

**Tamworth Local Plan Examination  
Statement by North Warwickshire BC**

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1. North Warwickshire Borough Council has considered the Inspector's questions and has set out below its response to the questions it considers are relevant.

**2. Duty to Co-operate (DTC):**

*2.1 Has the Council worked collaboratively with other authorities and organisations during plan preparation on strategic planning matters that cross administrative boundaries?*

*Response:*

- 2.1.1 NWBC has worked with TBC and LDC over a number of years to progress collaborative working. This work led to the inclusion in the NW Core Strategy October 2014 of 500 dwellings to be delivered in North Warwickshire and a policy stating that when it is clear what further provision is required it will work with both authorities and the GBSLEP to reach a conclusion on any outstanding provision.

**4. Spatial strategy and housing need:**

*4.6 Should the Plan include a policy which states that, should the Plan's monitoring indicate that an on-going 5 year deliverable and a subsequent 10 year supply of developable housing land can no longer be sustained to meet Tamworth's needs, the Council will review its housing land provision and negotiate with neighbouring authorities if appropriate, to bring on-stream additional housing as required?*

*Response:*

- 4.6.1 The Borough Council can see the logic of this approach however there are circumstances that are very particular to Tamworth. North Warwickshire has always been concerned that sites outside of Tamworth's boundary would be seen as easy wins and the Council would be concerned that such a policy would bring this about. The focus should be on resolving issues on sites within Tamworth's boundary and getting to grips with why there is a potential under-supply of housing within the TBC boundary. Monitoring will be very important to ensure that there are early signals of any under provision and that TBC works proactively to resolve any issues to the sites coming forward.

*4.9 Bearing in mind the relatively tight boundaries around Tamworth, what should be the appropriate area in which to consider and plan for the provision of housing and other development to meet the Borough's needs?*

*Response:*

- 4.9.1 The Borough Council considers that:
1. It has respected the work of the RSS and accepted the initial 500 units which are included in the adopted Core Strategy.

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2. Tamworth has been actively working with and is an active member of the GBSLEP which is looking at Spatial Scenarios. As a result NWBC does not see how the outcome of individual evidence can direct the location of housing and employment land solely at the immediate adjoining authorities whilst working on a wider than local basis. Until the results of this work have been discussed and consulted upon it is unclear where the solution lies solely on the two local adjoining authorities or with the wider BSLEP.

*4.10 With reference to the concept of a Housing Market Area (HMA) in the Framework, paragraph 47[1], and the work undertaken in the Southern Staffordshire Districts Housing Needs Study, does the appropriate area for the consideration of Tamworth's housing needs comprise the Borough of Tamworth and the adjoining areas of North Warwickshire Borough and Lichfield District?*

*Response:*

- 4.10.1 The study does not include areas of North Warwickshire. North Warwickshire has been considered under the CW HMA

*4.11 What roles should other areas within the West Midlands HMA, such as Cannock Chase and Birmingham, play in relation to either meeting part of Tamworth's housing needs or in Tamworth meeting part of their housing needs?*

*Response:*

- 4.11.1 This is the area that NWBC feels needs to be explored to a greater extent. With Tamworth being part of the GBSLEP and that LEP's housing study covering Tamworth, the Borough Council believes this should be the basis for the involvement in areas outside of the LEP's boundary. We would also be concerned that there is no double counting of any provision of housing and employment land that we are being asked to deliver and that different strategic approaches be developed for the same issue. Housing and employment are being considered in the GBSLEP Spatial Strategy work which has not reached a conclusion. Tamworth and Lichfield are part of the GBSLEP. In the Borough Council's view needs from GBSLEP local authorities should be considered within that geography and only if there is still a shortfall areas outside of this geography be asked to look at what capacity and opportunities may exist. Until it does any additional requirement cannot be assumed to be delivered in Lichfield or North Warwickshire. The other options should reach a conclusion prior to NWBC allocating further land.
- 4.11.2 However the Borough Council is clear that the Inspector needs assurance that NWBC is willing to work to resolve any issues. To this end the Borough Council will consider allocating land in the forthcoming Site Allocations Plan which would give the flexibility that if numbers are required and it is agreed that North Warwickshire is the most appropriate location then sufficient land could come forward. The safeguarded land will be multi-functional in terms of giving flexibility to cater for the Council's own needs; to consider the CWHMA wider housing

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needs as well as those potential needs from the Birmingham and GBSLEP area. This could mean that a further round of plan making will not be required and therefore that the land could be delivered quickly. This safeguards NWBC from double counting but gives flexibility and assurance that there is a way forward if and when required.

