Tipton Area Action Plan, Submission Document October 2007

Statement of Compliance

(Pre-Submission Consultation Statement under Regulation 28)

Statement of Community Involvement

1. The Council adopted its Statement of Community Involvement in January 2007, after most of the stages of community involvement on the Tipton AAP had been completed. However, the AAP consultation which was undertaken followed all of the requirements which were eventually adopted. In any case, the AAP process achieved the minimum requirements in Regulations.

Consultation under Regulation 25 (pre-submission consultation)

2. The issues and options stage of the Tipton Area Action Plan, as set out in the approved Sandwell Local Development Scheme, began in January 2005. However, prior to this, there was a period of preparatory work based on the Sandwell Unitary Development Plan (UDP), which was adopted in April 2004. The Tipton Town Planning Statement set out the land use context for Tipton Town, analysed the relevant planning issues based on the Adopted UDP, and identified parts of Tipton where it might be necessary for Area Action Plans to be prepared in future. The Tipton Town Planning Statement was approved by the Cabinet Member for Environment & Transport in November 2004 as the basis for further examination of the issues with the Town Team and other key partners.

3. The Tipton Town Planning Statement was presented to Tipton Town Committee in February 2005 as part of the process of front-loading the Area Action Plan process. Sandwell's Town Committees are appointed to involve, consult and represent the community on local issues and on the various policies and strategies of the Council; to consider and to determine the allocation of the local area budget; and to be consulted by the Executive and by the Council, as appropriate, on such matters as major developments, changes to local services and facilities and traffic management issues. The presentation concentrated on the proposal to prepare one AAP for Tipton, in the area broadly bounded by Alexandra Road, Bloomfield Road and Owen Street. A number of questions were asked from the floor to clarify the issues; no objections were expressed to the course of action discussed.

4. The Town Planning Statement was distributed to those present (Councillors, members of the public, and officers), and subsequently provided to local organisations and stakeholders, either on request or at meetings. During 2005, a number of meetings were held with interested parties, including the Tipton Traders Association, the owners of a major part of the District Centre, residents of Locarno Road, local Ward Councillors, the Tipton Green Ward Meeting (local
residents forum), British Waterways, and appropriate Council Divisions. Two “Planning For Real ®” events organised by Sandwell Housing and Sandwell Homes were held for residents of the Tibbington Estate in order to seek their views on local issues. An article was included in the Tipton Voice which was distributed to all households in the Town, and four Town Team meetings were attended to discuss issues arising. A leaflet was sent to local groups and organisations (see appendix 1).

5. With regard to the AAP itself, the following bodies were consulted by letter on 24 November 2005 regarding the Screening Statement for the Sustainability Appraisal:


(the Screening Statement is in appendix 2)

6. The following bodies were consulted by letter on 16 January 2006 on a Scoping Report for the Tipton AAP (i.e. to determine the scope of the Sustainability Appraisal Report):


(the summary of responses to the Scoping Report is in appendix 3)

7. The issues raised during the early stages above were incorporated into an Issues and Options Paper for the AAP, approved for consultation by the Cabinet Member for Regeneration and Transport in December 2005. The Issues and Options Paper covered the key local social, economic and environmental features of the AAP area and six plan objectives concerned with housing, employment, green space, the District Centre, education provision, and local heritage.

(the report to the Cabinet Member, 14 December 2005 is in appendix 4)

8. A wide range of organisations were consulted by letter on the Issues and Options Paper from February 2006. This was sent to statutory consultees, local groups and organisations, and other interested parties, including landowners, and a response requested by the end of May 2006. The Paper was also used at Tipton Town Committee and Tipton Town Team as an aid to discussion of the local planning issues and the possible sites for development. 2,100 leaflets were
distributed to all households in the AAP area on 30th and 31st January 2006, and sent to the Traders Association, and other local organisations. A copy of the leaflet is in appendix 5. A list of consultees is in appendix 6.

9. In addition, the following actions were taken:

The document was made available on the council’s website (www.sandwell.gov.uk). A copy of the website page is included in appendix 7.

Paper copies of the Issues and Options Paper were made available at Sandwell Council House, the offices of the Directorate of Planning & Transportation, Tipton Town Team, and Tipton Library.

A press release in January 2006 resulted in an article in the Express and Star on 6 January 2006 (see appendix 8).

A local event was held on 7 February 2006 at Summerhill Primary School, a central venue in the AAP area. This “drop-in” event, advertised by leaflet (see appendix 5), was attended by 60 people.

A briefing for local councillors was held on 5 January 2006, and for the local MP on 3 February 2006.

A number of local meetings were attended, and presentations given: Tipton Town Committee (14.2.06), Tipton Civic Society (21.2.06), Tipton Town Team (22.2.06), Tipton Traders Association (11.5.06).

A consultation day, based on the issues and options, was held with pupils of Alexandra High School on 14 March 2006.

A Report on the issues and options stage, and for approving the Preferred Options Document and the Sustainability Appraisal Report was submitted to the Cabinet Member for Regeneration and Transport on 27 September 2006 (appendix 9). A table of representations received, and the SMBC response is at appendix 10. Written feedback was provided to everyone who responded; an example of the feedback letter is in appendix 11.
Consultation under Regulation 26 (pre-submission public participation)

10. The Tipton AAP Preferred Options Document 2006 (and the Sustainability Report) was subject to a six week consultation period from 16 October 2006 to 27 November 2006, with documents and letters sent out the week before.

11. The following actions were taken:

Letters and documents and representation forms were sent to specific and general consultees as listed in appendix 6, including local organisations.

Copies of the document were made available at Sandwell Council House, the offices of the Directorate of Planning & Transportation, Tipton Town Team, and Tipton Library.

The documents and the representation form were made available on the council’s website (www.sandwell.gov.uk) (see appendix 7).

A formal notice (the Notice of Proposals Matters) was put into the main local newspaper, the Express & Star on 16 October 2006 (copy in appendix 12), giving details of where and when documents can be inspected.

A press release in October 2006 resulted in an article in the Express and Star on 10 October 2006 & 11 October 2006, and in the Evening Mail on 11 October 2006 (see appendix 13).

A local event was held on 17 October 2006 at Summerhill Primary School, a central venue in the AAP area. This “drop-in” event was advertised by the distribution of 2,100 leaflets and attended by 50 people. A copy of the leaflet is in appendix 14.

A presentation was made to Tipton Town Committee on 10 October 2006.

Written feedback was provided to everyone who responded; a table of representations and SMBC’s response is in appendix 15.

12. The Tipton AAP (Locarno Road) Preferred Options Document 2007 was subject to a six week consultation period from 19 February 2007 to 2 April 2007, with documents and letters sent out the week before.

As before, the following actions were taken:

Letters and documents and representation forms were sent to specific and general consultees as listed in appendix 6, including local organisations.
Copies of the document were made available at Sandwell Council House, the offices of the Directorate of Planning & Transportation, Tipton Town Team, and Tipton Library.

The documents and the representation form were made available on the council’s website (www.sandwell.gov.uk). A copy of the website page is at appendix 7.

A formal notice (the Notice of Proposals Matters) was put into the main local newspaper, the Express & Star on 19 February 2007 (copy in appendix 16), giving details of where and when documents can be inspected. The press release for February 2007 is included in appendix 17.

A local event was held on 22 February 2007 at Summerhill Primary School, a central venue in the AAP area. This “drop-in” event was advertised by the distribution of 2,100 leaflets and attended by 35 people. A copy of the leaflet is in appendix 18.

Information on the latest document was provided to Tipton Town Committee held on 6 February 2007.

A Report on the preferred options stage, and for approving the Submission Document and the Sustainability Appraisal Report was submitted to the Cabinet Member for Regeneration and Transport on 15 August 2007 (appendix 19).

Representations received under Regulation 27 (addressing representations received whilst preparing the submission development plan document).

13. Written feedback was provided to everyone who responded; a table of representations and SMBC’s response is in appendix 20. An example of the feedback letter is in appendix 21.
List of appendices

6. List of consultees for AAP at each stage.
7. Example of information on Council’s website.
Appendix 1

(Leaflet distributed November 2005).

TIPTON AREA ACTION PLAN

The Council is beginning the preparation of the Tipton Area Action Plan, which is identified in the approved Local Development Scheme. The proposed boundary of the area is shown overhead.

The Tipton Area Action Plan is intended to review land uses in the Owen Street, Alexandra Road and Bloomfield Road area, where there is pressure for development arising from a number of issues. These issues include potential highway improvements, retail proposals, and residential development sites which could come forward as a result of relocating and restructuring employment and education land uses. In addition there are opportunities for new investment in open space. The Area Action Plan needs to consider the issues and the options for development of a number of potential sites, and to balance the needs of the existing residential and business communities with the need for regeneration.

A Sustainability Appraisal - a way of assessing the potential social, environmental and economic effects of a plan - will also be prepared.

You are welcome to make a written response to the Issues and Options Paper, or to contact us for further information or to arrange a meeting. It is intended that there will be at least one meeting in the area in early 2006. Your contribution will be used in the preparation of the next stage of the Area Action Plan.

The Council will prepare the final Tipton Area Action Plan - the Preferred Options Document - (together with a formal Sustainability Appraisal) by October 2006 for formal consultation. There will be a further opportunity to make a representation on the Plan at that time if you so wish.

For further information, please contact:
Ian Thom,
Sandwell MBC Planning Policy,
Development House,
Lombard Street,
West Bromwich B70 8RU
Tel: 0121 569 4245
Email: ian.thom@sandwell.gov.uk

Sandwell
Appendix 2

Screening Statement

On the determination of the need for a Strategic Environmental Assessment (SEA) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 and European Directive 2001/42/EC.

For the proposed

Tipton Area Action Plan

A Development Plan Document

21 December 2005
Section 1: Introduction

The requirement for Strategic Environmental Assessments (SEAs) is set out in the Environmental Assessment of Plans and Programmes Regulations 2004, which places an obligation on Local Planning Authorities to undertake an SEA on any land use plan which sets the framework for future development consent of projects. There are however, exceptions to this requirement for plans that determine the use of a small area at local level and for minor modifications, if the Local Authority has determined that the plan is unlikely to have significant environmental effects.

In order to determine whether there are sufficient exceptions to justify an SEA not being undertaken, the Local Authority is required to undertake a screening process based on a standard set of criteria, in order to determine whether the plan is likely to have significant environmental effects. A determination on whether an SEA is required cannot be made unless the Local Authority has consulted on the screening process with four designated statutory bodies; the Countryside Agency, English Heritage, English Nature and the Environment Agency.

Following consultation, the results of the screening process will be detailed in a Screening Statement, which is required to be made available to the public. It is anticipated that all Development Plan Documents (DPDs), including Area Action Plans (AAPs), are likely to require an SEA, as they will normally contain statutory planning policies used to determine planning applications, and are likely to have significant environmental effects.
Section 2: Tipton Area Action Plan

1. The Tipton Area Action Plan, for the Owen Street, Alexandra Road, Bloomfield Road area, follows on directly from two other documents, the Sandwell Unitary Development Plan 2004 and the Tipton Town Planning Statement 2004.

2. The Sandwell Unitary Development Plan (UDP) was formally adopted by the Council on 27 April 2004. The UDP provides the statutory land use planning framework for the Borough, and contains Policies (used to determine planning applications), Proposals for specific land uses, and Inset Plans for particular areas of the Borough where there is a concentration of proposals.

3. As the Sandwell UDP was adopted in 2004, it is considered to be up-to-date. Therefore, the Council intend to save all of the policies for at least three years, until 2007, while the new documents are being prepared. There may also be some policies that are saved for a longer period. Over the next three years, the Council will be preparing its evidence base for reviewing the UDP policies and preparing Area Action Plans for various parts of the Borough.

4. Following the adoption of the UDP, the Council also adopted three Town Plans in 2004 as Supplementary Planning Guidance (for Rowley Regis Smethwick and West Bromwich). With the advent of Local Development Frameworks, it was considered appropriate to prepare Town Planning Statements for the remaining three towns (Oldbury, Tipton and Wednesbury). The purpose of the Statements is to set out the initial land use context for the Town, analyse the relevant issues, and identify where Area Action plans may be required.

5. Planning Policy Statement 12 advises that Area Action Plans should be used to provide the planning framework for areas where significant change or conservation is needed, and should deliver planned growth areas, stimulate regeneration, protect areas sensitive to change, resolve conflicting objectives in areas subject to development pressures, or focus the delivery of area based regeneration initiatives.

6. The Tipton Town Planning Statement was approved in November 2004 as the basis for further consultation with key partners. The Statement identifies several key issues in Tipton, derived from the Adopted UDP: demand for housing land; pressure on industrial land; regeneration sites and town centres; transportation; open spaces, green spaces and play space; support for health, social and community facilities. A number of community concerns were also identified in the Statement: the impact of major new housing development on school places and other services; the poor state of local shopping centres, and associated antisocial behaviour and crime; poor quality open spaces and lack of maintenance; dislocation caused by Owen Street Level Crossing; crime and antisocial
behaviour related to housing developments and open spaces; improved activities and facilities needed for young people; low access to private transport, and reliance on a poor public transport network; concerns about abuse of rights of ways and gullies.

The Statement identifies six potential Area Action Plans:

1. Great Bridge Town Centre and surrounds
2. Locarno Road/Alexandra Road
3. Bloomfield Road area
4. Park Estate
5. Owen Street
6. Dudley Port.

Subsequently, Sandwell’s Local Development Scheme included an Area Action Plan covering three of these areas, i.e. Owen Street, Alexandra Road, and Bloomfield Road, now referred to as the Tipton Area Action Plan.

The Local Development Scheme summarises the role and content of the document as follows: “To review land uses in the Owen Street, Alexandra Road and Bloomfield Road area, where there is pressure for development arising from a number of issues. The Owen Street Relief Road is scheduled for completion 2008/2009; Owen Street District Centre is in need of regeneration; there are a number of potential residential development sites which could come forward as a result of relocating and restructuring employment and education land uses; and the Council’s Green Space Audit has identified opportunities for new investment. There is also the opportunity to focus investment arising from the potential Black Country HMRA. The AAP needs to consider options for development of a number of potential sites and to balance the needs of the existing residential and business community with the need for regeneration.”
Section 3: The Screening Process

The key to the screening decision is the determination of whether the AAP is likely to have significant environmental effects, using the criteria set out in Annex II of the SEA Directive. These criteria are set out in the table below, alongside which is the Council’s response in relation to the AAP.

<table>
<thead>
<tr>
<th>SEA Directive Criteria</th>
<th>Response</th>
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<tbody>
<tr>
<td>The degree to which the plan or programme sets a framework for projects and other</td>
<td>The AAP will be based on the Adopted UDP 2004, but is likely to include new or different allocations in some locations. Subject to adoption, the AAP will therefore set a framework for a range of proposals specifically with regard to location, nature and size, and will also allocate resources accordingly.</td>
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<tr>
<td>activities, either with regard to the location, nature, size and operating conditions</td>
<td></td>
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<tr>
<td>or by allocating resources</td>
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<tr>
<td>The degree to which the plan or programme influences other plans and programmes</td>
<td>The Adopted UDP 2004 will influence the AAP, but also be influenced by the AAP. There will also be some influence on the Tipton Housing Strategy and the potential Housing Market Renewal Area.</td>
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<tr>
<td>including those in a hierarchy</td>
<td></td>
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<tr>
<td>The relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development.</td>
<td>PPS12 states that at the heart of sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations. Environmental considerations have already been identified as key issues for the community and key stakeholders, ranging from reduction of pollution, to provision of green space and open space, to traffic generation. The intention of the AAP is to integrate environmental, economic, social and physical considerations in order to promote a better quality of life.</td>
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<tr>
<td>And</td>
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<tr>
<td>Environmental problems relevant to the plan or programme</td>
<td>There will be some relevant environmental issues affected by the AAP, including air and noise pollution.</td>
</tr>
</tbody>
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<tr>
<th>The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection)</th>
<th>The anticipated effects will be the delivery of a range of proposals by a partnership of key stakeholders over a period of years, which will be established in consultation with those partners. The proposals when taken together will significantly affect the characteristics of the area, in terms of the introduction of new development and the replacement of some existing uses and operations. The majority of these effects will be irreversible.</th>
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<tr>
<td>The probability, duration, frequency and reversibility of the effects</td>
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<tr>
<td>And</td>
<td></td>
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<tr>
<td>The cumulative nature of the effects</td>
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</tbody>
</table>

<p>| The transboundary nature of the effects | The effects will be mainly local, but by its nature, the Black Country is an area of interdependency in terms of the housing and |</p>
<table>
<thead>
<tr>
<th>The risks to human health or the environment (e.g. due to accidents)</th>
<th>There may be risks arising from increases in development and consequently traffic. Some of these risks may be counter-balanced by the possible reduction in unsafe or unhealthy sites in the area.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)</td>
<td>The area of the AAP is approximately half of Tipton Green Ward in size, containing a population in the order of 8,000 people. Whilst the actual geographical area is relatively small, it contains a significant population.</td>
</tr>
</tbody>
</table>
| The value and vulnerability of the area likely to be affected due to:  
• Special natural characteristics or cultural heritage  
• Exceeded environmental quality standards or limit values  
• Intensive land-use  
• The effects on areas or landscapes which have a recognised national, Community or International protection status | There are no areas which are of national, Community or international protection status, although there is the Factory Locks Conservation Area, which is of significant local value, and contains Listed features. The existing and former canal system is also of significant local value. |
Section 4: Statement of Reasons for Determination

It has been demonstrated above, through the responses to the SEA Directive Criteria, that the impact of the Tipton Area Action Plan will have significant environmental effects, and it will set a new framework.

