East Staffordshire Local Plan 2012 – 2031 Regulation 22 (1) (c) Statement

Summary of the Main Issues Raised in the Representations to the East Staffordshire Local Plan Pre-Submission Consultation 18th October – 29th November 2013

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<u>1. Submission Consultation Statement</u> (Reg 22 (1)(c))

- 1.1 This Consultation Statement (Reg 22 (1)(c)) has been prepared in accordance with the requirements under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012¹, which requires the publication of a statement setting out:
 - *(i)* Which bodies and persons were invited to make representations under regulation 18,
 - (ii) How those bodies and persons were invited to make representations under regulation 18,
 - (iii) A summary of the main issues raised by the representations made pursuant to regulation 18,
 - *(iv)* How any representations made pursuant to regulation 18 have been taken into account;
 - (v) If representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
 - (vi) If no representations were made in regulation 20, that no such representations were made.
- 1.2 This statement seeks to show how the local planning authority has prepared the plan in accordance with Regulation 18. The summary of representations which demonstrates how the local planning authority has dealt with representations made in Regulation 20 is set out in the Summary of Representations document, which is submitted alongside this consultation statement.

¹ came into force on 6 April 2012

2. Introduction

- 2.1 This Submission Local Plan Consultation Statement describes how East Staffordshire Borough Council has undertaken community participation and stakeholder involvement to produce the Local Plan. It also sets out how previous stages of consultation and engagement have shaped the Local Plan.
- 2.2 This statement has been produced to fulfil the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, which came into force on 6 April 2012, specifically the statement defined in Regulation 17 comprising "a statement setting out:

a. which bodies and persons were invited to make representations under regulation 18;

b. how those bodies were invited to make representations;

c. a summary of the main issues raised by those representations; and

- d. how those main issues have been addressed in the Local Plan"
- 2.3 The Town and Country Planning (Local Planning) (England) Regulations 2012 also sets out procedures for the production of Local Plans, previously known as Development Plan Documents (DPDs). Regulation 18 (preparation of a Local Plan) of the 2012 Regulations effectively replaced Regulation 25 of the now superseded Town and Country Planning (Local development) (England) Regulations 2004, and subsequent amendments. The 2012 Regulations makes it clear that work undertaken by local planning authorities before they came into force is to be treated as having been done under the corresponding provision of Regulations.
- 2.4 Regulation 18 specifies the consultation a local planning authority must undertake on a local plan before it can proceed to publish a pre-submission version. It states the following:

Preparation of a local plan

"18.- (1) A local planning authority must –

(a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and

(b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are –

(a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;

(b) such of the general consultation bodies as the local planning authority consider appropriate; and

(c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

- (3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1)."
- 2.5 During the course of preparing the new Local Plan the relevant Regulations, originally published in 2004, were updated in 2008 and 2009. In April 2012 the new set of Regulations replaced all previous versions. Whilst the requirement to produce this statement is not new, the specific Regulations which refer to it have changed. The Regulations refer to the entire process of preparing Development Plan Documents (DPDs) such as the Local Plan. Work undertaken under previous regulations is valid.
- 2.6 This consultation statement forms one of the submission documents referred to in Regulation 19. The consultation statement highlights how the Borough Council has met the requirements of the Statement of Community Involvement (SCI) which was adopted in September 2007 with a future revision adopted in September 2013. Regulation 19 states:

"19. Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must –

(a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and

(b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18 (1)."

- 2.7 This statement sets out information on the number of representations made and a summary of the main issues raised in those representations.
- 2.8 Individual representations are available to view on the Council's website at

http://www.eaststaffsbc.gov.uk/Planning/PlanningPolicy/LocalPlanCoreStrateg y/NewLocalPlan/Pages/SubmissionDraftLocalPlan.aspx

- 2.9 This statement also includes a summary of the consultation on the previous stages of the Local Plan.
- 2.10 The Borough Council has been working on the new Local Plan since 2007 and has produced the following consultation documents:



