre strategic site allocations central to the delivery of the whole strategy? How do they relate to the primary shopping area?</p> <p>Consider combining both town centre policies.</p> <p>Close working between adjoining authorities is essential to successfully integrate housing outside the borough.</p> <p>Indicate if possible where the 60% brownfield target will be found within the urban area and whether the SHLAA sites are predicted to deliver 400 dwellings.</p> <p>In allocating the Anker Valley as a strategic site, it needs to be justified against alternatives and evidence provided to confirm its deliverability. Consider phasing, when it will be developed and contingency in the event that it does not come forward.</p> <p>Policy basis for affordable housing should be robust for the whole plan period.</p> <p>In flagging up the Green Belt as a potential location for Gypsy and Travellers, very special circumstance would have to be demonstrated, including a lack of alternative sites.</p>	
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	<p>Are any of the employment areas likely to be redeveloped before 2026?</p> <p>Indicative requirement for employment land provision should be four times the minimum reservoir not three times.</p> <p>Are any of the identified broad locations strategic allocations and is there a priority in phasing? What is the spatial distribution of land with planning permission?</p> <p>Whole RSS provision does not have to be identified, but the strategy should state where it will come from.</p> <p>EC3 reference to offices should be included in the town centre policy.</p> <p>Local and neighbourhood centre policies could be combined. They should be the first option for location of community facilities. Key diagram should make it clear that four of the centres are also locality working locations.</p> <p>Is the community sports centre going to be allocated in a DPD? Has any consideration been given to commercial leisure?</p> <p>Design policy should be re named Design and Place Making. Is climate change going to be incorporated in this policy? It could include long distance views to key landmarks.</p> <p>Sustainable resource management policy needs reconsideration. It could be more proactive with regard to renewable energy and localised energy supply. No need to refer to waste management facilities or minerals safeguarding, although safeguarded areas should be shown on the proposals map.</p> <p>No need for a Green Belt policy. The overall spatial strategy policy should state that the Green Belt boundary will not be altered in the short to medium term and will only be changed through a review of the Core Strategy.</p> <p>Do not need a flooding policy. Improvements to physical and</p>	
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	<p>visual access to the riverside could be included greenspace policy.</p> <p>Identify a core transport network and identify it on the diagram. This would represent the most accessible locations and would link to key facilities outside the borough.</p> <p>Elements of streetscape policy could be incorporated into design policy.</p> <p>Consider including housing trajectory as an appendix.</p> <p>Publication version will need to include a list of saved local plan policies to be superseded by the Core Strategy.</p> <p>Is a sustainability appraisal being prepared?</p> <p>Has Natural England been consulted about the need for a Habitats Regulation Assessment?</p>	
<p>McInery Homes (GL Hearn)</p>	<p>Strategy is not sufficiently flexible and does not take into account the RSS panel report to increase Tamworth's housing requirement to 4000 dwellings, of which 1000 should be located north of Tamworth in Lichfield District. Recommendations are in line with Structure Plan and GOWM's desire for cross boundary working. Core Strategy needs to be flexible to deal with changing circumstances.</p> <p>Anker Valley is subject to significant constraints and it is not clear when the infrastructure will be in place. Cannot rely on its delivery in the plan period.</p> <p>Economic climate will impact on deliverability of the SHLAA sites. Density of 40 dwellings per hectare is too high in the current climate. 30 dwellings per hectare is more realistic and would impact on capacity of SHLAA sites. Some of these sites are constrained by the Green Belt or flood zones 3a and b.</p> <p>Tamworth has a limited supply of previously developed sites within the urban area. Most are small, meaning that they</p>	<p>Depending on the outcome of the RSS Phase 2 Review, there may be a need to find land for additional housing to meet Tamworth's need. Consideration of potential sites, which will include those in Lichfield and North Warwickshire, will involve joint working with these authorities, which will be responsible for allocating sites in their core strategies.</p> <p>The Council will be preparing an infrastructure delivery plan, which will be in place by the time the Core Strategy is published. This will ensure that the necessary infrastructure will be in place when it is needed.</p> <p>Other comments noted.</p>