Each of the four statutory consultation bodies were consulted on the initial screening statement.

The responses received were as follows:

Countryside Agency: no comment received.

English Heritage: an SEA will be required.

English Nature: an SEA will be required.

Environment Agency: an SEA will be required.

It is considered that as a result of the assessment undertaken by the Council, along with the responses received from the statutory consultation bodies, an SEA is required for the purposes of the Tipton Area Action Plan.
## Appendix 3: Summary of responses to Tipton AAP Scoping Report (January 2006)

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Summary of Response</th>
<th>Council’s Response (interim)</th>
</tr>
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<tbody>
<tr>
<td>English Nature</td>
<td>EN considers that the AAP should seek to secure greenspace as a network of interconnected sites which are linked across a wider area to form a network that functions both ecologically and socially. This would ensure that the AAP conforms with the RSS. As a consequence, the targets by which the success of the AAP can be measured would include standards for accessible natural greenspace: A greenspace of at least 2ha &lt;300m from home; A Local Nature Reserve provision at a minimumum of 1ha. Per thousand population; At least one greenspace of 20ha. Within 2km of home, one 100ha. site within 5km of home, and one 500ha. site within 10km.</td>
<td>Consider changing Plan Objective 3 to refer to the greenspace network. Include the standards and targets under baseline information under Environmental Issues.</td>
</tr>
<tr>
<td>Tipton Town Team</td>
<td>In connection with reducing crime and antisocial behaviour, it would be useful to refer to consultations with Police Architectural Liaison Officers. Should there be a reference to the Greenspace Audit for Tipton, and the demand for increase play provision.</td>
<td>Consider adding reference to 4.22 Crime Reduction Strategy, or to baseline information for Social Issues (or key issues identified locally, at 6.4). Consider detailed indicators for SA Objective 2. Include Open Space Audit in baseline information under Environmental Issues.</td>
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<tr>
<td>Government Office for</td>
<td>It is encouraging to see that the authority</td>
<td>Consider adding the strategies to the list of</td>
</tr>
<tr>
<td>Agency</td>
<td>Comments</td>
<td>Notes</td>
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<td>the West Midlands</td>
<td>has identified the Regional Spatial Strategy, and differing regional and spatial strategies. The authority should also consider the following regional strategies: Regional Housing Strategy; Regional Economic Strategy; West Midlands Cultural Strategy; and West Midlands Visitor Economy Strategy.</td>
<td>relevant plans, policies, and programmes.</td>
</tr>
<tr>
<td>English Heritage</td>
<td>Overall, the content and approach is appropriate. Suggest that Sandwell’s Sustainability Objective 9 – Value, enhance and protect built environment assets – include the historic environment.</td>
<td>SOs are ‘given’ (i.e. decided at Sandwell level). Confirm that the historic environment is part of the built environment (there is a specific plan objective).</td>
</tr>
<tr>
<td>Countryside Agency</td>
<td>Given the likely impact of the proposed AAP, the Agency has decided not to submit detailed comments on the Scoping Report, as a result of resource prioritisation.</td>
<td>Noted.</td>
</tr>
<tr>
<td>Environment Agency</td>
<td>Recommend additions to Sandwell “Environmental objectives”, - “encourage the remediation of Brown Field sites”, and - “Reinstate culverted watercourses, and make space for water”. Supports Sustainability Objective 12 – Improve air, water and soil quality</td>
<td>This response was received 12 weeks after the 5 week consultation period, and consequently was too late for consideration. Sandwell’s Sustainability Objectives are ‘given’ for the purposes of this AAP. These two suggestions are detailed requirements which can be incorporated in site design requirements.</td>
</tr>
</tbody>
</table>
1. **Summary Statement**

1.1 The Tipton Area Action Plan (AAP) is included in the Sandwell’s approved Local Development Scheme (LDS). The purpose of the Tipton AAP is to provide a land use framework to guide development arising from a number of pressures, particularly in the Owen Street, Alexandra Road and Bloomfield Road areas. The AAP will seek to balance the needs of the existing residential and business communities with the need for regeneration, and to consider options for development of a number of potential sites.

1.2 The planning process requires the consideration of issues and options prior to the formal plan being prepared, and the early informal involvement of communities and stakeholders in line with the Draft Statement of Community Involvement.

1.3 In order to assist this stage of the planning process, it is proposed to publish an Issues and Options Paper. This includes some of the issues already raised in informal discussions and local meetings, and the paper will assist the process of community involvement further. The draft text of the paper is attached, together with a plan indicating the boundary of the AAP. It will be updated prior to distribution.

1.4 The plan objectives as stated in the Paper are to:

   1) provide a mix of new high quality homes to meet local and future needs, including affordable homes.

   2) support sustainable local employment opportunities, and the introduction of new jobs to diversify the economic base.

   3) enhance existing open spaces and green spaces for all users.

   4) aid the regeneration of the Owen Street District Centre.

   5) facilitate improvements to local education provision, particularly those required as a result of new residential development.

   6) protect and enhance the best of the local heritage.
1.5 The Paper will be sent to statutory consultees, local groups and organisations, and other interested parties, and meetings held locally where appropriate. The outcomes will be used to prepare the formal Preferred Options Document, which is the next stage of the process, scheduled to be issued by October 2006.

1.6 A further report will be submitted prior to the Preferred Options Document being prepared for consultation.

Further details are attached for your information

2. **Recommendation**

2.1 That the Issues and Options Paper be approved as the basis for further community involvement and consultation.

2.2 That the Issues and Options Paper, and issues arising from consultation, be used to inform the content of the Tipton Area Action Plan.

In accordance with the authority delegated to the Cabinet Member for Regeneration and Transportation, the following course of action has been agreed, which will be set out in the formal record of the decisions taken by the Member:

(1) the recommendation(s) above are approved.

(2) the recommendation(s) above are approved as now amended.

(3) the recommendations above are not approved.

Cabinet Member for Regeneration and Transport

Date ......................................

Robert A. Lee
Director of Planning and Transportation

Contact Officer
Ian Thom, Planning Policy
0121 569 4245

**Issues and Options Paper for Tipton Area Action Plan**

3. **Strategic Resource Implications**
Production of the Issues and Options Paper and the subsequent Area Action Plan will be carried out within the identified resources of the Council.

4. **Legal and Statutory Implications**

4.1 The Planning and Compulsory Purchase Act 2004 introduced a new statutory planning system for local planning authorities. Each local planning authority is required, in due course, to prepare a Local Development Framework (LDF), which is, in effect, a portfolio of the local development documents which will comprise the spatial planning strategy for the area. The Act is accompanied by The Town and Country Planning (Local Development) (England) Regulations 2004, and the Town and Country Planning (Transitional Arrangements) Regulations 2004. The new system came into effect in September 2004.

4.2 The Tipton Area Action Plan is included in Sandwell’s approved Local Development Scheme (LDS), which requires the preparation of issues and options in 2005/2006 prior to the submission of a Preferred Options Document by October 2006. The Council must comply with the timetable contained in the LDS.

4.3 The Council’s Draft Statement of Community Involvement outlines the general approach to consultation on plans, and requires the early involvement of a range of community groups and organisations. The Issues and Options Paper will be distributed to local groups and businesses, and a range of other organisations (including ‘statutory’ consultees) in order to encourage discussion and feedback.

5. **Implications for the Council’s Corporate Priorities**

5.1 The Tipton Area Action Plan primarily supports the Council’s priority of Transforming the Physical Environment, by identifying a planning framework to guide change in this part of the Borough. However, the Plan supports a number of other priorities, by giving spatial expression to those elements which can be implemented or supported through the planning system: A Safe Borough, High Value Jobs, Improving Housing Choice, and Local Communities.

6. **Background Details**

6.1 Further information is contained in the draft text attached as Appendix 1.

**Source Documents**

Sandwell Local Development Scheme
Draft Statement of Community Involvement
Appendix 5

(Leaflet for 7 February 2006 event distributed to 2,100 households)

Tipton Area Action Plan

The Tipton Area Action Plan covers the Owen Street, Alexandra Road and Bloomfield Road areas, where there is pressure for development arising from a number of issues.

Some of the proposals are:

• A proposed Owen Street Relief Road (a tunnel under the railway).

• New residential development at the former Little Burton estate and the Sigmacast site (if the site should close or relocate).

• A new Summerhill Primary School on the site of the existing Westminster School on Upper Church Lane.

• Redevelopment of the former Locarno School site when the new school has been built.

If you want to know more information about these and other proposals, or if you want to talk to a planning officer about the Tipton Area Action Plan, there will be a

Drop-In Session
Tuesday 7 February 2006
7.00 p.m. to 8.00 p.m.
Summerhill Primary School, Central Avenue

For further information, please contact:

Ian Thom,
Sandwell MBC Planning Policy,
Development House,
Lombard Street,
West Bromwich B70 8RU
0121 569 4245
ian_thom@sandwell.gov.uk

Sandwell Metropolitan Borough Council
# Appendix 6

## Tipton AAP Consultees

<table>
<thead>
<tr>
<th>Access Alliance</th>
<th>London Energy</th>
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<tr>
<td>Accord Housing Association</td>
<td>Midland Heart</td>
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<tr>
<td>Advantage West Midlands</td>
<td>Midlands Architecture &amp; The Designed</td>
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<tr>
<td>Arts Council England- WM</td>
<td>Environment</td>
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<tr>
<td>Atlantic Electric and Gas</td>
<td>Mobile Operators Association</td>
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<tr>
<td>Birmingham and Black Country Wildlife</td>
<td>National Grid</td>
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<td>Trust</td>
<td>National Rail</td>
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<td>Black Country Investment Bureau</td>
<td>Neptune England</td>
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<td>British Gas</td>
<td>New Bloomfield Tenants and Residents</td>
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<td>British Waterways</td>
<td>Association</td>
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<td>Bromford Carinthia Housing Association</td>
<td></td>
</tr>
<tr>
<td>Brook Street Community Centre</td>
<td>Npower</td>
</tr>
<tr>
<td>C.G. Murray and Sons Ltd</td>
<td>Owen Street Traders Association</td>
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<tr>
<td>Centro/WMPTE</td>
<td>Premier Steel Processing</td>
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<td>Chatwins Wharf Residents and</td>
<td>Qualtronyc Property Holdings Ltd</td>
</tr>
<tr>
<td>Tenants Association</td>
<td>Richards and Jerrom Ltd</td>
</tr>
<tr>
<td>COBA Asset Management</td>
<td>Rope Services (Tipton) Ltd</td>
</tr>
<tr>
<td>Countrywide Energy</td>
<td>Sandwell Council of Voluntary</td>
</tr>
<tr>
<td>Culture West Midlands</td>
<td>Organisation</td>
</tr>
<tr>
<td>Dudley &amp; Sandwell Chamber of</td>
<td>Sandwell Partnership</td>
</tr>
<tr>
<td>Commerce</td>
<td>Sandwell Primary Care Trust</td>
</tr>
<tr>
<td>Dudley MBC</td>
<td>SCEN</td>
</tr>
<tr>
<td>Ebico Ltd</td>
<td>Scottish and Southern Energy</td>
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<tr>
<td>Ecotricity</td>
<td>Severn Trent Water Ltd</td>
</tr>
<tr>
<td>English Heritage</td>
<td>Sigmacast Iron Ltd</td>
</tr>
<tr>
<td>Environment Agency</td>
<td>South Staffordshire Water PLC</td>
</tr>
<tr>
<td>Firth Cleveland Steel Strip</td>
<td>Sport England</td>
</tr>
<tr>
<td>Focus Housing Association</td>
<td>St. Paul’s CE Primary School</td>
</tr>
<tr>
<td>Good Energy</td>
<td>Summerhill Primary School</td>
</tr>
<tr>
<td>Government Office for the West</td>
<td>Summerhill TRA</td>
</tr>
<tr>
<td>Midlands</td>
<td>The Angle Ring Company Ltd</td>
</tr>
<tr>
<td>Groundwork Black Country</td>
<td>The Housing Corporation</td>
</tr>
<tr>
<td>Gypsy &amp; Traveller Law Reform</td>
<td>The Planning Inspectorate</td>
</tr>
<tr>
<td>Coalition</td>
<td>Tipton Civic Society</td>
</tr>
<tr>
<td>Harris Lamb Chartered Surveyors</td>
<td>Tourism West Midlands</td>
</tr>
<tr>
<td>Highways Agency</td>
<td>Utilita Services Ltd</td>
</tr>
<tr>
<td>Home Builders Federation</td>
<td>Waterloo H.A</td>
</tr>
<tr>
<td>Hugh James</td>
<td>West Midlands Planning Aid Service</td>
</tr>
<tr>
<td>Inland Waterways Association</td>
<td>West Midlands Police</td>
</tr>
<tr>
<td>Jephson Housing Association</td>
<td>West Midlands Regional Assembly</td>
</tr>
</tbody>
</table>
Appendix 7

Tipton Area Action Plan
The Tipton Area Action Plan (AAP) will provide a land use framework to guide development in a specific part of Tipton.

Planning And Transportation
Development House
Lombard Street
West Bromwich
B70 8RU
Tel: 0121 569 4245
Fax: 0121 569 4082
Email: town_plans@sandwell.gov.uk

Opening Hours: Monday - Thursday 8.00am - 5.30pm. Friday 8.00am - 5.00pm

The purpose of the Tipton AAP is to provide a land use framework to guide development arising from a number of pressures, and seeks to balance the needs of the existing residential and business communities with the need for regeneration. The AAP plans positively for land use change, rather than depend on “windfalls” for development. It seeks to promote delivery of identified sites and introduce more certainty for the area. The Notice of Proposals Matters gives more information

In order to assist you in making your response, there is an online representation form or a downloadable representation form, available on the website, which can be returned to the Council via a freepost address:

Sandwell MBC, Development House, FREEPOST BM1389, P.O. Box 42, West Bromwich B70 8BR.

There are other ways in which you can send us your comments, but please use the heading ‘Tipton AAP – Preferred Options’.

You can:

- Send us a letter to the freepost address above
- Send us an email, to: ldf_planning@sandwell.gov.uk
- Send us a fax to: 0121 569 4245

The Council has published a second Preferred Options Document concentrating on the land between Locarno Road and Alexandra Road. Please note that the deadline for making comments on the Tipton Area Action Plan (Locarno Road) - Preferred options is Monday 2 April 2007. Any comments received after this late may not be considered by the Council.

Further information is available by telephone: 0121 569 4245

Issues and Options Paper - This paper is intended to inform communities and stakeholders about the key issues and options to be considered in the preparation of the Tipton Area Action Plan. The Council welcomes responses to this paper from residents, community groups, businesses, and other parties with an interest in the area, by the end of May 2006.

Preferred Options Document – due October 2006

Submitted AAP – due October 2007

**Sustainability Appraisal**

Sustainability Appraisal is a process by which the social, economic, and environmental effects of a plan are evaluated. There are different stages of this process.

A [Screening Statement](#) is a formal assessment of whether the Sustainability Appraisal needs to include a Strategic Environmental Assessment (in accordance with European Directive 2001/42/EC).

The [Sustainability Appraisal Report](#) is a formal part of the Area Action Plan.

**Tipton Town Planning Statement**

The Tipton Town Planning Statement analyses local planning issues and identifies potential Area Action Plans.

[Tipton Town Planning Statement](#)
Tipton residents have been reminded they can have their say on a multi-million pound regeneration plan for the town.

Sandwell Borough Council is looking at ways of improving provisions for jobs, investment, homes, education and health.

The scheme will focus on the Gwen Street, Alexandra Road and Bloomfield Road areas which are seen as gateways into the town.

A period of public consultation is now under way and council officials said they backed the plans and wanted to hear from community groups, businesses, retailers and residents. Cabinet member for regeneration and transport Councillor Bob Badham said the project was the first of its kind for the council.

He added: "It was also the first time people on the street could have such a major say on what they wanted to see happen in the area."

The final document is expected to be drawn up in October next year, and published shortly after.
Sandwell Metropolitan Borough Council

Report to the Cabinet Member for Regeneration and Transport

27 September 2006

Tipton Area Action Plan – Preferred Options Document

1. Summary Statement

1.1 The Tipton Area Action Plan (AAP) is included in Sandwell’s approved Local Development Scheme (LDS). The purpose of the Tipton AAP is to provide a land use framework to guide development arising from a number of pressures, particularly in the Owen Street, Alexandra Road and Bloomfield Road areas. The AAP seeks to balance the needs of the existing residential and business communities with the need for regeneration.

