

EAST STAFFORDSHIRE BOROUGH COUNCIL

REPORT SIGN-OFF SHEET

Title of Report:	Core Strategy: Summary of Consultation on Strategic Options Stage.
Meeting of:	Leader and Deputy Leader's Advisory Group
Date:	19 th January 2012
If Cabinet Report, state if Key Decision:	NO
Is Report Confidential:	NO
If so, please state relevant paragraph from Schedule 12A LGA 1972:	
Essential Signatories:	
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Head of Regulatory Services	
Date	Signature
Head of Legal and Democratic Services and Monitoring Officer	
Date	Signature
Head of Financial Services and Section 151 Officer	
Date	Signature

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EAST STAFFORDSHIRE BOROUGH COUNCIL

Report to Leader and Deputy Leaders Advisory Group

13th January 2012

TITLE: Core Strategy: Summary of Consultation on Strategic Options Stage.

PORTFOLIO: Regulatory Services

RESPONSIBLE OFFICER: Head of Regulatory Services

CONTACT OFFICER: Glenn Jones ext. Number 1645

WARD(S) AFFECTED: All

1. Purpose of the Report

1.1 To report to Members the main comments and opinions of the public following consultation on the Strategic Options stage of the Core Strategy/Local Plan.

2. Background

2.1 In August to September last year the Council undertook extensive consultation on the Strategic Options stage of the Core Strategy/Local Plan. This was a non-statutory stage in the Plan's preparation; the intention was to gauge the opinions of the public and stakeholders on a variety of major sites for new sustainable communities and on the overall strategy of where building should go. Maximising the use of brownfield sites with a reasonable expectation of coming forward in the Plan period was taken as a given. However, it is estimated that some 4000 homes will need to be located on greenfield sites, and, since these are the most contentious, it was important that the public were given the opportunity to voice their opinions as early in the preparation process as possible.

2.2 Because of the importance of the subject, and the number of respondents unable to fully comment within the time period, responses received for some weeks after the closing date have been included in the Consultation Schedule, and reviewed in the Consultation Summary (Appendix 1).

2.3 Consultation methods were in line with the Council's Statement of Community Involvement and included: front page article in ES News; direct mailing to all on our extensive consultee database; a Citizens Panel mailout; articles in the press; notices in libraries, doctors' and dentists' surgeries; notification of all parish councils, some of which organised their own consultation events; and officer-attended exhibitions at Cooper's Square, Uttoxeter Town Hall, Burton Library and unattended displays at other libraries.

3. Contribution to Corporate Priorities

3.1 Encouraging Local Enterprise – delivering housing and economic growth:

The Core Strategy/Local Plan is the key document for demonstrating to investors where new housing and commercial premises should go, and of expressing the Council's commitment to growth.

3.2 Enhancing Lives Throughout the Borough-

The Core Strategy/Local Plan helps to achieve all four Objectives under this priority, and consulting with the public especially helps to strengthen communities through involvement.

4. Report

4.1 The document containing detailed summaries of each comment received is too large to append to this report, It is hoped that it will be possible to place it on the Council website in due course. The summary of comments is attached as Appendix 1. The main messages are:

- There was some comment that the 13000 housing requirement between 2006 and 2031 was excessive; that there was no need for this amount; and the basis of calculating this figure is flawed.
- There was overwhelming support for the principle of preferring the development of brownfield land over greenfield where possible.
- Most comments referred to particular sites, not to an Option as a whole;
- No one Option clearly favoured over another;
- Therefore, clear that at next stage ("Publication") the Council will need to put forward an "Option 4" based on public views on individual sites, as long as these can form a coherent, sustainable development strategy for the Borough
- A handful of submissions proposed alternative sites, but there were few that proposed revised Borough-wide Options. Those proposing new sites were made up entirely of the landowner or potential developer of that site.
- Concerns about the impact of growth on existing services, including school capacity and transport services, and the importance of new development contributing to the provision of additional investment.

- The importance of planning for mixed use developments to ensure provision of employment opportunities as well as new housing;
- Several responses pointed out that there were procedural difficulties associated with the Drakelow development being regarded as part of East Staffordshire's housing requirement, without South Derbyshire's agreement. Whilst clearly serving Burton's housing market, it was also serving South Derbyshire's and the East Staffordshire 13000 new home requirement should be in addition to this. Dropping the target by 2000 if Drakelow cannot be included was also illogical: East Staffordshire's requirement is derived from actual projected need, and this remains the same whatever sites can or cannot be included.
- Lawns Farm, land west of Uttoxeter, and land south of Stone Road/Bramshall Road received the least objections and some of the comments preferring that the latter site not be developed did suggest conditions to be met if development did go ahead.
- Detailed comments were received on most of the sites around Burton, Uttoxeter and the major villages. In many cases these raised valid points of local knowledge which will help the Council to make decisions on these sites – either as to their suitability for development at all or as to problems which any new development would have to overcome.
- Given the amount of opposition to current proposals in some of the Strategic Villages it was clear that there needs to be a clear decision from Members on the role of these villages in the overall development strategy;
- Whilst some supported the Settlement Hierarchy, there were some who disagreed with the criteria used to establish where each settlement stood in the hierarchy – some claiming it would lead to inappropriate levels of new development being allowed, others that it would restrict new development necessary to support existing services.
- The Citizens Panel provided 71 responses covering a wide range of issues and perspectives, including comments of support and objection. Overall, the Citizens Panel responses suggested more support for Option 3 than for the other two Options, although there were objections to all three Options.

Next Steps

- 4.2 The Council must now formulate its preferred option for its development strategy for the Borough, taking into account the views expressed in this consultation and being guided by a Sustainability Appraisal of any favoured strategies. This process, which will also be informed by further evidence base updating and refinement, will take place until spring 2012, when the finalised "Publication" version will go out on consultation.
- 4.3 With some urgency, Officers will be commissioning additional evidence base work to underpin the housing requirement figure, in the light of the uncertainty over Drakelow. The current assumption is based solely on the CLG household forecasts for East Staffordshire for the period 2006 to 2031, plus a figure of 2000 homes to provide for choice and economic growth. It is proposed to commission an update of the Strategic Housing Market Assessment (SHMA). This will mainly comprise a comprehensive updating of the market's view (developers, housebuilders, Registered Providers of Social Housing, land and estate

agents, etc) of the capacity to build this number of dwellings in the time period, and the likelihood of this number of homes being taken up by buyers.

- 4.4 In particular, the consultants will be asked to assess the effect on Burton's housing market of building 2000 new homes at Drakelow, together with the best estimate of what demand would remain to be satisfied. This could have a significant effect on the Borough-wide housing requirement of 13000 which would then need to be reviewed. This in turn will impact on the amount of greenfield land that will need to be allocated in the Core Strategy/Local Plan.
- 4.5 A Project Plan (Appendix 2) is attached which sets out the draft proposed timetable for the above and all other work that will be necessary to prepare the Publication stage, with an indicative timetable thereafter for all other stages to Adoption. The timetable is an extremely challenging one, and may be subject to some minor change. However, this pace will be necessary to progress the Core Strategy/Local Plan as swiftly as possible to Adoption and provide certainty to the public and to developers alike as to how much development will be permitted and where.
- 4.6 In order to achieve this timetable Member input and decision making on strategic site allocations will be needed from an early stage, and at intervals thereafter up to the approval of the Publication version for public consultation in June. A Members Discussion is being organized for February 2012 at which Members will be requested to give direction on the issues raised above, that is:
- The role of Drakelow in the Burton housing market and in overall housing requirement;
 - The effect this will have on the amount of greenfield land necessary to meet this requirement once brownfield land use has been maximised;
 - The location of the strategic greenfield sites;
 - The roles (if any) of the Strategic and the non-Strategic Villages (respectively) in supporting the housing requirement.

5. **Financial Considerations**

5.1 There are no direct financial issues arising from this Report.

6. **Risk Assessment and Management**

6.1 The main risks to this Report and the Council achieving its objectives are as follows:

6.2 Positive (Opportunities/Benefits):

The provisions of the Localism Act 2011 are being followed in the preparation of this Core Strategy/Local Plan and integrated from this early stage, thus ensuring robustness and soundness.

6.3 Negative (Threats):

The localism agenda puts what local people want as a high priority. However, where there is an identified strategic need for the future – as with housing – reconciling opposing priorities will be a challenge and pose a threat to the success of the Core Strategy.

6.4 The risks do not need to be entered in the Risk Register.

7. **Legal Considerations**

7.1 There are no significant legal issues arising from this Report.

8. **Equalities**

8.1 The subject of this report is not a policy, strategy, function or service that is new or being revised. When the Council puts forward their Preferred Option at Publication stage an equality impact assessment will be required. At this stage, where the public's views are being canvassed without any indication of the Council's preferred policies, an assessment is not required.

9. **Human Rights**

9.1 There are no Human Rights issues arising from this Report.

10. **Sustainability** (including climate change & change adaptation measures)

10.1 All options being put forward at the next stage, including significantly different options proposed by respondents at this stage, will be subjected to Sustainability Appraisal.

11. **Recommendation(s)**

11.1 Members are requested to note the comments and main messages from the Consultation, and to take these into consideration when formulating their views, and subsequently making decisions on, the Council's preferred option for the Borough. Members are advised that officers

12. **Background papers**

12.1 Core Strategy/Local Plan - Strategic Options consultation draft August 2011

13. **Appendices**

13.1 Appendix 1 – Summary of Responses

13.2 Appendix 2 - Project Plan for Core Strategy/Local Plan

SUMMARY OF RESPONSES

Strategic Options Stage of Core Strategy/Local Plan

Summary of Responses on Specific Sites/Options -

Drakelow - Supporting

- Drakelow a major opportunity for Green Infrastructure and the creation of a greenway.
- South Derbyshire should accept that Drakelow should be included against East Staffs target. Without such cooperation it cannot be proven that 2000 additional dwellings are not needed on greenfield sites in East Staffs.

Drakelow - Objecting

- New Devt must make the best use of existing infrastructure where there is capacity. County Council believes that the education provision should be provided by the developer. Need to provide both primary and secondary provision.
- Option of Drakelow shown without discussion or agreement with South Derbyshire.
- Substantial education contributions required to support this additional housing
- Besides the fact that the quantum of housing proposed No evidence base to support Drakelow as an allocation - not part of Housing Market Area, SDDC object.
- Drakelow cannot be double counted. It is also suggested that this site will not be complete within the suggested plan period hence flexibility needs to be introduced.
- Council not produced sufficient evidence of cross border working, demonstrated by an inconsistent approach to sites in South Derbyshire (Drakelow in – but Newton Road sites discounted).
- Housing in South Derbyshire counting towards the ESBC requirement not supported.
- Has Drakelow been counted twice both as a commitment and 'capacity'?

Land South of Branston - Supporting

- LSOB the ideal site without having a detrimental impact on the existing community as long as the A38 Island.
- LSOB well located and offers opportunity for mixed use in a location that is already within the define boundary.
- Welcomes the identification of LSOB as a potential allocation.
- Lawns Fm and LSOB considered most appropriate locations for substantial development.

Land south of Branston - Objecting

- Substantial education contributions required to support this additional.
- Where SBIs are located on or near possible sites the findings of the GI study should be used to establish approach to devt in this location.
- Unacceptable into the countryside that dilutes the objective of maintaining separate identity of surrounding settlements
- Scale of inappropriate, leading to traffic congestion.
- Access issues

- PFA and flood risk and access issues make the site inappropriate. Lack of any planning for basic needs such as schools, doctors etc seems back to front.
- Access and drainage important issues. Community gain in the past has been limited given numbers of new homes, this needs to be redressed.
- Totally opposed to the development of this land primarily due to access/transport problems.
- This level of housing in Branston not required. Site not appropriate given PFA tipping and poor access.
- Deliverability of Land South of Branston questionable given the likely cost of second access onto A38.
- Inclusion of Drakelow as part of cross border cooperation

Lawns Farm - Supporting

- Outstanding opportunity to provide a standalone with all of the community facilities to support itself whilst being well linked to Burton.
- Prefer no additional devt but Lawns Farm seems more logical than extensive development in Outwoods therefore Option 3 is preferred.
- Character of the Trent and Mersey Canal conservation area is an issue if this site is to be developed but could be an opportunity.
- Site offers potential to provide a range of benefits with the minimum of constraints.
- Lawns Fm and LSOB considered most appropriate locations for substantial devt.