	<p>are difficult to bring forward in a co-ordinated manner. There is a need for other greenfield urban extensions outside Tamworth's boundary to ensure that its strategic housing requirements are met. Area to north of Tamworth is the most suitable site for a sustainable urban extension that is not affected by Green Belt or flooding constraints.</p>	
Flatagent Ltd. (CSJ Brooke Smith)	<p>Land at Mile Oak was identified as the second most sustainable option to meet Tamworth's needs in the growth and infrastructure study.</p> <p>Site has a good level of service provision, is close to railway stations, road network and is immediately available. It is considered to have adequate infrastructure servicing and few environmental constraints. It would be a sustainable alternative to the Anker Valley.</p> <p>Question the viability of Anker Valley due to infrastructure costs. This site was ranked low in the growth and infrastructure study.</p>	<p>Depending on the outcome of the RSS Phase 2 Review, there may be a need to find land for additional housing to meet Tamworth's need. Consideration of potential sites, which will include those in Lichfield and North Warwickshire, will involve joint working with these authorities, which will be responsible for allocating sites in their core strategies.</p>
Environment Agency	<p>Substantial flood defence system and flood plain should be recognised and incorporated into the spatial objectives. These should reflect the importance of maintaining space around essential flood defences, preserving flood plains and promoting sustainable drainage systems. None of the objectives relate to sustainable use of land.</p> <p>Policy reference needed to ensure brownfield sites are cleaned up before development.</p> <p>Key diagram should clearly show the two rivers and the floodplain.</p> <p>Where potential allocations fall within the flood plain, a level 2 SFRA will be required. More detailed information required where there is development pressure on areas at medium or high risk and there are no suitable alternative sites.</p> <p>Town centre regeneration policy does not consider flood risk.</p>	<p>The water cycle element of the joint study will determine what sustainable water infrastructure is needed to deliver the level of development proposed.</p> <p>The Anker Valley site as identified is not within flood zone 2 or 3 and it is not expected that a level 2 SRFA is required to support the Core Strategy. With regard to crossing the floodplain, it is understood from previous discussions with the Environment Agency that the Agency is working closely with the developers on design solutions.</p> <p>The Council will seek clarification whether the site identified for the leisure centre lies outside flood zones 2 or 3.</p> <p>Other comments noted. The Council will be re-drafting the</p>

<p>With regard to the Anker Valley, if it is in the floodplain, a level 2 SFRA is required. No objection to it being a strategic allocation if there are no other reasonable sites available provided that flood zone 3 and climate change allowance are preserved. Climate change may alter the developable area. It is unacceptable that the allocation is shown as overlapping the flood zone.</p> <p>Crossing of the Anker floodplain would require EA consent. It must not detrimentally affect the floodplain or make the situation worse for third parties. The design should improve the situation. Space for water should be considered within the design and layout at the outset, including above ground storage.</p> <p>Water cycle study should assess the feasibility of growth with regards to water resources and quality.</p> <p>Protect all green spaces and corridors along river banks as they are often in the floodplain and provide habitat linkages and flood storage.</p> <p>Level 2 SFRA would be required for the new leisure centre because of vulnerable location.</p> <p>Consider requiring code level 3 equivalent for water efficiency standard. BREEAM standards should apply to other uses, not just offices.</p> <p>Flooding policy should be retained, with some changes.</p> <p>Maintain natural character of river valleys and floodplains and where appropriate, restored. Avoid culverts, which are a barrier to wildlife, water flow and reduce natural cleansing. They also lead to rivers being ignored.</p> <p>The floodplain should be maintained and restored.</p> <p>Improve physical and visual access to riverside where possible.</p> <p>Core strategy needs to address efficient use of resources,</p>	<p>core policies in the light of consultation responses and emerging evidence.</p>
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	<p>appropriately sited waste facilities and a reduction in waste crime. Evidence base should look at current waste disposal capacity and capacity gaps. It should identify current waste management and future requirements for facilities. Identify treatment gaps and consider allocating sites for facilities.</p> <p>Delivery mechanisms required for zero waste to landfill target.</p>	
<p>Taylor Wimpey (Boyer Planning)</p>	<p>Core Strategy fails to reflect the RSS Panel Report and parts conflict with it.</p> <p>Council should not have used the Draft RSS figure of 2900 dwellings. This view has been backed up by the consultant's brief for the development and infrastructure study and RSS Panel Report, which recommended an increase to 4000 dwellings (including the 1000 to be met within Lichfield District).</p> <p>Disagree with the Option report's sequential approach whereby the Green Belt was given precedence over land outside the Borough following the urban area and Anker Valley. This is contrary to PPG2 and the Panel Report which concluded that Tamworth's housing requirements can be met both within and outside the Borough without the need to release Green Belt.</p> <p>Land north of Tamworth was recommended in the Structure Plan to meet the Borough's needs. This land is still suitable and the sequential approach should be amended to reflect this.</p> <p>Two of the high ranking locations identified in the growth and infrastructure study have limitations. The land between Stonydelph and the M42 is of insufficient size to make a material contribution to the strategic requirement and land at Mile Oak is in the Green Belt. The score for sites north of Tamworth is unduly low.</p>	<p>Depending on the outcome of the RSS Phase 2 Review, there may be a need to find land for additional housing to meet Tamworth's need. Consideration of potential sites, which will include those in Lichfield and North Warwickshire, will involve joint working with these authorities, which will be responsible for allocating sites in their core strategies.</p> <p>The Proposed Spatial Strategy states in Policy SRM3 that there is no need to develop Green Belt in the short to medium term. There may be a need to consider some Green Belt release in the long term if alternative or additional sites are needed and sustainable sites outside the Borough do not come forward.</p> <p>Other comments noted.</p>