1.2 There is a series of stages for the preparation of the AAP with community involvement at each stage. Early involvement has been carried out since January 2005, and has included local organisations, local Councillors and residents, businesses and stakeholders, and statutory organisations. An Issues and Options Paper was distributed for discussion and comment in February 2006, with responses invited up to May 2006. The responses during this stage have been used to prepare the Preferred Options Document and the Sustainability Appraisal Report (which assesses the social, environmental and economic effects of the proposals).

1.3 There is a formal consultation period of six weeks, which is scheduled for 16 October 2006 to 27 November 2006. Following this, the Council will consider representations received, and revise the AAP as necessary. The revised AAP (the Submission Document) is scheduled for preparation by October 2007, after which the formal Examination Stage will be carried out by an independent Inspector appointed by the Planning Inspectorate.

1.4 The plan objectives are to:

   1) provide a mix of new high quality homes to meet local and future needs, including affordable homes.

   2) support sustainable local employment opportunities, and the introduction of new jobs to diversify the economic base.

   3) enhance the green space network for all users.

   4) aid the regeneration of the Owen Street District Centre.
5) facilitate improvements to local education provision, particularly those required as a result of new residential development.

6) protect and enhance the best of the local heritage.

7) improve accessibility for all modes of transport through and within the plan area.

1.5 The Area Action Plan has been prepared in accordance with national and regional planning policy, and has taken into account a number of local plans and programmes relating to the economy, housing, transport, nature conservation, health, schools, and open spaces. There are already a number of committed schemes in the AAP area, such as Owen Street Relief Road, new schools, health centres, shops, and new housing development. The AAP provides a balanced approach to new housing growth, retention of employment, and provision of social and community facilities. It seeks to promote delivery of identified sites and introduce more certainty for the area. The preferred option sites identified are:

T1: Alexandra Road/Upper Church Lane – residential, with integral open space.

T2: Central Avenue – residential.

T3: Upper Church Lane – education

T4: Upper Church Lane/Moat Road – residential.

T5: Tibbington Open Space – extend community open space designation.

T6: Tibbington Terrace – residential.

T7: Bradleys Lane/High Street – mixed use: residential and employment.

1.6 A further report will be submitted prior to the Submission Document being prepared for consultation.

Further details are attached for your information

2. **Recommendation**

2.1 That the Preferred Options Document and the Sustainability Appraisal Report be approved for consultation.
2.2 That the Preferred Options Document and the Sustainability Appraisal Report, and issues arising from consultation, be used to inform the content of the Tipton Area Action Plan Submission Document.

In accordance with the authority delegated to the Cabinet Member for Regeneration and Transportation, the following course of action has been agreed, which will be set out in the formal record of the decisions taken by the Member:

(1) the recommendations above are approved.
(4) the recommendations above are approved as now amended.
(5) the recommendations above are not approved.

_____________________________
Cabinet Member for Regeneration and Transport

Date ......................................

Robert A. Lee
Director of Planning and Transportation

Contact Officer
Ian Thom, Planning Policy
0121 569 4245

Tipton Area Action Plan – Preferred Options Document

3. **Strategic Resource Implications**

Production of the Preferred Options Document will be carried out within the identified resources of the Council.

4. **Legal and Statutory Implications**

4.1 The Planning and Compulsory Purchase Act 2004 introduced a new statutory planning system for local planning authorities. Each local planning authority is required, in due course, to prepare a Local Development Framework (LDF), which is, in effect, a portfolio of the local development documents which will comprise the spatial planning strategy for the area. The Act is accompanied by The Town and Country Planning (Local Development) (England) Regulations 2004, and the Town and Country Planning (Transitional Arrangements) Regulations 2004. The new system came into effect in September 2004.

4.2 The Tipton Area Action Plan is included in Sandwell’s approved Local Development Scheme (LDS), which requires the preparation of a
Preferred Options Document by October 2006. The Council must comply with the timetable contained in the LDS.

4.3 The Council's Submission Statement of Community Involvement outlines the general approach to consultation on plans, and requires the involvement of a range of community groups and organisations. The Preferred Options Document will be distributed to local groups and businesses, and a range of other organisations (including 'statutory' consultees) in order to encourage discussion and feedback.

5. **Implications for the Council’s Corporate Priorities**

5.1 The Tipton Area Action Plan primarily supports the Council's priority of Transforming the Physical Environment, by identifying a planning framework to guide change in this part of the Borough. However, the Plan supports a number of other priorities, by giving spatial expression to those elements which can be implemented or supported through the planning system: A Safe Borough, High Value Jobs, Improving Housing Choice, and Local Communities.

6 **Background Details**

6.1 Further information is contained in the attached Appendices 1 and 2. Appendix 1 is the Preferred Options Document. Appendix 2 is the Sustainability Appraisal Report.

**Source Documents**

Sandwell Local Development Scheme
Submission Statement of Community Involvement
<table>
<thead>
<tr>
<th>Respondent</th>
<th>Summary</th>
<th>SMBC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Centro</td>
<td>Broadly supportive of the AAP. Could refer to benefits of Metro, improved public transport as a result of the Relief Road, &amp; put more emphasis on integration of new development with transportation.</td>
<td>Agree. Amendments to be included.</td>
</tr>
<tr>
<td>Highways Agency</td>
<td>No comment.</td>
<td>N/A</td>
</tr>
<tr>
<td>Race Equality Sandwell</td>
<td>Query options for the level crossing, use of the vacant land at Little Burton for a park, and provision of private housing.</td>
<td>Relief Road is now a commitment, option of park at Little Burton is not considered appropriate, and there is a proportion of new development required to be affordable.</td>
</tr>
<tr>
<td>West Midlands Regional Assembly</td>
<td>AAP is supportive of the RSS agenda, especially higher house building levels and the relief road. It is therefore in accord with RSS.</td>
<td>Noted. To be referenced in the AAP.</td>
</tr>
<tr>
<td>Advantage West Midlands</td>
<td>SMBC should protect valuable employment land despite the drive for residential development; the AAP should emphasise a balanced portfolio of employment sites. All the identified sites should be retained for employment.</td>
<td>The sites identified for change from employment to residential are those which are least suitable for continued employment use because of their location within a residential area or the condition of the site and buildings making the site uneconomic for alternative employment use. Some of the sites could be omitted or allocated for mixed use. The remaining employment land in the AAP area will remain as such, as the majority is clearly suitable for such uses and there is a need to maintain a level of local employment land.</td>
</tr>
<tr>
<td>Organization</td>
<td>Description</td>
<td>Response</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Qualtronic</td>
<td>Wish to relocate in Sandwell to a better site. Propose site for residential development, with adjacent uses (scrapyard).</td>
<td>Consider proposed site for residential or mixed use residential and employment. Awaiting response from Black Country Investment.</td>
</tr>
<tr>
<td>John S. Allen</td>
<td>Important industrial archaeology in Bloomfield Road needs to be protected.</td>
<td>Agree. To be protected by planning conditions.</td>
</tr>
<tr>
<td>Inland Waterways Association</td>
<td>Environment of Conservation Area should be improved, with canal related development, and more heritage &amp; canal facilities.</td>
<td>CA to be reviewed. Agree on environmental quality issues. To be addressed further in the AAP.</td>
</tr>
<tr>
<td>British Waterways</td>
<td>No canal related use for Factory Locks. Seeking to develop for quality residential use.</td>
<td>Not included as allocation in AAP. Planning application imminent.</td>
</tr>
<tr>
<td>B. Whitehouse</td>
<td>Relief road welcomed; District Centre needs action to improve; any development to improve Little Burton/Sigmacast and Bloomfield Road is welcomed; regeneration of Tibbington is welcomed; Cracker should be a proper recreation/leisure facility; prefer refurb of existing school, although new housing should blend in; canal conservation should be a major project; new housing should include bungalows or sheltered accommodation.</td>
<td>Noted. Issues to be taken into account in the AAP.</td>
</tr>
<tr>
<td>English Nature</td>
<td>AAP should seek to secure a greenspace network of interconnected sites. Suggests targets for greenspace.</td>
<td>To be incorporated into the AAP.</td>
</tr>
<tr>
<td>Tipton Civic Society</td>
<td>Canal system needs to be the centre-piece of Tipton. Conservation Area should be extended, canal related development should be encouraged, poor development prevented, good design required. Relief Road supported, but concerns about increase in traffic.</td>
<td>CA and Local List to be reviewed. Agree on quality of design issues – to be strengthened in AAP. Two sites omitted from AAP. Comments noted on re-use of buildings, but redevelopment retained as an option.</td>
</tr>
<tr>
<td>Bromford Housing</td>
<td>Support affordable housing provision. Need affordable housing mix in site details and new PPS3 definition.</td>
<td>AAP to include suggested details.</td>
</tr>
<tr>
<td>-------------------</td>
<td>------------------------------------------------------------------------------------------------</td>
<td>---------------------------------</td>
</tr>
<tr>
<td>Harrow Estates on behalf of Bridgmere Properties</td>
<td>AAP is appropriate way to regenerate the area. Support for redevelopment of Little Burton Sigmacast</td>
<td>Noted, and included in AAP.</td>
</tr>
<tr>
<td>Environmental Services</td>
<td>Strongly recommend that no residential development (of Little Burton) goes ahead without a significant improvement in their environmental obligations under the relevant regulations.</td>
<td>Noted and included in AAP.</td>
</tr>
</tbody>
</table>
Appendix 11: example of feedback letter

Keith Hodgkins,
Tipton Civic Society,
7 Chatwins Wharf,
Tipton DY4 8QG.

Dear Keith,

Tipton Area Action Plan

Thank you for the comments you provided earlier this year. The Council has considered your comments and those made by others, and has now prepared the Tipton Area Action Plan – Preferred Options Document. A copy of this will be sent to you shortly for formal consultation.

With regard to your particular comments, I can respond as follows. Your comments have been very constructive, and parts of the Area Action Plan have been changed accordingly. A number of the points are outside the scope of the AAP itself, but I have requested others to either take action where necessary or consider your suggestions in other pieces of work.

The Preferred Options Document now includes the following paragraph:

“4.48 The former and existing canal network also forms the basis of much of the remaining heritage interest in Tipton, and within the AAP area. The only designated Conservation Area in Tipton is in the AAP area. Tipton Factory Locks Conservation Area is included in a programme of conservation area reviews scheduled for completion by 2010. The character appraisal and boundary review study is scheduled for 2007, with a programme of work to be completed by 2009, subject to detailed consultation. The review will undertake a character assessment of a wider area to consider whether a revised boundary is required, and what enhancement measures might be required. This will enable some specific issues identified by local interest groups such as Tipton Civic Society to be dealt with. A similar programme is in place to draw up Local Lists of buildings within the Six Towns of Sandwell. The Tipton Local List is scheduled for the same period.”

As you can see, issues with regard to the Conservation Area and the Local List are to be dealt with in processes running parallel with the AAP process. These matters will be dealt with by my colleagues in Planning Development, including the Conservation & Listed Buildings Officer.

The AAP itself contains seven proposal sites, and has omitted a number of those considered in the Issues and Options Document. The AAP is seeking to balance the requirements for residential sites with the need to protect sustainable employment opportunities. With this in mind, there are residential allocations for Alexandra Road/Upper Church Lane (T1), Central Avenue (T2), Upper Church Lane/Moat Road (T4), Tibbington Terrace (T6), and Bradleys Lane/High Street (T7). Three of these sites are partly or wholly marginal employment uses, and two are school sites due to be surplus to requirements. I am aware of your concerns with regard to Princes End School, Tibbington Terrace,
and I suggest further discussion about the nature of the site’s development would be useful. The possible sites at Bloomfield Road north and Factory Road/Doulton Way have been omitted.

The AAP has been strengthened with regard to design issues, and the Council will put forward a series of design and layout principles to guide development on the identified sites. The detailed issues of unsatisfactory development have been referred to my colleagues in Development Control and Enforcement.

When you have received the AAP, you may wish to consider a small meeting to consider some of the issues in more detail.

Yours sincerely,

Ian Thom  
Senior Planner  
Planning Policy Section
PLANNING AND COMPULSORY PURCHASE ACT 2004
Town and Country Planning (Local Development) (England) Regulations 2004
Notice of Deposit for the Tipton Area Action Plan (Preferred Options)
Development Plan Document
THE BOROUGH COUNCIL OF SANDWELL
TIPTON AREA ACTION PLAN (PREFERRED OPTIONS)

DEVELOPMENT PLAN DOCUMENT
The Borough Council of Sandwell has prepared proposals for the Tipton Area Action Plan Preferred Options Document. This Plan provides a land use framework for part of Tipton to guide future development, and considers proposals for the development of a number of sites.
Copies of the Tipton Area Action Plan Preferred Options Document are available for public inspection free of charge during normal office hours (Monday to Thursday 8.30 am - 5.30 pm and Friday 8.30 am - 5.00 pm) from 16 October 2006 to 27 November 2006 at the following offices:
(a) Sandwell Council House, Oldbury, West Midlands B69 3DE;
and
(b) the offices of the Director of Planning and Transportation, Development House, Lombard Street, West Bromwich, West Midlands B70 3RU
and during library hours at:
(c) Tipton Library, 17 Unity Walk, Tipton DY4 8QL

Comments in respect of the Tipton Area Action Plan Preferred Options Document, should be sent in writing to:
The Director of Planning and Transportation, Development House, Lombard Street, West Bromwich, West Midlands B70 3RU to reach the Director of Planning and Transportation no later than 27 November 2006. Comments should specify the matters to which they relate and the grounds on which they are made. They may also be accompanied by a request to be notified at a specified address of the withdrawal, adoption, approval or rejection of the Tipton Area Action Plan Preferred Options Document.

Only those whose comments are made in writing and arrive at the address specified within the six week period ending on 27 November 2006 will have a right to have their comments considered by the Council. Comments received within the consultation period will be collated and responded to.
Further information is available from the Planning helpline (0121 669 4122) at the offices of the Director of Planning and Transportation, Development House, Lombard Street, West Bromwich, West Midlands B70 3RU.
Robert A. Lee
Director of Planning and Transportation
Appendix 13

Press coverage from Express & Star and Evening Mail, October 2006.

Cracker site may be included in 10-year development scheme

Clean-up plans for land going to waste

By Ken Tudor

Possible plans to develop the Cracker at Tipton are to be included in plans to improve the area over the next 10 years. The plan is for the rundown expanse of green land above the railway station and below the Tipton Estate.

It is included in the new Tipton Action Plan drawn up by Sneydwell Council. It is used extensively by cyclists, footballers and youngsters playing a place area. It is also used for official horse grazing. Director of planning Robert Utley said Tipton had some good green spaces.

However, the worst of these in terms of maintenance and facilities was the Cracker, which was a prime site for investment.

"The site has suffered from underuse and abuse for many years and has deteriorated in poor condition."

He said the site was particularly suitable for potential businesses because of the open space and links for young people. He said the site was particularly suited for pensioners because it was not too far from their homes. There is also no formal allotment use of the land and no planning difficulties.

Justified

During discussions on the action plan there will be discussion on whether the site should be cleared and whether plans for 30 houses could be justified for replanning.

There would be new houses built from the Tipton Estate area across the Greenfield Road, incorporating the northern part of the Cracker bogland, and because it was also possible that the expanse of land would be a very good and the area would be developed on it and be absorbed into the town.

The action plans will also be a way of improving the whole area of Tipton with consultation in the short term and on consultation on future location.

Resident will be consulted on the site and the site's potential is to be discussed in the future plans.
Town reveals future options

The future of Tipton is to be mapped out by a plan that will go on display to members of the public next week.

People living in the town have been invited to have a look at the Area Action Plan, which outlines options for future land use in the area.

It will address potential social, environmental and economic developments and will focus on the future of housing, employment, regeneration, education, local heritage and transport. Planning officers will be on hand to discuss the action plan next Tuesday at Summerhill School in Central Avenue between 4pm and 7pm.

It will launch a six-week consultation period. Feedback will be considered by the council before the final plan is drawn up. That plan would go before an independent inspector appointed by the Planning Inspectorate.

Cabinet member for regeneration and transport Councillor Bob Bacham said he hoped people would take the opportunity to get involved.

He said: "As a council we want to be well informed of people's views, and as well as the public exhibition, this document will also be distributed to a range of community groups and organisations."

"Transforming the physical environment is a priority for Sandwell and the AAP sets out a planning framework to shape the way this part of the borough will change."

"There are already a number of committed schemes including Owen Street Relief Road, new schools, health centres, shops and new housing development."

Plans go on show

TIPTON residents will get the chance to view plans for the long-term regeneration of their area.

The Area Action Plan goes on show this week. People can look at the proposals on Tuesday between 10am and 3pm.

They will be on view at Summerhill School in Central Avenue, when planning officers will be on hand to discuss them.

The exhibition launches a formal six-week consultation period, feedback from which will then be considered by the council.
Appendix 14

(Leaflet October 2 006 distributed to 2,100 households).