- 2.11 A number of consultation response reports have already been published as part of cabinet or Full Council reports which set out the issues raised from each consultation. The summary of responses for each stage is contained in this report.
- 2.12 It is important to set out that consultation has not been restricted to these four consultation periods and that there has been continuous engagement and awareness raising through consultation on separate consultations such as the Masterplans, design briefs, supplementary planning documents and the evidence base, regular articles in 'ES News' which is published quarterly and sent to all households in the Borough, and meetings with stakeholders, developers, local interest groups such as Burton Civic Society, and parish councils.
- 2.13 The full list of those bodies and persons invited to make representations is set out in Appendix 1. The list sets out those specific consultees and general consultees which have been consulted on all stages of plan production. Since 2007, our local consultation database has grown substantially with individual contact details at each stage of consultation. Over time, the database has been amended to reflect change of details, addition of contacts or removal of

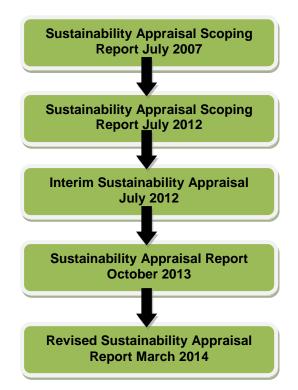
individuals. At present the database contains in excess of 1,150 individuals which are listed in Appendix 1.

2.1 Relationship with the Statement of Community Involvement

2.14 The Statement of Community Involvement was originally adopted in September 2007. It outlined who should be consulted at each stage of the plans production. The Statement of Community Involvement was revised in 2013 with consultation taking place between June and August and adoption in September 2013. The consultation and engagement of each stage of the Local Plan complies with the adopted Statement of Community Involvement at the point of consultation.

2.2 Relationship with the Sustainability Appraisal

2.15 The following sustainability appraisal documents have been produced and consultation upon:



- 2.16 Consultation on each document was targeted to the SEA bodies (English Heritage, Natural England and the Environment Agency) but anyone was able to make comments on any of the Sustainability Appraisal documents.
- 2.17 A schedule of the comments on each document and response to these is set out in the Revised Sustainability Appraisal Technical Appendices.
- 2.18 The Sustainability Appraisal has played an integral role in shaping the Local Plan by identifying sustainability issues, appraising various reasonable strategy and site alternatives, appraising objectives and policies and providing recommendations on how the plan could be more sustainable. The sustainability appraisal has also set out how significant environmental effects will be monitored following adoption and implementation of the local plan.

2.3 Duty to cooperate

2.19 Section 110 of the Localism Act 2011 inserted section 33A, entitled "Duty to Co-operate in relation to planning of sustainable development", into the Planning & Compulsory Purchase Act 2004. This defines co-operation on 'strategic matters' as:

"sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas"; and

"Sustainable development or use of land in a two-tier area if the development or use is a county matter, or has or would have a significant impact on a county matter"²

- 2.20 The Borough Council must work with neighbouring authorities and Staffordshire County Council as well as the following organisations:
 - Environment Agency
 - Historic Buildings & Monuments Commission for England (English Heritage)
 - Natural England
 - Civil Aviation Authority
 - Homes & Communities Agency
 - Primary Care Trusts (PCT)
 - Office of the Rail Regulator
 - Highways Agency
 - Integrated Transport Authorities
- 2.21 The Council has discussed with the relevant local authorities the effects of proposed development in adjoining areas on East Staffordshire as well

² Section 33A(4)(a) and(b) of the 2004 Act

as the effect on the adjoining authority of proposed development in East Staffordshire. In some cases the outcome of this co-operation has been reflected in the Local Plan wording; in other cases the outcome might be that the issue is monitored through ongoing liaison between officers. Officers have met with neighbouring authorities over the last 12 months on the Duty to Co-operate in order to demonstrate that the duty has been met.

- 2.22 Council officers have discussed with each of the neighbouring authorities the proposed housing requirement of 11,648 dwellings between 2012 and 2031. The Council has made it clear that it will accommodate all the proposed growth within its own boundaries. Officers continue to work with neighbouring Derby Housing Market Area ("HMA") authorities to confirm that they will not be expecting East Staffordshire to deliver any part of their housing requirement.
- 2.23 In addition, the Borough Council has been working closely with Staffordshire County Council to identify the future education provision required and necessary transport infrastructure over the plan period. This has resulted in a number of evidence base reports and strategies such as the Integrated Transport Strategy.
- 2.24 The Borough Council has also worked jointly on the following pieces of evidence:
 - Staffordshire County wide Renewable and Low Carbon Energy Study (All Staffordshire District and Borough Councils)
 - Strategic Flood Risk Assessment and Water Cycle Study (Environment Agency)
 - Habitat Regulations Assessment (Natural England, South Staffordshire District Council, Stafford Borough Council, Cannock Chase District Council, Lichfield District Council. Staffordshire County Council, Black Country Authorities, Forestry Commission and the Cannock Chase AONB Partnership)
 - Historic Environment Character Assessments and Conservation Area Appraisals (English Heritage, Staffordshire County Council and East Staffordshire Parish Councils)
 - East Staffordshire Integrated Transport Strategy (Staffordshire County Council)
 - Biodiversity Opportunity Mapping (Staffordshire Wildlife Trust and Environment Agency)
 - 2.25 In addition, the Borough Council has liaised with the following organisations in developing policy wording prior to statutory consultation under regulation 19:
 - Staffordshire County Council (Public Health, education, transport, historic environment)