Lawns Farm -Objecting

- Floodplains usually of high archaeological importance. Further information may be required.
- Substantial education contributions required to support this additional.
- Education contributions required of the level of a new 1 - 2 form school.
- Where SBIs are located on or near possible sites the findings of the GI study should be used to establish approach to devt in this location.
- Areas of the site are susceptible to flood risk.
- Should not be allocated due to impact on a sensitive green asset. Should be protected as part of green space strategy.
- Mixed use devt at Lawns Fm is inappropriate as it would join Tatenhill with Burton. This would lead to the loss of character and identity.
- Access and drainage important issues. Community gain in the past has been limited given numbers of new homes, this needs to be redressed.
- Site would require a full range of amenities suitable for an area of this size.
- Group (and Parish Council) will lobby against large scale, unsympathetic or unwanted. It will also be high priority to lobby for no other than parkland and leisure areas on the Lawns Farm Site.

Harehedge Lane, Burton Issues – Objecting (17 comments)

- Road infrastructure inadequate.
- Traffic congestion.
- Traffic at school starting and finishing times.
- Unsafe for children (traffic).
- Parking on Harehedge Lane resulting in lane being too narrow for buses.
- Dangerous black spot at Beamhill/ Tutbury junction.
- Impact on road infrastructure - Tutbury Road, Harehedge lane, Rolleston Road.
- Exits from the fields to join up Longhedge Lane, Tutbury road and Athelstan Way would create a "rat run" around the Harehedge Lane forcing traffic into other quieter zones.
- Create rat-run via Calais Road and Shobnall Street.
- Increase traffic to dangerous junction with Horninglow Road, which has poor sight lines.

- Increase traffic on the Rolleston Road/Harehedge Lane/Bitham Lane staggered junction, which also has poor visibility (and people driving too fast).
- Flooding of Rolleston Road and Harehedge Lane.
- Inadequate drainage infrastructure.
- Sustainable drainage systems expensive- who will pay?
- Brownfield before greenfield.
- Impact on schools - schools at full capacity.
- Create rat run.
- Loss of Greenfield land.
- Impact upon existing infrastructure in Stretton.
- Change character of area to be less attractive.
- Loss of identity.
- Loss of wildlife habitat (hedgerow, grassland).
- Visual impact from Tutbury Road, Rolleston Road, and Harehedge lane. Loss of view of countryside.
- Stretton expanded significantly already - Stretton is also already accommodating development at Pirelli.
- Depreciation in existing property values
- Too few existing amenities - concern that housing will come before infrastructure.
- Inadequate utilities.
- Health risk as a result of construction.
- Coalescence of Outwoods to Rolleston.
- Impact on public footpaths.
- Loss of pleasant public footpaths.
- Increased pollution.
- Inadequate public transport.
- No opportunity for the provision of high quality off-road cycle routes into Burton. Not in walking distance of the town centre.
- Inadequate local amenities and services.
- Not sustainable transport wise.

Harehedge Lane, Burton Issues – Supporting (2 comments – William Davis Homes and Staffordshire County Council)

- New homes would support population for schools.
- Sustainable location. More sustainable than options 1 and 3.
- Would deliver a 2 FE Primary school.
- Site will deliver community benefit (Core Strategy objective).
- Conforms with Staffordshire's SCS.
- Available for development within 5 years.
- Close proximity to schools.
- Close proximity to bus service.
- Logical extension to Burton.
- Non-sensitive landscape.
- Visually well contained.
- Deliverable and developable in SHLAA.
- Could accommodate more housing.

Harehedge Lane, Burton – General Comment (1 comment)

- Effectively an infilling between two radial routes without unduly extending the town limits.
- Visual impact on three sides needs considered design and planting.

Beamhill, Burton Issues – Objecting (19 comments)

- Road infrastructure inadequate.

- Loss of valued countryside.
- Brownfield before greenfield. Greenfield should be preserved.
- Road infrastructure inadequate.
- Traffic.
- Traffic at school starting and finishing times.
- The distance from major transport links will create a huge increase in traffic through neighbouring residential areas with associated safety issues.
- Access difficulty - restricted visibility. Traffic turning on to or out on to either Beamhill Road or Field Lane at the point of turning on to the A511.
- Beamhill/ Tutbury Road junction is already a notorious black spot.
- Use of Kitling Greaves Lane and Field Lane should be discounted, as both are already bad junctions.
- Access to Field Lane and Beamhill inadequate.
- Outwoods Lane and the Top of Field Lane are single track roads.
- Schools at full capacity.
- Access to Beamhill will create traffic to Beacon crossroads and via Anslow and Tatenhill to reach the A38 thus impacting on residential areas.
- Schools will generate more traffic.
- Junctions at Outwoods Cross, Field Lane and Calais Road are already inadequate for current traffic volumes.
- Increase traffic and HGVs through Anslow. Exit from Field Lane would be dangerous.
- Create rat-run via Calais Road and Shobnall Street to destinations such as the Centrum and the A38. People would also drive through Stretton to the A38.
- Increase car journeys via A511.
- Access will result in traffic northwards to go back south into the town centre, and to the major employment sites at Centrum and the town centre and to the A38, particularly for south bound journeys.
- Unsound access strategy.
- No information has been supplied regarding the transport plan or the development/creation of any new major roads to minimise the existing transport issues that are evident within the Parish. Impact on road infrastructure -Beam Hill/Tutbury Road/ Beacon Inn junction and the Lower Outwoods and Forest Road/Henhurst Hill areas.
- Inadequate facilities & utilities infrastructure.
- Not in walking distance of the town centre or a meaningful number and range of local amenities and services.
- Inadequate public transport.
- No opportunity for the provision off-road cycle routes into Burton.
- Impact on public footpaths.
- Loss of amenity (used for field trip, cycling, running routes).
- Impact on education, health, public transport, retail and other services.
- Impact on schools. Schools at full capacity.
- Inadequate infrastructure.
- Infrastructure would need to be significantly upgraded in this part of Burton. Telephone lines are inadequate and very poor broadband speeds.
- Visual impact.
- Site could remain incomplete and be an eyesore.
- Change of character.
- Out of character.
- Loss of wildlife habitat.
- Devalue properties.
- Loss of greenfield land.
- Loss of agricultural land.
- Coalescence of Beamhill with Anslow.

- Coalescence of Outwoods to Rolleston.
- Drainage problems.
- Flooding.
- Impact on air quality.
- SUDS are expensive -who will pay?
- Impact upon drainage infrastructure
- Require land barrier between existing properties and any new housing.
- Sloping land unsuitable for development and would reduce quality of new dwellings.
- Intruding into countryside.
- Extending the town impact disproportionately. Major structural landscaping required to mitigate this.
- Too large.
- Slope of land would require considerable work needed to stabilise the bank for development work.

Beamhill, Burton Issues – Supporting (4 comments from Hallam Land)

- New homes would support population for schools.
- Suggest a two phase development on Outwards Farm of 300/400 homes, depending on what ESBC's calculations suggested.
- Development will constitute a sustainable urban extension to the Beamhill area.
- It will integrate with the local community through joint use of new retail, health, education, community facilities, open space, public transport and footpath / cycle links.
- No over-riding constraints that would prevent the early delivery of housing on this site have been identified.
- The site has a high expectancy level for the early delivery of housing and completion within the Plan Period.
- Proposed two new junctions to provide access from Beamhill Road. Signalised junction improvement - A511 Tutbury Road / Harehedge Lane / Beamhill Road Designed to minimise impact of car trips upon the local highway network.
- Pedestrian and signalised junction routes created
- Bus service between site and Burton upon Trent town centre (including the rail station).
- Provide a new 210 place primary school. Secondary and Sixth Form places will be addressed by financial contributions.
- Allows for the provision of a health centre with Doctor, Dentist and Pharmacy Services “possibly as a satellite surgery to an existing practice.
- 20% Affordable Housing will be provided, either on or off-site provision in lieu or a combination of both.
- On-site biodiversity will be increased through Green Infrastructure.
- The site is largely well contained within the wider landscape.
- The site is overlooked by properties on Beamhill Road and Field End Lane A GI strategy will create a network of accessible, open spaces and green corridors
- The Masterplan is continuing to evolve in response to further research, consultation and stakeholder response.
- Built to Code for Sustainable Homes Level 3 standards, where viable.
- Mitigate potential flooding by attenuating flood water on-site up to the 100 year plus 30% climate change event, thus reducing the risk of flooding downstream of the site,
- Incorporate measures to deal with storm -SUDS
- A suitable solution has been identified for the dealing with the additional foul flows from the development without any significant environmental impact on the surrounding areas and drainage network.
- Most of agricultural land is of moderate or poor quality (grades 3b and 4).
- The Hallam proposal to provide up to 950 new homes at Outwoods Farm would fit within this Option.
- Option 2 The Hallam proposal to provide up to 950 new homes at Outwoods Farm would undershoot the capacity target of 1200 dwellings in the Beamhill area but the full capacity figure could be achieved by additional development through extension of the proposed development site at Outwoods or on other smaller sites in the locality.

- Option 3 - This option is not supported unless the range of capacity for the Beamhill location is increased to 950 dwellings. This need not be regarded as a serious departure from the strategy but it would be better for the strategy.
- Size is an advantage as would justify provision of a social, employment etc infrastructure leading to a sustainable self-sufficiency.
- Generally supported but needs to deliver wider benefits and infrastructure to dissipate traffic in a number of directions.

Redhouse Farm, Burton Issues – Objecting (3 comments)

- No over-riding constraints that would prevent the early delivery of housing on this site have been identified.
- Access problems - for the hospital side and via Shobnall Road.
- Access problems in Winter.
- Road infrastructure inadequate - problems with HGVs along Forrest/ Shobnall Road, hence the S.T.A.G.
- Traffic.
- Traffic at school starting and finishing times at the bottom of Reservoir Road.
- Inadequate drainage - needs improving.
- Loss of amenity.
- Brownfield before greenfield.
- Loss of greenfield land.
- Destroy landscape.
- Visual impact.
- Traffic – Belvedere Road and Lower Outwoods Roads have a high volume of traffic to the hospital and existing residences.
- Cars parked on roads results in Lower Outwoods Road being only able to accommodate a single lane of traffic.
- Poor visibility on road.
- George Road and Reservoir Road steep and narrow inadequate road infrastructure for increased traffic.
- Lower Outwoods Road is narrow, very steep and, frequently full of parked cars.
- Shobnall Road junction busy due to Shobnall Primary at school start and finishing times.
- Children and residents at risk. Apparently Shobnall Road unsuitable for traffic calming measures (B classification). Shortage of parking Roadside parking by hospital visitors and staff remains a concern to local residents. This situation would get worse with the hospital's proposal to sell part of its Outwoods site for use in this development.
- Impact on frequently used public footpath from the farm area down to the parkland at the end of Belvoir Road.
- Impact on vehicular access from the top of Lower Outwoods Road to the farm and properties behind St Margaret. This letter also represents the views of other local residents and I enclose a list (see attachment 1) containing their details and signatures (x13 SIGNATURES).
- Access should be from the wider Reservoir Road.
- Inadequate sewerage needs improving.

Redhouse Farm, Burton Issues – Supporting (3 comments – 2 from Alliance Planning, 1 from Outwoods Parish Council)

- A new rear access road running from Reservoir Road to the Hospital would be a benefit those attending the Hospital from West of Burton i.e. Branston and Lawns Farm developments.
- It's a sustainably located greenfield site.
- Importance for its delivery to local NHS objectives through the master plan.
- Deliverable.

- Provision of new forest planting.
- Provision of new, improved and enhanced access (vehicular, pedestrian and cycle).
- Site is in close proximity to town centre.
- Improvements to delivery of hospital services for improved access.
- Funding receipt to improve local facilities.
- The masterplan respects the topography and landscape of the Outwoods area.
- Potential advantage to the development of Queens Hospital.