TIPTON AREA ACTION PLAN: PREFERRED OPTIONS DOCUMENT

The Council has recently prepared the Tipton Area Action Plan: Preferred Options Document. A Sustainability Appraisal - a way of assessing the potential social, environmental and economic effects of a plan - has also been prepared. The boundary of the Area Action Plan (AAP) is shown overleaf.

There will be an exhibition of the Area Action Plan proposals on Tuesday 17 October 2006, between 4.00 p.m. and 7.00 p.m., at Summerhill School, Central Avenue, where planning officers will be present.

There are already a number of committed schemes in the AAP area, such as Owen Street Relief Road, new schools, health centres, shops, and new housing development.

The preferred option sites identified in the AAP are:

- T1: Alexandra Road/Upper Church Lane - residential, with open space.
- T2: Central Avenue - residential.
- T3: Upper Church Lane - education.
- T4: Upper Church Lane/Moat Road - residential.
- T5: Tibbington Open Space - extend community open space designation.
- T6: Tibbington Terrace - residential.
- T7: Bradley’s Lane/High Street - mixed use: residential and employment.

You are welcome to make a written response to the Preferred Options Document, or to contact us for further information. Your contribution will be used in the preparation of the next stage of the Plan.

Copies of the document are available at Tipton Library or on the website: www.sandwell.gov.uk, search A-Z under T.

For further information, please contact:

Ian Thom, Sandwell MBC Planning Policy, Development House, Lombard Street, West Bromwich, B70 8RU.

0121 569 4245 or ian.thom@sandwell.gov.uk
### Appendix 15: Tipton Area Action Plan: Preferred Options Document 2006

#### Representations

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Representation</th>
<th>SMBC Response</th>
</tr>
</thead>
</table>
| Sandwell Primary Care Trust    | Sandwell PCT are proposing development of three new health care facilities in Tipton, and wish to ensure they are able to develop buildings which will allow for the continued growth in new houses.  

The current practice list size for all GP's operating in Tipton currently stands at just under 40 thousand. The three new primary care buildings and refurb of Neptune planned for Tipton are proposed to have a capacity to deliver services for between 12 and 15 thousand patients each. | The sites within the Tipton AAP could provide approximately 770 dwellings in the period up to 2021. At a standard household size of 2.36 (projected figure for 2011), this would equate to 1,817 people. (This does not include dwellings currently on site, such as adjacent to Neptune or on Bloomfield Road). This figure does not take account of other residential development, outside the proposal sites, but within the catchment of the health centres, which may occur within the same period. Given the low availability of other sites, this is not likely to be a significant figure in relation to the plan proposal sites. |
| J. Tye                         | Wishes to convey support for TAAP as it is both exciting and innovative.  

Specific comments with regard to Plan T2A Central Avenue:  

1. The alley on the SE boundary of the site would not be acceptable to the occupants of the Locarno Road houses. Alleys are very bad news in terms of litter, crime, escape routes etc.  

2. The secure boundary should be secure for the entire boundary, not just part as shown on the plan. What form will this barrier take?  

3. Will existing fences be removed and replaced? Will established trees to the rear of Belmont Close properties be retained as a screen, both visual and to provide a | Plan T2a is an indicative layout intended to show the general arrangements which the Council would prefer to see on the site should it be developed for housing. It is not intended to show matters of detail, which will normally be decided at a later stage.  

The alley on the SE boundary will not be part of the layout of this site; it is intended that new development will adjoin the back gardens of houses in Locarno Road.  

The ‘secure boundary’ notation is intended to show that the gardens of new development will back onto the existing gardens. In practice, the boundary to properties in Belmont Close will be as they are now, i.e. the existing garden fences.  

Prior to any permission for development, there will be a full tree survey which will establish what trees, if any, can be removed. It is the Council’s normal practice to require that |
<table>
<thead>
<tr>
<th>A. Taylor</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. There appears to be a break or group in the secure boundary at the back of the rear gardens of Nos. 19, 21 ·&amp; 23 Belmont Close.</td>
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<tr>
<td>2. The mature trees at the back of the rear gardens of Belmont Close seem to be missing from the plan.</td>
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<tr>
<td>3. The building line of the ends of the properties to be built on the old school site appear to be touching the boundaries of properties in Belmont Close and could affect the amount of light reaching Nos. 17 to 27 Belmont Close inclusive.</td>
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<thead>
<tr>
<th>A. Taylor</th>
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<tr>
<td>4. Will there be access to the new school from Central Avenue across the site of the proposed development? This could create considerable nuisance for the residents.</td>
</tr>
<tr>
<td>5. As the plan does not seem to include any roadside planting areas, could the ‘square’ to the rear of the site contain one large mature tree? This would soften the appearance of the development and avoid the early sterility that new build areas suffer until gardens mature.</td>
</tr>
<tr>
<td>6. Is there any possibility of improving the disused garage space adjacent to 105 Central Avenue? This space has become a dumping ground for rubbish and detracts from the adjacent landscaping.</td>
</tr>
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The current planning application for the new Summerhill School includes a pedestrian link through this site and on to Central Avenue. Assuming this is approved, it will be necessary to provide a pedestrian link which is suitable for all parties, including residents.

The detail of any planting areas will not be decided at this stage, but the idea is noted and will be considered during the later stages of the development process.

The former garage site adjacent to 105 Central Avenue is currently being marketed by the Council as a small residential site, and hopefully, this will be developed in the near future.

Plan T2a is an indicative layout intended to show the general arrangements which the Council would prefer to see on the site should it be developed for housing. It is not intended to show matters of detail, which will normally be decided at a later stage.

The ‘secure boundary’ notation is intended to show that the gardens of new development will back onto the existing gardens. In practice, the boundary to properties in Belmont Close will be as they are now, i.e. the existing garden fences.

Prior to any permission for development, there will be a full tree survey which will establish what trees, if any, can be removed. It is the Council’s normal practice to require that existing trees are retained wherever possible.

The building lines of the properties is notional, although they
| Qualtronyc Property Holdings Ltd. | Qualtronyc Property Holdings Ltd is the major property owner in the Bradleys Lane/High Street site, and supports the overall aims and objectives of the TAAP, specifically the residential redevelopment option for the site. Wishes to work with Sandwell Council to achieve the residential-led comprehensive redevelopment of the whole site and the relocation of the companies operating from the Qualtronyc premises. | Response welcomed, and further work will be carried out to bring forward this option. |
| Harris Lamb Chartered Surveyors, for Harrow Estates plc. | Harris Lamb act for Harrow Estates plc who are landowners of the site currently occupied by Sigmacast Iron Ltd at Upper Church Lane/Locarno Road. This site is part of Site T1 in the TAAP. Our previous representation on the Issues and Options Document supported the redevelopment of Site T1 as it has the potential to contribute towards the programme of regeneration and change advocated the TAAP. We are pleased that those comments have been taken into account, and that the site is now recognised as a preferred option for residential redevelopment. Harrow Estates continues to support the draft policies for Site T1. The TAAP will add certainty to the planning process and will assist in the delivery of development sites. Whilst registering our support for the redevelopment of Site T1 we do wish to comment upon the design principles for the site. In particular, we comment on the conceptual layout on Plan T1A and the design principles. | Support noted for the preferred option for residential use incorporating new community open space. With regard to the concerns on the conceptual layout and design principles, I can confirm that the plan is indicative and subject to change as a result of, for example, site investigations and flood risk assessments. The precise location of different densities and the community open space corridor based around Tipton Brook and the former canal will also be subject to further detailed work. The form of any buffer on the Firth Cleveland boundary will to some extent be influenced by the outcome of the consultation on the TAAP 2007 and the submission document in October 2007. I note the information regarding the anticipated timescales of development, which will be reflected in the Submission Document. |
We will work with Sandwell MBC to design a scheme for this site which follows agreed design principles. However, further technical work needs to be completed, including an investigation into ground conditions. Until those investigations have been completed it is premature to be too precise on the distribution of development across the site area. Therefore, the TAAP should make it clear that Plan T1A is indicative and subject to change.

Plan T1A suggests a mix of two storey and three storey properties across the site, with three storey on that part of the site at the junction of Alexandra Road/Upper Church Lane. We are not persuaded that this is the most appropriate distribution of housing mix across the site, and parts of the Sigmacast site may well be appropriate for higher development. This will need further analysis and discussion with the Council.

Similarly, the quantum and positioning of public open space and the need for a buffer against the Firth Cleveland site needs further discussion. We are advised that the Firth Cleveland industrial operation does not create a nuisance to existing housing in Locarno Road; whereas some separation between new housing and industrial business is desirable, we question whether a buffer 20 metres wide is appropriate. This can be discussed further with the Council prior to a planning application.

Lastly, we wish to comment upon the Council’s projected timescale for the redevelopment of site T1. The Preferred Options Report forecasts that the site will come forward in the medium term and assumes that the site will be ready for development post-2012. We consider this is a conservative long stop date, but anticipate making a
planning application much sooner than this timescale, and will keep the Council advised in that regard.

Harrow Estates remain committed towards the redevelopment of Site T1, and will bring forward its proposals for the site in the plan period.

| Harris Lamb Chartered Surveyors, for Caparo Industries plc. | Harris Lamb are instructed by Caparo Industries plc. These representations specifically refer to the site which is occupied by Firth Cleveland (FC) between Locarno Road and Alexandra Road (plan provided). FC is a steel strip company which operates within the division of Caparo Industries plc. Caparo has a significant presence within the Black Country and its divisional Head Office is in Popes Lane Oldbury. The company recently expanded its presence within the Black Country by the acquisition of the Tyco business which has added the Trident Steelworks, Albion Road, West Bromwich to the list of steel strip companies within Sandwell.

FC operates successfully from the Locarno Road site. The business has a workforce of 130 personnel and is an important business unit within the Caparo Group. However, there are operational constraints on this site and Caparo continue to review the way it operates all of its business units. In this particular case, there are options available to Caparo which could reorganise the existing workforce to its other sites within the Black Country such as the Albion Road site. It is noted that the TAAP will set the blueprint for planning decisions over a period to 2021. Therefore, Caparo wishes to put a marker against the FC site as a potential redevelopment opportunity subject to a business strategy for relocation.

These representations therefore object to the TAAP and its failure to identify the FC site as a preferred option for

| | Whilst there is merit in considering the site as a residential proposal, we do not feel that it can simply be included in the Submission Document without undergoing formal consultation as an option. To do so would not allow various bodies, local organisations and residents an opportunity to consider both the proposal and any wider implications.

We therefore propose that the Council carries out a further consultation on this proposal, together with supporting information about the effect on housing and employment locally and a sustainability appraisal.

Clearly this proposal will generate local interest and discussion, and your client may wish to provide further information before any document is distributed. |
development. We set out a case for residential development on this site by explaining the site’s limitations for ongoing industrial use, and how it would contribute towards the regeneration objectives of the TAAP by allocating the site for residential development. We also evaluate the site against sustainability criteria.

In respect of the operational constraints it should be noted that two companies operate on this site – Firth Cleveland Ltd and Multi Stroke Ltd. The industrial buildings are designed as a number of separate bays with Multistroke occupying two central bays within the site. FC occupy industrial units either side of Multistroke. The site is therefore split in operational terms. Both companies share vehicle access onto Locarno road and Alexandra Road. The buildings are ageing and outdated industrial stock which back onto a residential area. We note that the TAAP (Page 10, Plan 3) describes the site as an ‘older industrial site’ in contrast to other areas within the TAAP which are described as ‘newer industrial sites’. Further, it is noted that the TAAP redesignates all of the older industrial sites for alternative development with one exception; the one site which is omitted is the FC site. We believe that the long term industrial use of the site may be difficult to sustain due to the operational difficulties mentioned above, the restricted nature of the site with little opportunity for expansion, the ageing nature of the industrial buildings, and the fact that this site is some distance from the strategic highway network. Harris Lamb has a team of commercial agents who deal with commercial industrial stock throughout the West Midlands. In our experience the industrial market is not attracted to property within this part of Tipton in preference for other opportunities which are better related to the motorway network.
We therefore support the findings of the Black Country Study Progress Report which anticipates the restructuring of former poor quality employment land. That study recommends four new employment investment corridors which are linked into the strategic highway routes. The area covered by the TAAP falls outside the identified corridor and, in our view, it is highly unlikely that the subject site will be considered for future industrial investment. This is likely to lead to a surplus of poor quality industrial land.

<table>
<thead>
<tr>
<th>Environment Agency</th>
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<tr>
<td>The Agency are pleased to read that your local authority are to undertake a Strategic Flood Risk Assessment (SFRA) to inform your Local Development Framework (LDF)</td>
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<tr>
<td>However, until this is produced, adopted and informs this Area Action Plan, the Agency OBJECTS to the DPD, as submitted.</td>
</tr>
<tr>
<td>SFRA is a requirement outlined in the forthcoming Planning Policy Statement 25: Development and Flood Risk (PPS25), which is due to be adopted by the DCLG in December 2006. SFRA is a strategic document which Local Planning Authorities in England and Wales are expected to produce to inform their new LDF documents. SFRA takes a strategic look at flood risk within a LPA area. All Development Plan Documents produced by a LPA should be informed by SFRA to ensure that the plans, programmes, allocations etc are sustainable from a flood risk viewpoint.</td>
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<tr>
<td>The SFRA will form an evidence base regarding flood risk. Only with this document can we comment as to the sustainability of your LDF documents.</td>
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I acknowledge your objections. I can confirm that the Black Country Strategic Flood Risk Assessment will be commissioned and completed in 2007, and will be used to prepare the Submission Document scheduled for October 2007. The flood risk assessment for the particular site will be also be commissioned and received prior to submission stage. The conceptual plan in the document was not intended to show an actual footprint, and it is intended that a central open space area based around the Tipton Brook will be a key feature of the new development, and that its design will be informed by the flood risk assessment. The further comments regarding inclusion of PPS23 in the policy framework, and inclusion of reference to remediation of contaminated land and other ground conditions will be included in the Submission Document in due course.
Upon completion of a suitable SFRA, the Agency may be in a position to review its stance and would then comments as follows:

Policy Framework

The Agency consider that as the Tipton ‘Vision’ includes redeveloped on some industrial estate and considering some of the preferred option sites are located on previously developed sites that may have cause, or have the potential to cause, contamination of controlled waters, PPS23: Planning and Pollution Control (PPS 23) should be included within the ‘Policy Framework’ section. PPS23 adopts the precautionary principle in relation to development plans and in this regards desk studies will need to be undertaken prior to the determination of planning applications.

Preferred Option Sites

**T1: Alexandra Road/Upper Church Lane**

The Environment Agency OBJECTS to this site, as it is located with Flood Zones 2 and 3, which are defined as follows:

Flood Zone 3 is the high-risk zone as defined in Table 1, paragraph 30 of PPG25 and illustrated by the Flood Zones produced by the Environment Agency. Flood Zone 3 covers all land where there is a 1 in 100 (1%) or greater chance of flooding from rivers in any one year or a 1 in 200 (0.5%) or greater chance of flooding from tidal/costal sources in any one year.
Flood Zone 2 is the low to medium flood risk zone as defined in Table 1, paragraph 30 of PPG25 and illustrated by the Flood Zones produced by the Environment Agency. Flood Zone 2 covers all land where there is a between a 1 in 100 and 1 in 1000 (1%-0.1%) chance of flooding from rivers in any one year and between a 1 in 200 and 1 in 1000 (0.5% - 0.1%) chance of flooding from the sea in any one year.

The Tipton Brook runs in culvert through the allocation site. The Tipton Brook was culverted on a new route by Sandwell Metropolitan Borough Council in the late 1980’s. The aim of the scheme was to alleviate flooding in the area. However, the Agency has no knowledge of the design standard, but considers that it is likely to be the 1 in 50 year as this was the agreed standard by the Land Drainage in the West Midlands Report (1974). With the design capacity in mind, in a 1 in 100-year event (plus 20% for climate change) the proposal site is likely to become flooded.

The suggested footprint of plan T1A appears to show proposed development over the approximate line of the culvert, which the Agency consider unacceptable as future maintenance works may be required on the culvert.

As stated in previous correspondence, where opportunities arise through redevelopment, culverted watercourses should be taken out of culvert as this thereby provides opportunities for improved habitats for wildlife and improving and creating green areas and corridors.

Therefore before its consideration with the AAP the site
must be subject to a flood risk assessment.

This further strengthens the need to undertake a SFRA to enable a strategic approach to allocation.

**T4 – Upper Church Lane/Moat Road**

As identified with Alexandra Road, this site has previous contaminated uses, which must be identified. We therefore consider the following should be added.