	<p>Panel Report supports submission on the merits of land north of Tamworth in stating that cross boundary provision should be made for at least 1000 dwellings north of Tamworth in Lichfield District.</p> <p>The Vision only refers to specific elements of the housing requirement and not the community as a whole. Support statement that town cramming will be avoided but it is incompatible with the strategy which restricts development to the Anker Valley and urban area. Provision must be made to include land adjoining the Borough to meet Tamworth's housing requirement. Without this, it will not be possible to meet the Vision's aims of avoiding town cramming, improving residential amenity and reduce congestion.</p> <p>Spatial Strategy should be amended to facilitate appropriate development on land to the north of Tamworth in Lichfield District. It is a matter for Lichfield DC but Tamworth should facilitate the necessary planning permissions including co-operating in discussions with land owners/developers in bringing forward proposals and identifying infrastructure and service requirements.</p> <p>Questions the viability of the Anker Valley and its continuing role in the Core Strategy.</p>	
Ken Forest	<p>Sensitive redevelopment needed in the town centre. Park and ride would reduce car use in the town centre. Doubts over short term deliverability of the Anker Valley. Further work needed to identify sites for Gypsies and Travellers.</p> <p>Level of employment land allocation will have to increase to ensure Tamworth's future prosperity. Employment creation is important.</p> <p>Good public transport links with all areas of the Borough</p>	<p>Government policy requires us to ensure that there are sufficient sites to meet the identified need. It is intended to re-establish the steering group of neighbouring local authorities along the A5 corridor to consider the strategic provision of sites.</p> <p>The Council is in the process of updating its open space audit and assessment. This will update the picture of deficiency and surplus across the Borough. The general</p>

	<p>needed. Greenspace SPD must be subject to consultation for it to have any weight. This should be done as soon as possible. It is essential to protect all green spaces for well being reasons. Sport and recreation facilities must be appropriately located to avoid adverse impact on neighbouring uses. Proposed site of leisure centre should be more clearly shown. Design policy should take into account biodiversity and trees on development sites. Sustainable transport strategy should include a park and ride strategy encompassing a number of sites around the town centre. Development management policy is essential. There should also be a separate policy relating to the ageing population, including a retirement complex. SPDs should be prepared on house sizes (bedrooms), affordable housing and developer contributions.</p>	<p>approach will be to protect open spaces that already make a positive contribution to the needs of the local area or are capable of making such a contribution (Policy SN3).</p> <p>The key diagram can only show the broad location of strategic allocations, it does not use an Ordnance Survey base. The exact location of the proposed leisure centre has not been confirmed.</p> <p>Other comments noted. The Council will be re-drafting the core policies in the light of consultation responses and emerging evidence.</p>
Mabec Property	<p>Over-reliance on the Anker Valley as a strategic site. It is not viable or deliverable to provide the amount of housing required in the RSS. It does not represent the most efficient use of land and is not a sustainable solution to long term housing need. Other locations are considered to be more appropriate and sustainable to provide the long term housing requirement of the Borough. Proposition that housing can be provided outside the Borough is flawed. A sensible and sensitive review of the Green Belt boundaries is considered the most appropriate long term solution, more so than the Anker Valley. Land at Dosthill should be allocated for housing, it will accommodate a development of less than 200 dwellings</p>	<p>Depending on the outcome of the RSS Phase 2 Review, there may be a need to find land for additional housing to meet Tamworth's need. Consideration of potential sites, which will include those in Lichfield and North Warwickshire, will involve joint working with these authorities, which will be responsible for allocating sites in their core strategies.</p> <p>Land at Dosthill is in the Green Belt. The Proposed Spatial Strategy states in Policy SRM3 that there will be no need to develop Green Belt in the short to medium term. There may be a need to consider some Green Belt release in the long term if alternative or additional sites are needed and sustainable sites outside the Borough do not come forward.</p>

