



Report

GVA
3 Brindleyplace
Birmingham
B1 2JB

Planning Statement

Regeneration of Kerria Estate, Amington, Tamworth
Tamworth Borough Council

February 2015



Prepared By: Laurence Holmes Status: Principal Planner .. Date: 20th February 2015

Reviewed By: Simon Phillips Status: Associate Date: 20th February 2015

For and on behalf of GVA Grimley Ltd

CONTENTS

| | |
|--|----|
| 1. Introduction..... | 1 |
| 2. Background and Context..... | 3 |
| 3. Description of Site and Surroundings..... | 9 |
| 4. Description of Proposed Development..... | 12 |
| 5. Planning Policy Overview..... | 16 |
| 6. Planning Assessment..... | 23 |
| 7. Summary and Conclusion..... | 44 |

Appendices

| | |
|--------------|--|
| Appendix I | Tamworth Borough Council EIA Screening Opinion |
| Appendix II | Site Location Plan |
| Appendix III | Illustrative Masterplan |
| Appendix IV | Planning Policy Extracts |

1. Introduction

- 1.1 This Planning Statement has been prepared by GVA on behalf of Tamworth Borough Council (“the applicant”), in support of a planning application for the redevelopment of land comprising the Kerria Estate (hereafter referred to as “the site”) in Amington, Tamworth. The application is submitted in outline with all matters reserved for subsequent approval, except access. The application proposes the following description of development:

“Comprehensive redevelopment consisting of the erection of up to 44 residential (Class C3) dwelling units, retail (Class A1) unit of up to 381 m² gross and associated car parking, and means of access with all other matters reserved”.

- 1.2 The proposals are intended to bring to fruition a vision for the regeneration of the site which will deliver an appropriate mix of high quality homes in order to help meet social and affordable housing needs which have been identified within the local area. A thorough programme of environmental and technical investigative works, together with extensive public and community stakeholder consultation, has culminated in a carefully considered proposal which will secure a positive future for the site.
- 1.3 The outline planning application is defined by certain parameters, namely the use and amount of development proposed, and access arrangements. The Council’s Development Control Manager has provided a Screening Opinion which confirms that the application proposal does not qualify as Environmental Impact Assessment (EIA) development. A copy of the Screening Opinion is attached in **Appendix I** of this report.
- 1.4 This Planning Statement is accompanied by the following documents which support the application proposal:
- Completed Application Forms and Certificates;
 - Planning Drawings;
 - Statement of Consultation;
 - Design and Access Statement;

- Transport Technical Note;
- Flood Risk Assessment and Drainage Strategy;
- Ecological Appraisal (incorporating Extended Phase 1 Habitat Survey and Bat Survey);
- Phase 1 Geo-Environmental Study;
- Tree Survey and Arboricultural Assessment; and
- Utilities Assessment.

1.5 The remainder of this Planning Statement is structured as follows:

- **Section 2** details the background and context to the proposals.
- **Section 3** provides a description of the site and its surroundings.
- **Section 4** provides a detailed breakdown of the proposed development.
- **Section 5** establishes the existing and emerging planning policy context relevant to the proposals.
- **Section 6** assesses the proposals against relevant planning policy and other material considerations.
- **Section 7** draws together the summary and conclusions of this Planning Statement for consideration by the Council.

1.6 Should you require any further information, please contact:

Laurence Holmes

Principal Planner

T 0121 609 8060

E laurence.holmes@gva.co.uk

2. Background and Context

- 2.1 It has been a long-held aspiration of the Council to regenerate the site. Developed in the late 1960s, the site consists of 36 dwelling units comprising a mixture of flats and maisonettes, together with a small commercial element and a community centre. The site is unpopular amongst residents, with properties that are no longer fit to meet their needs. This, together with other related issues, is a major contributory factor to high levels of deprivation that have been identified on the site.

Feasibility

- 2.2 A plan of action to bring forward the regeneration of the site was identified in April 2012, following Cabinet approval of the Council's Housing Revenue Account Business Plan. This outlined the Council's ambitions for its housing stock over a thirty-year period, pivotal to which is the delivery of area-based housing regeneration for struggling estates. This was informed by a sustainability assessment against the following criteria:
- Potential return on social investment.
 - Rental opportunity over a thirty-year period.
 - Capital investment requirements.
 - Sustainability in relation to tenancy turnover and void costs.
 - Opportunities for regeneration or area-based renewal.
 - High levels of revenue expenditure including the cost of managing tenancy conditions, cleaning and maintenance.
- 2.3 Following the above assessment, the site emerged as a priority area and feasibility work was undertaken to establish the business case and options for achieving a comprehensive regeneration. This work commenced in early 2012.
- 2.4 The Council's Housing and Health Directorate published the findings of its feasibility study into the regeneration of the site in November 2012. The Council's Tenant Consultative Group was actively involved in the preparation of the study and shared the Council's vision to transform and regenerate the site with a clear focus on the principles of 'Prosperity, People and Place'.

- 2.5 In terms of achieving prosperity, the Council's shared vision has sought in the first instance to achieve a degree of re-provision of existing facilities on the site; this will help to bolster the local economy whilst contributing towards meeting the needs of local residents.
- 2.6 The focus on people seeks to promote general health and wellbeing, whilst creating safe and cohesive sustainable communities. A core element of the focus on people is ensuring that the housing offer is diversified through the provision of a range of high quality, mixed tenure properties.
- 2.7 Achieving the principle of place is manifested in the creation of a vibrant and successful community - a community that is able to benefit from the replacement of poor quality housing with high quality, energy-efficient homes with adequate car parking provision and clearly defined, defensible spaces.
- 2.8 The strategic objectives for the regeneration of the site are supported by the Council's Healthier Housing Strategy, which has been developed in partnership with the Department of Health and Staffordshire County Council. The Healthier Housing Strategy is linked to various local, regional and national strategies and policies, including the Government's Housing Strategy for England. It is focused on four key objectives:
- Provision of suitable homes for everyone.
 - Provision of homes that are healthy, warm and safe.
 - Enabling people to maintain healthy and independent lifestyles.
 - Delivering neighbourhood environments that are conducive to healthier and safer communities.

Deliverables

- 2.9 The feasibility work undertaken involved initial consultation with key stakeholder groups to help determine what the key considerations and requirements are with regard to delivering improvements to the area. This culminated in a series of objectives being defined which would help to inform the options for regeneration, set out as follows:
- Unpopular and unsuitable dwellings should be replaced with dwellings which reflect housing needs and residents' aspirations.
 - Within this housing there should be a mix of tenure and property type.
 - All properties must be of good quality and built to a high standard of design.

- Properties should be designed to provide a high standard of thermal comfort and include 'green measures' where appropriate.
 - Properties for rent should be subject to a rental policy which reflects a balance between business needs and affordability.
 - The environment should encourage healthy lifestyles.
 - The environment should be structured to 'design out crime'.
 - The layout and design should establish defensible space.
 - Design should encourage sustainability and include 'eco' features.
 - Residents should have access to appropriate community facilities including retail which supports their needs.
- 2.10 A key requirement emerging from the feasibility work is to maximise the opportunities for social and affordable rent through redevelopment and re-provision. In doing so, there is also an aspiration to stimulate economic growth within the local area through the delivery of a Council-led affordable housing programme.

Key Milestones

- 2.11 Following on from the recommendations which emerged from the feasibility work, the Council's Director of Housing and Health put in place resources to deliver the regeneration of the Kerria estate. This included the appointment of GVA as the Council's Development Agent in 2013, to advise them on the delivery of the regeneration proposals and oversee the planning process.
- 2.12 A timeline of preparatory works and key milestones is set out below:

January 2014



- **Site investigation works to address environmental and technical matters associated with the redevelopment of the estate commence.**
- **A newsletter is sent out to all tenants which updates them on the progress that has been made and the process moving forward.**
- **An initial meeting is held with Development Control officers at the Council in order to scope the necessary information required to support an outline planning application, the anticipated timescales, and a suitable strategy for consultation with local residents and key stakeholders.**



- A meeting is held with the Council Leader, local councillors, and the Cross Party Working Group to discuss the strategy for moving forward with the regeneration proposals.
- Site investigation work ongoing.



May 2014



- An 'Ideas and Aspirations' meeting is held with local councillors, which enables the Council and its appointed development consultants to obtain an understanding of the keys issues affecting constituents in and around the estate, and matters that could be addressed through the planning process.
- The Council's appointed architect and masterplanner, BM3, commences preparation of initial options for the regeneration of the estate, which entail a comprehensive redevelopment.