**Remediation of any contaminated land and other ground conditions.**

**T5 – Tibbington Open Space and Playing Fields**

Due to the historical land-uses of ‘The Cracker’, the potential for contamination of the underlying soils and groundwaters exists. Any on site contamination may be currently impacting the site and there is potential for re-mobilisation of any contaminants during site development. Local surface watercourses and the groundwater in the underlying Minor Aquifer are ‘Controlled Water’ and potential receptors of any contamination. We therefore again, consider the following should be added:

**Remediation of any contaminated land and other ground conditions.**

It should be noted that the Swan Brook in culvert runs through ‘The Cracker’. This watercourse is a designated Main River of the Environment Agency. Therefore, any works must take consideration of the brook and the maintenance of it.
<table>
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<tr>
<th>General Comments</th>
<th>Advantage West Midlands</th>
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<td>Any allocations that are over 1 hectare in size, in accordance PPG25 and the forthcoming PPS25, should be subject to a flood risk assessment to access potential flooding cause by increased surface water run-off prior to determination at the application stage.</td>
<td>Thank you for consulting the Agency on the revised document. I note from your letter that you have amended the TAAP to include more detailed rationalisation of the loss of areas of employment land, including the Sigmacast site, and to reiterate the Council’s commitment to maintaining a portfolio of suitable employment sites. The reasoned approach outlined in paragraphs 4.22 – 4.27 is welcomed, as it sets out clear justification and parameters for the consideration of the re-allocation of employment land in the Tipton area.</td>
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<td>In general terms, the Agency would still wish to see the retention of significant areas of employment land across the Black Country, but acknowledges that there will be sites that for various reasons do not provide sustainable and high quality environments for the sort of operations described on page 49 of the document (Advanced Electronics and Lynwood Engineering). Companies such as those described here, and others employing significant numbers of local people should as far as possible be encouraged to relocate within the immediate area, in the interests of maintaining links with the local economy and offering opportunities for environmental improvements.</td>
<td>Thank you for your comments welcoming the Council’s reasoned approach to the rationalisation of employment land within the Tipton AAP area. Your previous comments have proved very helpful to the Council in developing its approach. I note your wish to see retention of significant areas of employment land, and the need to take appropriate account of the need to preserve, as far as possible, levels of local employment and links with local areas when companies relocate.</td>
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<td>Given the revisions suggested by the Council both in</td>
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<tr>
<td>Birmingham &amp; Black Country Wildlife Trust</td>
<td>The Black Country and Sandwell’s natural heritage, geodiversity and biodiversity is inextricably bound up with its cultural heritage and economic development. The Black Country and the Borough’s open spaces and wildlife corridors are home to a variety of geological features, nature conservation sites and habitats, in addition to many familiar species and also a number of protected and vulnerable species such as great crested newts, water voles and bats. The wildlife within these spaces is also a user of these spaces and the geodiversity provides the Black Country landscape amongst which its residents live and work. Together they are key components of the quality of life of the Black Country’s residents. These components not only need careful consideration but also offer considerable opportunities as part of the urban renaissance agenda now emerging within the Black Country. This urban renaissance agenda is being set within a framework comprising the Black Country Vision, the draft RSS Phase One Revision: the Black Country (now submitted to government), and the Black Country Study. The transformation of the Black Country’s environment is a key pillar of the agenda. How and how well the Black Country and each of the boroughs protects and enhances the environment and creates safe, attractive, and healthy places to live and work will be a key test of the quality of the delivery of the urban renaissance.</td>
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<td>I note your support in principle of the AAP, and your constructive comments. Generic Comments With regard to your comments about the Black Country Vision, I think that whilst it is appropriate for the sub-region to have an all-embracing agenda, it is more appropriate for an AAP dealing with a very local area to have a vision which local residents and organisations can readily relate to. However, I take your point about the absence of environmental quality in the natural and historic environment, and will amend the text accordingly. We will also consider the placing of the vision within the document to raise its profile. With regard to the objectives, I think that there is scope to redraft them to put more emphasis on biodiversity, the green space, and local heritage. The policy framework noted in the AAP is not intended to be a full and complete listing of every policy or strategy which may be relevant. That is more appropriate to the Core Strategy which is in preparation. I think though that it is reasonable to include more reference to environmental guidance and advice, and will include this within this section, given that there is a limit to the amount of detail which can be put into what is a local action plan.</td>
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Documents such as the Tipton Area Action Plan have a key role in determining the scope and scale of urban renaissance at the local level and to bring the Black Country’s ambitions into contact with Black Country residents who will ultimately benefit from them. The environmental components can be readily appreciated at this local level and are deserving not only of careful attention but also full expression in terms of delivery.

The Wildlife Trust is able to support Sandwell Council’s commitment to producing such documents but would like to make a number of comments which are identified below. The comments are of three types, the first are somewhat generic in origin, whilst the second are specific to the AAP itself; the third relate to the SA of the draft document.

1. **Generic Comments**

1.1 **Section 4.2 Vision** The Trust is disappointed that the Vision provided in the draft is almost hidden in Chapter 4. We think that if the document is to have a Vision then it should be more prominently located at the front of the document.

1.2 **Section 4.2 Vision** We are also disappointed that the Vision that is provided fails to use as a base the Black Country Vision which has been used as the foundation for the work relating to the Black Country Study and draft RSS Phase 1 Revision. We are also disappointed that there is little detail about the importance of environmental quality, both broadly and in terms of the natural and the historic environment. Environmental quality should be at the heart of Black Country (and

### Specific Comments

It has been difficult to identify specific environmental information relating to the AAP area, despite accessing the Biodiversity Action Plan and requesting information from EcoRecord. I will review the available information to include some of the more general environmental information on the basis that there may be species and features within or adjacent to the AAP area.

The UDP Nature Conservation reference will be amended to reflect the nature of other policies; however, this section is meant to be a signposting, rather than a list of every policy in the UDP which might be applicable.

The reference to protecting the environment will be included within this section, and reference will also be made to the Black Country as Urban Park concept, biodiversity and accessible natural greenspace, and the raising of environmental standards, at suitable places within the development framework.

Reference to biodiversity, geodiversity and historic environment assessments will be made within both the development framework and the site allocation details.

The section on implementation and monitoring will be reviewed in the context of the Black Country documents listed to see if there is relevant information which could usefully be included here.

**Sustainability Appraisal**

Information for this area was requested from EcoRecord,
Sandwell) regeneration and play a critical role in raising people’s quality of life – these issues are touched on elsewhere in the document but we think they need a much higher profile.

1.3 Section 4.2 Vision We find that the Vision as expressed is more about delivery, land allocation and assembly.

1.4 Section 4.3 Objectives We think that the important role that biodiversity plays in some of the objectives that have been identified needs to be expressed. It is important in providing accessible natural greenspace and so-called green infrastructure. In this sense, biodiversity is also a user of the greenspace network. It is also a part of the local heritage. The Trust notes that there is an objective to protect and enhance the “the best”. What is to happen to that part of the local heritage that does not qualify as “the best” and how is “the best” to be determined? We think that what is not the best may be deserving of protection and enhancement also.

1.5 Chapter 3 Policy Framework We agree that the content of the Tipton AAP must be aligned with, and influenced and informed by, other guidance and strategies, in order to demonstrate the joined-up thinking of the Council and to make the most of policy and implementation linkages. Whilst articulating the economic, employment and social policy framework clearly, the Trust has the view that this document needs to articulate more clearly environmental guidance and advice from government, other environmental strategies and evidence from the national, regional, sub-regional and I have received protected species records for the Cracker and the area within one kilometre (dated 1988). This information can be presented in a more detailed manner to indicate the types of biodiversity and locations within the AAP area, together with an assessment of whether Tipton meets English Nature standards.
and local policy base available to Sandwell Council, as well as legislative requirements. Examples are provided below;

National;
• Natural Environment & Rural Communities Act 2006
• Countryside & Rights of Way Act 2000
• PPS9 Biodiversity and Geological Conservation
• Circular 06/2005 Biodiversity & Geological Conservation – Statutory Obligations and their impact within the Planning System, ODPM
• Working with the Grain of Nature, the England Biodiversity Strategy, DEFRA
• Natural Partners, England Biodiversity Group, DEFRA
• Life-Support, incorporating Biodiversity into Community Strategies, ODPM
• Providing Accessible Natural Greenspace in Towns and Cities, English Nature
• Natural Communities, English Nature

Regional;
• West Midlands Regional Spatial Strategy, in particular the Quality of Environment policies, and especially those relating to Biodiversity Enhancement Areas, WMRA
• Restoring the Region’s Wildlife Regional Biodiversity Strategy for the West Midlands WMRA
• Beyond the Wish List A Toolkit for Integrating Biodiversity into Community Strategies in the West Midland Region, West Midlands Biodiversity Partnership
1.6 The NERC Act 2006 is especially important because it establishes a new legal duty for all public bodies to conserve biodiversity in carrying out their proper functions. The preparation and adoption of new planning documents provide an opportunity for local authorities, as public bodies, to demonstrate this.

2. Specific Comments

2.1 Chapter 2 Description of the Area In our view, the draft AAP provides limited information about the environmental context of the area. We think that more environmental context could be provided, particularly in relation to biodiversity, geodiversity and the historic environment. We welcome the identification of the nature conservation importance of the Tibbington Open Space. We welcome the identification of the Canal System but wish to point out that this is also of nature conservation importance, being identified as a Wildlife Corridor in Sandwell’s UDP. The
Canal System also falls within the definition of Article X of the Habitats Directive and Regulation 37 of the Habitats Regulations, both of which relate to “linear features of the landscape”.

2.2 There are other areas within the AAP boundary that harbour biodiversity interest, some of which are identified on Plan 2 but not mentioned in the text. There may also be protected species, Biodiversity Action Plan species and Species of Conservation Concern within the AAP area or is environs; for example, water voles are know to inhabit the Canal System here. Likewise, there may be geodiversity features or historic environment features. In the nature of Good Practice, we recommend that the AAP attempts to identify potential features and their importance, either in a map-based format and/or within the text. How well potential features are protected, managed and enhanced would be an issue for future delivery and implementation processes within the AAP area. Paras 2.9 and 2.10 would be the place in the text to describe these issues in a little more detail.

2.3 We also think that features outside the AAP area should be identified since the use of and linkage to these by people who live and work within the area is important. A “Berlin Wall” does not restrict or limit people, or biodiversity for that matter, to within the AAP area.

2.4 **Chapter 3 Policy Framework** Para 3.23 lists policies which are particularly relevant to this AAP. For Nature Conservation, part of one policy is
identified. We would argue that the other seven policies are also very relevant – it may be better to identify the topics covered by the 8 policies and list them.

2.5 Chapter 4 Development Framework In the Overview section, Para 4.20 mentions the need to “improve the environment”. We think the need to protect the environment is also vital by protecting open space, biodiversity, geodiversity and people’s use and access to it.

2.6 Chapter 4 Development Framework We think that this chapter should also take the opportunity to identify the Black Country as Urban Park concept as defined Policy UR1A (vi) of the RSS Phase 1 Revision. We think there is plenty of opportunity within the AAP area to deliver early wins in respect of this. The Tipton AAP area lends itself well to the beacons - corridors – communities themes and other network features as described in Policy UR1A (vi) in the draft RSS Phase One Revision: the Black Country.

2.7 Chapter 4 Development Framework In the Greenspace Network and Heritage section, there is little reference to the importance of biodiversity and accessible natural greenspace and action to protect and improve these features. This AAP offers considerable potential to promote action to implement the Birmingham & Black Country Biodiversity Action Plan and the Black Country Geodiversity Action Plan.

2.8 Chapter 4 Development Framework This AAP
offers considerable potential to encourage and deliver sustainability benefits as the regeneration of Tipton takes place. Para 4.35 identifies a range of sustainability areas as covered in the UDP’s design section. We think it would be helpful if this AAP could spell out topics which could contribute to raising environmental standards, for example;

- action in planning for climate change
- energy provision (e.g. renewables) and energy efficiency
- waste management
- sustainable drainage
- construction standards e.g. BREEAM EcoHomes
- open space/biodiversity/geodiversity provision
- potential for low carbon development

2.9 Chapter 4 Development Framework We think that developments within the AAP area should be accompanied by biodiversity, geodiversity and historic environment assessments to ensure that features of value are protected, managed, enhanced or restored so that the potential for environmental improvement is maximised.

2.10 Chapter 6 Implementation and Monitoring We think that this chapter should also identify the relevance of the emerging Black Country Study Delivery Plan and the Black Country as Urban Park themes.

2.11 Chapter 6 Implementation and Monitoring Initiatives operating at the Black Country sub-regional level could also be mentioned, for example the Birmingham & Black Country
Biodiversity Action Plan, the Black Country Geodiversity Action Plan, the Wildlife Trust’s Living Landscapes HLF programme currently under development and the recently completed Black Country Historic Landscape Characterisation work

3. **Sustainability Appraisal Comments**

3.1 **Section 4.2 Baseline Information**  We appreciate that it is difficult to source baseline date, especially environmental data, for the SA document and this is acknowledged in 4.3. In terms of the biodiversity and accessible natural greenspace data, it would have been possible to attempt to source data via EcoRecord, the ecological database for the Black Country & Birmingham. Information could have been provided for areas of designated nature conservation sites, protected and biodiversity action species, and a rough and ready assessment of whether Tipton meets English Nature ANG standards (the data provided for Tipton/Sandwell in the Table on p.20 are not data but the national standards themselves).

3.2 The Trust notes that Sandwell MBC officers have carried out this appraisal work but the opportunity to involve the local community and organisations in the development of the AAP through a workshop and other community-friendly ways has been taken. We think that the SA work is good practice in engaging the local community early, in line with the principles and requirements of Sandwell’s Statement of Community Involvement.
3.3 SA Guidance encourages the consideration of uncertainty and risk. These considerations are touched on and identified on several occasions through the Tipton AAP SA process. We think it would be beneficial to pull these issues together within the document so that they can be clearly acknowledged. Some may be more generic such as data and information difficulties which lead to uncertainty in undertaking the appraisal itself. On the other hand, other risks might be related to circumstances beyond control, for example that development in Tipton may not be implemented, or the possibility that the AAP might have to undergo amendment during the course of the LDF process. There is also the risk that the vision, aims, objectives and policies are not challenging enough.

The Trust hopes Sandwell Council finds these comments helpful. We have tried to approach our response in a positive fashion and have tried to make our comments constructive. The Wildlife Trust will remain a partner in the further development of Sandwell’s Local Development Framework and is available to provide help and further guidance. We look forward to further liaison in this respect. Should you need clarification or further details, or if you think it would be beneficial to meet to discuss our comments please contact us.

Inland Waterways Association

IWA welcomes the production of an action plan for Tipton and is pleased to see that the ‘Protection and enhancement of the best of the local heritage’ is one of the seven objectives of the plan. However, given that the only conservation area currently designated in the town is the Factory Locks it is perhaps surprising that the

I note your support for the Area Action Plan in general, and I also note a number of constructive suggestions.

With regard to the objectives of the AAP, we will consider strengthening these to make it clear about the canal element of the local heritage.
canals are not specifically mentioned within this objective (point 6, item 4.3 page 17) especially as it is a UDP policy to protect the canals within the Borough, which is recognised with the report (Policy C7 item 3.23 page 15). Having said that IWA does note that their importance to the town has been identified within the area’s description (item 2.10 page 7) but we are also aware that there area perhaps equally important historical structures in the town who’s important has so far not been so highly recognised.

IWA notes that the Council wishes to develop a strategy that will ‘protect the archaeological heritage during and after development, and to enhance the conservation area’ (point 6, item 4.10 page 19). IWA welcome such a strategy and is therefore surprised to note that there is no policy to extend the conservation area to cover the rest of the canals within the town and that Plan 5 (page 27) proposes to building houses in the area surrounding Tipton Top Lock (i.e. on the Wolverhampton side of Factory Bridge). Such a proposal does not protect the heritage of the area as both the former (& listed) historic Gauging Station and Boatman’s Mission are both within this designated area, the former specifically show as such. Both buildings are of national importance, the former particularly so being one of the very few unique to canals, of the buildings remaining and the only one with two parallel gauging docks. Its important is therefore considerable and its conversion to non canal use would go against this policy and IWA therefore objects to this proposal and asks that both buildings are removed from the housing designation and that efforts to find other, more conserving uses for them are found. (The Gauging Station could be used as a covered boat workshop for the adjacent Black Country Museum and could even

There is no policy within this Area Action Plan to extend the Conservation Area boundary, as this is not the appropriate vehicle to carry this out. However, paragraph 4.48 does note that Tipton Factory Locks Conservation Area is included in a programme of conservation area reviews scheduled for completion by 2010. The character appraisal and boundary review study is scheduled for 2007, with a programme of work to be completed by 2009, subject to detailed consultation. The review will undertake a character assessment of a wider area to consider whether a revised boundary is required, and what enhancement measures might be required. This will enable some specific issues identified by local interest groups such as Tipton Civic Society to be dealt with. This also includes yourselves. This process will be carried out in due course by the Council’s Conservation Officer.

Plan 5 on page 27 is incorrect and should not have been included. It was actually an earlier draft of options which were not followed through in their entirety. This will be amended to reflect the proposals in the plan, which do not include designating land either side of Factory Locks as housing land. However, it should be noted that last year, British Waterways sold the site of the Gauging Station (including the listed building) to a third party, and I anticipate that the Council is likely to receive a planning application for its conversion and/or development in the next few months.

With regard to the other residential development sites, it is hoped that this will indeed lead to enhanced facilities in the District Centre to the benefit of the residents and users of the canals. The retention of the former canal link as community open space does allow the possibility of it being restored to navigation in future. This, and the other
become a visitor annex of it – as indeed could the Boatman’s Mission).