Redhouse Farm, Burton Issues – General Comment (2 comments)

- Ideal opportunity to open the access to the hospital to make it more accessible for ambulances, patients and staff and reducing congestion on Shobnall road and reduced time for access in to the A & E.
- If a new access road was introduced from the top of Reservoir Road across the fields down on to Belvedere Road this would allow Lower Outwoods road to return to a normal road for the residents/ a no through road.
- I would expect that the industrial use of the farm buildings would not continue.
- Rising ground but made more acceptable if westward arm omitted.
- Consider relationship to Special Landscape Area.

Uttoxeter: Summary of responses received

41 responses specifically relating to Uttoxeter.

Many respondents only commented on one site, and there were objections to all sites. But where a respondent provided views on the comparative strengths of several or all Options, several preferred either Option 3 based on south of Stone Road and Bramshall Road, or Option 1 based on West Uttoxeter (mixed use). There is clearly least support for Balance Hill, but that includes some detailed comments sent to ESBC about the separate site specific pre-application consultation.

General:

- **Flood risk issues** should be considered for all sites indicated in Uttoxeter;
- For all 4 of the Uttoxeter sites, where a development is of sufficient size to exceed the **capacity of the existing school provision** the County Council reserves the right to require the construction of a completely new school and the acquisition of the land, access and relevant services. Any development in Uttoxeter will put additional pressure on the local first, middle and high school places. Substantial education contributions will be required from all of the sites, and any other residential development in the area, to enable the expansion of the local schools to ensure sufficient places are made available.

West of Uttoxeter: 9 individual comments in total – some general, two clear objections, and 3 clear comments of support (plus several from the Agent of the landowner suggesting this site replaces the others in Uttoxeter).

- Would **extend the town away from existing shops, schools and leisure facilities**, and would suffer from noise from the A50;
- **Town Council welcome this proposal** for mixed residential and employment, with the emphasis on the employment use;
- **Is less well related to the town** and may offer **more potential for limited new employment** land allocations rather than a larger scale mixed use scheme including a significant residential element. Development to the south of the town would be preferred.
- **Disproportionate impact** of the extension of the town along the A50 and linking with the new industrial belt opposite. Its development would facilitate the development of a link road.
- **In favour** of developing the site near the A50 as it would have less of an impact on the countryside and local residents.
- **[Landowner] Support land west of Uttoxeter within Option 3** as the location for a mixed use development. This is the only site that can secure a mixed use development of the right scale to provide adequate levels of

infrastructure. Other sites are too small, or environmentally sensitive. Mixed use (i.e. employment) is key to Uttoxeter's future.

Balance Hill: 20 individual comments/issues in total – approximately 15 are specific objections.

- Extends the town southwards making it the **furthest from existing schools, shops and leisure facilities**. Access through a housing estate would annoy existing residents;
- Access also from the busy B5031 creating a rat run. Would affect the privacy of more existing householders than the other options. Difficult to include into an existing bus route;
- **Object** to Balance Hill (Hazelwalls Farm) proposal. Objections relate to: road safety concerns with regard to proposed junction on the B5013 at Cullamore Lane; Significant impact on traffic using Westlands Road, Sorrel Close and Foxglove Avenue. Also flooding and wildlife impacts;
- **Several identical objections [detailed responses to separate pre-application consultation by the developer]** based on a bus route proposed along Timber Lane which is neither wide nor safe enough for constant use by vehicles of that size. There is already an established bus route along Westlands Road. Noise and disturbance issues. The construction of a 'balancing pond' close to existing properties raises concerns about additional surface water and flooding.
- Town Council **welcome this development** as this appears to be a logical extension to housing development with close links to major roads.
- [Promoter] The **most sustainable location for large-scale residential development** at Uttoxeter. The site has undergone a masterplanning exercise and public consultation and is considered to have a capacity for some 450 dwellings together with associated community facilities and green space.
- **Object - No justification for developing greenfield land**, which is important for the production of food, when there is an abundance of brownfield sites. Impact on the local services would be severe – e.g. local schools are already oversubscribed and children would have to travel further. Wider traffic impacts also. Also could local doctors' surgeries are already under huge pressure. Concerns about existing watercourses coping with additional runoff.
- **Objection** to the site near Timber Lane/ Westlands Road. Site is used recreationally for walking, nature watching and leisure via the local footpaths.

South of Stone Rd/BramshallRd: 11 individual comments received – 3 specific objections; 5 specific comments of support.

- Option 3 represents the **most suitable way to develop Uttoxeter** and that further employment opportunities should be generated on land near the Dovefields Industrial Estate. Option 3 based on this site is the best of the Options as it fills in undeveloped land rather than expanding the town, and is closest to existing schools, town centre shops and the leisure facilities. Could be served easily by an existing bus route, and affects the privacy of the least number of existing householders. Option 3 represents the most suitable way to develop Uttoxeter and that further employment opportunities should be generated on land near the Dovefields Industrial Estate.
- **Option 3 is preferred** as this includes approx. half of the surplus SCC land off Stone Road. Considered [by the landowner, SCC] to be a much more sustainable location than alternative sites in Options 1 and 2 (closer to town centre and facilities). Landowner maintains that the whole of the site at Stone Road should be included, and not just the northern part. The whole of this site is available for development within the next 5 years.
- Town Council **do not support this development** which has no access to major roads and all the additional traffic would have to pass through the minor roads in the centre of the town. The land on Mount Pleasant should be retained for educational/sport facilities.
- The larger western parcel of land **could not be as effectively integrated** within the urban area. It would not be as well contained, causing significant visual impact on properties to the north and east of the site and being more prominent in the wider landscape.

- [EA]South of Bramshall Road would have **some Flood Zone 3 implications**. Although it will be a low percentage of the site, where a current flood risk issue is identified with a site, the Sequential Test will need to be undertaken and a Level 2 SFRA will be required.
- **Land to the South of Bramshall Road should be included** - is in a sustainable location with good access to the local schools, existing shopping and other facilities. Concentrating development in higher valued areas of the town will ensure its delivery. There is an opportunity to extend this development area further to the west.
- Along with land South of Bramshall Rd, these sites make a **viable, sustainable and suitable location** to accommodate housing growth. Is of a scale which will complement the existing housing mix within the town. Development of part of these SHLAA sites only will not meet all the Planning aims and, because of multiple ownerships, may not be deliverable.

Village Sites

Efflinch Lane, Barton under Needwood -Issues – Objecting (20)

- Non- designated archaeological remains may be an issue
- Traffic congestion – road network, road safety
- Pressure on local schools – funding for extension
- Potential for flooding existing properties/ grounds – drainage issues
- Pressure on school places
- Problems with parking in the village
- Noise, light pollution
- Pressure on amenities and services
- Barton is big enough already – don't need an additional 150 houses
- Environmental – damage to countryside and wildlife habitat
- Security and privacy for current properties
- Lack of facilities in village

Efflinch Lane, Barton - Issues – Supporting (1)

- Would rebalance housing market, meet local housing need and fund social infrastructure.
- Provide a rounded off extension to village,
- provide affordable homes,
- provide a village car and coach park,
- a well enclosed location bounded by existing development, A38 and the canal.
- Could provide screening - visual and noise.
- close to Marina

Radhurst Farm/ Crowberry Lane, Barton – (28 comments)

- Access is hazardous and unsuitable.
- Traffic congestion.
- Road safety.
- Pressure on existing local schools – funding for extension
- Pressure on local amenities and infrastructure
- Infrastructure is inadequate
- Problems with parking in the village
- Site is too small to be considered strategic and therefore shouldn't be in the Core Strategy
- impact on countryside - environmental impact
- impact on conservation area

- concern that development may set a precedent
- Social and physical infrastructure of the village
- Barton is big enough
- Lack of facilities in Barton

Rolleston Issues (10 comments)

- Problems with inadequate infrastructure
- Traffic congestion – inadequate roads
- School places – could the village cope with more?
- Building would have a large impact on surrounding houses
- Flooding risk
- Would need to find alternative site for sports provision
- Would destroy a natural and well formed boundary, would be prominent and highly visual in the landscape.
- Not in keeping with village design statement.
- Possible legal restrictions with CPO of College Playing Fields.
- Impact on character, appearance and quality of the area.
- Not sustainable location - limited bus service. Lack of facilities.
- Access issues from existing development
- Potential for coalescence with Burton
- Loss of playing field - in conflict with national and local policy
- Currently used as a leisure resource for locals – footpaths, walking dogs etc
- College site is probably one of the better ones in Rolleston
- Provides income for forward investment for the growth of the college - supports local economy and encourages growth. 100 would be most appropriate figure.

Rocester Issues (9 comments)

- Non-designated archaeological remains may be an issue
- Additional school places may be necessary - educational contributions may be required.
- Traffic problems – congestion, and problems in relation to on-street parking
- Impact on conservation area. Quality of design and layout should be a deciding factor in its development
- Development on flood plain - flooding issues
- Existing farm house and building are in conservation area and an important element in heritage streetscape.
- Traffic congestion.
- Footpaths are narrow.
- Rocester has already had a lot of new build development recently - development should be on a smaller scale and spread over more sites. Residents do not want any more large scale housing estates.
- Damage character of village

Tutbury Issues (1 comment)

- On high ground, site development would need thoughtful landscape treatment.
- CPRE criticises sporadic spread of employment giving rise to unsustainable traffic access in the longer term.

Core Strategy Strategic Options - Other Issues

Affordable Housing

- 8 comments related to affordable housing, particularly relating to the provision of affordable housing– how much should be provided and where they should go, in both rural and urban areas. One respondent also raised the need to provide extra care housing sites, such as the site in Anglesey Ward. Comments also set

out a number of principles for affordable housing provision. This is likely to be covered in the affordable housing policy.

Employment

36 comments related to employment.

- In particular comments related to the need for a balanced strategy that encompasses employment provision with housing supply as far as this is possible. It is felt that the current Core Strategy concentrates too much on housing and doesn't show the land intended for economic regeneration. Housing should be located close to the employment land, with the proviso that the nature of the businesses is compatible with adjacent residences. Although the Core Strategy makes reference to the supply of employment land in the Borough and the required level of reserve, specific sites are not discussed or allocated.
- In addition, with relation to the employment structure of the borough questions arose regarding what evidence does ESBC have to suggest that they can attract more knowledge based industries to the area? And how will the high tech and management jobs be created.
- Some respondents raised concerns that the employment growth required (200 hectares) is unsubstantiated and unrealistic, and therefore not deliverable.

Biodiversity

3 representations from one consultee (Staffordshire Wildlife Trust)

- There is no mention of the plan containing a positive spatial vision for biodiversity, demonstrating how it is to be conserved and enhanced within the plan area and duration. There is no mention of the role of planning to protect and enhance the environment, natural resources or biodiversity, or to deliver sustainable development. It is felt that the focus of this strategy is often on the housing market and economic performance -this doesn't give a balanced summary of the role and duties of forward planning as set out in national guidance.
- It should also be recognised within the plan that brownfield sites often have high nature conservation value, sometimes of national importance for certain rare species, and are also important or potentially important for providing green space within urban areas. Where brownfield sites are favoured over some less bio-diverse greenfield sites (e.g. intensive arable land), there needs to be consideration of the need to retain key green areas as corridors and provide habitat and species mitigation such as replacement habitat off-site or via green/ brown roofs. Balancing environmental impacts such as biodiversity and also drainage issues can be as challenging or more so than some greenfield sites.

Brownfield – Greenfield

28 comments related to the development of brownfield and Greenfield sites.

- A number of consultees (11) supported the principle of building on brownfield land before greenfield. However, it is noted that, in the absence of the accompanying planning policies, it is unclear just how this can be achieved. The overall approach will need to be justified, otherwise developers will just cherry pick their favoured greenfield sites.
- In addition, a number of consultees (9) questioned the need to develop on Greenfield sites at all. Some feel that the overall housing number target is unrealistic and unjustified and therefore development on Greenfield sites is not needed, and others feel that building on Greenfield sites goes against the overall objective of protecting, enhancing or respecting the environment.
- In addition it was noted that the Core Strategy does not identify where the brownfield sites are that are being relied upon. One respondent noted that ESBC should not have such a high target for brownfield land development, and shouldn't apply the sequential approach to housing delivery as it is against the principles in the NPPF.
- One respondent mentioned that they are against the intention of using the development of greenfield sites to generate "planning gains" to fund regeneration projects. This runs contrary to the stated intention to

seek the allocation of brownfield sites first and raises the question are the development of greenfield sites really necessary purely for the provision of homes.