June 2014



- Meetings are held with the Council's Housing Management Team and Development Control officers to discuss and gather feedback on the three initial masterplan options for the site.
- A meeting is held with the Council's Portfolio Holder for Public Housing and Vulnerable People to discuss and review the initial options, the findings of which are shared with the Ward Councillors and other key stakeholders in the Council.
- Site investigation and technical work ongoing.



July 2014



- A meeting is held with the Council's Tenant Consultative Group, where ifeedback is invited on the initial masterplan options for the redevelopment of the site.
- Two public exhibition events are held at the Kerria Centre; these are well attended and a range of feedback is received on the three masterplan options for the estate. Consultees are asked whether they have a preference amongst the options, the type and mix of housing they would like to see provided, and what they feel is needed to make the regeneration of the site a success.

August 2014



- All feedback received during and after the consultation events and meetings with key stakeholders is analysed. An Interim Consultation Review report is provided to the Council, which details the key findings emerging from the consultation process and puts forward a set of recommendations for moving towards a 'Preferred Option' masterplan for the site.
- Further investigation of ecology on the site is undertaken; this includes a survey of the site and loft spaces within its buildings to determine whether there are bat roosts and/or any other protected species.



October 2014



- Work is ongoing to prepare a Preferred Option masterplan. Meetings are held with the Council's Housing Regeneration and Finance officers to ensure that the scheme is viable and maximises the delivery of suitable new homes in order to meet local needs.



November 2014



- GVA is instructed by the Council to investigate interest from potential operators in order to establish whether the re-provision of a retail facility is viable and of an appropriate size and format to meet requirements. This informs further revisions to the Preferred Option masterplan.



January 2015



- Meetings are held with the Cross Party Working Group and the Council's Tenant Consultative Group to present the Preferred Option masterplan for the site and gather feedback.
- A second public consultation event is held at the Kerria Centre to present the Preferred Option masterplan for comment and feedback. Responses are considered in determining the eventual scheme to be submitted for outline planning permission.



February 2015



- **Preferred Option masterplan is finalised and receives Cabinet approval to proceed through submission of the outline planning application.**

- 2.13 A more detailed overview of the public consultation process that was undertaken to inform the proposals is set out a Statement of Consultation which has also been submitted with the planning application, whose findings should be read in conjunction with this report.
- 2.14 A decant process will commence in 2016, ensuring that all buildings on the site are empty and can be demolished in mid-2017, with redevelopment commencing in early 2018. It is expected that the proposed development will be completed by 2019 (this process will be kept under review).

3. Description of Site and Surroundings

- 3.1 The site is outlined in red on the submitted Site Location Plan (attached in **Appendix II**). It is situated within the district of Amington, which lies approximately 2.4 miles east of Tamworth town centre and 1.8 miles north of the A5. The site is bounded by Kerria Road to the north and east, and Robinia to its southern boundary. The site's western boundary is adjoined by an extensive tract of open space which includes a cycleway and footpath and areas of established woodland.
- 3.2 Comprising a split-level area of 1.06 ha, the site is presently occupied by 36 residential dwelling units, consisting of two-bedroom flats and maisonettes in three-storey buildings. In addition, there is a community centre ("the Kerria Centre") and 5 shop units, one of which is occupied by a Londis convenience store.
- 3.3 A doctors' surgery formerly occupied part of the site between the Kerria Centre and Robinia, however, this has since been demolished and is expected to be developed independently (see paragraph 3.11 below). Similarly, part of the site fronting the corner of Kerria Road and Robinia was occupied by a public house ("the Gardeners Arms"), however, this has since been demolished. This land has previously been the subject of a planning permission for a care facility (see paragraph 3.10 below), however, it remains part of the site for the purposes of this application proposal.
- 3.4 All existing buildings on the site were developed in the late 1960s and wrap around areas of car parking and small pockets of poorly defined open space. The architectural vernacular and layout of the buildings, whilst utilitarian in appearance, is characteristic of pioneering social housing developments of its era. Elevations are faced in an alternate mix of red brick and grey slate cladding, and are punctuated by small windows with single openings.
- 3.5 Entrances to properties are typically approached via steps to the first floor level, comprising of individual staircases with timber clad balustrading and/or steel railings. The rears of buildings typically feature walk-on terraces which are used for the drying of clothes, and overlook concrete courtyards used for car parking and bin storage. Communal areas within the site are further characterised by public art, consisting of

painted murals to brick walls and a bronze statue (“Woman on an Anvil”) sited on a concrete plinth.

- 3.6 The overall appearance of the buildings on the site is considered poor and is in marked contrast to residential properties in the surrounding area. This has been further exacerbated by instances of anti-social behaviour, including vandalism to the buildings and public artwork, whilst the majority of the retail and commercial frontage is permanently screened by steel shutters. This has resulted in an unwelcoming environment with little sense of place and a heightened risk and perception of crime.
- 3.7 There are two vehicular accesses into the site: from the north via Kerria Road and from the south via Robinia. The centre of the site, within which the shop units and the Kerria Centre are situated, is inward-facing and can only be accessed on foot. As such, the existing shopping and community facilities on the site are not readily visible from Kerria Road. It should be noted, however, that a central walkway exists which links Kerria Road to the centre of the site.
- 3.8 The site is well located for local bus services, namely the No.5 which stops on Kerria Road and provides links to Tamworth town centre, via Glascote. In terms of vehicular access, Kerria Road links with the Mercian Way collector road (via Woodland Road), which serves employment areas to the south.
- 3.9 The site lies within the catchment area of a range of education facilities, including Two Rivers and Greenacres primary schools, and Landau Forte Academy secondary school. In addition, South Staffordshire College’s Tamworth campus, located approximately 2.4 miles away at Croft Street, provides a wide range of vocational courses for school leavers and adult learners.

Relevant Planning History

- 3.10 Land formerly occupied by the Gardener’s Arms Public House, in the vicinity of Kerria Road and Robinia, forms part of the application site and has been the subject of separate planning permissions granted previously. In addition, the land formerly occupied by the doctors’ surgery, to the rear of the site and principally accessed from Robinia, is excluded from the site though its planning history is relevant. Details of planning permissions granted for both sites are set out in Tables 3.1 and 3.2 overleaf:

Table 3.1: Relevant Planning History – Former Gardener’s Arms Site

| Application Ref. | Description of Development | Decision (date) | Comments |
|------------------|--|-----------------------|---|
| 0453/2004 | Erection of 18 no. apartments and parking below | Granted on 14.04.2006 | Not implemented by applicant. Time expired. |
| 0460/2011 | New build Class C2 residential nursing care home with ancillary facilities | Granted on 30.11.2011 | Not implemented by applicant. Time expired. |

Source: Tamworth Borough Council

Table 3.2: Relevant Planning History – Former Doctors’ Surgery Site

| Application Ref. | Description of Development | Decision (date) | Comments |
|------------------|--|-----------------------|---|
| 0129/2008 | Erection of 12 flats | Granted on 01.07.2008 | Planning permission extended – see below. |
| 0226/2011 | Extension of time pursuant to planning permission 0129/2008 for erection of 12 flats | Granted on 26.07.2011 | Pre-commencement planning conditions discharged and development lawfully commenced. |

Source: Tamworth Borough Council

- 3.11 The owner of the former doctors’ surgery site has commenced development on the site, thus lawfully implementing the planning permission. To date, the works undertaken constitute the digging of building foundations, however, there has been no further progress on the development. The application proposal can be delivered without the need for the former doctors’ surgery land to be incorporated. As such, the site owner is able to deliver the approved apartment scheme independently of the application proposal.

4. Description of Proposed Development

- 4.1 The full description of development, as stated on the planning application form, is provided below:

“Comprehensive redevelopment consisting of the erection of up to 44 residential (Class C3) dwelling units, retail (Class A1) unit of up to 381 m² gross and associated car parking, and means of access with all other matters reserved.”

- 4.2 Whilst the application includes means of access into the site from Kerria Road and Robinia, all other detailed matters, to include appearance, layout, landscaping and scale, are reserved for subsequent approval by the Council.
- 4.3 The Illustrative Masterplan demonstrates how the form of development could be delivered. The outline planning application seeks to establish the principle and amount of residential development, in addition to retail floorspace, that is proposed for delivery on the site.
- 4.4 The submitted Design and Access Statement refers to details of the design, height, scale and massing of buildings, notwithstanding that these remain indicative for the purposes of this application. These details will be addressed through applications for reserved matters planning permission.
- 4.5 The proposed development will comprise of at least 80% affordable housing; this is expected to be a mixture of social and/or affordable rented (the latter being defined as properties available for rent up to a maximum of 80% of market rent). The tenure mix of the proposed development is to be agreed through subsequent applications for reserved matters planning permission.