Other than the above we note that the majority of the plan contains proposals to redevelop former brown field sites, the majority of which will be for housing purposes, none of which relate directly to the canal network and are therefore outside our remit. Therefore with the increase in housing stock we are pleased to see that the main shopping facilities are to be enhanced (4.2 p17) something that will not only be of benefit to the increased population but the users of the adjacent canal. Being the only shopping centre immediately adjacent to the main Birmingham to Wolverhampton canal this is likely to be seen as a strategic location but, because it is above the line of site from the canal, will need to advertise itself. We are pleased to note the retention of the former Tipton Green Canal as public open space (plan 3 Page 10). This former canal linking the Old Main Line Canal, opposite Coronation Gardens, to join the New Main Line by Watery Lane could at sometime in the future (& given the right financial climate) be restored to navigation becoming a town centre feature in the same way that the canal is in the centre of Birmingham. Perhaps the plan should include this as a long-term objective for the town.

Finally Tipton has the only working boatyard in the Black Country that, not only provides services on both a DIY and contract basis for the boating community, but because its historic importance is worthy of inclusion within the conservation area (see above). This important facility is often booked up six months in advance yet it has not received any investment by the lessee because of the planning blight resulting from the proposed railway level crossing replacement road which hopefully this plan proposals for canal-related improvements, needs to be considered in the review of the Conservation Area.

Finally, the latest position with regard to the Owen Street Relief Road is that the Compulsory Purchase Order has been approved and that the Council is now awaiting final financial approval, with a view to starting the work later this year.
Summing up IWA supports the proposed plan but would like to see:-

1. Better visitor moorings with the town information adjacent to Owen Street Bridge and also by Coronation Gardens.

2. The retained former Tipton Green Canal earmarked for long term restoration as a town centre feature that would be a benefit to the town in the same way that the canals do in Birmingham.

3. The conservation area extended to cover all the canals, and the former Tipton Green Canal.

4. Support and conservation area status for Caggies Boatyard.

5. The removal of the housing designation for the Gauging House and the Boatman’s Mission and the possible restored of the former back into waterway use possibly as either a boatyard/hire base or a workshop/outstation of the Black Country Museum.

Paragraphs 4.41 – 4.44 refers to Owen Street District Centre. Our client in principle support the Council’s approach to retaining the current designated centre boundary.

Any further retail allocation should be subject to an up-to-date retail needs/capacity assessment. Allocation prior to such an assessment would be premature.
The Tipton AAP is a clear opportunity to address some of the issues identified in the Sandwell Green Space Audit 2006.

Sport England welcome planning gain contributions being sought from new development to substantially improve and maintain The Cracker.

Paragraph 4.47 page 25 states that work is ongoing to prepare a more detailed masterplan for The Cracker in conjunction with residents and interested parties. Sport England would welcome opportunities to contribute to this process.

With regard to proposed new housing development, Sport England also has guidance relating to ‘Active Design’. New housing and mixed use development schemes can have a vital role in providing easy access to a choice of opportunities for sport and physical activity to suit all age groups for making new communities more active and healthy. Further information on active design can be found at www.sportengland.org/activedesign.pdf.

Support for the approach to planning gain contributions noted. Sport England will continue to be consulted with regard to The Cracker.

As you will recall comments on the preceding Issues and Options Paper were sent to the Regional Planning Body on behalf of CEPOG in April this year. In general terms, these concluded that the broad thrust of the options put forward at that stage accorded with the principles of the Regional Spatial Strategy (RSS). In particular, the Issues and Options Paper suggested the need to redefine land use patterns in the area in order to improve overall environmental quality and residential amenity.

This Preferred Options document takes policy development a step further and actually identifies sites for specific uses within the context of an overarching

Response notes that proposals in the Preferred Option Document are in broad conformity with RSS.
strategy.

The underlying principles of the AAP at the Preferred Options stage is to regenerate a relatively deprived area with a poor quality environment through the provision of new housing and accompanying social infrastructure. One of the mechanisms for achieving this is the reallocation of employment sites that are poorly located in terms of meeting the needs of modern industry and are problematic in terms of current and potentially future residential amenity.

It is proposed that developer contributions from new housing development will be utilised to improve the large expanse of open space known locally as ‘the cracker’. New housing development will also be delivered in accordance with a detailed urban design strategy.

These proposals build on extant planning consents and proposals for residential development, investment in new educational and medical facilities, retail development and the Local Transport Plan Major Scheme to provide a relieve road to remove the Owen Street level crossing on the West Coast Main Line (WCML).

The policies and proposals identify a potential additional 770 dwellings on previously developed land; this will clearly contribute towards the underlying RSS principle of urban renaissance through increasing the proportion of new dwellings built within the Metropolitan Area than has been the case in the recent past. The emerging AAP also goes to great lengths to ensure that high standards of urban design will be secured, again enhancing environmental quality.

As such, the proposals are clearly supportive of Policy CF1 Housing within the Major Urban Areas and Policy
This new housing development, in conjunction with the new and expanded community and retail facilities identified above, will also contribute toward the development of sustainable communities as promoted in Policy UR3: Enhancing the role of City, Town and District Centres and Policy UR4: Social Infrastructure. Similarly, the document identifies a mechanism for financing and improving the quality of existing open space, which will contribute towards making the area a more attractive place to live.

The emerging AAP identifies some areas of employment land which it considers should be reallocated to housing. This to deliver the overall objectives of the emerging AAP and also reflects the relative historical decline of manufacturing employment in Sandwell.

Policy PA6 Portfolio of employment land requires local authorities to identify an adequate supply of employment land to meet the needs of the region’s economy. Elsewhere, underused or unsuitable employment land is identified as one of the prime sources of land to accommodate new housing development. It is considered that the Council is best placed to assess this given its knowledge of local circumstances and markets.

Furthermore, the Council has been able to draw on extensive survey work undertaken as part of the Black Country Study. It is understood that this has examined opportunities for reallocating employment land to meet future housing requirements in some detail.

The document demonstrates that an evaluation of employment land has been undertaken and has identified those sites which are marginal and reallocated them for housing which, in due course, should create an
improved and expanded residential area. This is also likely to relieve pressure on better appointed and higher quality employment land elsewhere in the Borough and wider Black Country and as such supports the RSS’s Prosperity for All policies.

The AAP area includes the Owen Street Level Crossing Relief Road; this is a major scheme in the West Midlands Local Transport Plan (2006) and accords with Policy T12, Priorities for Investment, which identifies the need for ‘improved transport networks within the Black Country’.

The proposal benefits from provisional acceptance for funding from the Department for Transport and has been acknowledged as a firm priority through the recent Regional Prioritisation process. The purpose of this scheme is the construction of a relief road beneath the WCML, which will permit closure of the level crossing that causes severe traffic delays and impedes access to Owen Street Local Centre. This proposal clearly contributes towards the regeneration and environmental improvement of the Tipton area and by inference the emerging AAP.

As mentioned, there are extant consents to increase retail provision in the Owen Street Local Centre. This is within the confines of its existing boundary with further growth / expansion to be considered when the relief road is completed. As such, this concurs with Policy UR3 as already stated and does not breach the thresholds identified within Policy PA11: Network of Town and City Centres.

Comments have been received from the Rural Renaissance policy lead. This notes the linkages between urban and rural areas provided by the rail
services and acknowledges that the emerging AAP reflects the RSS.

In general terms, it is considered that the emerging AAP has the potential to play a key role in implementing the RSS’s urban renaissance agenda. Overall, environmental quality will be improved and a large number of new dwellings will be provided on previously developed land and accompanied by improved community infrastructure.

The overall environment will be enhanced by the release of marginal employment land, which in due course will release pressure on higher quality and better located employment sites thus supporting the RSS’s Prosperity for All policies.

I trust that these comments are of assistance. Please note that they are informal at this stage and are provided without prejudice to any views given when a formal Conformity Assessment is required.

| Highways Agency | The Highways Agency (HA) welcomes the opportunity to comment on the above document and hopefully develop a positive and constructive relationship with Sandwell Metropolitan Borough Council. It is our expectation that this ‘front-loading’ exercise will facilitate the HA’s involvement in the development plan process in a manner that supports the Council in realising its own vision and aspirations.

The HA is responsible for maintaining, operating and improving the strategic road network (SRN) in England on behalf of the Secretary of State for Transport. In carrying out this role, the HA is committed to supporting Government objectives on sustainable development and recognises the need for closer integration between transport and land use planning. The HA is fully |

I welcome your support for proposals that will contribute to the regeneration of the area, and your suggestions and recommendations for improving the preferred option.

I note your view that the increase in the number of residential dwellings proposed may result in some impact on the Strategic Road Network, and the need to assess the impact of development on the local highway network and the SRN, together with possible air quality impacts.

I am awaiting the response from Environmental Health with regard to air quality impacts.

I note your concern about limited reference to the public transport network, the absence of proposals for its improvement and enhancement, the suggestion to amend
committed to the promotion of a sustainable transportation system and in particular, safeguarding the strategic road network, through working closely with its strategic partners.

The Tipton Area Action Plan (AAP) Preferred Options Paper sets out a range of issues present in the local area and consequently proposes a preferred option for the comprehensive regeneration of Tipton. The document divides Tipton into seven distinct sites and proposes a number of regeneration initiatives for the area, including an additional 770 dwellings, educational facilities, employment and open space.

The area covered by the plan currently contains a range of land uses, including industrial, residential, and educational uses. The HA considers that the regeneration of the local area will be of benefit to local residents and businesses. The Agency has reviewed the document with a view to ensuring that the options chosen appropriately consider the SRN and that the opportunities to explore, promote and deliver sustainable transport measures have been maximised. As a result, we have made a number of suggestions and recommendations that we consider could improve the preferred option, which we hope you will find constructive.

Impact on the SRN

The AAP proposes options for seven distinct sites in the area covered by the AAP. These aim to build upon the existing UDP allocations, substitute the existing UDP allocations with alternative designations, or retain the exact allocations set out in the current statutorily adopted objective 7 to give priority to non-car modes, the development of an Area Travel Plan to assist in identifying measures to promote sustainable travel.

It is pointed out in the AAP that the implementation of the Owen Street Relief Road will significantly improve local traffic movement, enable better access to the District Centre, and enable bus routes to be restored (Paragraph 4.42), and that the green space network offers opportunities for walking and cycling, which should be enhanced by new developments (Paragraph 4.47). However, I agree that there should be a more rounded approach to these issues, and I have asked for an Area Travel Plan to be prepared to inform the Plan.
Should the existing UDP land use allocations be retained in their current state, the HA considers that there is likely to be no additional impact on the SRN. However, where the preferred option chosen builds upon existing allocations, or proposes an alternative land use allocation for the area that would result in a significant increase in additional trips, the HA considers that the additional impact of any development beyond that allocation in the UDP would need to be carefully considered in relation to the SRN.

The SRN in the vicinity of Tipton consists of the A449, the A4123, the A456 and the M5. Reference is made throughout the document to the existing poor accessibility on the local road network. However, no mention is made to the status or potential impacts of development on the SRN itself. The HA is of the opinion that some of the proposals contained in the AAP, including the proposed educational establishments and improvements to recreation and conservation, are unlikely to impact on the SRN to any significant degree. However, the increase in the number of residential dwellings proposed and the promotion of additional employment development may result in some impact on the SRN.

In-line with Government policy, the HA is of the opinion that development plans and supporting documents can only be credible and deliverable if transport considerations form an integral part of the evidence-base. Therefore, there is a need to define realistic catchments for each of the preferred options, assess the impact of the development on the local highway network.
and the SRN and identify potential remedial measures to mitigate the impacts. It cannot be assumed that the SRN can continue to sustain unconstrained traffic from major development proposals.

Furthermore, given that the whole of the Borough is within an Air Quality Management Area (AQMA), an assessment of the impacts of increased traffic on air quality will also be important.

The above recommendations assume that such traffic assignments have not already been undertaken by the Council. If they have, then the Agency would be grateful to receive a copy or any work undertaken for further review. If transport assessment work has not already been undertaken, then the HA would be happy to liaise with you regarding their scope and content. These assessments should then feed into a strategic appraisal of the transportation implications of the proposal.

**Sustainable transport**

Assessment of predicted traffic levels and impacts on the road network is only one element in the preparation of a strategic transport appraisal for a major development site. Development proposals should also include ways to reduce trips at source (particularly by single occupancy vehicles) and promote alternative transport modes including the use of public transport, walking and cycling.

At paragraph 4.3, the document sets out that an objective for the AAP is to increase accessibility within the local area. At paragraph 4.35, the document sets out that a key design principle for the document is to promote sustainable access. In order to address these
issues, the document sets out a number of improvements, including a number of previously approved improvements to local infrastructure such as the Owen Street Relief Road and the A4123/A461 Junction Improvement. Furthermore, the preferred options include improvements to pedestrian and cycle accessibility in-line with the key design principle set out in paragraph 4.35.

Whilst local highway improvements may form part of the approach to tackling traffic congestion, this should form part of an overall strategy aimed at reducing car-based journeys and promoting more sustainable forms of travel, in accordance with central government guidance set out in PPG13. As a result, the HA is concerned over the limited reference in the AAP to the state of the local public transport network and the absence of proposals for its improvement and enhancement, particularly when considered in relation to the gaps in provision identified in paragraph 4.5 of the Sustainability Appraisal.

The HA would firstly, therefore, encourage Objective 7 of the AAP to reflect the need to give priority to non-car modes. The HA would also suggest that the key design principle of sustainable access (set out in paragraph 4.35) is promoted through the preferred options set out in the document by further improvements to the public transport network and methods to reduce car demand. Any measures aimed at tackling congestion through highway improvements should only be considered as a last resort.

As part of this sustainable approach, the HA the AAP would benefit from the inclusion of an Area Travel Plan. This should set out a co-ordinated and comprehensive
approach to the promotion of sustainable travel within the AAP area, including the identification of the detailed measures that will be considered and the proposals for their delivery. This would establish a framework against which individual planning applications could be judged and developer contributions to sustainable transport initiatives required.

Examples of further work the HA would recommend for inclusion in an Area Travel Plan include:

- The extent of the existing bus network in the vicinity should be examined and opportunity for its improvement explored. This could include investigation of the potential to divert existing bus routes through the site or increase their frequency.

- Encouragement could also be given to measures to increase bus patronage by new residents including, for example, the provision of bus passes to new residents by developers as part of any legal agreement.

**The Sustainability Appraisal**

In section 7 of the Sustainability Appraisal, the document sets out the methods to predict and monitor the effects of any proposed development. This is based on the framework of core output indicators as set out in the Annual Monitoring Report.

In order to ensure that the local highway network and the SRN are protected, the HA suggests a further sustainability objective is included that requires the minimisation of additional traffic on both the SRN and the
local highway network. This could then be supported through the use of an indicator measuring traffic movements at key points on the network to ensure no significant additional impact is created to the network.

**Conclusion**

The HA would recommend that a strategic assessment is undertaken of the transportation implications of the proposals. This should include assessment of the interaction between the local and strategic road network and the wider transportation system (public transport, walking, cycling). The aim should be to identify the scale and nature of improvements that would be required to accommodate the developments and the opportunities to reduce travel demand at source, influence travel behaviour and promote the use of sustainable transport modes. The HA would suggest that this is then developed into a range of specific measures to be included in an Area Travel Plan.

<table>
<thead>
<tr>
<th>Centro</th>
<th>Centro is broadly supportive of the approach taken in the Preferred Options Document and does not propose to make any comments.</th>
</tr>
</thead>
</table>
| Grace Community Church | This response to the Tipton Area Action Plan is made on behalf of the members of Grace Community Church which meets at Newhall Street, Princes End, Tipton.  

As part of its mission, Grace Community Church is committed to an active involvement in the Princes End Community. In addition to these activities the church is in the final stages of arrangements with the local SureStart programme to make facilities available for SureStart activities on three half-days per week and is about to enter into discussions as regards |

Support noted.

I note your comments with response to additional community facilities. In addition to existing community facilities at Brook Street and High Street, the building and rebuilding of Summerhill Primary School and Alexandra High School will result in further community facilities. These will be new facilities on the ground and will be delivered in practice through the Extended Schools initiative, which will provide facilities before and after school and at weekends.

I also note your desire to expand your own activities, and that you are considering relocation possibilities. At this stage, I am not aware of any possible sites (Council-owned
becoming a venue for the NHS Expert Patient Programme.

The church has read with interest the Tipton Area Action Plan Preferred Options document prepared by Sandwell MBC. Tipton has traditionally been a town where housing has existed immediately adjacent to both light and heavy industry. The decline of manufacturing industry in the past decade or so has seen the demise of many industrial sites in Tipton, most of which have been replaced by new housing. Save for the loss of employment, this is, in our view, a positive development since it leads to a much better balance for the town and creates a much more pleasant environment for Tipton residents. We are, therefore, pleased to note that a key element of the Action Plan is the re-location of industry and the creation of further residential developments.