	<p>and will represent a small scale amendment to the Green Belt boundary.</p> <p>There should be a fundamental review of all green space, including the Green Belt in order to assess the most appropriate locations for accommodating housing.</p> <p>Green Belt policy should allow for a comprehensive review of boundaries in the short to medium term.</p> <p>A larger number of smaller sites dispersed around the Borough are more appropriate and viable in terms of infrastructure provision.</p>	<p>The Council is in the process of updating its open space audit and assessment. This will update the picture of deficiency and surplus across the Borough. The general approach will be to protect open spaces that already make a positive contribution to the needs of the local area or are capable of making such a contribution (Policy SN3).</p> <p>Other comments noted.</p>
British Pipelines Agency	<p>Requests that the rights of statutory consultation on all planning matters are maintained within pipeline area of interest or easement.</p> <p>Recommend SPD on control and administration to ensure statutory consultees are included on planning applications.</p>	Comments noted.
Coal Authority	<p>Tamworth is an area that has a coal mining legacy and the planning process needs to take account of this. Potential public safety and stability problems can be triggered and uncovered by development.</p> <p>Mine entries can be located anywhere and should be considered by the local planning authority to ensure site allocations, policies and programmes do not lead to future public safety hazards.</p> <p>Land instability and mining legacy is not a complete constraint on new development. If mining legacy matters have been considered the development should be safe, stable and sustainable.</p> <p>Because Tamworth's mining legacy will be locally distinctive, it should be addressed in the Core Strategy. It should be specifically referred to in the Spatial Portrait and spatial objectives. Policy criteria should be included on land stability and coal mining legacy issues, either in DEVMAN1</p>	Comments noted.

	<p>or DH1.</p> <p>There is a band of coal running across the Borough from the north east to south west. Coal resources should not be unduly sterilised by new development. If this is the case, it should be extracted prior to development. This should be reflected in an amended policy SRM2.</p>	
RE Matthews (CT Planning)	<p>Phase 2 land at Bitterscote North should be allocated for employment. It is well related to existing employment land at Bitterscote North, which benefits from a strategic and sustainable location.</p> <p>Indicative schemes include B1 and B8 floor space, they are likely to be phased and begin with infrastructure provision which will include a bus service and cyclelane.</p> <p>Policy EC2 should be amended to include Phases 1a and 2 land off Dunstall Lane as suitable employment locations up to 2026.</p>	<p>There is no need to find additional land under the current RSS employment land target. However, depending on the outcome of the RSS Phase 2 Review, there may be a need to find land for additional employment land to meet Tamworth's need. Consideration of potential sites, which will include those in Lichfield and North Warwickshire, will involve joint working with these authorities, which will be responsible for allocating sites in their core strategies.</p>
Shuttington and Alvecote Parish Council	<p>Object to Anker Valley because it proposes a large number of low cost homes in a small area. Inclusion of social amenities is necessary but will lead to high density housing. This will replicate the problems of Amington Heath, Stonydelph and Glascote Heath. Other sites are available within Tamworth and windfalls will arise, which will enable integration into existing communities.</p> <p>Anker Valley development will lead to major traffic congestion on Ashby Road. Link roads would be very expensive and lead to another traffic blackspot on Amington Road.</p> <p>Park and ride facility will not be well used, need to evaluate who will use it.</p> <p>There will be increases in surface water run off.</p> <p>Link road will impact on high quality agricultural land and an area of great natural diversity and recreation.</p> <p>Housing should be provided within the urban area.</p>	<p>The Council's strategy comprises a mixture of development within the existing urban area and greenfield development. It would not be possible to conform to the RSS in terms of meeting development targets without using greenfield sites.</p> <p>New development must make efficient use of land. High density development can be sustainable, inclusive and well designed and will have to conform with Policies DH1 and SRM1.</p> <p>The Council considers that the Anker Valley and Amington Links are needed in connection with the strategic housing allocation. There will also be an emphasis on the provision of sustainable forms of transport including a park and ride facility at the railway station, footpaths and cycleways. The Council will consider how infrastructure is funded through</p>