Amount of Development and Illustrative Mix

- 4.6 The proposed redevelopment will provide up to 44 residential (Class C3) dwellings, whose type and size is informed by local requirements for affordable housing.
- 4.7 On this basis, the dwelling mix as currently envisaged will comprise the following:

Table 4.1: Illustrative Dwelling Mix

| Apartments | | Houses | | Total Dwellings |
|------------|-------|--------|-------|-----------------|
| 1-Bed | 2-Bed | 2-Bed | 3-Bed | |
| 8 | 4 | 24 | 8 | 44 |

Source: Illustrative Masterplan

- 4.8 Whilst the dwelling mix will be finalised and determined at Reserved Matters stage, it is expected to remain broadly consistent with the breakdown identified in Table 4.1. This reflects the existing and anticipated size / type requirements for affordable housing within the local area.
- 4.9 The proposed retail unit will comprise of 381 m² gross floorspace and will be located in the south-eastern part of the site, fronting Kerria Road and Robinia. The gross floorspace represents an upper threshold, based on the confirmed requirements of prospective retail operators, for the trading of a local convenience store.
- 4.10 The net sales area of the unit will be confirmed through a subsequent application for reserved matters planning permission, pending sign-up of a suitable operator. It is proposed that the retail unit will be supported by 11 customer car parking spaces, in order to enhance its viability for a prospective operator (these are to be accommodated to the rear of the unit and accessed from Robinia).

Density

- 4.11 The density that will be achieved on the site equates to 42 dwellings per hectare gross, with a net developable area of 0.31ha and total site area of 1.06 ha. This excludes the former doctors' surgery site, whose development (if fully implemented) will deliver an additional 12 no. 1-bed apartments.
- 4.12 The Design and Access Statement describes how the density and scale of development will be appropriate in the context of the surrounding area.

Illustrative Dwelling Types

- 4.13 The proposed redevelopment will be principally comprised of two-storey, semi-detached houses. Within the total number of dwellings to be accommodated on the site, the

proposed masterplan also makes provision for two detached (two-storey) three-bedroom houses, a two-storey block of four apartments (Plot Ref. pda1), and two additional floors above the proposed retail unit, which will comprise of four no. one-bedroom and four no. two-bedroom apartments. As such, the majority of buildings on the site will be of two-storey height, whilst the combined retail and apartments fronting onto Kerria Road will achieve a three-storey height.

Access

- 4.14 The proposed redevelopment of the site will utilise the existing vehicular and pedestrian access routes from Kerria Road and Robinia. In addition, a vehicular access will be created along Kerria Road, adjacent to the existing pedestrian crossing facility. The proposed masterplan demonstrates how the total quantum and mix of dwellings could be accommodated within a suitable layout. This is explored in further detail within the submitted Design and Access Statement.
- 4.15 The servicing arrangements for the proposed retail unit have been carefully considered in order to meet the requirements of a prospective operator, whilst ensuring that the delivery operations can be accommodated within the site without compromising highway or pedestrian safety. In this regard, the Illustrative Masterplan demonstrates how a designated bay, to be used for the off-loading of HGVs and other delivery vehicles, will be provided to the side of the retail unit. This will provide a single-manoeuve, in/out access from Kerria Road and Robinia. This will be addressed in further detail at Reserved Matters stage.

Construction and Phasing

- 4.16 It is anticipated that, subject to outline planning permission being granted, the Council's approach to the delivery of the proposed development will be confirmed during 2015. Options for delivery of the scheme, e.g. through a partnership between the Council and a developer, are currently being considered.
- 4.17 Once the approach to delivery has been confirmed, and subject to outline planning permission being granted, the detailed elements of the proposal will be finalised and addressed through the submission of applications for reserved matters planning permission. It is anticipated that the preparation and submission of reserved matters will be undertaken in Q1 and Q2 of 2016.

- 4.18 Subject to obtaining detailed planning permission(s), and discharging relevant pre-commencement conditions, it anticipated that demolition and construction of the development will be commenced during 2016, with completion by 2019. Construction timescales will also be dictated by progress on the Council's decant programme; this is due to commence shortly at the site and is expected to be completed by 2017.

Scheme Evolution

- 4.19 As set out in Section 2 of this report, the application proposal has evolved following an extensive programme of consultation with local residents and key stakeholders. In seeking to address the comments and concerns of all consultees, the Illustrative Masterplan (attached at Appendix III) also responds to the environmental and technical matters identified through the earlier site investigation process, and ensures that the eventual development meets the Council's requirements, specifically in terms of affordable housing needs and financial viability.

5. Planning Policy Overview

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. The relevant parts of the adopted Development Plan and emerging planning policies, together with non-statutory documents, are outlined below.

The Development Plan

- 5.2 The relevant part of the statutory Development Plan comprises the “Saved Policies” of the Tamworth Borough Local Plan (2001 – 2011), which was adopted in July 2006 (“the Local Plan”). There are currently no other statutory development plan documents which are adopted.
- 5.3 It should be noted that the Local Plan pre-dates the NPPF and NPPG (see below) and as such, the degree of weight that can be afforded to its saved policies will be dependent on their consistency with the NPPF, in addition to the emerging policies set out in the draft Tamworth Borough Local Plan (see below). Relevant saved policies are listed below (full extracts are provided at **Appendix IV** for reference):

Table 5.1: Relevant Saved Local Plan Policies

| Policy Reference | Policy Name / Title |
|------------------|--|
| HSG5 | Residential Development within the Urban Area |
| ENV19 | High Quality Design |
| TCR13 | Development in Local Centres |
| TRA3 | Traffic |
| ENV14 | Open Space for New Development |
| ENV13 | Protection of Open Space |
| ENV7 | Habitats and Biodiversity outside Designated Nature Conservation Sites |
| ENV8 | Habitats of Legally Protected Species |

| | |
|------|--|
| ENV9 | Protection of Trees, Woodlands and Hedgerows |
|------|--|

Source: Tamworth Borough Local Plan (2001 – 2011) (Saved Policies)

Site-Specific Designations

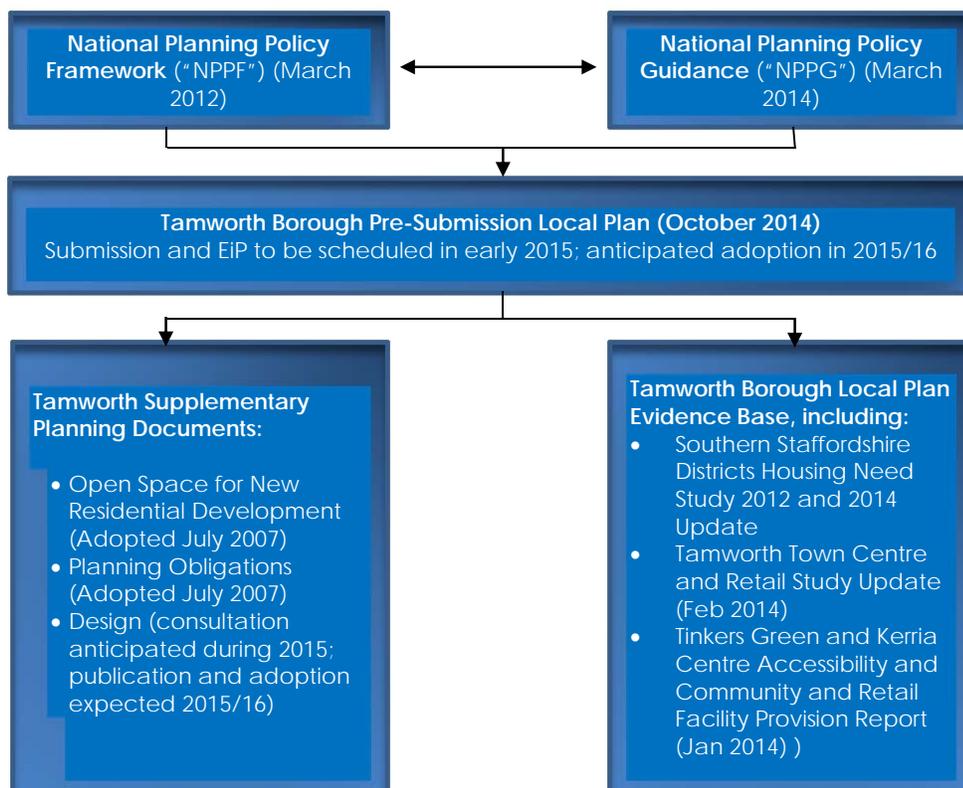
5.4 The site is neither allocated nor subject to any specific designations within the adopted Local Plan. The Kerria Centre is defined as a Neighbourhood Centre (Policy NC4) within the Tamworth Borough Local Plan Pre-Submission document and the estate lies within the designated Amington Regeneration Priority Area (see below).