Cross boundary co-operation/ Duty to co-operate

20 comments

- A number of consultees (10) support closer cross boundary co-operation, however it is essential that this cross-border co-operation is comprehensive and effective. It is noted that the East Midlands boundary should not be a barrier to the towns growth as it does not bear any direct relation to the economic, employment and social activities of its population.
- A number of comments were also received with regards to the Drakelow site (10) and the inclusion of the 2,000 homes as part of East Staffordshire's housing figures. There needs to be a clear understanding and agreement between the East Staffordshire and South Derbyshire authorities to ensure that each authority is both looking to deliver and treat the provision of residential development at Drakelow in a consistent manner. It appears that this co-operative working has yet to be carried out. It is vitally important therefore that East Staffordshire and South Derbyshire District Council work together in planning for housing growth over the longer term. Any consideration within the Core Strategy policy framework of the role such development could play must however be supported by evidence and agreed with South Derbyshire District Council.

Development management policies

3 comments

- The comments received stated that it is when the Development Management Policies are available that the full implications of the strategic options become apparent. Without them there is no way they can be fully and appropriately considered and commented upon.

Education

10 comments

- Respondents commented on the need to consider the availability, demand and needs of education (primary, secondary and tertiary) across the whole Borough.
- Staffordshire County Council provided specific comments in relation to their statutory responsibilities for Education provision. The comments were as follows: At this stage it is not possible to be precise about the implications on education provision for all schools. This is for a number of factors, notwithstanding the three different options put forward: the size of individual developments, timescales of when build would start, the phasing of development and the breakdown of housing types are all unknown. The possible range of education requirements could involve the necessary reorganisation of nursery, primary, secondary and sixth form education. Section 106 contributions are likely to be necessary from all sites to ensure the sufficient supply of school places, and could require: Expansion and changes to the infrastructure of existing schools; Additional land to expand an existing school beyond its current boundary; Relocation and expansion of current schools onto new sites; or Additional land and building for new schools. Where pressure for school places is already high it may be necessary for new primary school(s) or additional primary school places to be created before occupation or in the very early stages of the development. Where a development is of sufficient size to exceed the capacity of the existing school provision the County Council reserves the right to require the construction of a completely new school and the acquisition of the land, access and relevant services.

Financial Contribution - CIL

5 comments

- Some respondents are concerned that paragraph 8.12 requires the provision of financial contributions towards a fund to be used to regenerate inner Burton. We would query whether this requirement would meet the 'tests' outlined in Circular 05/05 or the requirements of the Planning Act 2008 in so far as it relates to the Community Infrastructure Levy. Notwithstanding comments on the principle of such a requirement,

we would query whether the Core Strategy is the most appropriate document to implement it and would suggest that it should be reviewed in the context of the emerging Community Infrastructure Levy. As such, it is recommended that paragraph 8.12 is deleted from the emerging Core Strategy document.

- Three respondents objected to the proposed 'village tax for urban development'. Any monies paid to ESBC should be directly related to the development proposed and in the local area. Development in a "strategic village" should provide a financial contribution towards the amenities, infrastructure and services in that village. It is not accepted that there should be a levy on development outside Burton for the development of that town, particularly as there is nothing for the local community in which such development takes place. Such a practice is contrary to the principles of Sustainability.

Flood Risk

3 comments

- The Environment Agency support and welcome that flood risk is a key consideration in the allocations of land for development especially with the current concerns over climate change. They welcome the consideration of the Strategic Flood Risk Assessment (SFRA) undertaken in 2008. Several updates regarding the flood maps within the East Staffordshire area are currently ongoing. As the SFRA is a living document it may require updating in light of new evidence. This up-to-date evidence will then enable the allocation of sites using the Sequential Test and the development of locally specific flood risk policies.
- The other two comments related to specific areas with regards to flooding, including Marchington, and flooding of the River Churnet which would be affected by development in the Derbyshire Dales and Staffordshire Moorlands.

Green Infrastructure

9 comments

- The majority of consultees (7) supported the inclusion of Green Infrastructure principles throughout the document. One consultee outlined the need for cross boundary working related to GI as it doesn't follow local authority boundaries. Staffordshire County Council mentioned that development in the Drakelow area provides a major opportunity for green infrastructure in the form of a Greenway that cross the East Staffordshire and Derbyshire boundary twice, at Stapenhill, and at Walton across the Bailey Bridge. The County Council would like to see the Core Strategy recognise the opportunities for green infrastructure improvements and new cross-boundary links that could arise as a result of development in this area.
- One consultee was disappointed that neither the natural environment nor green infrastructure features are headlined as a key issue or challenge.

Historic Environment

3 comments from English Heritage

- English Heritage provided a number of comments related to the need for a Historic Environment Character Assessment. It is recommended that this is progressed to enable an appropriately informed selection of the options and the Core Strategy's wider sustainability appraisal assessment. English Heritage noted that in the absence of a Historic Environment Assessment, we are not in the position to offer a definitive view on the proposed options as their potential implications on designated and non-designated heritage assets (particularly assets of archaeological interest) is unclear.
- English Heritage also commented as follows: The spatial portrait to the consultation document only refers to designated heritage assets (3.46) and we regard this as inadequate in presenting a robust and appropriate understanding of the Borough's historic environment. We have previously endorsed the approach adopted by all other district/borough councils in Staffordshire in undertaking Historic Environment Character Assessments. These utilise data sets such as the County's Historic Environment Record and the county-wide Historic Landscape Characterisation (HLC) to help inform the sensitivity of areas to large-scale development,

but also of value in informing detailed masterplanning and associated strategies such as the provision of green infrastructure.

Housing

10 comments

- A number of comments were received in relation to housing. In particular people commented on the need to plan for the right housing type and mix and the need to provide high quality housing. People also commented on the need for affordable housing and housing for the elderly. There was also concern about the number of houses proposed in the borough.

Housing Requirement and Calculating Future Need

- Villages should not receive **further development as this would spoil their village character.**
- Definition of Sustainable development should be made clear.
- To ensure future need **is met it is vital that ESBC collaborate with adjoining LPAs.** There is little or no evidence that this has already been done.
- Migration is clearly a major issue and the **Council needs to make clear that it has understood and correctly clarified the ONS data on Migration/immigration** as this will have a significant effect if it has been over estimated.
- Need to clarify if the **statements made at Table 4** to take account of government policy to reduce net immigration.
- **The increase in the number of new dwellings based on the smaller 'household' should be catered for but there should also be larger housing provided,** in line with the aspiration for more high value homes.
- **The ONS household forecast of 11,000 is inflated by out-of-date and inappropriate migration assumptions and the Council should review this and use a much lower figure for its forward Planning.** The arbitrary addition of 2,000 for economic growth is neither explained nor justified in this Options document and should be removed.
- **The Housing Requirement from 2006-2031 is inflated by excessive immigration assumptions and an unjustified economic growth allowance, and should be significantly reduced.**
- IWA considers that **there should be a substantial reduction in the immigration projection and housing requirement** totals in the Core Strategy, and strongly objects to the inclusion of the Lawns Farm site in Option 3. The Trent & Mersey Canal should be protected from any further canalside development to maintain its environmental and recreational value.
- Who is going to buy these homes? How many young people will be able to afford them? Many building sites remain incomplete and an eyesore...
- **What real evidence do you have that these vast numbers of people will be moving into the area? Can you agree that at this point it is purely speculation?**
- Question the quantity of houses you say is needed.
- We are a rural area and **do not want an influx of people coming into the area creating strains on our utilities and other factors.** Why can't you view the local housing market and ascertain just how many and do not want an influx of people coming into the area creating strains on our utilities and other factors.
- **I cannot comprehend why this scale of development should be taking place on greenfield sites, give the amount of brownfield land** that could be regenerated.
- Projection shows a **12% increase in population due to migration over the plan period compared to 3% for natural population.** This does not seem logical given the losses in basic manufacturing industry in the Burton area and in Derby. What new industry will attract the migrants? Even if this was anywhere near correct why does the plan require 13,000 additional homes for an estimated 16,620 population increase?
- Given the current economic outlook I think it **doubtful that the number of single persons able to buy homes in the plan period will match the projections.**
- The assertion that the area will be able **to attract sufficient jobs to not only employ the existing working population but also 13000 migrants is not substantiated.**

- The underlying assumptions of the level of population growth due to migration as based on the ONS forecast require a more up to date review. The figures are critical to the whole plan but appear out of kilter with the economic realities that we face today. Are the greenfield sites really required?
- I do not think that the core strategy has demonstrated beyond a reasonable doubt that building on greenfield sites is inevitable.
- I do not believe that the core strategy has addressed the key questions: 1. Why do we need 13,000 houses for a population increase of 16,620? 2. Why are so many of the proposed houses single occupancy? 3. How could single persons afford such houses in today's economic climate? 4. How robust is the migration figure of 13,110 (where are the jobs being generated)?
- The total requirement of 13,000 properties is not justified in relation to the projected increase in population. **(3500 projected increase in terms of the natural population)**
- There have been a number of recent housing developments in the Burton area where properties remain unsold. How are these reflected in the projected requirement for 13,000 new houses?
- There have been a number of recent housing developments in the Burton area where properties remain unsold. How are these reflected in the projected requirement for 13,000 new houses?
- The housing targets within the Regional Spatial Strategy were adopted by the local authority on the justification that if, at the time, they had not agreed, the targets would have been imposed on them anyway. **The Core Strategy, nor any other available document, does not justify why the Council retains the view that these targets, originally devised by an unelected body, should be retained and implemented without the consent of the electorate within the Borough.**
- The projection of population increase including migration is in line with that used in arriving at the original housing targets set in the Regional Spatial Strategy. The adoption by the Council of these projections is therefore based on the decision by them that they want the town to grow by this amount. A number of councillors have quite inappropriately informed the electorate that this number of houses is needed and cannot be challenged. **The correct number of houses that will be "needed", if the projections are accurate, is actually 6301 i.e. the natural change in household projection as quoted in Section 3.14 below.**
- The data predicts an increase in population of 16,000 (which is by no means certain) and you are suggesting a need for 13,000 properties. **Are you suggesting that the majority of people will live alone?** I would imagine that there will be a much larger proportion of couples, families and friends sharing in the future which will mean a vast reduction in the number of properties needed.
- Migration occurs usually due to increased employment opportunities or cheap housing stock. **I see little evidence of growth in significant employment opportunities.** Those that have occurred are potentially in retailing or warehousing/distribution. These are traditionally not well paid and therefore it would prove difficult for those involved to raise the necessary finance to purchase property, especially in the current financial climate which is likely to continue for some considerable time. If the argument is that inward migration will occur due to cheap housing then that assumes that Burton will become a dormitory town. That also then assumes that those who live here will work elsewhere, given the rise in fuel costs and a congested and limited transport infrastructure I doubt the validity of that assumption.
- All of these options represent a significant expansion of Burton and **I find little evidence to support the need for such a scale of development.** A natural population growth of 3% I suspect could be catered for from existing developments and the new Drakelow Village. The development plan appears to be housing led which I find strange as the assumption then is that industry will follow. There is a whole range of locating factors which industry considers and given the degree of automation of processes labour is no longer a critical locational factor. I believe that a more holistic approach needs to be considered before detailed housing plans are published.
- In the light of our comments on 8.2, and at the commencement of this response, we suggest a **review of the Settlement Hierarchy**, using parish level data rather than super output areas which has demonstrably distorted population figures and other data.
- We suggest that, **if a hierarchy is required to direct growth, that each of the categories should have a base level of services to be expected rather than a points system.** For instance Yoxall has a Post Office, Doctors Surgery with Pharmacy, Several Shops, Education to 11 years of age etc. Compare this with Marchington,

which has no Post Office, no Doctors Surgery, no Pharmacy, one Community Run Shop (future uncertain) and Education to 9 years of age, yet both villages are classed as a Local Service Village.

