

Submission for Theme 1

Matter 5 Distribution Of Housing Development

Tamworth is now very restricted in choice of space for future development and locations for housing. Based on information from estate agents 70% of the sales of properties will be to households outside of the borough of Tamworth (March 2015). These sales are to families who do not work in the town and will commute out to work. This is because market housing is cheaper in the town. This will result in increased traffic and pollution. Some will work from home and travel at times of their own choosing (likely off-peak periods). This section is 13.9% nationally and growing. Tamworth is currently below average but also has this growing section. To minimise this effect I seek to encourage development on smaller sites, rather than a few major site. This to spread the impact. The location should preferably be close to major road infrastructure and with easy access to public transport to encourage alternative sustainable modes of transport, including walking and cycling.

Matter 6 Deliverability of Housing

This matter raises difficulties for local authorities because the market reacts to market conditions and financial viability, with numerous outline and speculative applications which mostly fail to make speedy progress whilst the site owner seeks to sell on the site with the benefit of outline consent.

Whilst local authorities may be informed verbally of the intentions of these site owners, this lacks guarantees and gives uncertainties which does not help future planning. It is not uncommon for outline applications to be renewed with no progress taking place over many years. The Hedging Lane site is one such a case and the Anker Valley provides another example. Recognising this problem is important. Solving it is not so easy when a planning system effectively allows such expiring applications to be renewed almost as a matter of course. I firmly believe that unless there is firm evidence that outline applications will make progress towards completion within the 5 year deliverability period then they should not be considered deliverable. They should instead be considered deliverable within, and included in, the 6 - 10 year period.

D W W O P A A L E

Matter 7 Green Belt And Other Constraints.

These are important issues and cover a variety of difficulties and considerations for planning authorities. Such as historic landscapes, nature reserves, canals, rivers and flood risk areas. All of these are important planning considerations which the system generally copes with reasonably well.

However, my concerns relate principally to biodiversity and protection of the environment on non-designated sites where there is evidence of a wide range of protected species that could likely be present. Yet the planning department accepts a walk-over survey by an ecological expert paid for by the applicant. This expert then too frequently reports that there is "no evidence" of protected species. There was a case last year in Tamworth where the ecologist did not do the job sufficiently well to find no evidence of badgers or bats on the site. The planning officer involved (who I have respect for) gave great weight to this experts view. Unfortunately the Council did not have the resources to independently investigate this. The planning committee rejected it and the appeal was dismissed. However the applicant persisted and eventually got the permission he wanted.

The Council has a local Tree Validation policy (included) which is not included in the Local Plan because of this situation that developers are not abiding by it. Having taken this up with the Council, they have responded that in accordance with the Planning Policy Guidelines there has to be a degree of "reasonableness". The end results have been inadequate tree surveys and substantial removal of trees which substantially contribute to biodiversity but do not in themselves warrant tree preservation orders.

To assist in addressing this issue I request that the tree validation requirements be included in the Local Plan, as a broad statement and better publicised, to help close this ecological shortfall. In addition there are identified weaknesses in the Council's approach to protection and enhancement of biodiversity in practice, contrary to the guidance given in the NPPF chapter 11.

I request that the Inspector consider these ecological issues in order to seek an advisory solution.

Matter 8 Gypsy and Traveller Accommodation

As a past member of the now defunct branch of Planning Aid , I attended a well researched and informed presentation and seminar some years ago. The lady presenter explained the problems and challenges well. These can be summarised:-

1. Gypsies and Travellers are two distinct groups with differing attitudes and lifestyles. They do not integrate together. Almost like putting Israelis in the same camp as Palestinians.
2. They both roam the country and are generally unwelcome in local communities because of associated problems of litter, rubbish, anti-social behaviour and other crimes associated with their presence.
3. Any site provided would require at least the basic facilities such as toilets and water.
4. Their arrivals and continued presence is unpredictable as a result of their nomadic lifestyles.
5. They are difficult to liaise and communicate with because of their individual lifestyles. This makes it difficult for local authorities to plan for and consult with them.

An assessment has been undertaken that, I remember, only allocates the likely need for 2 sites in the Lichfield and Tamworth locality. The Council proposes not to allocate any sites in Tamworth. These are allocated elsewhere.

Some years ago problems occurred at Mile Oak and the users were moved on. More recently we had a problem at Mercian Way, Amington for a few weeks until they were persuaded to move on. The problem is infrequent but the solution is not easy.

There are difficulties in consulting with these groups. Any identification of specific locations would likely cause a local outcry. Whilst I personally have no difficulties with the Council's approach, this problem will not go away.

I consider the issue should be kept open and flexible. Also that additional efforts be made to contact and liaise with these groups in order to guide a long term potential solution.

APPENDIX INCLUDED

COUNCILS TREE VALIDATION REQUIREMENTS

APPENDIX A,

Appendix A

Tree Validation Requirements

Validation Item and Location	National Policy Driver	Types of application that require this information	What information is required and Links to Further Advice
<p>Tree survey / arboricultural statement</p> <p>Borough Wide</p> <p>25</p> <p>No. 25 - Tamworth Borough Council - Planning Application National and Local Validation Requirements - July 2013</p>	<p><u>National Planning Policy Framework</u>, particularly Section 11</p> <p><u>Town and Country Planning Act 1990</u>,</p> <p>(Section 197-198),</p>	<p>All planning applications where the application involves works that may affect any trees on or off the site.</p> <p>All sites where there is a Tree Preservation Order or any proposals within a Conservation Area</p>	<p>All trees are a material consideration in planning. A Tree survey and plan as specified in BS.5837:2012 must be provided showing the location of all trees on site and within 8m of the proposed development.</p> <p>A list of trees which are desired to be removed and a schedule of any works to retained trees shall also be supplied.</p> <p>Where trees are protected by a Tree Preservation Order or Conservation Area legislation a report in full accordance with BS5837:2012 Trees in Relation to Construction 2005 Recommendations must be submitted.</p> <p>Give a detailed description of the proposed works, e.g. crown thinning, reduction/topping, lifting, felling or the removal of dead dying trees, and the reasons for it. Digital photographs of the existing tree(s) should be provided.</p> <p>A structural engineer's or surveyor's report and arboriculturist's report if the work required relates to subsidence damage.</p> <p>Applicants are encouraged to discuss proposals with the Tree Officer before submission.</p> <p><u>Adopted Tamworth Local Plan 2001-2011 Policy ENV9:Protection of Trees, Woodlands and Hedgerows</u></p> <p><u>Tree Preservation Orders :a guide to the law and good practise (DCLG)</u></p>