Other Material Considerations

5.5 There are a number of supporting planning policy and supplementary guidance documents which are material to the determination of this planning application. These are summarised in Figure 5.1 below:

5.6 Given that the Local Plan pre-dates the NPPF and NPPG (see below), the weight that can be attached to its policies will be dependent on their degree of consistency.

Figure 5.1: Other Material Planning Documents



National Planning Policy Framework

- 5.7 The NPPF was published on 27th March 2012 and provides national planning policy. It is supplemented by more detailed guidance which is contained within the NPPG.
- 5.8 The NPPF explains the arrangements for its implementation at Annex 1, Paragraph 215. This states that:
- “In other cases and following this 12-month period, due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the framework, the greater the weight that may be given).”*
- 5.9 The adopted Tamworth Borough Local Plan covers the period to 2011 and is therefore out-of-date. In this instance, unless the saved policies of the Local Plan are in strict conformity with the policies of the NPPF, the latter should prevail in determining planning applications.
- 5.10 In deciding planning applications, Paragraph 14 of the NPPF is relevant. This introduces a “presumption in favour of sustainable development” and advises that where the development plan is out-of-date, planning permission should be granted unless any adverse impact(s) of doing so would outweigh significantly and demonstrably the benefits when assessed against the policies in the NPPF.
- 5.11 A number of the core planning principles set out in the NPPF are relevant to this application proposal. To summarise the most salient points, planning should:
- Be plan-led, empowering local people to shape their surroundings;
 - Proactively drive and support sustainable economic development to deliver the homes, business, infrastructure and thriving local places that the country needs;
 - Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
 - Take account of the different roles and character of different areas, promoting the vitality of urban areas.

-
- Support the transition to a low carbon future in a changing climate, taking full account of flood risk, and encourage the re-use of existing resources;
 - Contribute to conserving and enhancing the natural environment and reduce pollution;
 - Encourage the effective use of land by reusing land that has been previously developed;
 - Promote mixed use developments; and
 - Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community facilities to meet local needs.

5.12 In addition to the relevant core principles summarised above, the NPPF also places emphasis on the need for local authorities to plan for a mix of housing based on current and future demographic trends, market signals and the needs of different groups in the community, and identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand (NPPF, Paragraph 50). Other key requirements of the NPPF which are relevant to this proposal are:

- The need to achieve high quality and inclusive design for all development (Paragraph 57);
- Giving great weight in the decision-making process to outstanding or innovative designs which help to raise the standard of design more generally in the area (Paragraph 63);
- Requiring applicants to work closely with those directly affected by their proposals to evolve designs that can take account of the views of the community; proposals that can demonstrate this in developing the design of new development should be looked on more favourably (Paragraph 66);
- Promoting safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion, with developments incorporating clear and legible routes, and high quality public space (Paragraph 69); and

- Planning positively for the provision and use of shared space and community facilities (i.e. shops) to enhance the sustainability of communities, whilst guarding against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs (Paragraph 70);

Tamworth Borough Local Plan (2006 – 2031)

- 5.13 The emerging Tamworth Borough Local Plan will replace the saved policies of the adopted Local Plan upon its adoption. Consultation on the Pre-Submission version of the draft Local Plan was undertaken between October and December 2014, and the Council is anticipating submission and examination during the course of 2015. Subject to the Inspector's findings and notwithstanding the need for any modifications to be made to its policies, the draft Local Plan is expected to be adopted by early 2016.
- 5.14 The process of preparing a new Local Plan for the Borough commenced in 2007; work continued to progress until submission for examination in 2012. However, following concerns raised by the Inspector over the robustness of some of its evidence base, the draft Local Plan was withdrawn from examination in March 2013. Further work on updating the evidence based ensued, and the plan preparation process continued to late 2014. Pending the Council's consideration of responses to the Pre-Submission consultation, the process will shortly complete and the draft Local Plan will be submitted for examination in early-mid 2015.
- 5.15 Relevant to the application proposal is the draft Local Plan's vision for 2031 in respect of regenerating deprived areas in the Borough. In particular, the draft Local Plan states that:

"... A total place approach to regeneration in those areas of most need will have tackled pockets of deprivation by improving access to both employment and housing whilst improving the general environment. Other vulnerable neighbourhoods will have received housing-led regeneration to improve the quality of the stock and support the vitality of existing local and neighbourhood centres.

"New house-building will have responded to local need by increasing the supply of affordable housing, widening housing choice and preventing homelessness."

5.16 To help achieve the above, the draft Local Plan sets out a number of Strategic Spatial Priorities. Particularly important are:

- **SP1** – making the most efficient and sustainable use of the Borough’s limited supply of land;
- **SP5** – to provide a range of affordable and high quality housing that meets the needs of Tamworth residents;
- **SP10** – to create safe, high quality places that deliver sustainable neighbourhoods and reflect Tamworth’s small scale and domestic character using a blend of traditional and innovative design techniques;
- **SP11** – to minimise the causes and adapt to the effects of climate change by encouraging high standards of energy efficiency, sustainable use of resources and use of low carbon / renewable energy technologies; and
- **SP12** – to promote sustainable transport modes for all journeys by improving walking, cycling and public transport facilities.

5.17 The draft Local Plan identifies the Kerria estate within the defined Amington Regeneration Priority Area (Pre-Submission Document, Figure 5.1). Within these post-war neighbourhoods, there is a focus on regeneration that will improve the physical environment whilst delivering social and economic renewal. Policy HG3 requires that, where feasible, development in the Regeneration Priority Areas should:

- Improve the quality of the existing housing stock, providing new and existing properties with renewable and low carbon technologies or energy efficient measures;
- Enhance the mix of housing to meet local needs;
- Improve or provide local community facilities and services where opportunities are available;
- Protect and enhance the network of high quality open space;
- Support the vitality and viability of existing local and neighbourhood centres;

- Increase integration with surrounding areas and improve accessibility to employment, key services and the town centre by walking, cycling and public transport, facilitating improved public health by supporting active lifestyles; and
- Be of a high quality design which contributes towards designing out crime and improving the attractiveness of the area.

5.18 In addition to the above, there are a number of other policies contained within the draft Local Plan which may be afforded limited weight in the determination of this application proposal. These are listed in Table 5.2 below:

Table 5.1: Relevant Planning Policies of the Draft Tamworth Borough Local Plan

| Policy Reference | Policy Name / Title |
|------------------|--|
| SS1 | The Spatial Strategy for Tamworth |
| SS2 | Presumption in Favour of Sustainable Development |
| HG1 | Housing |
| HG4 | Affordable Housing |
| HG5 | Housing Mix |
| HG6 | Housing Density |
| EN3 | Open Space and Green and Blue Links |
| EN4 | Protecting and Enhancing Biodiversity |
| EN5 | Design of New Development |
| EC4 | Supporting Investment in Local and Neighbourhood Centres |
| SU1 | Sustainable Transport Network |
| SU4 | Flood Risk and Water Management |
| SU5 | Pollution, Ground Conditions and Minerals |
| SU6 | Community Facilities |

Source: Tamworth Borough Local Plan Pre-Submission Document (October 2014)

5.19 Full extracts of the relevant draft Local Plan policies are provided at **Appendix IV** of this report.

6. Planning Assessment

6.1 This Section assesses the application proposal against the Development Plan and the other material policy considerations outlined in Section 5. The following key issues are considered:

- The principle of the proposed development; and
- Whether the proposed development is sustainable and meets the requirements of relevant planning policy, whilst achieving the objectives for the Amington Regeneration Priority Area.

6.2 The above are considered in turn below.

Principle of Development

6.3 This is a residential-led regeneration scheme whose emphasis is on providing suitable, high quality new homes which meet the needs of local people. A mix in the size, type and tenure of new homes is proposed, based upon identified requirements. The mix of properties is to be confirmed through subsequent applications for Reserved Matters planning permission.

