

Tamworth Local Plan Examination

Letter to the Council – Proposed Main Modifications (MMs)

I am aware that you have requested a list of suggested MMs from me as quickly as possible. I would like to start by thanking you for the modifications that you have already submitted (Examination Document EX1), which has been helpful. I consider that the Council's suggested modifications referenced 014, 016, 020, 028, 042, 051, 052, 054, 055, 063-070 and 076-079 would be MMs, in that they are required to make the Local Plan sound. This means that it is for the Council to consider whether any or all of the others in the Council's list, as additional modifications (ie minor changes), find their way into the Local Plan.

Also, I consider that the Statement of Common Ground (SCG), between Tamworth Borough Council and Natural England regarding impact on the Alcove Pools SSSI, is fundamental to soundness and I propose to recommend the agreed wording in the SCG as an MM.

You will recall from the documentation and discussion during the Examination Hearings that several other matters were raised, some of which relate to other potential MMs, and I will turn to them now.

Firstly, the Council helpfully reworked its **objectively assessed housing need** (OAHN) based on the DCLG household projections for 2012, which were issued after the submitted Local Plan but prior to the start of the Hearing sessions. I consider that the revised OAHN and a brief explanation need to be included in the Local Plan, and this needs to be covered by MMs.

Secondly, based on your statement entitled **Potential Future Development Areas** (Examination Document HDR05), you indicated that a number of dwellings on Flood Zone 3A sites and an increase in the yield from Anker Valley SUE could be factored in to the Local Plan housing requirement as set out in the table after paragraph 3.10 of the submitted Local Plan. This will require some redrafting of policy SS1 and its supporting text, and appropriate MMs would need to be included in the Report.

Thirdly, you will recall that not all of the remaining housing shortfall to be provided outside Tamworth Borough, which would be reduced to from 2,000 to 1,750 dwellings following the MM covered in the above paragraph, is definitely committed in existing development plans and allocations. There could be as many as 750 dwellings to find. This, you will recall, is the basis of the need for a **review of the Local Plan** to reassess housing provision be built into the Local Plan, say by the end of 2017/2018, which would be triggered if sites outside the Borough to fill this gap had not been identified by then. Document HD07 provides a starter, but I would welcome any additional comments from the

Council on the 'final' wording of a MM to cover this, possibly as an amendment to policy SSS1, plus supporting text.

Fourthly, you will also recall that the **Green Belt** was considered at the Hearings, and a potential way forward, taking account of both the Council's submissions and those from neighbouring authorities and developers' representatives, would be to include a MM which would give the Council the option of reviewing the Green Belt, say by the end of 2017/18, and it could be included as part of the above mentioned MM to cover a review to policy SSS1. Again I would welcome your suggested wording of the MM.

The final soundness issue which was discussed at the Hearings concerned the **Gungate retail scheme**. A MM to cover this scheme would need to be linked in to a policy – EC2 seems the most appropriate place – and again I am inviting you to put forward the wording you consider would be most appropriate.

I am happy to assist with the wording of the above MMs, but I think it might be helpful if the Council could initially suggest any text, following which I would let you have any comments that I think would be helpful.

It would be useful to know the Council's procedure and timescale for approving the final set of proposed MMs before they are published for consultation. In this regard also, please bear in mind the need to carry out sustainability appraisal (SA) of the proposed MMs and that the SA findings should be made available with the MMs at the public consultation stage.

I look forward to hearing from you.

Mike Fox

INSPECTOR