	<p>Main road through Amington has not been identified as a local centre, despite having a number of shops and facilities.</p> <p>Tamworth suffers from a poor standard of street furniture. Upper Gungate bridge and railings are of a poor standard. A design strategy should mean better outcomes for future developments.</p> <p>All proposed developments need rigorous flood risk analysis. Better rail links are needed.</p> <p>Anker Valley Link and park and ride will not ease congestion. Building roads leads to more traffic.</p>	<p>the infrastructure delivery plan.</p> <p>Acknowledge that the development would have an impact on the floodplain of the Anker because of the increase in impermeable surfaces. It is important that the development incorporates appropriate measures to attenuate run-off.</p> <p>The main road through Amington contains a small number of dispersed shops. Local centres have been defined as concentrations of shops and facilities.</p> <p>Other comments noted.</p>
Sport England	<p>Inconsistency between promotion of Leisure Zone within the town centre and proposed location for new leisure centre. Proposed site would lead to loss of a playing field of which there is a deficiency in the Borough. Next document should explain and review other alternatives considered. Sport England would support the location given overall benefits of a modern accessible leisure centre outweighing loss of playing fields if supported by the Sport Strategy. Replacement playing fields should be provided.</p> <p>Sports Facility Calculator shows that the Anker Valley development would generate demand for half a swimming pool and almost one sports hall assuming 1150 dwellings at average occupancy rate of 2.4. Capital cost of £800,000 illustrates the level of planning contributions needed to contribute towards leisure centre.</p> <p>Anker Valley policy also proposes community centre to be used for indoor sports, so how would contributions be spilt? Clarify the priority.</p> <p>Although it is positive that the Sports Strategy is in place to</p>	<p>All four potential sites for a leisure centre have been subject to sustainability appraisal and the proposed site to the east of the town centre scored equally as well as the town centre site. It has the benefit of being located close to areas of need and being easily accessible. The potential town centre site would be too close to the existing facility at the Snowdome and would not be large enough to accommodate all the required facilities.</p> <p>Other comments noted. The Council will be re-drafting the core policies in the light of consultation responses and emerging evidence.</p>

	<p>robustly justify this level of investment, without the revised SPD there is a risk that this development could come forward before the level of contributions is clarified through policy. If this happens, policy should advise developers to use Sports Facility Calculator as a basis for calculating indoor sports contributions.</p> <p>Provision of primary school may provide opportunity for community use of sports facilities including provision of playing fields. Link in with Anker Valley policy.</p> <p>Potential housing development in Lichfield will generate a demand for Tamworth's services. Issue needs to be viewed jointly with Lichfield District Council.</p> <p>Proposed employment land should not lead to loss of sports facilities.</p> <p>Support production of SPDs for sport and recreation and planning contributions.</p> <p>Proposed Spatial Strategy is one of the best examples Sport England have seen in relation to developing clear policies for sport and recreation based on a robust evidence base and close working between planning and leisure.</p>	
Stuart Ashton	<p>Land off Pennine Way is the largest opportunity for housing growth within the urban area. It is available and deliverable within the first 10 years of the plan.</p> <p>Housing should be located with good access to public transport, community services and facilities.</p> <p>The Council should only protect green spaces and waterscape shown on the key diagram.</p>	<p>The Council is in the process of updating its open space audit and assessment. The key diagram can only indicate the broad location of strategic allocations, designations, infrastructure and constraints. There will be other important open spaces that are too small and local to be shown on the key diagram. The Council is considering the best ways of showing these in the Publication version of the Core Strategy.</p> <p>Other comments noted.</p>
Centro	<p>It is important that there is strong correlation between the Core Strategy and the principles of the WMRSS transport</p>	<p>Comments noted.</p>