6.4 The proposed development is to include a replacement retail facility whose primary purpose will be to ensure that local residents' day-to-day convenience shopping needs can be met, without having to make impractical and unsustainable trips to facilities in the wider area.

6.5 The type and nature of development proposed is considered to be consistent with the principles set out in Policy HG5 of the emerging Local Plan. This is subsequently expanded upon in further detail within this section of the report.

Is the Proposed Development Sustainable?

6.6 It is important that the application proposal is assessed in the context of whether it constitutes sustainable development for the purposes of the NPPF. In accordance with Paragraph 7 of the NPPF, there are three dimensions within the context of sustainable

development: economic, social, and environmental. These are defined in more detail below:

- An economic role: contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements including the provision of infrastructure;
- A social role: supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- An environmental role: contributing to protecting and enhancing the natural, built and historic environment and as part of this, helping to improve biodiversity and use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

6.7 The proposed redevelopment of the site will contribute to delivering sustainable development in the following ways:

An Economic Role

6.8 The application proposal is intended to help stimulate economic growth through a Council-led regeneration programme. The principal economic benefit of the proposed redevelopment will be in the delivery of affordable, high quality homes which are intended to meet locally identified needs.

Affordable Housing Provision

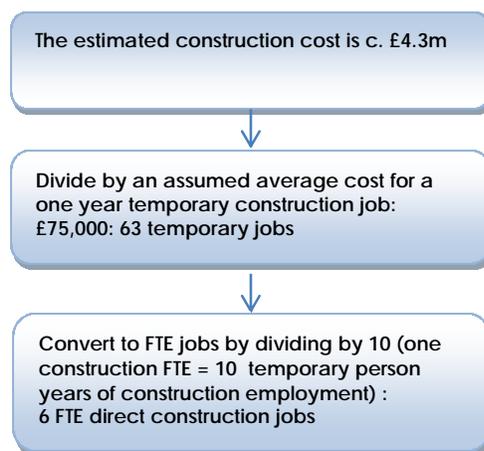
6.9 Whilst the tenure mix is to be confirmed through subsequent applications for Reserved Matters planning permission, at least 80% of the new properties constructed on the site will be 'affordable'. By way of definition, this will consist of properties being made available for social and/or affordable rent (the latter being rent charged at up to 80% of the market rent for such properties).

-
- 6.10 Following the publication of the South Staffordshire SHMA in 2012, and its update in 2014, Policy HG4 of the emerging Local Plan is predicated on delivering at least 1,000 affordable homes within the Borough up to 2031.
- 6.11 Whilst the draft policy establishes a requirement of at least 20% affordable dwellings being delivered on site for residential developments of 10 or more dwellings, it is considered likely that there will be many instances where the proportion achieved will be lower, owing to viability constraints. This could exacerbate the lack of affordability for people whose incomes are insufficient to enable them to rent or buy market housing.
- 6.12 In view of the above, the provision of at least 80% of properties being made available for social and/or affordable rent within the proposed redevelopment of the site should be recognised as a positive boost to the supply of affordable housing in Tamworth.
- 6.13 The provision of more affordable homes will help to ensure that more local people, particularly those who are young and seeking employment opportunities, can remain in Tamworth. This will help to bolster the local workforce available to Tamworth-based employers, providing a greater propensity for them to recruit and train people locally.
- 6.14 Ensuring that there is a sufficient supply of affordable housing within the Borough is imperative in helping to create the right conditions for business growth and employment generation. Enabling the creation of such opportunities is a key facet of the emerging Local Plan ('Strategic Priority 1'). As part of this, it is important that the Borough's suburbs provide attractive places to live for both local and incoming residents.

Direct Employment Opportunities

- 6.15 The provision of a new local convenience store as part of the proposed redevelopment is expected to generate approximately 20 full time equivalent jobs. Whilst this is based on a store of 381 m² gross and is derived from latest average employment densities ('HCA Employment Densities Guide 2nd Edition 2010'), it also has regard to anecdotal evidence of full and part time jobs typically created by small convenience foodstores traded by the national supermarket operators. Many positions allow for flexible working hours, thus being suitable for parents with young children, or those combining work with studying for a formal qualification or other commitments.

- 6.16 The new jobs created by the convenience store are expected to be complemented by associated training and personal development programmes for staff. This could provide opportunities for some local residents to upskill and progress to management roles, either within that particular business, or by opening up opportunities to develop roles within other businesses and organisations in Tamworth.
- 6.17 The construction of the proposed development will also generate direct employment opportunities. The House Builders Federation ('The Labour Needs of Extra Housing Output: Can the Housebuilding Industry Cope?', 2005') has produced evidence that every new home provides for 1.5 direct construction jobs. Applying this calculation to the proposed development would generate circa 66 direct construction jobs.
- 6.18 Whilst the above relates to all jobs, the number of full time equivalent jobs can be calculated by applying the method outlined in 'The Economic Impact of Development Investment in Birmingham 1998 - 2010' (Birmingham Economic Information Centre) as follows:



- 6.19 The above assumption suggests that the proposed redevelopment will generate 6 full time equivalent jobs during the construction phase. The creation of both full and part time jobs will provide invaluable employment opportunities for local people, especially those who are long-term unemployed or school leavers who would like to develop vocational skills in the construction industry.

Indirect Employment Opportunities

- 6.20 In addition to the full and part time jobs that would be created by the proposed development, a number of indirect and induced jobs would also be created primarily through the construction stage. The Royal Institute of Chartered Surveyors (RICS) estimates that the creation of one full time equivalent job creates two additional jobs elsewhere. On this basis, it is estimated that an additional 13 jobs could be generated in the supply chain (indirectly) and in the local economy (induced).
- 6.21 In essence, the creation of up to 76 full and part time jobs during the construction phase of the proposed development will help to deliver tangible economic benefits in accordance with the aspirations set out under Strategic Priority 1 of the emerging Local Plan, and the principles set out in the NPPF with regard to economic growth and sustainable development.

Public Revenue: New Homes Bonus

- 6.22 The proposed redevelopment would generate public revenue in the form of the New Homes Bonus. This initiative matches the increase in Council Tax for each new home for each new home built for a six-year period and includes an additional payment for the provision of affordable housing.
- 6.23 Given that the type and mix of properties are yet to be finalised, it is not possible to confirm the exact amount of New Homes Bonus that the Council would receive from the development at this stage. However, if all new properties fell into Council Tax Band A, attracting £978.65 per property per annum, this would equate to New Homes Bonus payment over 6 years of £111,500. An additional contribution of £27,875 would be payable to Staffordshire County Council.

A Social Role

- 6.24 The proposed redevelopment of the site will significantly improve the social wellbeing of new residents through the following:
- Providing homes that are of an appropriate size and type to meet their occupants' needs;
 - Providing homes that are energy efficient, warm and economical to run;

- Creating a sense of place by delivering high quality development of an appropriate design, scale and density, which restores pride amongst local residents and makes for a desirable place to live;
- Optimising accessibility for local facilities and public transport travel modes which are proximate to the development and meet residents' day-to-day needs; and
- Ensuring good accessibility for recreational and other open space within the vicinity of the development.

6.25 The above are addressed in turn below.

Size and Type of Homes

6.26 Whilst the final mix and specification of dwellings is to be confirmed through subsequent applications for Reserved Matters planning permission, the Illustrative Masterplan which is submitted in support of this planning application demonstrates how 44 dwelling units could be developed on the site.

6.27 The proposed mix as envisaged at this stage prioritises the provision of two-bedroom properties, constituting some 64% of the total. One and three-bedroom properties are expected to make up 18% respectively. In terms of two and three-bedroom properties as a whole, it is envisaged these will comprise 82% of the overall development.

6.28 The proposed mix is predicated on meeting locally identified affordable housing needs. This is primarily informed by the following evidence:

- South Staffordshire SHMA 2012 and 2014 Update;
- Feasibility Study for Kerria Estate (Tamworth Borough Council Housing and Health Directorate, 2012);
- Ark Housing Consultancy Report, 2013; and
- Public Consultation undertaken during 2014.

6.29 As the Council will be aware, the 2012 SHMA identified an acute shortage of one and two-bedroom properties (which can be categorised as affordable housing) within Tamworth (SHMA, paragraph A3.6). Conversely, the SHMA acknowledged that there was more availability for three-bedroom properties or larger, albeit those were categorised

as market housing. In translating the implications of this for new residential development in Tamworth, the SHMA states that:

“...The potential therefore to skew the property mix towards smaller properties would be advantageous, not only in redeeming subsidy required per unit but also optimising redevelopment density.”