*4.12 The Plan states that the Borough relies on neighbouring authorities to provide about 2,000 houses out of the total OAHN of 6,250 dwellings (paragraph 3.10 of the Local Plan).*

*With this in mind:*

*(i) Is this quantum objectively based in terms of the amount of OAHN that could be developed on available land free of constraints within the Borough?*

*(ii) Is its delivery within the plan period realistic in terms of the commitments by the relevant adjoining authorities, and the overall viability of sites?*

*(iii) Are the broad locations of the sites for Tamworth-related development outside the Borough sustainable in terms of their relationship to the town of Tamworth and other considerations such as transport infrastructure and flood risk?*

*Response:*

4.12.1 NWBC is already committed to delivering 500 dwellings. These are included in the Council's housing requirement of 3650 as stated in the adopted Core Strategy.

**7. The Green Belt and other physical constraints on new housing:**

*7.1 Should the Green Belt, as indicated in policy EN2, continue to be a permanent constraint on the development of new housing throughout the plan period?*

*Response:*

7.1.1 Green Belt is to be permanent so cannot be assumed that once designated will come forward for development in the short term. Therefore there needs to be a more detailed consideration of the Green Belt.

*7.2 Are there any likely development scenarios which would amount to the very special circumstances required to justify the development of new housing in the Green Belt?*

*Response:*

7.2.1 Yes there are very special circumstances in that development should not be assumed to be not acceptable when Tamworth BC has growth aspirations and is not willing to actively seek the release of even a small part of the Green Belt.

7.2.2. The partial subdivision of Green Belt land to the south of Hockley at what is a potentially sustainable location could be a potential future site that should be considered. Very special circumstance could be justified in view of the significant physical and capacity constraints affecting Tamworth. The issue of whether the landowner has put the land forward for development should not be a consideration

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in Green Belt terms. This would be part of the consideration as to whether the site is deliverable.

**10. Employment**

*10.1 Are the expectations in the Plan for employment growth (including 32 ha of new employment land) soundly based on a coherent framework? Are there any changes in the Plan needed in response to the Government's Growth Agenda?*

*Response*

10.1.1 It is difficult to assess the growth of Tamworth in a normal way when it is so constrained. The growth agenda works in a place where it has full control over the future land provision.

*10.2 The Plan also identifies a significant shortfall (14 ha) of employment land which needs to be identified in neighbouring authorities and then implemented within the plan period. Is this figure justified, and what steps has the Council taken to secure the implementation of this land for employment purposes?*

*Response*

10.2.1 The Borough Council has signed a MoU to look at the amount of employment land it could accommodate within its boundary. This is of course similar to the housing provision subject to the outcome of the work that is ongoing with the GBSLEP.

10.2.2 NWBC is working on a Site Allocations Plan which will assist in this matter. Officers are working on a Plan that has opportunities for at least part of this provision until such time that the GBSLEP work has been resolved and more detailed discussion can take place.

*19.1 How will the monitoring arrangements work? Should this matter be addressed as a policy?*

*Response*

19.1.1 The Borough Council will work with TBC, LDC and the local authorities from the GBSLEP to consider the results of monitoring and any implications. The Borough Council collects and provides information that is consistent with the rest of the West Midlands on a range of subjects including housing and employment.

19.1.2 In terms of housing that is being delivered in North Warwickshire this is taken as 27 dwelling completions per annum. The only ward that has a low travel to work with Tamworth is Fillongley so this is the only ward where no completions will be considered as providing for the needs of Tamworth.