	<p>policies, Regional Transport Strategy and the West Midlands Local Transport Plan.</p> <p>It is important that residents have sustainable access to regional services and wider employment and educational opportunities.</p> <p>New local Tamworth to Birmingham Moor Street service is dependent on the Birmingham Central Chord improvements at Camp Hill.</p> <p>Investment in the provision of high quality public transport facilities and services to serve new and existing development must be made at the outset in order to encourage use of sustainable modes.</p>	
Gary Heritage	<p>Housing development should be contained on brownfield sites. Green areas should be a last resort.</p> <p>Town centre must hold onto its heritage in order to draw in tourism.</p> <p>Anker Valley should not be developed. The urban area should stop at the railway line. Development in this area would spoil the setting of the valley and encroach on the Amington Hall Conservation Area.</p> <p>Traditional buildings, history and local heritage need better protection from local policies.</p> <p>Mineral extraction should not be allowed in the Anker Valley.</p> <p>Priority for sustainable transport would be to increase public transport to the outlying areas.</p>	<p>The Council's strategy comprises a mixture of development within the existing urban area and greenfield development. It would not be possible to conform to the RSS's development targets without using greenfield sites because there is a shortage of sites within the urban area.</p> <p>Note concerns about the impact of the Anker Valley development on the Amington Hall Estate Conservation Area. Policies H2 and D3 acknowledge the potential impact and the need for development to have regard to the character and appearance of the conservation area and its setting.</p> <p>Other comments noted.</p>
Richard Gough	<p>Safety is important beyond the town centre, it should be delivered across the whole Borough. Safety delivery is dependent upon an adequately funded Police Service and facilities.</p> <p>There should be a specific strategic objective covering safety issues which recognise development guidance and</p>	<p>The Council's Strategy is focused on regeneration of the town centre and neighbourhoods, which would complement the work of the Police Service.</p> <p>Other comments noted.</p>

	<p>provision of adequate policing services and facilities. Provision of adequate Policing services and facilities are essential to the creation of a safe town centre environment. Anker Valley should properly fund increased Police services provision.</p> <p>Local centres provide the opportunity to provide local services. Different services have the ability to serve differently sized areas and a hierarchy of centre is appropriate. Recognise the important role of the Police particularly in Amington, Belgrave and Glascote.</p> <p>Design policy should make reference to Secure by Design principles.</p> <p>Protection of historic assets is important to establish a sense of place and identity. Welcome initiative to find viable new uses, but this should be balanced against the need to preserve assets which have no viable use against legitimate development needs, especially those for essential service provision.</p> <p>Reducing congestion so that essential services, including the Police can properly respond to emergencies and provide quality services.</p> <p>DEVMAN1 does not refer to measures to deliver community safety, such as Secured by Design and the provision of adequate Police services and facilities. Where development increases the need for Police services and facilities, it should fund the improvements.</p> <p>Recommends a community safety SPD to bring together physical design measures with requirements to fund improve Police services.</p>	
<p>Inland Waterways Association (Lichfield Branch)</p>	<p>Oppose further expansion of the employment area north of Bonehill Road. Such a development would be highly intrusive into the landscape and very damaging to the</p>	<p>The Council's strategy comprises a mixture of development within the existing urban area and greenfield development. It would not be possible to conform to the RSS's in terms of</p>

	<p>historic canal environment, wildlife and tourism. Object to Bitterscote North employment allocation.</p> <p>Support commitment to designation of canal conservation area.</p>	<p>meeting development targets without using greenfield sites. There are no alternative sites of sufficient size within the Borough.</p> <p>Other comments noted.</p>
John Mitchell	<p>Vision should include affordable housing targets so that developers are aware of their obligations.</p> <p>Disagrees that Amington, Belgrave, Glascote Heath and Stonydelph should be singled out as having problems. All parts should be treated equally.</p> <p>Major housing complex for the elderly should be built at Anker Valley, to include a range of accommodation.</p> <p>There is not enough green space in the borough.</p> <p>Most of the document is a long standing wish list. Do not see the majority of its objectives coming to fruition. The Anker Valley is the only certainty.</p>	<p>Affordable housing viability work is on-going and will inform the publication version of the Core Strategy, which will incorporate targets as appropriate. As stated in the supporting text to Policy H3, the Council will carry out a separate consultation on this subject when the viability work is complete.</p> <p>The Council's Strategy is focused on regeneration of the town centre and neighbourhoods. In order to make the Strategy locally distinctive it is necessary to reflect Council priorities and the Sustainable Community Strategy, which focus on the locality working neighbourhoods. However, in order to reflect the range of physical and social characteristics of the Borough, the Council will be undertaking further work to divide the Borough into neighbourhoods and to develop policies that reflect their needs.</p> <p>The Council is in the process of updating its open space audit and assessment. This will update the picture of deficiency and surplus across the Borough. The general approach will be to protect open spaces that already make a positive contribution to the needs of the local area or are capable of making such a contribution (Policy SN3).</p> <p>Other comments noted.</p>
Lalitha Webb	<p>Health should be specifically referred to in SO8.</p>	<p>The Anker Valley policy H2 includes provision for a new</p>