- **There are serious concerns regarding the quantum of housing identified in the draft core strategy** draft pre-publication strategic options paper for a number of reasons: The 13,000 (target 2006 – 2031) should be re-assessed and a minimum figure of 16,250 introduced. There is a failure to take account of the under provision 2006- 2010. Drakelow lies outside of the Borough boundary in a different Housing Market Area. There is no evidence base to support its inclusion in the Council’s target. SDDC is likely to object to this transference. There should be no sequential approach. Lower densities will be achieved if green led infrastructure sites are to evolve. This will not in itself affect the housing numbers but will require more land to be allocated. There is too heavy reliance on delivery from brownfield sites identified in the SHLAA. These sites should be identified now and be the subject of consultation. Accordingly we invite the Council to revisit the quantum of housing as a whole and reassess the ability of brownfield sites to deliver the identified numbers. There has been a consistent target of 13,000 homes over the 20 year period; that is evidence based. This needs to be reviewed upwards to take account of growth agenda, the inability to rely on Drakelow, the under provision in early years and the inability of brownfield sites to deliver the quantum of housing indicated.
- Issue of **Phasing of Brownfield sites before greenfield not PPS3 compliant**. Brownfield is no longer prioritised over greenfield in PPS3. Both sustainable brownfield and greenfield sites should be identified and reference to the phasing approach should be deleted.
- Without a sufficient quantum of housing there will be less investment in Burton town centre. Shoppers will continue to use competing centres in Lichfield and Derby.
- **The need to explore cross boundary agreement is detailed in the NPPF**. Table 9 assumes that East Staffordshire Borough Council can adopt some 2,000 houses on the Drakelow site; a site located in South Derbyshire District. Previously this had been discounted as an Option. Not only is the Drakelow site within an adjoining District it does fall within a different Housing Market Area. Hitherto, all of the baseline evidence has related to the East Staffordshire Housing Market Area and the assessment within South Derbyshire District to the broad Derby Housing Market Area. There is no evidence base to now change strategy.
- **The extension of the plan period to 25 years (to 2031) reduces the five year supply from 3250 to 2600 units**. In reality the demonstrable supply figure should be 3,250 plus 20% = 3,900. Section 4.1 and Table 9 outlines the future housing requirement. (20% 'headroom' from NPPF)

Landscape

5 comments related to the landscape

- Essentially these revolved around the importance of the landscape character and how this should be reflected in the Core Strategy. Staffordshire County Council’s Landscape Character Assessment should be used when designating sites. The Core Strategy should seek to promote the conservation and enhancements of the landscape character of the countryside. The County Council considers that the Core Strategy should give consideration to wider landscape character (not just designated sites) when deciding the scale and location of new development in the Borough. One respondent mentioned that it was not apparent that the selection of the site options has been informed by appropriate testing of landscape capacity and landscape sensitivity in East Staffordshire. In addition the tourism section and Environmental Issues section needs to refer to the countryside.

Local Enterprise Partnership (LEP)

9 comments

- A number of respondents are concerned about the grouping of the Birmingham Solihull LEP, and feel that we would be better suited to a different geographical grouping. There are also questions over what power or influence a LEP may be given in terms of planning, and concerns over their involvement with developing the core strategy.

Localism/ Neighbourhood Planning/ NPPF

14 comments

- A number of comments were received around the implication of the localism bill and the draft National Planning Policy Framework (NPPF). In particular it was highlighted that the Core Strategy must be in conformity with the NPPF and take into account the implications of the revised National Policy. Questions over localism and what this means for the local community were also raised.

Marchington Camp

- Two comments were received on section 5.20 related to the future of the Marchington Camp. One respondent felt that the paragraph was too vague and that there should be some indication of what would happen to it. Another found the paragraph to be insufficiently substantive. The comment stated that: Given that the old military bases are in rural areas, any development would be, by definition, unsustainable. To balance this inherent unsustainability, any development must have a distinct and balancing sustainable component; for example a 'solar development', a model 'eco-community' and/or upweighted community/sports facilities. We believe that the 'Barracks Blocks' site off the B5017 could provide an opportunity for a 'model development' of a 'sustainable nature' that could be used as a blueprint for wider development through the Borough and would be interested in entering into discussions with the Borough Council to investigate this possibility.

Energy

1 comment.

- The comment said that there is little mention of energy or micro-generation in the document. We need to say: - Builders of new homes will be encouraged to include micro generation of electricity - Homes shall be as energy efficient as possible - The highest standards of insulation will be demanded in new developments.

National Forest

15 comments,

- Two respondents noted that we need a National Forest tourist attraction in East Staffordshire as a lot of them tend to be in South Derbyshire. Some people queried why Burton is branded as the 'capital of the National Forest'.

A number of comments were from the National Forest Company. Specifically they included:

- The section entitled 'Environmental Issues' describes the landscape and natural environment characteristics of the Borough. It is a major omission that The National Forest does not feature in this section given that it is a major national initiative covering a substantial part of the Borough. The Forest should be specifically referred to in this section both for the impact that it has had on the landscape and its status as a national environmental policy initiative
- the portrait of the Borough presented within the Publication document should contain references to The National Forest in at least the transport, landscape character, natural environment and tourism sections. This would then provide threads running through the portrait and a far stronger context to the statement that Burton forms the 'Capital' of The National Forest.
- the NFC would welcome specific reference to the National Forest planting guidelines as this remains a very significant mechanism to achieve green infrastructure gains with all forms of development in The National Forest area.
- the NFC is concerned that insufficient information is presented to allow informed choices to be made on site preferences, particularly as they are all greenfield extensions. This consultation document simply highlights the relative positions of the proposed sites and presents them as alternatives with alternative scales of development at each site. Details of the environmental impact of the proposed sites and their potential to contribute to meeting the aims of the East Staffordshire Green Infrastructure Strategy are required before a decision can be reached on which are preferable.
- The NFC supports the reference to the need to maximise the potential of green infrastructure in accommodating growth set out in paragraph 4.1. The NFC also supports the focus of new development being on Burton

New Settlements

- 1 comment was received: Recent press reports made reference to the possibility of the creation of entirely new settlements although these were unlikely to form part of the Core Strategy. There is merit in looking into the possibility of this type of development as it creates a more cohesive and vibrant settlement than the mere expansion of urban sprawl. Some years ago the Duchy of Lancaster as a major landowner in the Needwood area proposed plans for just such a development near the Tatenhill Airfield. The plan was quietly dropped as it was deemed un-necessary and inappropriate at the time. Such a proposal, with direct links on to the A515, could form an integral part of the plan in the medium term.

ONS Data

2 comments

- The figures and data used to form a basis of the proposals are suspect in that they are not authenticated and we are apparently based on false premises. One striking example is that migration figures are given by many councils but there is no figure of migration outwards? ONS does not have figures which are viable and Communities and Local Government differ in their figures.
- East Staffordshire has an obligation to provide housing for its own population growth. The West Midlands Regional Spatial Strategy sought to limit outward migration from the conurbation by promoting its regeneration and, notwithstanding its formal abolition, this principle was agreed by all the local authorities and still holds good. Therefore, East Staffordshire should not provide for any significant outward migration from Birmingham and the Black Country..

Phasing

3 identical comments from 3 consultees (repeated).

- The plan contains no details of phasing or timing of releases.

Public Transport

12 comments

- Burton train station is not close to where buses stop in town centre. Should reroute buses past train station.
- Local Authorities have little control over bus transport. How can you provide necessary improvements when transport is not publicly owned?
- Bus service not adequate to travel to work i.e. cannot reach Winshill, Wetmore, Centrum etc. Bus times don't coincide with shop and office closing times and Sunday trading.
- In rural areas we have always been advised by Staffordshire County Council that bus services will be reduced or even replaced by a taxi style service.
- Unrealistic that those persons occupying higher value homes planned outside the town centres will rely on buses. This plan can only increase the reliance on cars.
- Concerned that public transport links, which are currently poor, be at least maintained.
- Without a radical change of direction by Staffordshire County Council and Bus operators it will become increasingly unsustainable to develop in rural areas.
- CPRE sees a severe future problem arising from commuting traffic to work, and accessing educational, social, shopping and support services from home. East Staffordshire starts with a disadvantage in this respect, and it seems to be an understatement of the first order to just summarise "that improvements to the bus network are needed".

- Given the size of the proposed developments in the rural areas it is highly unlikely that the existing bus services will be altered without a subsidy being provided by ESBC.
- The NFC would support measures to improve rural public transport connections which could also reduce the amount of car-borne traffic for rural tourist attractions such as the National Forest Adventure Farm in Tatenhill and Rosliston Forestry Centre.
- A new sustainable urban extension will make the economics of providing more bus services viable. Restricting development simply restricts public transport use - rather than encouraging it.

Retail

2 comments

- (para 3.31) How well Uttoxeter town centre performs is currently questionable.
- The August 2007 Retail Study identifies capacity for between 5,300 sq.m. net (under a low growth scenario) and 8,100 sq.m net (under a high growth scenario), however this is not within the Core Strategy DPD. The Core Strategy document should contain a realistic summary of the need for both comparison and convenience retail development in the Borough, taking account of both quantitative and qualitative considerations. This should be informed by an up to date Retail Study, as required by the guidance set out in PPS4.

Road Infrastructure

23 comments

The key pressure on the SRN is at peak, commuter, times, and therefore employment land and housing allocations should be considered together to ensure the principles of Planning Policy Guidance 13 (PPG13) to minimise trips at source are considered fully.

Is it feasible to make major highways into town clearways to cut down congestion and improve safety for cyclists (unless dedicated cycle routes are included of course). I'm sure bus drivers would appreciate this as well!

Burton has major problems regarding its road networks and congestion. Given that two major access points to the town are via bridges over the river Trent and the other two main access points are from the A38 additional traffic can only compound the problems.

- Further development must be considered on the impact on inadequate rural roads.
- Burton on Trent's highway network is already congested during peak periods. This is an understatement! what plans are in place to improve the road network to enable all these new people to travel during these peak times and to cross the 2 bridges in the town centre, around schools and on busy junctions into and out of the town.
- (Para 3.24) Problems arising from on-street parking are not just confined to Burton and Uttoxeter
- Careful Planning needs to be considered with the highways, in particular at the proposed new developments at the old Plasplugs site, the proposed new Tesco on Hawkins Lane and the roundabouts at the Pirelli Stadium and Derby Turn. These new developments will have a major impact on all the junctions in the town and it is crucial these are correct as there are already major problems in the town.

- The HA has concerns regarding the proximity of housing sites to the SRN. Detailed testing of the previous Core Strategy / growth point proposals in 2010 by the HA indicated that in Burton upon Trent the option chosen would make little difference to the impact on the SRN. However, there were more significant differences in terms of traffic impact on particular roads (links). In Uttoxeter, the difference between options was marginal in terms of overall traffic impact on the SRN. There was little discernable difference in terms of impact on particular roads (links).
- The HA is of the view that whichever option is chosen the impact on the SRN will be noticeable and the Core Strategy and the Implementation Plan will need to allow for mitigation measures for transport impact to be identified, funded and delivered.
- Those which force large volumes of traffic onto inadequate surrounding roads should not be developed unless and until adequate new road provision is made. Importantly for both the Burton and Uttoxeter areas, sites which are adjacent to, or easily linked to the A38 and A50 should be prioritised, also taking account of the opportunities for commercial development and job creation.
- The substantial inward migration that is assumed will mean an increase in commuting in and out of the area, going against the trend of reduced car use and adversely affecting existing residents who live on the routes most likely to suffer.
- Development in rural areas will only compound existing congestion in urban areas.
- The coverage of the “challenges” facing the transportation system is weak and in the HA’s view requires more detail.
- The view expressed that travel patterns are solely influenced by the Burton upon Trent travel to work area fails to consider the wider nature of commuting patterns and the key links. The recognition that SRN capacity is a fundamental challenge in East Staffordshire is welcomed by the HA but the lack of any comment on possible measures to mitigate the traffic impact of development is not welcomed by the HA. Given the key linkages created by the A38 the Core Strategy will be required to fully address this issue. In the same context, the failure to discuss transport infrastructure in the “infrastructure” section of the report fails to address the HA’s concern that the spatial choices offered at this point in the Core Strategy development are not linked directly to the likely levels of infrastructure provision that will be required to mitigate the chosen option’s transport impact. An integrated transport strategy is proposed for the development plan area. The HA will require the opportunity to comment on this strategy. At the very least the current work should make reference to the need for sustainable transport measures to be place at all points in the development planning and development control cycle.
- Should not the Vision also consider ... transport and access?
- Transportation is bound up with both the housing and employment issues. CPRE believes that solutions must be developed from much more radical thinking. These include mobility from door to door/the rôle of public transport/the development of personal transport and the layout of housing areas encouraging such use as walking and cycling concentration rather than dispersal of employment areas to facilitate public or shared transport etc. In many respects the whole new strategy needs to be transport-orientated.
- Has ESBC considered a park and ride facility to reduce traffic congestion?
- The Core Strategy makes sweeping statements regarding transport provision in the Borough. The justification of statements made in the document is essential to the development of a Core Strategy that is fully evidenced and

will stand scrutiny by the Planning Inspectorate. Section 4 makes a statement about the inadequacy of the highway network, but no reference or explanation is given; nor is it clear if this refers to the local highway network, the HA SRN, or both. So on what authority is this statement actually made?

