

Amington Residents Association

Local Plan Issues:

There is currently no adopted local plan in place. Portions of the evidence base refer to the 2006-2031 draft local plan which has NOT been adopted and has NOT been assessed as being "sound" by the inspectorate for the Secretary of State.

The Inspectorate has already put in place a number of agenda items for the forthcoming consultation meetings, in order to satisfy himself that the plan is sound. He is already questioning the HMA (Housing Market Area Assessment) and the relevance of Cannock instead of Lichfield and North Warwickshire and questions the overall distribution of the houses within the Borough.

It is considered that the strategic benefits of delivering the emerging Local Plan particularly in respect of housing provision out weighs any perceived loss of open space. As this is a departure from the Local Plan until the Local Plan is adopted and confirmed to be 'sound' the strategic benefits can not be confirmed. (Environmental Assessment 5.39)

If the planning committee take the view that this application will be assessed under the draft local plan we would ask them to consider the fact that the plan suggests Amington and Bolehall wards should provide 11% of the housing need within the period to 2031.

Tamworth are said to require 6,250 new homes in the period, we personally feel this is too high but 11% equates to 687 homes. Some houses should be built in Bolehall and so it would be reasonable to say Amington needs to supply 500 in the plan period and Bolehall 187. The application for 1,100 dwellings is over double what Amington should reasonably provide in the plan period.

Any development should be progressive and evenly spread across the town to limit infrastructure pressure and would allow CIL monies to provide green space and outdoor leisure provision in the area, which is much needed.

Approving this outline plan under saved policies from the previous local plan would be irresponsible behaviour by the planning committee. It would give a developer too much freedom to change plans and offer no protection for the council or existing residents most affected by the proposed development.

If the planning committee take the view that the proposal will be assessed under saved policies, we would remind them that Amington Golf Course appeared nowhere in the previous local plan. The site has never appeared in a SHMAA (Strategic Housing Assessment) or a SHLAA (Strategic Land Allocation Assessment). The proposal does not comply with the previous local plan and is far too large a departure from the local plan to rely on saved policies.

Infrastructure Delivery Plan

- The IDP (Infrastructure Delivery Plan) is currently no more than a wish list. No items on the R123 list have any costing, it is therefore not possible to know if the CIL charging scheme will cover all of the proposed items and there is no commitment to provide the facilities. It is therefore not possible to assess the deliverability of the required infrastructure. When will the new facilities be built? Where will the new facilities be built? These are all questions that remain unanswered. None of the proposed facilities appear to be built in Amington, why is this? Amington is devoid of facilities.

- Facilities should be local to proposed developments to ensure growing communities have adequate facilities.

- The largest scale developments proposed in the emerging local plan are in the North of the Borough, namely Amington golf course and Anker Valley. No items on the R123 list are proposed in the areas most affected by development and where the CIL funding will be raised. It is not viable

to over develop areas of the Borough; especially areas already classed as deprived (Amington) and move all of the funding to already more affluent areas that do not need the infrastructure improvements as much as Amington is reported to need.

- No new sporting provision within the infrastructure Delivery Plan has been shown to be deliverable.

- The application has no plan to provide the additional recreational and leisure provision required to compensate for the loss of the golf course and that required by 3,000 additional residents of the proposed site.

Historically, Tamworth has no other urban extension that has proved to be deliverable, sustainable and viable at its initially proposed size. Anker Valley reduced by 50% is just one example. The same problems apply to the golf course development. The council have been over ambitious and have put forward an application that will in time be proven to be too large.

Housing Density and Type

The density of housing proposed (35 dph (dwelling per hectare), 14 dpa (dwellings per acre)) is significantly higher than the existing residential housing stock and cannot be considered to be in-keeping. Carnoustie is built to 12.5 dph and Troon /St. Andrews 15.6 dph. Density should not exceed 20 dph. This will ensure a better quality development that is more in-keeping with existing locality whilst maintaining a viable level of development.

The types of housing suggested does very little to fulfil NPPF 50: For instance no flexi-care contribution is detailed for the elderly which goes against sustainable urban developments as a fair mix is not provided for the demographic in greatest need.