The Action Plan provides for up to 770 new residential dwellings and it is likely, therefore, that the population of the area covered by the Action Plan will increase by around 1500 – 2000 people. There are many positive elements to this proposal but the issue which primarily concerns us is the extent to which this additional population will be provided for in terms of additional community facilities.

There is no provision in the Action Plan for the development of additional community facilities save for reference to the fact that some schools in the area will be rebuilt and will provide additional community facilities on site. We query the extent to which this will enhance provision in practice given the practical limitations which always exist as regards the availability of such facilities both during and beyond the normal school day.

or otherwise) other than the former Princes End School. To assist you, I enclose the Council’s formal advice note on “The allocation of Council-owned land and/or premises for development by community and religious organisations”, and I have requested the assistance of our Corporate Property Division in this matter. It is my understanding that the Council will be seeking residential land value for this site.
Our particular concern is the extent of community facilities in the Princes End area. As well as the five proposals which relate to new residential developments in or within walking distance of the immediate Princes End area regard must also be had to the David Wilson development in Bloomfield Road on the former Corus site which we understand will create a further 250 or so residential dwellings. To what extent will community facilities be available to the individuals and families moving into the new housing which is planned?

In our view, the extent of the community provision is somewhat limited at present and will be further stretched as the residential population grows. Council owned facilities exist at Brook Street and High Street. We are uncertain as to the range of activities taking place at Brook Street but believe that there are few operating on a regular (weekly) basis. Additionally, this facility is seen as "out on a limb", being surrounded primarily by industry rather than housing. The centre in Princes End offers a good variety of activities during the course of the week most of which are, we believe, well supported.

As far as we are aware, the only other community provision comes from ourselves and from St John’s Church in Upper Church Lane which we are aware hosts a small number of groups including a youth club and a photographic society. It would, therefore, seem to us that there are already some significant gaps in community provision and that this position will only become more apparent as the residential population grows.

As indicated above, Grace Community Church is committed to an active involvement in the
community, as demonstrated by the impending link with SureStart. It is also fairly central to the planned new residential developments. We are, however, limited in what we can do by the constraints of our building.

Originally the church hall of the 1872 Baptist chapel and extended in 1933, our premises were refurbished (with assistance from Sandwell MBC) in 1987/88 and this has extended their useful life. However, available space is limited and on occasions proves inadequate for existing activities and a block to other activities which might otherwise take place. There is a lack of off-road parking and the building is generally very old and tired needing tens of thousands of pounds spending on it to bring it up to a standard which would ensure another 30 years or so of useful life.

Accordingly, the church is actively considering the possibility of re-locating in order to provide larger and more suitable premises for its existing activities and to give the scope for the development of new activities in the future as particular needs are identified.

In the light of the church’s position and the need for appropriate, sustainable community facilities in the Princes End area we would be keen to enter into discussions with the Council as regards the possibilities for partnership working between the church and the Council.

In this regard we note that the proposed use of
the former Princes End Primary School site in Tibbington Terrace is rather less settled than most if not all of the other proposals. We would be keen to discuss possibilities in this regard. At the same time we would wish to explore the possibilities of the Council assisting us in relocating to other appropriate sites in Princes End.

In conclusion the church and its predecessors have been an integral part of the Princes End community for almost 180 years, providing valuable services to local residents. It is our intention that this should continue for many years to come. We hope that it will be possible for us to work with the Council to establish premises that will allow us to further extend the range of activities we are able to provide.
Appendix 16


PLANNING AND COMPULSORY PURCHASE ACT 2004

Town and Country Planning (Local Development) (England) Regulations 2004
Notice of Deposit for the Tipton Area Action Plan (Locarno Road) Preferred Options Development Plan Document

THE BOROUGH COUNCIL OF SANDWELL
TIPTON AREA ACTION PLAN (LOCARNO ROAD) PREFERRED OPTIONS
DEVELOPMENT PLAN DOCUMENT

The Borough Council of Sandwell has prepared proposals for the Tipton Area Action Plan (Locarno Road) Preferred Options Document. This Plan provides a land use framework for part of Tipton to guide future development, and considers proposals for the development of a number of sites.

Copies of the Tipton Area Action Plan (Locarno Road) Preferred Options Document are available for public inspection free of charge during normal office hours (Monday to Thursday 8.30 am – 5.30 pm and Friday 8.30 am – 5.00 pm) from 19 February 2007 to 2 April 2007 at the following offices:

(a) Sandwell Council House, Oldbury, West Midlands, B69 3DE; and

(b) the offices of the Director of Planning and Transportation, Development House, Lombard Street, West Bromwich, West Midlands, B70 8RU;

and during library hours at:

(c) Tipton Library, 17 Unity Walk, Tipton DY4 8QL.

Comments in respect of the Tipton Area Action Plan (Locarno Road) Preferred Options Document, should be sent in writing to:

The Director of Planning and Transportation, Development House, Lombard Street, West Bromwich, West Midlands, B70 8RU

to reach the Director of Planning and Transportation no later than 2 April 2007. Comments should specify the matters to which they relate and the grounds on which they are made.

They may also be accompanied by a request to be notified at a specified address of the withdrawal, adoption, approval or rejection of the Tipton Area Action Plan (Locarno Road) Preferred Options Document.

Only those whose comments are made in writing and arrive at the address specified within the six week period ending on 2 April 2007 will have a right to have their comments considered by the Council. Comments received within the consultation period will be collated and responded to.

Further information is available from the Planning helpline (01384 569 4122) at the office of the Director of Planning and Transportation, Development House, Lombard Street, West Bromwich, West Midlands, B70 8RU.

Robert A. Lee
Director of Planning and Transportation
Appendix 17

Tipton AAP (Locarno) Press Release

Tipton townspeople in the Locarno Road area are invited to examine their Area Action Plan from this week.

People can look at the proposals on Thursday (22 February) between 4.30pm and 6.30 pm, at Summerhill School in Central Avenue, when planning officers will be on hand to discuss them.

The document outlines options for land use in the Locarno Road area, and is a follow-up to a similar document consulted on last year. It was produced in response to an objection from a local landowner that more land should be redeveloped for housing.

As before, its objectives focus on the future of housing, employment, environmental, regeneration, education, local heritage and transport.

The exhibition launches a formal six-week consultation period, feedback from which will then be considered by the council before the final plan goes before an independent inspector appointed by the Planning Inspectorate.

Cabinet member for regeneration & transport Cllr Bob Badham said he hoped people would take the opportunity to get involved.

He said: "As a council we want to be well informed of people's views and as well as the public exhibition, this document will also be distributed to a range of community groups and organisations.

"Transforming the physical environment is a priority for Sandwell and the AAP sets out a planning framework to shape the way this part of the borough will change.

"There are already a number of committed schemes including Owen Street Relief Road, new schools, health centres, shops and new housing development."

February 2007
Appendix 18

(Leaflet February 2007 distributed to 2,100 households).

TIPTON AREA ACTION PLAN
(LOCARNO ROAD):
PREFERRED OPTIONS
DOCUMENT 2007

The Council has recently prepared the
Tipton Area Action Plan (Locarno Road):
The boundary of the Area Action Plan (AAP) is
shown overleaf. There are already a number
of committed schemes in the AAP area, such
as Owen Street Relief Road, new schools,
health centres, shops, and new housing
development.

This AAP 2007 is a short document dealing
only with land between Locarno Road and
Alexandra Road (as a result of an objection
from the landowner of the site occupied by
Firth Cleveland).

THE SITES IDENTIFIED IN
THE AAP (LOCARNO ROAD)
2007 ARE:

1: Alexandra Road/Upper Church Lane
(Sigmacast/Little Burton) - the Council
proposes to allocate this site for
residential use, including new
community open space.

2: Land at Locarno Road (Firth
Cleveland) - the Council is seeking
your views on whether the industrial
use should be relocated, and the site
redeveloped for residential use (as
proposed by the landowner).

3: Locarno Road/Alexandra Road
(Alexandra Industrial Estate) - the
Council is seeking your views on
whether the existing industrial uses
should be retained, or whether some
other use should be made of the site.

Copies of the document are available at
Tipton Library or on the website
(www.sandwell.gov.uk, search A-Z under T).

There will be an exhibition of the Area Action
Plan proposals on Thursday 22 February 2007,
between 4.30 p.m. and 6.30 p.m., at
Summervill School, Central Avenue, where
planning officers will be present.

You are welcome to make a written response
to the Preferred Options Document 2007, or
to contact us for further information. Your
contribution will be used in the preparation
of the next stage of the Plan.

For further information, please contact:

Ian Thorn,
Sandwell MBC Planning Policy,
Development House,
Lombard Street,
West Bromwich B70 8RU
0121-569 4245

Sandwell
Metropolitan Borough Council
JANUARY 2007
<table>
<thead>
<tr>
<th>Respondent</th>
<th>Representation</th>
<th>SMBC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>H. Haines</td>
<td>I (and many others) would like to have more shops in the variety of Owen Street Tipton. It used to be a thriving little town with a regular bus service, now there is nothing, except the Co-op Store in which to shop - with sky high prices poor service, hardly any variety, freezer foods continually defrosting and refreezing. If you complain your rudely told that if you are not satisfied shop elsewhere. There are many people who are unhappy with this situation, many old aged pensioners, who carry on shopping there because there isn't any competition or any buses to go elsewhere. Co-op prices are a lot dearer than anywhere else and a lot of the goods are poor quality.</td>
<td>Comments acknowledged.</td>
</tr>
<tr>
<td>L. Hurley</td>
<td>Number 4 Upper Church Lane used to be my home and land, over the last years I spent thousands of pounds completely refurbishing inside and adding a conservatory with the hope of the wife and I enjoying all our retirement there. Then in 2001 in came your bomb shell, GET OUT, WE WANT THE LAND, WE ARE CLEARING THE AREA. The wife and I were devastated, on top of this the Sandwell council gave us a mere pittance for our lovely home. When I asked what was happening to the land we were told by a council official that where we lived was going to be a leisure park with a bowling green ECT and further back perhaps a large food store and car parking, we didn’t feel too bad now, WHAT A BIG CON! For 6 years it has been derelict land WHAT A WASTE OF PUBLIC MONEY! NO WONDER SANDWELL IS ON THE BOTTOM OF THE COUNTRIES LIST. On the 22nd of February I went to see the proposed plans for land between Locarno Road and Alexandra Road, I was told where our house was they are to build a block of flats. Just imagine my</td>
<td>I note that you previously lived at 4 Upper Church Lane. Your property was acquired as part of a programme of clearance approved by Housing Strategy Committee in 2001. The reason for the demolition of the majority of the properties was the poor housing and environmental conditions, particularly those arising from the adjacent foundry. The Committee resolution was to dispose of the vacant site on the open market on compliance with a planning brief prepared in the context of the wider regeneration of Tipton. The site has been vacant since demolition as the Council’s preferred option is to develop the site for housing in conjunction with the site of Sigmacast Iron Ltd. I enclose an extract from the Tipton Area Action Plan 2006 which explains the reasoning behind the Council’s approach. As you will note, it is considered likely that Sigmacast Iron will relocate or close in the next few years. In that</td>
</tr>
</tbody>
</table>
feelings, I was reeling in temper, we had all been promised there would not be houses or industry, further more I was told that Firth Cleveland and the old Triplex was going to be removed to another area and be replaced with houses and flats the cost would be internal, O dear, O dear, O dear. Then I hear the old Triplex will not be replaced anywhere else, WHAT COMPENSATION WILL THEY GET FROM OUR TAXPAYERS?

The wife and I are VERY VERY upset. Please answer this letter and we would like to hear if the above is really true.

eventuality it is proposed that the site is redeveloped for housing and community open space. Other uses have been examined, but are considered inappropriate. In addition, Firth Cleveland are proposing to relocate their business to West Bromwich, and are themselves proposing that the site is redeveloped for housing.

Accordingly, there is no question of ‘compensation from taxpayers’ as these are commercial decisions made by the companies involved. The Council is considering the best future use of the land should this occur.

| Advantage West Midlands | It is noted from your letter and from subsequent consideration of the TAAP (Locarno Road) Document that you are now seeking further comment on the above, in particular on the issues surrounding the objections from Caparo Industries about the failure of the TAAP to allocate their site at Locarno Road for residential uses in the preferred options document. The site is currently home to two companies, Firth Cleveland Ltd (FC) and Multi-Stroke Ltd. I would refer you to Advantage West Midlands’ previous comments in its last letter to you:

In general terms, Advantage West Midlands would still wish to see the retention of significant areas of employment land across the Black Country Companies employing significant numbers of local people should as far as possible be encouraged to relocate within the immediate area, in the interests of maintaining links with the local economy and offering opportunities for environmental improvements.

Part of the evidence provided by the company as summarised in the TAAP states that:

FC operates successfully from the Locarno Road Site. The |

| I note your reference to your previous comments, particularly that in general terms, Advantage West Midlands would still wish to see the retention of significant areas of employment land across the Black Country, and that companies employing significant numbers of local people should as far as possible be encouraged to relocate within the immediate area, in the interests of maintaining links with the local economy and offering opportunities for environmental improvements. |

| I note your view that the Council will have to take a decision on whether it feels the evidence supplied by Caparo Industries provides sufficient reasoned justification for the release of their site for residential development. I can confirm that the list of appraisal criteria to which you refer has formed part of our own assessment of these sites’ potential, but this will be reviewed to ensure all issues have been covered. |

| Should the outcome of the review be that the Firth Cleveland site is allocated for housing, then your |
business has a workforce of 130 personnel and is an important business unit within the Caparo Group (Paragraph 4.3) but goes on to mention operational constraints, locational issues and other restrictions on the site, including poor physical access.

There is also included a letter from Caparo Industries itself, which states: Firth Cleveland is currently operating at a small loss, and it is difficult in current market conditions to envisage a return to sustainable profitability without some significant costs reduction actions. (Paragraph 4.9)

Obviously the Council will have to take a decision on whether it feels the evidence supplied by Caparo Industries provides sufficient reasoned justification for the release of their site for residential development. Advantage West Midlands notes the intention (set out in the comments from Harris Lamb on behalf of the objector) to explore the relocation if the existing employees and activities from this site to the company’s other operations in the borough. This would clearly be preferable to losing those jobs to the area. The Council will, however, find it very difficult to enforce the retention of these jobs as part of any planning approval for the site’s redevelopment.

At the recent Black Country Study Examination in Public (EiP), Advantage West Midlands raised concerns over the process by which employment/industrial land was to be transferred to residential use. It took exception to the lack of clear guidance in the draft Phase 1 Revision to the Regional Spatial Strategy on how this process was to be managed, given the scale of transformational change that would be required in the Black Country. As part of its evidence, Advantage West Midlands identified the following as necessary and helpful guidance for local authorities seeking to implement these sorts of change:-

Additional policy wording should be included as part of the Draft comments about the possible effects on the Alexandra Industrial Estate are noted.
Phase One Review, to inform plan-making, land capacity studies and as a development control tool. Advantage West Midlands’ position on this issue has been informed by:

- National guidance; in particular we would urge that clear reference be made to ODPM Employment Land Reviews Guidance Note 2004, Annex E, which sets out a list of appraisal criteria for assessing the quality, market demand and availability of the existing portfolio;
- The WMES paragraph 6.4 and related Action 28- Implement a Strategic Land Use Programme; and
- RSS Policy PA6 Part C, which includes a series of quality criteria tests.

It went on to suggest additional policy wording to reflect this view, which the Black Country Consortium and Regional Assembly agreed to consider and pass on to the EiP Panel. Clearly there has been no Panel report produced yet, but this remains Advantage West Midlands’ broad view on the degree of consideration a local authority should employ when contemplating significant land transfers to other uses.

Where sites in current active use are being proposed for reallocation for other uses, the Council will need to have sight of that company’s business rationale for the proposed closure of their site prior to making a decision, such as its business plan, evidence of market testing, site investigations, costing of relocations and so on.

The other main issue to consider is the pressure that allocation of this site for residential purposes may place on the Alexandra Road Industrial Estate, especially as there are several clearly successful companies operating from it who do not want to relocate. The Council’s view is (paragraph 5.21) that there is a high volume of industrial activity on the estate, which demonstrates that it is a well-located site providing appropriate employment activities. This
would appear to be somewhat at odds with the comments made in paragraph 4.5 of the TAAP, wherein it is claimed that this part of Tipton generally is not attractive to the industrial sector.

Allowing further adjacent residential development may make it difficult for existing industrial occupiers to carry on their activities, as there will be an increased likelihood of complaints and conflict between them and new residential occupiers should housing development eventually take place on the FC site. The council must weigh this carefully. The circumstances described above may (if not carefully managed) in due course result in adverse impacts on the economic stability of existing firms and thus on the retention of jobs on the Alexandra Estate.

According to paragraph 4.10 of the TAAP, the transfer of 130 jobs at FC may not see all of them retained during the process in any case, as the letter from Caparo Industries says the transfer represents the best opportunity to preserve the greatest number of jobs at Firth rather than stating explicitly that all jobs will be preserved elsewhere. This is also an issue the council should take into account when considering this and other similar allocations.