- Concerns with the capacity of the highway network and how it will cope with additional houses. Reliance in Burton on logistics and distribution employment which increases the amount of HGVs on the roads, often during the night-time hours, which is unacceptable when the routes used are areas of intensive and well-established residential development (such as the B5017).
- The allocation of sites in the villages is likely to increase commuting levels.
- Capacity of A38 needs addressing and reference to the existing highway network and the A38 as a key issue and challenge is welcomed. The Highway Agency's planned improvements to the A38 junctions are supported as a key priority project by Derbyshire County Council.
- In para. 6.10, to a Transportation Strategy, but we have been unable to find this document on the ESBC website. We understand that there is a transport model for Burton and so it should be possible to assess the effects on the network of the proposed sites, but no information is forthcoming.
- We feel that ESBC needs to undertake a more thorough analysis. We would also like to see how sustainable transport objectives might be employed in each proposal.
- If more greenfield sites are to be promoted for mixed use schemes, then public transport must become an integral part of infrastructure planning from the outset and not when demand has been generated.
- The council must have a plan to encourage walking and cycling to ensure active transport contributes to the Sustainable Community Strategy vision and Key themes relating to healthy communities.
- (para 3.28) would be more accurate if it said there are some dedicated cycle, bridleway and pedestrian routes. Or maybe it should say many but not enough.
- There is sadly no traffic free - and therefore safe - cycling route from Burton to Uttoxeter.
- The council must be ambitious in its planning for the next 20 years in trying to improve facilities for cyclists and encourage cycling and walking tourism in the borough.
- The core strategy should include the following aspirations:
 1. To work with British Waterways to improve the canal towpath for walkers and cyclists from the northern borough boundary at Clay Mills to the southern boundary at Wychnor. (It should be the same standard as the current route from Shobnall to Princess Way which is excellent if too short.)
 2. To have a network of cycling and walking routes throughout the Washlands
 3. To have cycle routes connecting all the suburbs of Burton to the town centre, the Washlands and the canal.
 4. To have a cycle route linking Uttoxeter Heath with the town centre.
 5. To have a traffic free cycle, bridleway and walking route from Burton to Uttoxeter following the Dove valley.
 6. If possible to extend this route from Uttoxeter to Ashbourne to connect with the Tissington Trail at Ashbourne.
 7. New homes/estates should have cycle routes that connect to the network of existing routes.

Sequential Approach

7 comments

4 consultees comment on the Sequential approach being inconsistent with National Policy.

- The sequential approach prioritising brownfield and then suitable greenfield land within the settlement is supported. The proposed sequential approach should contain a third priority of derelict land adjacent to settlements. This would include land formerly used for mineral extraction and subject to limited restoration (e.g. the allocated development site at Branston South). These sites should come forward before greenfield development given that environmental impacts may potentially be less and environmental gains through green infrastructure may be higher. The listed third priority, “extensions to the settlement” (which would then become priority 4), should additionally specify that priority is given to sites that have minimal impact on the environment, have strong potential to incorporate green infrastructure and have strong pedestrian and cycle links in addition to public transport connections.
- Woodland planting and landscaping on some brownfield development sites also provides an opportunity for urban tree planting that cannot be achieved through other methods. A balance is therefore needed between developing brownfield sites whilst ensuring appropriate green infrastructure is incorporated.
- A further approach needs to be agreed setting out how to compare greenfield options given that the majority of sites highlighted in this section would fall under the same category in both the settlement hierarchy and sequential approach. In particular, all sites need a detailed environmental impact assessment and an appraisal of their green infrastructure potential. The assessment of greenfield sites should be in terms of a least environmental impact analysis. This should consider the site’s current contribution to the landscape character of the area, the existing ecological value along with the potential visual impact of development and the potential for delivering green infrastructure in line with the East Staffordshire Green Infrastructure Strategy. While some information on the suitability of sites for development is provided in the SHLAA this is not considered sufficient nor readily available with this consultation document to allow respondents to assess the relative merits of the proposed strategic allocations.
- It is important to promote the re-use of previously developed land - paragraph 36 of PPS3 advocates previously developed land being a priority for development, the requirement for a “sequential approach” to site selection and identification at paragraph 8.10 of the draft document is inconsistent with National Policy. There is now no requirement for applications for residential uses to be considered in relation to a sequential test (as was the case with PPG3) and the status of the land is just one factor which should be considered in determining a site’s suitability. We would therefore recommend that the requirement for a sequential approach to site selection is removed from the emerging Core Strategy in order that it remains consistent with National Policy in this regard and prevent the plan from being found unsound. This matter was dealt with by the Inspector at the Examination of the Harborough Core Strategy when to ensure soundness reference to a sequential approach was deleted.
- The sequential approach could be replaced with a set of principles for considering a site’s suitability which could include the site’s status as well as the quality of the land.
- Barton Parish council support the brownfield sites first proposal, but question why no brownfield sites appear as part of the strategic options and how the policy will actually be achieved? The Parish Council question the application of the sequential approach to greenfield development in the strategic villages linked to the regeneration fund for inner Burton.
- Sequential approach prioritising previously developed land is supported.

- The larger strategic villages (Abbots Bromley, Barton under Needwood, Rocester, Rolleston and Tutbury) already provide wide-ranging services although in many cases these have been in decline. It is important that these services are retained by encouraging enterprise and appropriate development to maintain thriving and sustainable communities.
- Burton hospital is not capable of accommodating the proposed increase in population, nor are the secondary schools. Burton town centre cannot cope either in terms of roads or car parking, and the towns retail outlets are barely sufficient for the population today in terms of range, diversity, and size of stores, which already leads to many people travelling to other towns such as Derby.

Settlement Boundary

- Defined settlement boundaries should only be varied by a majority vote in a local referendum in accordance with the Localism Bill. Can this be incorporated into the Core Strategy?

Settlement Hierarchy

23 comments

5 comments objecting to Marchington being classed a local service village but by **2** consultees.

6 comments supporting the Settlement Hierarchy but by **5** consultees.

- Objection to Marchington being placed as a local service village. It is felt that Marchington has very little in the way of services compared with Yoxall for example. Information used in the Settlement Hierarchy is inaccurate and is in reality a Small Village / Hamlet.
- Miscalculation with the population figures for Marchington.
- Query as to why Abbots Bromley is classed as a strategic village as its services mirror those of Yoxall which is classed as a "Local service Village".
- Suggest a review of the Settlement Hierarchy, using parish level data rather than super output areas which has demonstrably distorted population figures and other data.
- Suggest that, if a hierarchy is required to direct growth, that each of the categories should have a base level of services to be expected rather than a points system.
- The settlement hierarchy is logical and supported (5 consultees).
- The identification of Yoxall as a Local Service Village is supported (1 consultee).
- The Parish Council would like to challenge why Abbots Bromley has been listed as a strategic village as it does not meet the criteria required as highlighted in point 8.5 the definition of a strategic village.
- The Settlement Hierarchy does not include the aspirations of the villages nor did it solicit the views of villagers in this respect. Why was this?
- Query the role of Barton as a strategic village in the settlement hierarchy - does it really serve the wider rural area? Its proximity to, and the relative ease of transportation to Burton means that it has a low provision of shops and services for the size of population. The recent closure of the Lloyds Bank in Main Street is a case in point. How will further development in the village help to reinforce Barton's role as a service provider for a wider rural area when a service such as a shuts up shop.

- The role of Uttoxeter is not fully developed. It seems to rest on being a provider of services for a wide rural area. As the second largest settlement in the borough, its contribution to the overall housing requirement at 650 houses or 5% is extremely modest and in percentage terms equals the contribution being made by the strategic villages and the local centres put together. We are led to question whether that level of housing will be sufficient to achieve that aim of the master plan vision for the town centre.
- In the strategic options not all the strategic villages are treated equally. No explanation as to why no development is proposed for Abbots Bromley. We are also concerned that the approach for strategic villages centres almost exclusively on housing and yet the very reason for promoting housing in these locations is due to their services and facilities. What measure will ESBC be undertaking to support local services and facilities? Will there be appropriate backing from planning policies? What opportunities will be provided for rural employment in order to maintain their sustainability?
- Section 8.5 states that for a village to be classified as a "Tertiary Service Village": *"It should provide primary education facilities, community recreation area, at least one shop and be accessible by a bus or train service"*. By following such strict criteria the village schools in such places as Anslow, Church Leigh, Draycott, Kingstone, Newborough and Rangemore are put at severe risk of closure, with greater knock-on effects for the future of these villages. As such I would recommend that alternative options to those set out in the Core Strategy should be seriously considered.
- Section 5.19 in "The Rural Areas" states that "the larger villages will be the rural centres for services, facilities and jobs acting to sustain the rural areas". I believe that this approach to development, which focuses primarily on larger villages thus neglecting smaller communities is detrimental to the future of rural village life in Britain. Small villages are in critical need of affordable housing to provide support for the primary schools, pubs, shops and bus services, which are at serious risk of closure. By neglecting this need, the populations and rural communities will continue to age as young families are not able to afford to buy houses in the smaller villages. This results in the loss of community as houses are bought by those wealthy enough to afford second homes in the country or holiday rental cottages.
- For clarity, it is suggested that the description of the features / characteristics of "Strategic Villages" under paragraph 8.5 be amended to read *"and be accessible by frequent (hourly) bus or train services"* in place of *"bus and train services"* as only one of the Strategic Villages identified by the Core Strategy (Tutbury) has a train station, and even then it is located outside of the village on the edge of Hatton.
- Paragraph 8.5 sets out the Settlement Hierarchy using the terminology of "Burton upon Trent", "Uttoxeter", "Strategic Villages", "Local Service Village" and "Small Village/Hamlet". This terminology is repeated within the text under "Strategic Location of Development", "Distribution of Housing Allocations" after paragraph 8.10. Different terminology is however then introduced in stating where land will be allocated (i.e. "Principal Urban Centre: Burton upon Trent", "Borough Centre: Uttoxeter", "Rural Service Centres" and "Local Centres"). This lack of consistency in terminology is confusing, particularly in relation to the rural settlements. Consistent terminology should be applied to make the Core Strategy clear, concise and easy to understand. The identification of Rolleston as a Strategic Village is supported, reflecting not only its existing range of services and facilities but also the need to support and enhance those services and facilities through new development.
- The NFC has significant concerns that comments are not only invited on the approach but also on the suitability of the sites highlighted in this section. The document contains no information on the sites themselves, and in terms of the approach used, all the major proposed allocations would fall under the same priority in the sequential approach, i.e. extensions to the settlement, therefore the approach used does not allow the suitability of sites to be assessed.

- Recommend that the approach to Small Village / Hamlet is altered to reflect the need for housing development at these locations to meet local need. The “functional” condition on development at a rural location excludes the potential for rural housing development, an approach that fails national guidance as set out in Planning Policy Statement 3 (“mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural”). The draft NPPF carries this approach to improving access to affordable housing forward, seeking economic growth at rural areas, indicating the Government’s objective to “raise the quality of life and the environment in rural areas by promoting thriving, inclusive and locally distinctive rural economies”. By excluding the potential for housing development at smaller rural settlements the Council is failing to support this key objective of emerging national planning guidance. We recommend the settlement hierarchy be changed to reflect the potential for affordable housing development at all rural settlements, where need is identified.