- 6.30 It is also important to understand the distinction made within the 2012 SHMA between the accommodation that is actually needed in Tamworth, and that which is aspirational. Within this context, it is useful to note that the actual need identified for two-bedroom properties across Tamworth was nearer to 50%, rather than the 42% arrived at as a recommendation on development mix when aspirational factors are taken into account (SHMA, paragraph 10.19).
- 6.31 A greater need for smaller properties – primarily two-bedroom flats and houses – has also been identified within the Council’s Feasibility Study into the redevelopment of the site and a subsequent report prepared by Ark on behalf of the Council. The latter identified a high number of single people and young families who typically reside in properties on the site, the latter of whom often consist of one or two parents with one dependent child.
- 6.32 The findings identified by the Council’s own studies were further corroborated by a high number of responses received during the public consultation process, including meetings with the Council’s Tenant Consultative Group and exhibition events held in July 2014. This culminated in 54% of respondents expressly stating on consultation feedback forms that there is a need for more two and three-bedroom houses which are available for social and affordable rent in the area (Statement of Consultation, paragraph 3.4). A further 10% of respondents expressly stated a need for one and two-bedroom flats which are available for social and affordable rent (Statement of Consultation, paragraph 3.7).
- 6.33 The need for one-bedroom affordable properties has also been highlighted owing to the implications of the measures introduced in the Welfare Reform Act 2012. In particular, there has been a need for some tenants of social rented property to downsize, where they are dependent on Housing Benefit and are liable for an under-occupancy penalty

(e.g. where properties are occupied which are deemed by the Government to be too large for meeting their needs).

- 6.34 In view of the above, the proposed mix of dwellings has been revised since the preparation of the Initial Option masterplans for the site's redevelopment. This has resulted in modifications to the proposed layout and density of development, in order to accommodate a greater number of smaller one and two-bedroom properties within the overall mix.
- 6.35 A significant proportion of dwellings identified in the proposed mix (73%) will be two and three-bedroom houses. These are intended to meet the needs of families whose children would appreciate and benefit from having a garden, as well as more internal space e.g. bedrooms and main living areas.
- 6.36 It is acknowledged that the proportion of one, two and three-bedroom dwellings that would be provided by the proposed redevelopment differ in terms of the exact split recommended for new residential developments in Policy HG5 of the emerging Local Plan (namely a greater proportion of one and two-bedroom properties than that stipulated in draft planning policy terms). However, it is considered that the proposed mix as envisaged by the Illustrative Masterplan is an appropriate response to meeting locally identified needs specifically in the context of affordable housing provision.
- 6.37 It is also necessary to understand that the financial viability of the site is not compromised by ensuring that there is no net loss in housing numbers as a result of the proposed redevelopment. Thus the need to optimise affordable housing delivery, concentrated on serving those with the most acute needs, must be considered in the planning balance when having regard to Policy HG5.
- 6.38 In view of the above, it is important to note that the supportive wording to Policy HG5 allows for flexibility to be had where it can be demonstrated that achieving the policy specific mix is not feasible or viable. In this context, the wording of the draft policy places emphasis on new developments meeting a preference for two and three-bedroom dwellings; this objective is demonstrably met by the application proposal.
- 6.39 As stipulated thus far in the report, the tenure mix will be confirmed at Reserved Matters stage. For the purposes of the outline planning application, not less than 80% of the new properties will be available for social and affordable rent (split to be confirmed). There is

the potential for the remaining 20% to be offered as either intermediate or market housing, dependent on viability and confirmation of the Council's preferred approach to procurement of the development. For the purposes of determining the outline planning application, the proposed development satisfies the requirements of Policy HG4 of the emerging Local Plan.

Energy Efficient and Economical Homes

- 6.40 Whilst the detailed design and specification of dwellings is to be determined through subsequent applications for Reserved Matters planning permission, it is the Council's aspiration that all new homes provided by the redevelopment will be designed and constructed to Level 4 of the Code for Sustainable Homes where possible.
- 6.41 The Code for Sustainable Homes is currently voluntary and is not enshrined in either adopted or emerging planning policy in the context of achieving sustainable design. However, it represents a series of standards against which the sustainability of development proposals can be assessed. The Code uses a 1 to 6 starred rating system which is used to rate the overall sustainability performance of new homes against 9 categories:
- Energy / CO₂
 - Water
 - Materials
 - Surface Water Run-off (flooding and flood prevention)
 - Waste
 - Pollution
 - Health and Wellbeing
 - Management
 - Ecology
- 6.42 Achieving Code Level 4 in the design and construction of new homes is considered to be an achievable standard, exceeding the standard typically achieved by housebuilders ('Code Level 3'). Whilst there is flexibility in how the overall standard is met (e.g. credits awarded for certain design measures being incorporated), it is not the purpose of this planning application to definitively set out how the Code Level 4

standard could be achieved. Notwithstanding this, all new homes to be developed on the site are expected to include the following qualifying measures:

- Low energy light fittings;
- Eco-labelled white goods;
- Water saving devices to WCs and appliances;
- Loft and cavity wall insulation;
- Double-glazing;
- Provision of suitable drying space;
- Increased day light in kitchen, dining and living areas;
- Sound insulation; and
- Building materials from certified and sustainable sources.

6.43 Achieving the relevant standards set out in the Code will be integral to ensuring that the proposed redevelopment of the site delivers homes that are healthy and warm, in order to meet the objectives of the Council's Healthier Housing Strategy. By maximising the use of energy and water-saving measures within the design of new homes, running costs will be reduced.

6.44 The need to alleviate fuel poverty amongst many existing residents of the site was highlighted as a key issue during the various consultation exercises undertaken during 2013 and 2014. Achieving the higher energy efficiency standards required by Code Level 4 is considered to be a key requisite in helping to achieve warm and healthy homes which are cheaper to run.

6.45 To put this into context, research undertaken by Sustainable Homes (a UK-based sustainable housing training and advisory consultancy) has found that, on average, two-bedroom, two-storey homes built to Code Level 4 standard will cost at least 7% less to run than their standard-built equivalent. Costs decrease further for two-bedroom flats, with such properties achieving reductions of between 11% and 15%. It should also be borne in mind that the difference in running costs when compared with the existing properties on the Kerria estate are expected to be greater still, owing to residents' reported difficulties in trying to heat their homes.

6.46 At this stage, the outline application does not make provision for the installation of any additional renewable energy technology to serve the proposed development. There remains the potential for the Council to consider whether a Combined Heat and Power (CHP) could be installed, which could supply heat energy and hot water to all homes within the redeveloped site. The financial viability and options for delivery of this technology will need to be investigated in due course. If the delivery of a CHP is considered to be viable, its provision would be dealt with as part of a detailed scheme for Reserved Matters approval.

6.47 For the purposes of this application, the proposed development is considered to satisfy Policy HG3(1)(a) and SP11 of the Strategic Spatial Priorities set out in the emerging Local Plan.

Creating a Sense of Place

6.48 Whilst the design concept for the proposed redevelopment is considered in more detail within the Design and Access Statement which accompanies the planning application, the key principles are summarised thus:

- Introduction of buildings which are of a 'human' scale; this means replacing the dense, three-storey and inward facing blocks which currently exist on the site, with predominantly two-storey mews, semi-detached and detached houses which are outward facing;
- Creation of traditional street blocks which enable a continuous circulation by pedestrians and cyclists, with all routes overlooked by properties;
- Private and public spaces are clearly defined; all private garden spaces to the rear of properties are secure and wrapped by development;
- Utilisation of corner plots ensures that surveillance of the streetscene is not interrupted; the absence of areas with no visibility will significantly reduce the risk and perception of crime;
- Provision of adequate car parking which is primarily incorporated within the property curtilages;
- The siting of the local convenience store along the site frontage with Kerria Road helps to maximise its visibility, in order to respond to operator requirements and deter crime;

- Improved accessibility, with clearly defined routes which enhance legibility for residents and visitors; and
- Provision of a comprehensive landscaping scheme throughout, to incorporate retained and replacement trees, within a high quality public realm.

6.49 Whilst the detailed design of the proposed development is to be confirmed through applications for Reserved Matters planning permission, this will be based upon the underlying principles set out above. The design and layout of the proposed development has been carefully considered and provides a robust response to comments raised by local residents and other stakeholders during the public consultation process.