If it decides that housing is an appropriate designation for the site, the Council should certainly ensure that the future successful operation of the Alexandra Industrial Estate (and associated retention of jobs) is not prejudiced by this decision. Any subsequent planning application or masterplan for the identified residential site should make clear provision for a significant buffer strip or other means of protecting both existing and new occupiers and reducing the potential for conflict between them.

M. Male
As a resident living in Tipton, I would like to see more facilities for the public, such as more shops, a leisure centre, somewhere for children of all ages to go and perhaps an Art Centre on the Cracker.

Multi-stroke
Multi-Stroke owns the factory between the two Firth Cleveland

I note your concern about the timing of any possible
| Ltd | buildings owned by Caparo Industries. Whilst we may be willing to consider re-location at some point if it were to be proposed in the next five years we would have to object. We only re-located to this site in 2005 and the cost if a further move in the next few years would be prohibitive. | redevelopment of the land at Locarno Road given your recent relocation to the site, and the cost of a further move.

Any redevelopment option will need to take account of phasing and timing to enable industrial activities to continue until relocation. |
| Environment Agency | We acknowledge your comments regarding the undertaking of the Black Country Strategic Flood Risk Assessment and continue to offer further guidance and advice should it be required. We also welcome and note your comments in regard to site allocation T1: Alexandra Road/Upper Church Street. It should be noted that Planning Policy Statement 25: Development and Flood Risk was adopted on 7 December 2006. This PPS replaces PPG25. An accompanying draft now supports PPS25, and is now out for consultation. It offers guidance and good practice case studies of how to implement PPS25. It should be noted that any flood risk assessment must now be in accordance with PPS25. The strategic flood risk assessment should inform the contents and site allocations within the LDF document and therefore allocations should not be taken forward until this is undertaken. Having reviewed the additional AAP document, the Environment Agency would comment as follows:

The Environment Agency acknowledges the summary of our comments within paragraph 3.6. However, it should be noted, as stated in 3.6, that an assessment of flood risk should be undertaken prior to the submission of the final AAP as the assessment may conclude that the site is not suitable for residential purposes because of the risk to future residents or existing third parties. |
| I note that the Agency continues to object to the AAP because the Strategic Flood Risk Assessment (SFRA) has not yet been produced. I also note that the Agency continues to object to the AAP Option Site T1 Alexandra Road/Upper Church Lane because they are not subject to the Sequential and Exceptions Tests, a satisfactory flood risk assessment, or a SFRA. Following my telephone conversation of 23 March, and a subsequent telephone conversation between Harrow Estates (landowner of the Sigmacast Iron site) and James Kitchen, I would like to clarify my understanding of the situation. I understand that completion of a satisfactory SFRA will satisfy the Agency with regard to the Tipton Area Action Plan, and that site-specific Flood Risk Assessments can be carried out as part of the subsequent planning application process. I can confirm that the Black Country Strategic Flood Risk Assessment will be commissioned in April 2007 and completed by July 2007, and will be used to prepare the Submission Document scheduled for October 2007. |
Options for the Locarno Road Area
As with site T1: Alexandra Road/ Upper Church Lane the proposed Firth Cleveland site (as indicated on plan 4) and the Alexandra Road Industrial Estate site (as indicated on plan 5) are also located partly within Flood Zones 2 and 3, which are again defined as follows:

Flood Zone 3 is high probability and comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (1% - 0.1%) in any year.

Please see the enclosed map EA1, which demonstrates the proposed options sites proximity to the flood zones.

Within PPS 25, table D.2, residential development is classed as highly vulnerable therefore, these sites must also now, in accordance with PPS25 and in the absence of a SFRA, be subject to the Sequential and Exception tests (Points 9-14 and Annex D, PPS25 and Chapter 3, PPS25 Companion Draft Guidance). This is to demonstrate that there are no other suitable sites at lower risk that would be more suitable for the type of development proposed.

The Environment Agency welcomes the recognition of enhancement to the course of Tipton Brook. However we consider paragraph 6.29 should be amended as follows:

'...which respects and enhances the former canal arm and the course of Tipton Brook, e.g. removing culverted sections to create a more naturalise channel. Indeed, given the requirement...'

This thereby gives a more specific definition of what would be required for sites that contained such culverted sections.

Overall, the Environment Agency is pleased to see that the
additional Area Action Plan makes a clear recognition of the implications of moving these two sites forward, taking social, economic and environmental considerations into account.

However the Environment Agency cannot support the allocation of any of the three sites until they are subject to the sequential and Exceptions Tests, a satisfactory flood risk assessment is undertaken or the SFRA is completed.

| **Inland Waterways Association** | The Inland Waterways Association (IWA) is a registered charity, founded in 1946, which advocates the conservation, use, maintenance, restoration and development of the inland waterways for the public benefit. IWA has over 18,000 members whose interests include boating, towpath walking, industrial archaeology, nature conservation and many other activities associated with the inland waterways of this country. This letter forms the Association’s response to the consultation and is written by its Birmingham, Black Country and Worcestershire Branch on behalf of its ruling Council.

IWA welcomes the Council’s initiative to draw up a plan for the future development of Tipton as a local centre and to look at specific local areas like Locarno Road that need special consideration. However Locarno Road is neither adjacent to, or visible from, the canal and therefore we are unable to make any additional comments to those already submitted regarding the main Preferred Options Document for Tipton.

We would however thank you for consulting the Association. |
| Response acknowledged. |}

| **Sport England** | I attach the response to the Tipton AAP from Sport England (along with a spreadsheet calculating contributions from housing development for indoor sports provision). For your information I also attach a copy of a summary of the implications for LDFs arising from the Lichfield Local Plan which you may be interested in to ensure all your documents are sound. |

We are in agreement with your view that there should be protection of existing open space, sports and recreation facilities, and provision of new facilities to meet demand generated by new development. Existing UDP Policy H7 enables the Council to consider demand for supporting facilities where appropriate to residential development proposals, and |
Thank you for consulting Sport England in relation to the document. I have several comments to make:

1. Since the publication of the Tipton AAP Sandwell BC have commenced preparation of a Playing Pitch Strategy which, along with the Green Spaces Strategy, should inform protection/provision of playing fields as part of sports provision associated with new development.

2. The proposals could lead to the construction of 980 dwellings (par 6.11) and along with the community facilities referred to in the document there are also indoor sports facilities which do not seem to have been properly considered. As you may know it is a Government aim to increase physical activity levels to improve community health. Base line data has now been used to establish physical activity levels for the audit commission and CPA indicators through the Active People Survey. The West Midlands were the most inactive region and Sandwell the most inactive local authority within that region. There is a serious health and social issue which planning policy (as set out in PPS1) needs to do its part to address. This means protecting existing open space, sports and recreation facilities and providing new facilities to meet the needs through new development. Ideally Sandwell would have also completed their indoor sports strategy to inform just how much provision is currently provided, whether it has the capacity to absorb the new demand or whether new facilities need to be provided. This study (Black Country Sports Strategy) has not yet been completed but from my knowledge of Sandwell swimming provision is very low and I would guess that provision is generally not adequate to meet current demand. On this basis the AAP needs to make it clear that indoor sports provision needs to be delivered through S106 contributions.

To help this process Sport England have developed the Sports Facility Calculator, which based on comprehensive research, other policies seek to protect and enhance sports facilities and open space.

I note the Active People Survey results for the West Midlands published December 2006, and these will be included in the evidence base. With regard to the Black Country Sports Strategy and the Sandwell Playing Pitch Strategy, these are currently in preparation, as you state, and will need to be completed before they can be used to justify contributions from particular residential development.

Notwithstanding the above, the Council appreciates the need for sports provision and the need to upgrade existing facilities. In this respect, the Sports Facility Calculator is a useful tool, and it is right that it should be used as part of a strategic approach to sports provision. This can only be achieved once the various strategies have been completed, and a borough-wide assessment made. The Council will be making a commitment to increasing the levels of sports provision across the Borough to meet the needs of all its residents through the preparation of the Core Strategy, the Housing Employment & Centres Development Plan Document (both underway) and a Planning Obligations Development Plan Document (to commence shortly).

It is our view that this is the correct approach to obtaining contributions from new residential developments for sports provision in Sandwell, rather than for a small Area Action Plan such as the Tipton AAP. This is not to say that in the Tipton AAP area no enhancement of sports provision will take place or that no contributions will be sought in due course.
calculates the demand for swimming pools, sports halls and indoor bowls facilities based on the level of new population. This can be run for each site or for the action area as a whole. I would recommend the latter as it enables a more strategic approach to provision and the pooling of resources to provide facilities which are generally expensive. Provision could include upgrading existing facilities to increase capacity (e.g. making school provision suitable for public use) or contributing to providing new facilities.

I have attached a copy of the SFC results but you can access this yourself on our website and put what population figures are correct depending on occupancy levels. I have assumed dwelling number of 980 and occupancy rate of 2.5. This provides a population of 2450 which gives rise to demand for ½ lane of pool space, almost one badminton court and 0.15 bowling rinks at a total cost of £698,222.

Sport England would like reference to indoor sports provision clearly made within the policies of the AAP e.g. in 6.17.

The role of schools should also be maximised as developing them as a community resource for sports and ref. should be made in the AAP to develop this along with any new provision for education in line with Governments objectives for extended schools.

Natural England

We welcome the fact that one of the objectives for the Tipton AAP 2006 is to enhance the green space network for all users. This should equally apply to the options for Locarno Road area and we note the inclusion in the various options of the provision of community open space based around the course of the Tipton Brook and the line of the former canal. Natural England supports this approach, but would suggest that it is made clear that, in order to be part of the green infrastructure, the creation of the open space should be based on sound ecological principles. We would also suggest that the AAP gives some indication as to the amount of open space that will be expected as part of each preferred option.

There are already enhancements to local provision within the plan area, including new playing fields proposed for the new Summerhill Primary School, and new sports pitches and other provision to be developed at The Cracker (Tibbington Open Space). The AAP area is also relatively well-served by virtue of having both the Tipton Sports Academy and Tipton Swimming Centre within a kilometre of the centre of the area.

In order to assist the enhancement of further sports provision in the AAP area where appropriate, the AAP will be amended to refer more clearly to indoor sports provision as suggested, the role of schools as a community resource, and the contribution that may be sought for enhancing sports provision as a result of residential development, subject to the Core Strategy and associated DPDs providing the necessary framework.

I welcome the support for our approach to enhancing the green space network. The reference to the Green Infrastructure and sound ecological principles will be included, as will an indication of the amount of open space to be expected as part of each preferred option.
| Highways Agency | The HA's previous comments on the Tipton AAP Preferred Options were based on the assumptions that the Alexandra Road/ Upper Church Road site would provide 340 dwellings. In addition to this, the current consultation document shows that the Firth Cleveland site would provide 112 dwellings and Alexandra Industrial Estate would provide a further 98 dwellings.  

The issue to consider is the impact of an additional 210 dwellings on this site on the Strategic Road Network. The HA's assessment concludes that they would not have any additional impact on the SRN. The HA therefore has no objection in principle to the revised AAP. 

I would however wish to re-iterate some of my previous comments, as your summary of my representation does not make reference to the development's sustainability in transport terms. Development plans and supporting documents can only be credible and deliverable if transport considerations form an integral part of the evidence-base. There is therefore a need to define realistic catchments for each of the preferred options, assess the impact of the development on the local highway network and the SRN and identify potential remedial measures to mitigate the impacts. It cannot be assumed that the SRN can continue to sustain unconstrained traffic from major development proposals. Furthermore, given that the whole of the Borough is within an Air Quality Management Area (AQMA), an assessment of the impacts of increased traffic on air quality will also be important. 

The HA would recommend that a strategic assessment is undertaken of the transport implications of the proposals. This should include assessment of the interaction between the local and | I note that you have no objection in principle to the revised AAP as the additional dwellings which may result would not have any additional impact on the SRN. 

I note your reference regarding previous comments made about the sustainability of development in transport terms, and your recommendation for a strategic assessment of the transport implications of the proposals in order to assess the scale and nature of improvements that would be required via an Area Travel Plan. This will now be built into the final Area Action Plan. |
strategic road network and the wider transportation system (public transport, walking, cycling). The aim should be to identify the scale and nature of improvements that would be required to accommodate the developments and the opportunities to reduce travel demand at source, influence travel behaviour and promote the use of sustainable transport modes. The HA would suggest that this is then developed into a range of specific measures to be included in an Area Travel Plan.

The HA would be happy to work in partnership with Sandwell MBC to advise on the form and content of this strategic appraisal. I trust that these comments are helpful and I look forward to working closely with you in the future.

<table>
<thead>
<tr>
<th>Harris Lamb for Harrow Estates.</th>
<th>Harris Lamb has previously commented on the TAAP Document 2006 on behalf of Harrow Estates PLC who own the Sigmacast site. Our client supports the Council's preferred options for this site which is fit out on page 12 of the preferred option document (January 2007). Harrow Estates PLC will continue to work with the Council to bring forward a residential proposal for this site.</th>
<th>Continued support acknowledged.</th>
</tr>
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<tbody>
<tr>
<td>Harris Lamb for Caparo Industries.</td>
<td>Caparo Industries Plc own the Firth Cleveland business at Locarno Road. The company has through its appointed agents, Harris Lamb, previously requested the allocation of this site for redevelopment. We are pleased that the TAAP Preferred Options Report (January 2007) identifies options for redevelopment. For reasons which we have set out in previous correspondence we wish to restate our support for residential redevelopment and, therefore, support the third option which is identified at paragraph 5.16 (page 17) of the Preferred Options Report. We note that the TAAP proposes a phased redevelopment of this site to follow the redevelopment of the adjacent Sigmacast site should come forward for development in the very near future and therefore envisage that the environmental issues associated with that site will be removed prior to the redevelopment of the Firth Cleveland site.</td>
<td>I note your support for the third option outlined in the AAP, i.e. redevelopment for residential use. I would re-iterate at this point that the Council will require the Sigmacast site to have ceased operating or polluting for this option to proceed, and take note that you consider this will happen in the very near future. Option three also includes the relocation of jobs locally, a high quality cohesive development linking with adjacent proposals, and community open space on-site taking advantage of the course of Tipton Brook and the line of the former canal. I can confirm that the proposed allocation site will include that area edged red on your attached plan. However, in this respect, I need confirmation from</td>
</tr>
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</table>
Could you please note that the extent of the Firth Cleveland site extends into the area edged red on the attached plan; we therefore request that the extent of any allocation in the TAAP reflects the extent of full ownership.

Your clients about the precise nature and extent of their land ownership, as Multi-Stroke Ltd. have informed me that they are the owners of the property that they occupy, and that relocation within a five year period would be financially prohibitive.

<table>
<thead>
<tr>
<th>Name</th>
<th>Comment</th>
<th>Acknowledgment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Victoria Chippy</td>
<td>A Housing Development is very welcome. It will be very good for business and it will support the Tipton Centre.</td>
<td>Continued support acknowledged.</td>
</tr>
<tr>
<td>T-&amp;J Pets</td>
<td>I am in full agreement with any development in Owen Street and surrounding area's that will help the community to be a thriving town again.</td>
<td>Continued support acknowledged.</td>
</tr>
<tr>
<td>D. Pearson</td>
<td>We are very pleased that we are having more housing in the area, this can only be a great thing for Tipton as this will bring more business into the area and hopefully return it back to a thriving town that it once was.</td>
<td>Continued support acknowledged.</td>
</tr>
<tr>
<td>Tipton &amp; Coseley Building Society</td>
<td>The development of housing in our areas is very welcome and should prove to be beneficial to the traders.</td>
<td>Continued support acknowledged.</td>
</tr>
</tbody>
</table>
Mr. L. Hurley,
The Bungalow,
50A Great Bridge Street,
West Bromwich,
West Midlands B70 0BP

appendix 21

Dear Mr. Hurley,

Tipton AAP (Locarno Road) Preferred Options 2007


I note that you previously lived at 4 Upper Church Lane. Your property was acquired as part of a programme of clearance approved by Housing Strategy Committee in 2001. The reason for the demolition of the majority of the properties was the poor housing and environmental conditions, particularly those arising from the adjacent foundry. The Committee resolution was to dispose of the vacant site on the open market on compliance with a planning brief prepared in the context of the wider regeneration of Tipton.

The site has been vacant since demolition as the Council’s preferred option is to develop the site for housing in conjunction with the site of Sigmacast Iron Ltd. I enclose an extract from the Tipton Area Action Plan 2006 which explains the reasoning behind the Council’s approach.

As you will note, it is considered likely that Sigmacast Iron will relocate or close in the next few years. In that eventuality it is proposed that the site is redeveloped for housing and community open space. Other uses have been examined, but are considered inappropriate. In addition, Firth Cleveland are proposing to relocate their business to West Bromwich, and are themselves proposing that the site is redeveloped for housing.

Accordingly, there is no question of ‘compensation from taxpayers’ as these are commercial decisions made by the companies involved. The Council is considering the best future use of the land should this occur. I enclose a copy of the Tipton Area Action Plan (Locarno Road): Preferred Options 2007, which provides further information.

Ian Thom
Planning Policy Section