	<p>Town centre regeneration should in addition consider leisure facilities and open space, promotion of sustainable, cohesive and integrated community, impact of ageing population, minimising impact of traffic, impact of development on existing communities, impact on sensitive groups and educational facilities for primary school children.</p> <p>A good location for affordable housing would be on the borough's border with North Warwickshire.</p> <p>Anker Valley policy should include provision for additional GP and Primary Care services.</p> <p>Focus additional employment development in deprived localities.</p> <p>Neglected town centre properties should be appropriately refurbished for offices.</p> <p>Need to achieve a balance between needs of the population and maintaining the green environment.</p> <p>Public transport must be affordable. Local facilities must be within walking distance or easily accessible by public transport.</p>	<p>local centre, which will include health facilities.</p> <p>Land to meet RSS employment requirements is generally related to existing employment areas, some of which are located close to the disadvantaged neighbourhoods. In addition, the local and neighbourhood centres will provide a focus for small scale employment opportunities (Policies SN1 and SN2).</p> <p>There is a range of opportunities for office uses within town centre, both within existing buildings and redevelopment sites.</p> <p>Other comments noted. The Council will be re-drafting the core policies in the light of consultation responses and emerging evidence.</p>
London Midland	<p>Support inclusion of railway station in the town centre.</p> <p>Walking and cycling linkages between the Anker Valley and other areas, including the station, should be optimised where possible.</p>	<p>Comments noted.</p>
Mr R. Rowland	<p>Concerned about the Anker Valley for reasons of flooding and impacts on town centre, Castle grounds and villages to west of Tamworth Borough Council.</p> <p>Anker Valley would be a suitable location for Gypsies and Travellers, it would not create as much surface water run-off.</p> <p>Independent study needed of impact of Anker Valley on flooding.</p>	<p>Anker Valley is considered to be the most sustainable site in the Borough that can meet RSS requirements and is allocated as a strategic site for that reason.</p> <p>The south east of the Borough is in the Green Belt. The Proposed Spatial Strategy states in Policy SRM3 that there will be no need to develop Green Belt in the short to medium term. There may be a need to consider some Green Belt</p>

	<p>Town centre is in need of investment and modernisation. Need for good public transport links to retail parks. Consideration should have been given to housing in the south east of the Borough.</p> <p>Park and ride should be for people living in outlying areas of the Borough. The Anker Valley is within walking distance of the town centre.</p> <p>Business areas outside the Borough could serve our needs, e.g. Birch Coppice or Kingsbury Link.</p> <p>New houses should be within easy reach of business areas such as close to Junction 10 rather than the Anker Valley.</p> <p>Businesses need direct links to major roads.</p> <p>Areas other than prime agricultural land should be allocated for housing, even in the Green Belt.</p> <p>Location of the proposed leisure centre is to the south east of town, which is on the opposite side of town to the large housing allocation.</p> <p>Do not build on the flood plain.</p> <p>Keep heavy transport away from the central areas.</p> <p>Better transport links needed for the outskirts.</p> <p>Industrial/business should be kept to the outskirts.</p> <p>Priorities for sustainable transport should be park and ride and frequent reliable public transport.</p> <p>DEVMAN1 is not sufficiently detailed.</p>	<p>release in the long term if alternative or additional sites are needed and sustainable sites outside the Borough do not come forward.</p> <p>All four potential sites for a leisure centre have been subject to sustainability appraisal and the proposed site to the east of the town centre scored equally as well as the town centre site. Although it is located to the south east of the town centre it has the benefit of being located close to areas of need and being easily accessible.</p> <p>Other comments noted. The Council will be re-drafting the core policies in the light of consultation responses and emerging evidence.</p>
British Waterways	<p>Canal network should be shown on a map as green space. Strategy does not include green infrastructure in its widest role of contributing as an urban green lung or to residential communities.</p> <p>Support use of sites in Amington and Kettlebrook for employment use and proposed sustainability measures.</p> <p>Sustainable resource management policy should be extended to encourage developers to look more widely than</p>	<p>The Council will be undertaking further work on green infrastructure.</p> <p>Note comments about use of canal for heating and cooling.</p> <p>The Council will take into account any canal based priority habitat works to be undertaken.</p>