6.50 The design and layout of the proposed development, as envisaged by the Illustrative Masterplan and set out in further detail in the supporting Design and Access Statement, is considered to meet the objectives of Policy ENV19 of the adopted Local Plan and Policy EN5 of the emerging Local Plan for the purposes of determining the outline planning application.

Accessibility for Local Facilities and Public Travel Modes

6.51 The proposed development will benefit from an established and sustainable location which is readily accessible to a range of local facilities and services. These are summarised in the table below:

Table 6.1: Accessibility of Local Facilities

| Facility | Type | Distance from Site |
|---|---|---|
| Amington Road Local Centre | Smallscale retail and service facilities. | 10 minutes travel time via local bus service. |
| Amington Heath Primary and Nursery School | Education | 4-minute walk. |
| Two Rivers Primary School | Education | 4-minute walk. |
| Landau Forte Secondary School | Education | 10-minute walk. |
| Amington Surgery | General Practitioner | 15-minute walk. |
| North Ormond Practice | Dental Practice | 20-minute walk. |

| | | |
|------------------|-----------|-----------------|
| Glascote Library | Community | 15-minute walk. |
|------------------|-----------|-----------------|

Source: GVA / Kerria Centre Accessibility and Community and Retail Facility Provision Study

- 6.52 It is evident that, whilst the site is readily accessible to local education, health and community library facilities, local residents require transport in order to travel to suitable facilities where their day-to-day shopping needs can be met. As identified in the Statement of Consultation which has been submitted with the outline planning application, the lack of retailing facilities within the area has been raised as a key issue by local residents.

- 6.53 In meeting local residents' needs it is necessary to ensure that any replacement facility is viable and can therefore be traded successfully by an operator. In this context, the Illustrative Masterplan is informed by the requirements of national convenience store operators who have expressed an interest in trading a local convenience store within the new development.

- 6.54 The above follows extensive research into the foodstore market which was undertaken by GVA on behalf of the Council in October 2014. Accordingly, the inclusion of a replacement retail facility as part of the outline planning application is considered to be deliverable and would ensure that residents' day-to-day shopping needs can be met.

- 6.55 It is acknowledged that the proposed redevelopment will not include the reprovision of the Kerria Community Centre ("Amington One Stop"). The need to maximise the provision of affordable housing on the site, the majority of which will need to be developed at a lower density than that previously achieved by the flats and maisonettes, coupled with the need to provide a replacement retail facility, means that there is insufficient scope within the site to accommodate additional community facilities.

- 6.56 Notwithstanding the above, there has been extensive dialogue between the operators of the existing community centre, Community Together CIC, and the Council, to establish who the key user groups are, and the services provided. Whilst it is acknowledged that some residents within the existing estate do use the services on offer within the community centre, the operators have confirmed that the majority of key user groups come from the wider Tamworth area. On this basis, the operators have confirmed that the services offered by the centre could be relocated and incorporated into

existing facilities elsewhere within the Borough. It is understood from the operators that the loss of the Kerria community centre would therefore not preclude its services being offered to the public from alternative locations.

- 6.57 In view of the above, the inability of the proposed development to incorporate a replacement community centre is not considered to be detrimental to the social wellbeing of local residents. As highlighted, the site benefits from a high level of accessibility for local bus services (bus stops being located immediately outside the site on Kerria Road), thus ensuring that alternative community facilities can be attended by local residents.
- 6.58 The overriding need to deliver high quality affordable housing of the right type and number, together with a replacement retail facility, must be considered in the planning balance when assessing the loss of the existing community centre. Based on the information provided by the operators of the community centre, it is considered that the objectives set out in Policies HG3 and SU6 of the emerging plan would be satisfied.
- 6.59 The provision of a replacement retail facility as part of the new development is considered to be consistent with the objectives of the emerging Local Plan, namely Policy EC4; in particular the quantum of floorspace and type of facility is based upon what the market can realistically deliver, thus ensuring that it remains vital and viable over the longer-term.

Open Space Provision

- 6.60 By virtue of its relative small size, the opportunity to incorporate recreational and public open space within the proposed development is constrained. This also takes into account the need to ensure that a sufficient number of new dwellings can be delivered, in order to meet locally identified needs and ensure the scheme's financial viability.
- 6.61 Whilst the existing site includes small pockets of civic open space, these are considered to be underutilised and of poor quality. Therefore the loss of this space resulting from the site's redevelopment is not considered to be detrimental. This takes into account the significant net gain in private and amenity garden space, which will be clearly defined and secured.

-
- 6.62 However, the site is afforded immediate access to extensive amenity green space to the west. This includes existing footpath / cycleway routes, running from Woodland Road and the rear of properties on Juniper to the north, through to Woodland Road in the south and beyond to the boundary with Glascote Road. This includes pockets of semi-natural green space, which include established pockets of woodland.
- 6.63 The close proximity and amount of open space available to residents of the proposed development is considered sufficient to meet the objectives of Saved Policy ENV14 and Policy EN3 of the emerging Local Plan (in particular being within 400 metres of high quality open space).

An Environmental Role

- 6.64 Paragraph 7 of the NPPF sets out that sustainable development will perform an environmental role in contributing towards the protection and enhancement of the natural and built environment. As part of this, new development also needs to improve biodiversity, minimise waste, pollution and the use of resources, and adapt to climate change.
- 6.65 The application proposal is supported by a range of technical assessments which consider the environmental effects of the development. These have been assessed against the requirements of saved and draft planning policies. This is designed to ensure that the environmental impacts of the proposed development are understood, and instances where suitable mitigation measures may be required to ensure that any constraints or issues are overcome.

Ecology

- 6.66 Wardell Armstrong has undertaken an Ecological Appraisal of the site, which is informed by an Extended Phase 1 Habitat Survey. The Ecological Appraisal is also complemented by a Bat Survey Report, also undertaken by Wardell Armstrong and which forms part of the application submission.
- 6.67 The appraisal confirms that there are no statutory or non-statutory sites within a 2km radius which would be impacted upon by the proposed redevelopment of the application site. Notwithstanding this, the appraisal sets out a series of recommended

measures to be implemented during the construction phase, in order to avoid causing any indirect negative effect on the conservation value of the nearest designated receptor which is Hodge Lane Local Nature Reserve. It is considered that this can be sufficiently dealt with by way of an appropriately worded planning condition.

- 6.68 Phase 1 habitats within the site have been assessed, together with an indication as to their Biodiversity Action Plan (BAP) status. The existing buildings on the site, whilst not a BAP habitat, are recognised as having bat roost / breeding potential. This includes a number of areas of brickwork within the site which are considered to have moderate bat roosting potential.
- 6.69 To assist the above, bat surveys were carried out on site during August 2014. This recorded bat activity around two of the buildings on the site (blocks identified as B4 and B4A). In light of these findings, the Council will require a European Protected Species License from Natural England before demolition works can commence on these blocks. A mitigation strategy is outlined within the Bat Survey Report and will be confirmed within the approved license.
- 6.70 Other potential constraints, whilst not precluding the scope for redevelopment of the site, have been identified within the Ecological Appraisal and are subject to recommendations. These include the potential for hedgehogs and nesting birds to be present within the site, and the existence of Japanese Rose. The latter is identified as an invasive species which is listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). It is proposed to remove and destroy the plant on-site, subject to a course of action to be agreed via an appropriately worded planning condition.
- 6.71 In delivering ecological enhancements on-site, it is recommended that the proposed redevelopment incorporates appropriately-sited bat boxes, for roosting and breeding, and a predominance of native species within a comprehensive Soft Landscaping Scheme.
- 6.72 Subject to the recommended actions and mitigation strategies set out in the Ecological Appraisal, there are no ecological constraints which would preclude development on the site. Accordingly, the application proposal meets the requirements set out in Saved Policies ENV7 and ENV8, and Policy EN4 of the emerging Local Plan.

Trees

- 6.73 A Tree Survey and Arboricultural Impact Assessment has been undertaken by Wardell Armstrong and is submitted in support of the outline planning application. The survey identifies a number of trees which will need to be removed in order to accommodate the proposed development (see Tree Survey Report, paragraph 7.2.1 and appended Constraints Plans).
- 6.74 The necessary removal of trees, where identified, will be undertaken sensitively to avoid unnecessary damage to retained trees which are in close proximity and considered to be of merit. The layout of the proposed development, whilst not fixed for the purposes of the outline planning application, has been carefully considered so as to maximise the retention of existing trees where these are deemed to be mature and/or of merit. Trees to be retained will be afforded suitable protection during the construction phase.
- 6.75 Suitable replacement trees will be included within a comprehensive Soft Landscaping Scheme for the site; this is to be addressed in detail at Reserved Matters stage.