Strategic Housing Market Assessment

1 Comment

- The Strategic Housing Market Assessment Conclusions report identified an affordable housing need of 895 homes per year based on 2006 household projections. This suggests a higher housing requirement than now proposed.
- As part of the evidence base the Council should work with neighbouring authorities to update the SHMA using the latest 2008 household projections. This work should include discussions with South Derbyshire District to agree a cross boundary strategy dealing with the overlapping Housing Market Areas.

Sites of Biological Interest

1 comment

- Some of the candidate sites would appear to involve locations that lie close to Sites of Biological Interest. We propose that the approach to the development of such candidate locations should reflect the findings of the Council’s Green Infrastructure Strategy. This will help to establish whether and how the interest that exists on such SBIs can be accommodated, linked with or buffered (as appropriate) as part of any development scheme that comes forward. The candidate sites in question are as follows:
 - South Branston
 - Lawns Farm

Social and Community Facilities

2 Comments

- Population increase including the Ageing Population indicates the need for increased social and community facilities, including Places of Worship,
- Support for the recognition of the need for improvements in the Villages and Rural Areas including provision of new community facilities and social infrastructure. We also draw attention to the need of new facilities including Places of Worship as recognised by the draft NPPF at paragraph 126.

Sport and Leisure Facilities

7 comments

- (Para 3.36) Disagree that "the Borough is well served by sports and leisure facilities".
- Providing sufficient quality facilities with good access, will help to contribute to the key theme of 'A healthier East Staffordshire and the vision of an 'improved health and sense of well-being'.
- New schools, providing access to sports facilities to the community in general can be a benefit in meeting the objectives of the Sustainable Communities Strategy. On the other hand the locations for the new schools could threaten playing field areas and this should be avoided to ensure national policy to protect playing fields is not compromised and the Councils Playing Pitch Strategy is complied with.

- Modelling work by Sport England identified the need for additional indoor sports facilities in Burton on Trent to address growing demand through housing growth and poor access in the north of the town. This needs to be articulated in the Core Strategy as it reads as if no other new facilities are required in Burton. The Playing Pitch Strategy will also need to be a reference document for new provision of outdoor sports facilities which are not referred to here either. The needs of the Borough for indoor and outdoor sport and recreation need to be integrated into the proposed Infrastructure Planning SPD and Green Infrastructure SPD.
- Negotiating community access to the facility to Burton Albion Football Club.
- The significant increase in housing development in the Borough will generate a need for additional indoor and outdoor sports facilities. A clear mechanism needs to be identified.

Sustainability

11 comments

- Issues closely related to sustainability appear to have been too lightly dealt with:-
 - a) Global warming, which has been apparently relegated to a later SPD rather than featuring prominently as it deserves.
 - b) World shortages of basic mineral resources, notably oil and rare earths oil with an expiry date of 2050, and rare earths fundamental to post-oil (battery) technology and electronics. This issue is basic to the future of transport, which in its turn raises doubts about spatial planning solutions involving dispersal of housing and employment.
 - c) Competition for land. The Strategy concerns itself with allocation of land, notably for housing and employment. With increased world and UK population growth and rising living standards also, demand for food is forecast to rise annually by 1.6%, i.e. approaching 40% within the Plan period. This can be directly related to agricultural land demands exacerbated by parallel rising demands for, e.g. fuel crops. Can this element be ignored in a "Strategic" document?

The six key principles of sustainable development are, at best, debatable.

- 1) - first define the objectives!
- 2) and other critical matters than just climate change,
- 3) a spatial approach doesn't necessarily comply with sustainability, nor
- 6) does high quality inclusive design, desirable though this is,
- 7) community involvement may or may not advance sustainability.

The four over-arching priorities, whilst both desirable and supportable, are not inherent in the term sustainability.

A sustainability appraisal, setting out the economic, social and environmental consequences of both the Core Strategy and the specific sites, should be an integrated part of the plan preparation process. This requirement is maintained within the draft national planning policy framework. We believe that it would have been helpful to have seen the sustainability appraisal of all the potential sites identified in the Strategic Options so as to assess their appropriateness against common criteria. Sustainability Appraisal needs to be part of a continuous process to be effective.

Sustainable Community Strategy is based around 5 key themes, one of these being a "A cleaner, greener East Staffs". If this is the case then surely development in areas with no effective public transport should be avoided.

It is hoped that the final Strategy will also be for a "brighter future" for more than just "children and young people". A "growing East Staffordshire" does not necessarily mean economic growth and expansion. The term also correctly implies social growth within communities

There needs to be a strong link between the Sustainable Community Strategy and the Core Strategy, as the latter provides the spatial framework for the former. Para. 4.35 of PPS 12 states, key spatial planning objectives for the area should be in alignment with priorities identified in the SCS “sustainable community strategy”. Whilst there is a statement about the aims of ESBC’s Sustainable Community Strategy, there is no explanation about how the Core Strategy can provide the land use basis or indeed how the aims are consistent and coherent.

By definition, if development is to be "sustainable" it must be located within, or immediately adjacent to, an existing centre.

Criticism of the use of the term "sustainable". The terms “Sustainability” and “sustainable development” mean different things to persons with different interests. An acceptable definition of each must be given and ideally a distinct section on the topic in the finally agreed Core Strategy document.

- CPRE would like see a contribution to the debate on the definition of sustainable development from ESBC.

Technology

1 comment

- Advances in technology will continue to reduce the necessity to travel into the major urban centres and will also see increasing numbers of businesses locating in rural areas.

Tourism

3 comments

- Tourism is an important part of the strategy and it is therefore vital that the Bargates development is taken as an essential key in placing Burton at the top of the tourist hot spots. We have here a once in a lifetime opportunity to make sure we do not turn our backs on the beautiful Washlands area and to blend the Bargates development within the existing leisure framework we already have of the Leisure Centre, the Library, the Market and the Abbey.
- Tourism can equally debase the character and quality of rural areas by increasing traffic and congestion as evidenced by the operation of Alton Towers.

Trent and Mersey Canal

5 comments

- British Waterways is pleased to note that the role of the Trent and Mersey Canal as a tourist and heritage attraction which contributes to the local economy is acknowledged within the document, and that it has potential to be developed further. Sympathetic waterway-associated development can therefore significantly enhance the character, attractiveness and local distinctiveness of the District, and thus help to promote the local tourist economy.
- British Waterways agrees with the identification of the Trent and Mersey Canal as a key green infrastructure asset within East Staffordshire, but would also comment that the canal is a valuable multi-functional community resource which can serve in a variety of roles. Land use implications and location requirements arising from their constraint (their location and alignment) need to be recognised and treated flexibly within planning policy. British Waterways would not therefore wish to see the importance of the canal as a green infrastructure asset precluding consideration of appropriate waterside and canal-related development.
- British Waterways would not therefore wish to see the importance of the canal as a green infrastructure asset precluding consideration of appropriate waterside and canal-related development, as such development (when appropriately designed and located) can help to promote the economic and social well-being of the area and improve the attractiveness of the canal to residents, employees, tourists, visitors and investors.

- Concerns over sites affecting Canal area- a designated a Conservation Area. Over recent years there has been considerable greenfield development along the canal corridor through Burton, much of it "big shed" industrial development that does not respect the Conservation Area and has damaged the canal's environment, amenity and tourism value. Another consideration is the designation of the prominent escarpment area between Sinai Park and Tatenhill as a Special Landscape Area and the "Green Infrastructure".
- Suggestion - To work with British Waterways to improve the canal towpath for walkers and cyclists from the northern borough boundary at Clay Mills to the southern boundary at Wychnor. (It should be the same standard as the current route from Shobnall to Princess Way which is excellent if too short.)

Unstable Land

1 comment

- Past coal mining activities have taken place within parts of the East Staffordshire area, particularly in the eastern part of Burton upon Trent which have left a legacy of potential land instability and other public safety issues. Whilst none of the strategic options outlined within the consultation document appear to propose significant new development allocations within the affected area, it is noted that the Core Strategy does propose to concentrate development in Burton upon Trent. It will therefore be important that development proposals in this area take account of any coal mining related land instability and other public safety issues and, where necessary, incorporate appropriate mitigation measures to address them. As such, The Coal Authority considers that the Core Strategy should incorporate the following:
 - A reference to the range of potential public safety issues relating to the legacy of coal mining within the East Staffordshire area. Potential hazards include: collapse of shallow mine workings; collapse of mine entries; gas emissions from coal mines; transmission of gases into adjacent properties; coal mining subsidence; and water emissions from coal mine workings. These hazards may currently exist, be caused as a result of development, or occur at some time in the future; A relevant reference to PPG14 (Development on Unstable Land) as this is fundamentally linked to the need to raise awareness of the potential public safety hazards arising from the legacy of mining; and Appropriate general policies/policy criteria requiring new development proposals to take account of any risks associated with former coal mining activities and, where necessary, incorporate suitable mitigation measures to address them.

Utility Services

5 comments

- Not enough on sewage infrastructure implications. Increases in housing will require major reinforcement and there could well be flooding and health implications in storm conditions.
- (para 3.49) mentions two major sewage treatment works within the catchment (Clay Mills and Checkley), however no comment has been made of any other sewage treatment works within the Council boundaries (e.g. Uttoxeter and smaller village sewage treatment works). The capacity and supporting infrastructure for these facilities will need to be assessed when considering smaller villages for growth as proposed in the options.
- (para 4.2) No mention of the other utility services that will also need to be increased.
- (4) Recommend consideration is given to water use and water efficient devices and appliances which should be employed in both residential and commercial buildings. Water demand management measures - those which reduce hot water use have significant potential to not only save water and energy, but also to reduce

the carbon footprint throughout the water system. We consider that given the statement within this point, further work should be undertaken to ensure the infrastructure and capacity will be in place to support growth.

Villages and Rural Areas

9 comments

- A community-led plan for Newborough was created at the end of 2010 and your policy department was given a copy of this. I would ask if you would consider the views of our community when considering any type of development in our area.
- Renaissance of villages is equally important, particularly as regards the reduction of congestion, enhancement of public transport and provision of off-street car parking. Possibilities and implications for housing and types arising from the cessation of gravel extraction from the Trent and Dove Valleys should be given.
- It is surprising that so little is said about the villages and rural areas. The list of priorities should be rank ordered. It is not accepted that any mix in the new developments should be established without proper consideration of what already exists. A table showing what each village already has would offer useful proof as to why the facilities of the strategic villages make them suitable centres for development when others may equally have the same or better.
- There is no reason why the smaller villages should not also offer employment, especially where home working is appropriate.
- (para 4.3) This section is superficial in the extreme, constituting purely a list of considerations to be visited. The consequences arising from these subject headings cut to the very heart of a settlement policy for villages, and the extent to which adequate facilities of all kinds can be organised, albeit in innovative ways, securing their continued viability in an era of reduced or non-existent private car use.
- Accept the need for specific attention to policies in the rural areas, and this must be after consultation with the local communities.
- Acknowledge that rural enterprise and employment needs to flourish in rural areas for healthy and sustainable communities but this should be small scale so as not to impose constrictions on existing services and infrastructure
- It is not true to say that the future health of villages and rural areas is dependent on whether or not rural employment and enterprise flourish, most people who live in villages do so because of the absence of industrial estates and they pay a premium in house price for the privilege.

Vision

13 comments

2 comments on lack of reference to housing in the Vision

2 comments on over emphasis on environment and environmental protection within the Vision

- The vision does not include any specific reference to the future provision of housing. It is unusual that The Vision does not even mention the words “dwellings”, “housing” or “residential”.
- Five of the seven bullet points refer to safeguarding the heritage of both the built and natural environment and promoting new green space and the National Forest. These are very important but the vision is not sufficiently balanced. It should give at least equal prominence to economic growth. There should be reference to the objective of meeting all housing needs. The vision of economic growth needs to be given greater priority.