NPPF 4 Sustainable Transport / PolicyTRA3

- There has been a lack of survey effort with regards to transport. Surveys were carried out during school holidays and at inappropriate times of the day. National models were used which do not reflect the uniqueness of Tamworth. The models are dated June 2010, again generated in the school holidays and should be considered to be out of date.

- Any new development in the town attracts large amounts of migration into the Borough. 65% of the Amington fields' development was purchased by people moving to Tamworth. Tamworth is a commuter town with a low percentage of jobs in the locality compared to its population. This means that some 65% of workers drive to a place of work outside of Tamworth. The impact of this development on Pennine Way, the A5 and the M42 J10 cannot be underestimated or ignored. The roads mentioned are already considered by the highways agency to be over capacity.

- The traffic assessments do not consider the impact of ancillary trips (Staffordshire County Council have disregarded this for some reason). This type of traffic will travel north towards the old Amington village and Glascoate Road to access the village amenities and town centre/Ventura retail areas. This cannot be disregarded when you consider there is no plan to develop the on-site local centre until Phase 3 of the proposed development. There will be a large impact on these unclassified / single carriageway roads.

- NPPF 37 is in question as a balance of land use within the area does not encourage people to minimise journey lengths for employment, shopping, leisure, education and other activities.

- The site design fails to minimise journey lengths (NPPF 37) as there are no exit routes from the southern development area. Vehicles will have to travel north to Eagles Drive, turn left to travel south, creating a 3 mile round trip for residents to be potentially within metres of their starting location. This will generate a large carbon footprint.

New Access Road

The proximity of the new road to the existing houses is unacceptable and the closeness of the new turning to the Carnoustie Island on a road which is 40mph does not appear to

have been sufficiently surveyed. The Traffic Assessment and Environmental Assessment have conflicting traffic flow data.

- The operational traffic distribution detailed within the Environmental Assessment used journey to work census data to establish likely routes to and from the site once occupied, however the Traffic Assessment identified that over 90% of traffic from the site would route south along Mercian way towards Glascote Road. At the junction with Glascote Road the majority of the traffic was anticipated to route west towards Tamworth down the Glascote Road. Only 23% of trips were estimated to follow the construction traffic route which is inconsistent with the Traffic Assessment. For the purpose of the Environmental Assessment the operational traffic is assumed to take the same route as the construction traffic. Therefore the environmental impact of the development traffic on the Glascote Road has not been assessed at all. It can not be stated therefore 'that traffic is seen to have a moderate impact on residential amenity as the houses are set back from the road with some foliage providing a screen.' This assessment is incorrect as the development traffic within the traffic assessment is deemed to follow the same route as construction traffic.

- Air pollution, road safety and noise implications need to be assessed before permission is granted for such a development. The development has not been subject to a detailed assessment of the highway safety implications, the proposed site access and development or traffic corridors or highway capacity for local routes to take traffic towards the town centre. Delivering sustainable transport can not be determined. Planning permission should be refused as travel to and from the development would be likely to cause harmful levels of pollution, highway safety or capacity impacts. 'Additionally, residual cumulative impacts of the development could be severe and go against the NPPF 32:3'.

School provision – safety concerns and traffic issues

- With an increase of traffic on Eagle Drive (it is suggested that 1 HGV every 5 minutes will travel along Eagle Drive for 11 years Monday to Friday). A pedestrian crossing on to Mercian Way is detailed within the Environmental Assessment however no mention of this is made in the planning application along with no provision to improve footpaths to the secondary school on Woodlands Road, which already requires children from surrounding areas to unsafely cross from one side of the road to the other to find suitable paved routes to school. The safety of this route must surely then be called into question along with the increased number of car journeys needed if footpath provision is not improved.

- Section 6.127 of the Environmental Assessment makes no mention of the potential for parents to send their children to Florendine or Greenacres School in Amington – the presumption is made that Amington Heath Primary will be used, although this school is within 300m of the site Amington Heath historically can be seen to attract very few children from the developments in Carnoustie/Troon/St Andrews and therefore this assumption is incorrect.