Flood Risk and Drainage

- 6.76 A comprehensive Flood Risk Assessment (FRA) has been undertaken by Wardell Armstrong and forms part of the outline planning application submission. This incorporates a strategy to address surface water and foul drainage with the proposed development.
- 6.77 The FRA confirms that there are no watercourses within the site; the nearest watercourse is an unnamed tributary to the River Anker (approximately 790 metres' distance from the site). The site is confirmed as being within Flood Zone 1 of the Environment Agency's Flood Map classification, and is therefore identified as being suitable for residential development (this being classified as 'more vulnerable' development for the purposes of the NPPG. The FRA's findings also confirm that:
- The risk of flooding from fluvial sources is low;
 - The elevation of the site and its underlying geology means that the risk of groundwater flooding is low;
 - There is a low risk of surface water flooding;

- New sewerage systems to serve the proposed development will be designed for a 1 in 30-year return period storm event (Severn Trent Water has confirmed that there is capacity within the existing sewerage system to serve the proposed development);
- There will be a negligible decrease in the permeable area of the site, with no increase in the overall rate and volume of surface water runoff with the proposed development;
- Mitigation measures are identified to restrict surface water discharge rates, in order to reduce the risk of flooding; and
- Surface water drainage will be limited to 70.7 litres/second for all storm events up to and including the 1 in 100-year, plus climate change, and attenuated on site. Attenuation will be distributed throughout the site in Sustainable Urban Drainage System (SuDS) features.

6.78 The findings of the FRA demonstrate that the proposed development can be accommodated on the site with no increased risk of flooding, subject to the recommended flood risk management measures being put in place. Accordingly, the proposed development meets the requirements of Policy SU4 of the emerging Local Plan.

Archaeology and Heritage

6.79 The site has been checked against the Staffordshire Historic Environment Record (HER) and the Extensive Urban Survey (EUS). Following investigations by the Landscape Archaeologist at Staffordshire County Council, the site is confirmed as being located within the 'Historic Urban Character Area (HUCA) 26: Glascote Heath and Amington' of the Tamworth EUS. The overall character of the HUCA is described as being principally of late 20th century origin and little of its earlier historic character survives. The HUCA notes that there is a low potential for below ground archaeological remains to survive in this area. It is also confirmed that the site does not contain any designated heritage assets, nor are any present within a 500-metre radius. On this basis, Staffordshire County Council has advised that there are no historic environment concerns raised in respect of the proposed development.

Geo-Environmental

- 6.80 A Geo-Environmental desk-based study has been undertaken by Wardell Armstrong, whose report forms part of the outline planning application submission. The study is informed by a Landmark Envirocheck Report, and Coal Authority Mining Reports, given its location within a Coal Authority Mining Reporting Area.
- 6.81 The study identifies the site as lying within the likely zone of influence from previous coal workings, whose operations ceased in 1963 and 1982. The site is not within a likely zone of influence of any present coal workings, and is not within an area for which a licence has been granted to remove coal using underground methods.
- 6.82 The study also confirms that the site is not within the defined boundary of any opencast coal mining or mine entries, and no claims of damage caused by coal mining subsidence have been received by the Coal Authority within 50 metres of the site since 1994. Therefore, it is concluded that the site is not at risk from past, present or future coal (or ironstone) mine workings.
- 6.83 It is confirmed that the contamination risk to the site is considered to be low, based on desk study information. The need to ensure that any constraints arising from the proposed development are accurately assessed (through intrusive investigation), and appropriate remediation requirements addressed, will be determined in conjunction with the detailed development proposals at Reserved Matters stage.
- 6.84 The findings and recommendations presented in the Geo-Environmental study are considered to meet relevant planning policy requirements, including Policy SU5 of the emerging Local Plan, for the purposes of determining the outline planning application.

Highways and Access

- 6.85 A Supporting Transport Technical Note has been prepared by Phil Jones Associates in accordance with the advice of Staffordshire County Council. It summarises the transport conditions of the site, details the quantum of development, access and parking arrangements, and reviews the trip rates and traffic generation from the site.

- 6.86 It is confirmed that there will be three proposed accesses to serve the site. Two of the accesses – to the north at Kerria Road and to the south at Robinia – will remain as existing, however, a new vehicular access will be created through the centre of the site off Kerria Road. This replaces an existing pedestrian access, just north of the zebra crossing facility on Kerria Road.
- 6.87 Appropriate turning heads will be provided to enable full access and manoeuvrability of servicing and refuse vehicles within the site. A sustainable movement strategy for the site will include the following:
- A 2-metre-wide footway along the northern access road in an east-west alignment. This will connect with the existing 3-metre-wide footpath and cycleway to the north of the embankment, providing access to the public open space to the west of the site; and
 - A 2-metre-wide footway along the new access road through the centre of the site, which will also be delivered in an east-west alignment.
- 6.88 The above is designed to create a permeable site for all modes of transport, whilst making accessible and safe provision for pedestrians and cyclists.
- 6.89 In conjunction with the information shown on the Illustrative Masterplan, it is confirmed that the proposed development will incorporate 81 car parking spaces. This is informed by investigation into car ownership levels, in order to establish evidence-based parking standards which can be applied to the proposed development. The identified car parking provision is considered to be sufficient for meeting residents' needs.
- 6.90 An assessment of trip rates and trip generation for the residential element of the proposed development has been undertaken. This confirms that the impact of the proposed development on the existing highway network would be negligible, given the existing quantum of residential, retail and community uses on the site at present. In terms of the proposed local convenience store, it is important to note that this is intended to serve a localised, walk-in catchment. As such, the number of vehicular trips made to and from the store will be reduced.
- 6.91 The technical note confirms that the proposed development will be fully accessible by pedestrians and cyclists, and all modes of transport, whilst vehicular trips generated will

be negligible. As such, there will not be a significant adverse impact on the local highway network. Accordingly, the proposed development is considered to satisfy the requirements of Saved Policy TRA3 and Policy SU1 of the emerging Local Plan.

Environmental Impact Assessment

- 6.92 The Council has issued a Screening Opinion (attached in **Appendix I**) which confirms that the proposed development does not require an Environmental Impact Assessment (EIA) in accordance with Regulation 5(1) of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011.

7. Summary and Conclusion

- 7.1 This Planning Statement has been prepared to support an outline planning application for the comprehensive redevelopment of the Kerria estate in Amington, Tamworth. It has been a long-held aspiration of the Council to regenerate the estate, which suffers from poor quality design and a negative reputation.
- 7.2 The proposed development will consist of up to 44 Class C3 dwelling units and a Class A1 local convenience store. All detailed matters are reserved for subsequent approval by the Council, with the exception of means of access.
- 7.3 This application proposal brings to fruition an extensive process involving the consultation of local residents and key stakeholders over a two-year period; this has guided the preparation of the Illustrative Masterplan to ensure the parameters of the proposed development meet the needs of residents and key planning policy objectives. The proposed development will deliver the following:
- Affordable homes of a size and type which are required to meet locally identified needs; the proportion of new dwellings available for social and/or affordable rent on the redeveloped site will be at least 80%. The tenure mix is to be finalised at Reserved Matters stage;
 - Homes that are warm, energy-efficient and cheaper to run;
 - Replacement retail facilities in the form of a local convenience store; this will occupy a prominent and highly accessible location along the site's frontage with Kerria Road;
 - A strong sense of place – the proposed development will be delivered upon traditional and 'best practice' design principles. This will see new dwellings delivered which are of an appropriate height, scale and massing their suburban context, with high quality aesthetic design;
 - A layout which ensures fully accessible and legible streets, with outward facing development that maximises surveillance of the streetscene, thereby minimising the risk and perception of crime; and

- Economic benefits, including the creation of direct and indirect jobs associated with the retail element and construction phase, whilst improving the attractiveness of the area and providing homes that are affordable, in particular helping to retain younger people within the area for the benefit of the local economy.
- 7.4 The application is supported by a comprehensive suite of environmental and technical reports. Following the outcomes of the respective assessments undertaken, it is confirmed that there are no environmental or technical constraints which would preclude the redevelopment of the site. This is subject to recommended measures being agreed with the Council and put in place to ensure the proposed development does not result in any significant adverse impacts.
- 7.5 In essence, the proposed development demonstrably satisfies national and local planning policy objectives and requirements for the purposes of determining this outline planning application.