- The impression is left that the Vision has been deferred until a particular growth trajectory was decided upon.
- The Vision offers an unexceptional menu and mixture of specific projects - a more focused and progressive development would have been welcome.
- It is not understood quite why there is a particular emphasis on partnership working in the Vision.
- The proposed Vision for the Core Strategy is commendable but fails to give adequate recognition of the need to plan for people (the social role) whilst planning for prosperity (the economic role) and planning for places (the environmental role) as set out in the draft NPPF and reflecting the Staffordshire Community Strategy. The Vision should include an additional bullet point: "The Borough will promote strong, safe and cohesive communities, who enjoy improved health and well-being, through the provision of new housing and community facilities to meet current and future needs including the ageing population".
- Only 51% of the respondents thought the Vision reflected the needs and character of the different parts of the borough. Why has such a poorly supported vision been adopted?
- The vision will only be achieved if the building blocks in terms of a sustainable core strategy and supporting DPDs is in place.
- The Vision as set out is unfocussed and fails to provide a concise summation of spatial planning objectives for the CS of East Staffordshire.
- Reference to para 8.9 says that this Spatial Strategy "will be consistent with the agreed Vision for the Borough as drafted earlier in the consultation document". It is very difficult, to understand how the spatial strategy can be consistent with that Vision, when the Vision provides no spatial direction or content for new development at all.
- The Vision talks about providing green space in new development (a detailed development control policy surely?) but provides no guidance as to how that should steer the scale, location and nature of residential and economic development which is being promoted through the CS.
- The sort of themes which one might have expected to see within the Vision, "ensuring that the housing needs of all of the Borough's residence are met in sustainable locations adjacent to the PUA and, close to the services and facilities which the population require" for example, are completely absent.
- The first bullet point of The Vision is also nebulous and unclear, whilst it talks about provision of "choice and opportunity for members of the community", it does not clarify in what areas that choice and opportunity should be. Is that choice and opportunity in which schools their children attend, which leisure centres they could use, which type of housing they have access to?
- There is also an absence of clarity in how the Vision of this CS relates to, or follows from, the Vision and Objectives of the Staffordshire Sustainable Community Strategy which are identified at paras 2.20 and 2.22 of the CS.
- Given the recognised resistance by some consultees from the Issues and Options stage (para 6.8 draft CS) to any greenfield development coming forward within the Borough, it is incumbent upon the Council to make a clear strategy and persuasive case for what is recognised through this CS as a necessary provision.
- At its heart, both the Vision and the Objectives which follow from it lack clarity or have detail which is lost within unfocussed text. It is strongly encouraged that The Vision be reviewed with production of a single and concise set of Vision Statements, and Spatial Strategy which should provide a balance between those aspects

which deal with growth and those which deal with protection. The Vision should provide a clear spatial context for the delivery of the CS. That Vision would then lead in from an equally clearly defined set of Aims/Objectives, which then in turn would typically feed down to the strategic choices and policy which ensure their delivery. It should be possible in looking at the Vision, and then the options for delivery to see how the two relate. It is not.

- English Heritage welcomes in broad terms the draft vision, and particularly supports the commitment to protect its heritage. We suggest that this could be further extended to include its “enhancement” and so “... seek to protect and enhance...”
- Figure 4 sets out a Vision Diagram. The elements of the Vision set out in this diagram are slightly different to the Vision as set out previously. The reference to “step change themes” and “cross cutting themes” are a bit of management speak which, at least, require a paragraph of explanation as to where they come from, what they mean and how they will be delivered.
- Natural England welcomes the vision and, in particular, bullet points 2-6. We note and support the stated role of green infrastructure in contributing to the Borough’s desired “step change” in economic prosperity. We refer to green infrastructure separately below but we welcome the high profile afforded to GI in relation to regeneration in Burton upon Trent and the beneficial after use of minerals sites in the area around Uttoxeter.
- Request for more explanation regarding the economic and green space aspects of the vision.
- There is a lack of attention to transport issues and the nature of the vision’s relationship with the Sustainability Community Strategy;
- The Vision places a lot of emphasis on the provision of significant green space and green corridors etc. All this is quite commendable, but there is no preceding analysis which provides an explanation as to why so much emphasis is being given to the need for green space. Should not the Vision also consider local services and facilities and transport and access?
- What will East Staffordshire feel like in 20 years time as a result of achieving this Vision?
- Solutions do not logically follow analysis and we are left wondering about the internal consistency of the document.
- The economic aspect to the Vision states that ESBC wants to attract new higher value businesses and to move away from its manufacturing base. Again, this may well be a laudable objective, but where is the evidence which suggests that this is best way forward for the borough? Have other options been tested? Why does ESBC want to promote financial services and what it calls “knowledge and creative based” industries, when the present Government has stated that it is committed to promoting the manufacturing base of the country and acknowledges the role of the financial sector for its part in contributing to the present recession? How is it going to be able to promote more knowledge based industries when there is so much competition from many other parts of the country all trying to achieve a similar objective?

Washlands

2 comments

- Support improved access to The Washlands.
- The strategy talks of improving access to the Washlands without saying how it will try to do this. The council needs to be ambitious and aspire for the Washlands to be a superb town centre green space with cycle, bridleway and pedestrian routes. This means the council must plan to:

1. Improve access routes to the area. This may include additional footbridges to enhance access.
2. Provide circular routes of different lengths; all routes to be well signed and with a good surface.
3. Promote these routes particularly by linking with the National Forest walking festival and by holding a cycling festival.

Waste Management

1 comment

- Waste will be produced during the construction stage of the development and during the occupational stages & eventual decommissioning. It will be necessary to provide appropriate waste management infrastructure to support development and any additional waste arising.
- It is important that the district council has regard to the emerging Waste Core Strategy and that phasing of developments ties in with delivery of supporting waste infrastructure.
- There are opportunities to promote sustainable construction techniques that will reduce the amount of waste produced during construction e.g. recycled and recyclable construction materials and ensure design of buildings & public spaces will enable occupants to store and segregate waste / recyclables in a sustainable manner.

Core Strategy Strategic Options - Citizens Panel Responses

71 responses received from members of the Citizen’s Panel, following 695 letters/emails sent out. This represents a 10% response rate. Responses were structured around a questionnaire rather than a ‘free-text’ approach, although there are also numerous opportunities for individual comments and ideas. The below provides a summary and overview of the key messages received from the Citizen’s Panel rather than a detailed description of the individual responses or comments made. However, all of the specific comments have been entered into a spreadsheet, and so will be used in progressing the preparation of the Preferred Option.

Preferences for Options (65 indicated a preference):

There were a wide range of views from the Citizen’s Panel. Overall the option receiving the most support was Option 3, although as shown below, a larger total number of respondents voted for either of the other two options or for ‘none of the options’. More people voted in favour of ‘none of the options’ than for Option 2 which appears to be the least supported of the three options.

Option 1	17	26%
Option 2	8	12%
Option 3	26	40%
None of the options	14	22%

Summary of responses:

The section below captures the main messages received from the Citizen’s Panel for each Option. In addition, some of the suggestions made in response to the questions about how each Option might be improved are also included:

Comments on Option 1 as a preferred option

Traffic impacts were commonly referred to, and many respondents feel that Option 1 would offer better possible access to main corridor route A50 and therefore result in less road and traffic congestion than the other options. In Uttoxeter, this Option was seen to create least amount of traffic on roads around the town. However, there were still questions about whether there would be major road/transport infrastructure provision, with references to Burton bridges.

Option 1 was generally seen as spreading development out over the Borough which lessens the impact, including on individual schools etc, and there were comments that this Option might have least overall impact in general terms. However, this was coupled with comments that Services, education and infrastructure improvements would be needed, but with them Option 1 could be implemented painlessly.

What improvements or changes might make Option 1 work better or lessen its impact?

A range of responses were provided covering many issues, but the most common themes are captured in the selection below:

- Improve the roads and ensure public transport links to new developments;
- Build more schools and shops to cope with extra people – a second secondary school in Uttoxeter might be required;
- Reduce the total number of houses proposed, and the numbers to be built on greenfield sites. Allow more small scale development within existing small villages.

Some other suggestions included:

- Perhaps give Uttoxeter the residential option from option 3 as well as the mixed use. Same for Rocester.
- Reduce the houses at point 2 (Beamhill) and add them to point 1 (South of Branston) on the map on pg 43.
- Vastly reduce the building on the unsafe land at Branston - dismiss the building of any sort due to lack of safe land. Also, roads need improving or increasing immediately.

Comments on Option 2 as a preferred option

Option 2 received least support in general, but there were still numerous comments about it. Some of the reasons it was supported included that it would avoid development in the Branston flood area. This Option is seen by some to represent evenly shared development within the Borough and allowing green space, keeping extra traffic away from already badly congested areas, and creating less disruption to already overloaded areas and villages. The key transport links required are already in place.

Option 2 was described as ‘the lesser of three evils’, but as referred above, received less support than the other options.

What improvements or changes might make Option 2 work better or lessen its impact?

A range of responses were provided covering many issues, but the most common themes are captured in the selection below:

- Reduce the size of block 1 on page 50 (Beamhill). I don't agree with building on blocks 2 (Tutbury Rd) & 3 (Redhouse Farm) as they would have a bigger impact on the environment than building South of Branston near the A38. Also, more growth allocated to Uttoxeter.
- Need to ensure school and employment provision, not just homes;
- Build in the towns closer to Burton where brownfield sites are.
- Include mixed use sites for Uttoxeter;
- Too large for the semi rural area, would need major highway improvements into Burton.

Comments on Option 3 as a preferred option

Option 3 received more support than either of the other two, and comments made included a range of issues. In general terms, the option was seen as containing a better distribution of sites, both housing and mixed use, and a better distribution of development across the Borough. Uses most land near the A38 in South of Branston, which has less of an impact on greenfield loss. Option 3 appears to give the best spread on paper, trying to create employment and housing with not swamping the natural environment.

The importance of creating more homes, and the pressure the Council is under, is recognised, but concerns were expressed about the numbers being discussed. 100 to 200 homes is the maximum that should be allowed at any time [in any one place], due to the disruption and discontent of established residents that would be affected – above that level, development would have a significant effect.

Housing should be created on both sides of the A38 and create a possible new junction, building homes at both Drakelow and Lawns Farm. However, other comments cautioned against 2000 homes on Lawns Farm which ‘smacks as an estate’ with inadequate proposals for supporting infrastructure (“primary schools and a few shops”). A secondary school will be needed.

Option 3 would maintain existing communities and minimise impact on certain areas close to town centres. It seems that it would be practical to make improvements to services and communications to cope with the developments. Just build in Burton. That is where the growth is and not on green belt land, and use the infill and brown sites. Less impact on the environment, with new areas identified to lessen the burden in the over populated areas of the countryside. Not such a big development at Option 3 and a large area of mixed use. The proposed distribution means acceptance of major increase in people and traffic stands a chance of being absorbed and in the end work.

What improvements or changes might make Option 3 work better or lessen its impact?

- In Uttoxeter the proposed development site (South Brownhill Rd?) should be moved further west to allow the Park to be at least double its present size some time in the future.
- Maintain village and ward identity and ensure that improved services are in place prior to development.
- Brownfield land must always be a first option. rejuvenates local areas, much more aesthetically pleasing. Removes old unused areas and places people, through economically viable asset, into the communities existing infrastructure. Increase Uttoxeter to mixed use as well as Rocester
- Include more mixed use in areas away from Burton.
- Reduce the total number of houses proposed, and the number to be built on greenfield sites. Allow more small scale development within existing small villages. Increase the focus on delivering infrastructure, employment etc.

Comments on preferring none of the options

Some respondents felt they couldn't support any of the Options, and some of the views expressed by them are summarised below. Some of the general issues relate to opposition to large scale housing development on greenfield land, and the view that the consultation options has insufficient focus on the provision of infrastructure, creating employment sites and ensuring a balanced strategy for the future of the Borough. There were numerous references to the importance of promoting brownfield development before Greenfield, including reuse or redevelopment of existing sites and empty buildings.

There was support expressed for a distribution of employment provision around the Borough so that no "bottleneck" of employment areas is created, and also housing close to places of work (mixed use allocations) as a general principle was supported by several respondents.

Some concerns were expressed regarding the role of villages where services are already considered stretched to the limit and the infrastructure under strain, although other comments were more positive if there were assurances that new development would bring appropriate investment in infrastructure. Some villages are not seen as having a 'strategic' role, and some are seen as having already "done their bit" with more housing (e.g. Barton). Any more will ruin their character villages will sprawl together, losing their individuality and charm and causing traffic problems.