	<p>conventional methods and consider the role of the canal for heating, cooling and water management. There is potential for water based heat pump technology to heat and cool larger premises adjacent to the waterways.</p> <p>A design guide should incorporate the issue of design relevant to the waterways and BW can help in supplying guidance on key urban design principles.</p> <p>Welcome provision of walking and cycling routes linking residential, leisure, employment and shopping uses to the towpaths.</p> <p>Sport and recreation strategy should be linked to the provision of linked spaces and connectivity.</p> <p>Confirm support for Coventry Canal Conservation Area, which would include a canal corridor study/SPD.</p> <p>There are biodiversity sites adjacent to the canal which would benefit from habitat creation or restoration.</p> <p>Protect the integrity of the canal infrastructure from the effect of river flooding.</p> <p>Flooding policy should include standards for SUDS and surface water run off as well as flood zone policy and details of acceptable design.</p> <p>Sustainable transport strategy should include a priority to upgrade the towpaths and access ways and signage.</p> <p>Priorities for BW would be to improve linkages, signage and surfaces.</p> <p>Delivery mechanisms should be mentioned as a possible SPD. This would include contributions for improvement and enhancement of the canal infrastructure.</p>	<p>All other comments noted.</p>
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Appendix B – The Evidence Base

Topic	Description	Status
Strategic Housing Market Assessment	Birmingham City, Lichfield District, Solihull Borough and Tamworth Borough Councils fall into a strategic housing market area defined at regional level for the consideration of housing needs. The authorities commissioned consultants to provide a detailed sub-regional market analysis of housing demand and housing need in the area. In particular the study analyses housing affordability issues and considers the level of affordable housing requirement within the area.	Complete
Conservation Area Appraisals	An assessment of the character of the conservation areas and recommendations for enhancement.	All CA's appraised 07/08.
Playing Pitch Strategy and Indoor Sports & Facilities Assessment	An assessment of current quality, accessibility and quantity, and looks at current and future needs.	Complete
Open Space Assessment	An assessment of current quality, accessibility and quantity, and looks at current and future needs.	Complete
Employment	An employment land review will: <ul style="list-style-type: none"> a) assess the existing employment land situation b) An examination of how much employment land may be required for the future c) The identification of a portfolio of sites for the future 	Complete
Retail	Work is required to assess the comparison and convenience retail provision for Tamworth.	The town centre masterplan provides some context on this. Further work may be required
	Town Centre Health Check	Complete
5 Year Housing Supply Paper	An annual estimate of the 5 year housing land supply.	2009-2014 complete and

		demonstrates TBC does have a 5 year supply.
Renewable Energy Study	Potential for all renewable and low carbon energy sources and technologies across Staffordshire.	A joint study between all Staffordshire Authorities has been commissioned and is expected to be complete by May.
Strategic Flood Risk Assessment	In August 2007 a group comprising the District and Borough Councils of Tamworth, Lichfield, Stafford and Staffordshire Moorlands commissioned Halcrow to produce a Level 1 Strategic Flood Risk Assessment (SFRA) in accordance with Planning Policy Statement 25 (PPS).The SFRA is a strategic document which illustrates information on the probability of flooding.	Complete
Water Cycle Study and Surface Water Management	A joint study with Stafford BC, Lichfield DC, South Staffs DC and Cannock Chase DC has been commissioned to identify the water requirements and impact on water management as a result of new development	Study has been commissioned.
Landscape and Biodiversity Assessment	Consideration is needed to identify what is critical in landscape and biodiversity terms to the character of the Borough, which important characteristics need protection from development and whether this has implications for potential strategic growth locations within the Borough.	A Habitats Study is complete. The County Council have undertaken some landscape appraisal work, however, further work may be required .
Southern Staffordshire and Northern Warwickshire Gypsy and Traveller Accommodation Assessment	Gypsy and Traveller Accommodation Assessments (GTAA's) are designed to provide the evidence needed to inform Local Authority strategies to respond to the accommodation needs of the Gypsy and Traveller communities as part of wider housing strategies. A GTAA was commissioned in May 2007 by a number of local authorities across the Southern Staffordshire and Northern Warwickshire area.	Complete

Strategic Housing Land Availability Assessment	Identifies potential housing sites in the Borough, assesses their housing potential and when they are likely to be developed.	Completed 2008. Needs to be reviewed and updated.
Future Development and Infrastructure Study	Examine how the scale of growth identified by the RSS Phase 2 Revision for Tamworth can be most effectively accommodated. This includes consideration of land in Lichfield District and North Warwickshire	Draft report received. Final report expected end of May.