- As the new school and local centre will not be built until the development is complete, the increased traffic and journey numbers which can be expected towards these schools has not been catered for and it is interesting to note that parking is in short supply at both Florendine and Greenacres now without the need to school further children until the development is complete. Children of the new development already attending one of the 3 existing schools are unlikely to move to the new school when it is completed and so the problem will persist for a minimum of 5 years after site completion.

- The trip to school generation also confirms that the school will eventually provided capacity for 420 students against a projected need to accommodate 265 from the development. Therefore 155 children potentially will make their way along Eagle Drive to fill the extra places from elsewhere in the Borough. These trips have not been included in the environmental assessment. Only 77 school related trips have been determined due to a 60% reduction made in the figures as the children are expected to walk to school. The residual cumulative impacts of the development are not yet supported by the Highways Agency breakdown of traffic generation, traffic distribution and junction capacity which has not yet been signed off.

Local Centre

The planning application does not confirm what services will be provided at the Local Centre, it is no more than an indicative list. Instead until the development is complete the local centre is described as a car park. Therefore the development will have no services and will put additional pressure on the shops, doctors etc provided in Amington. The cumulative impact of the new housing will undoubtedly lead to gridlock until delivered towards the end of the final phase of development some 10 years on from the start.

Economic Growth

The site does not support economic growth. The environmental assessment states the development will deliver into the local economy through the construction process new employment. This is disputable, only 75 full time construction jobs over 8 years will be provided, 16 full time local jobs and 22 regional positions. The affects are noted as of minor significance for the local economy which goes against NPPF - 'building a strong competitive economy'.

Environmental Assessment.

This application should not be granted as too many mitigation measures are suggested and too many further surveys are required to grant an outline planning application for the construction of 1100 houses and supporting vehicular accesses etc.

If consent is obtained to sell the land with the above vague development details and numerous reserved matters Developers will already have the authority they need to manipulate the site as they see fit. This can be seen with so many developments around Tamworth. Too much emphasis is usually placed on reserved matters. To ensure that Tamworth receives the development necessary and the facilities and infrastructure needed before giving the go ahead for such a large urban extension we should ensure that we can indeed make the development sustainable. The number of mitigation measures does not ensure that the policies and NPPF requirements will be met. Too many prior to commencement surveys are needed to grant permission for this application. Numerous "Planning conditions" are required to ensure the development is deliverable in a sustainable manner.

- Flood risk –
 - o only a basic hydraulic assessment of the watercourse was carried out - additional hydraulic modelling is recommended - even if the additional modelling is undertaken under reserved matters if this planning application is agreed 1100 houses etc will already have been decided upon and the Developer will hold the council to that.
 - o No mention is made of clearing existing watercourse to ensure positive drainage gradient along the sites full length and to ensure that measures to reduce the impact of flooding during events. A safe access/egress route for the site is noted to be available onto Eagle Drive - which is not a positive statement to read for existing residents.
 - o The assessment found insufficient information relating to the proposed development to confirm how the SIS treatment drains will be configured and flows would ultimately discharge into storage areas located within the public open space, which brings into question safety aspects of the site as the wetland area is to be used as public open space.
- Contaminated Land –
 - o A site investigation scheme should be undertaken as the desk top study was carried out by WYG Environmental in Dec 2013 a detailed assessment of the risks to all receptors affected is needed. Only then can a remediation strategy be undertaken . Surface water drainage levels have not been determined as an unacceptable risk to controlled waters.
- Foul drainage –
 - o It is unknown whether a scheme for the improvement of the existing sewerage system is required -

A sewerage capacity assessment should therefore be carried out and approved in writing before consent is given to this application.

High Quality Design ENV19.

- The dwellings proposed do not include flexi-care accommodation, the need for which is not provide within this proposal.
- The design of the cycle paths and footways mentioned will encourage loitering and criminal activity in the area such as burglary. Contrary to the Crime and Disorder Act 1998 and as detailed in recent Statutory Responses.
- NPPF 58 – the obligation to create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion is not demonstrated by this planning application.
- The application should be rejected as the restriction that the bunding (tipping areas) places on the design of the development goes against NPPF 64. This poor design fails to take the opportunities available for improving the character and quality of an area and the way it functions.

End.