- Environment Agency (Flooding and water management)
- Natural England (Natural Environment, green infrastructure, designated and non designated habitats)
- The National Forest Company (National Forest, green infrastructure)
- Tier 2 settlements Parish Councils (settlement boundaries)
- ESBC departments (Housing Services and Environmental health)
- English Heritage (Historic environment)
- Sport England (Indoor and outdoor sports)
- Central Rivers Initiative (Blue Infrastructure and water based recreation)
- 2.27 The full details of how the Borough Council has met its Duty to Cooperate is set out in the Duty to Cooperate Statement.
- 2.27 The following sections summarise the following for each consultation stage:
 - Purpose of consultation
 - Who was consulted
 - How consultees were notified
 - Details of consultation events
 - Summary of main issues raised
 - How representations influenced the evolution of the plan

3. East Staffordshire Pre-Submission Local Plan Consultation

Purpose of the consultation

3.1 The purpose of the consultation was to meet regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Who was consulted?

3.2 A full schedule of consultees can be viewed in Appendix 1.

How consultees were notified

- 3.3 The following methods were used to notify consultees:
 - Consultation portal automatic e-mail to 609 individuals
 - Letters to all parish councils
 - Letter to 639 individuals including specific, general and other consultees
 - An article in the ES News, 29th October, delivered to all households in East Staffordshire Borough
 - Exhibition stand in Burton Upon Trent Customer Service Centre between Tuesday 29th October and Thursday 7th November 2013
 - Exhibition stand in Uttoxeter library between Wednesday 13th November and Thursday 28th November 2013
 - Posters setting out consultation dates and information on where documents could be viewed were sent to all Parish Councils for distribution on notice boards
 - Full documents were available to view at the Burton Town Hall, East Staffordshire Offices at The Maltsters, Burton, Customer Service Centre Burton, Uttoxeter, Burton library and the mobile libraries serving East Staffordshire
- 3.4 Consultees were asked to fill in a representation form. A copy of the representation form can be found in Appendix 2.
- 3.5 The consultation letter constituted the statement of representation procedure and this can be viewed in Appendix 3.

Details of consultation events

- 3.6 Officers were available to answer questions on the Pre-Submission Local Plan at the following venues and times:
 - Burton Customer Service Centre, Market Place, Burton upon Trent between 11a.m. and 4p.m. on Tuesday 29th October and 5th November, and Thursday 31st October and 7th November 2013.

- Uttoxeter Customer Service Centre, Uttoxeter Library, High Street, Uttoxeter between 11a.m. and 4p.m. on Wednesday 13th and 20th November and Friday 15th and 22nd November 2013.
- 3.7 Borough Council Members and Parish Council representatives were also invited to the following additional drop in sessions which were also attended by representatives of local interest and action groups:
 - Burton Town Hall: 8th November (10am 1pm) and 12th November (2pm 5pm)
 - Uttoxeter Town Hall: 14th November (10am 1pm) and 18th November (2pm 5pm)
 - 13th November (18.30 19.30pm), Burton Civic Society meeting

A Summary of main issues raised

- 3.8 A total of 171 individuals, groups, companies and organisations made representations. In all, these respondents made some 504 individual representations. Three of the representations consisted of petitions (Friends of Outwoods 324 individuals, Residents of Stubby Lane, Draycott in the Clay 10 residents, and Picknall Valley Preservation Group, Uttoxeter 2008 residents).
- 3.9 A total of 23 representations from 19 individuals, the Central Rivers Initiative, Highways Agency, English Heritage and The National Trust were received outside of the consultation period.

Duty to Cooperate

3.10 Several representors commented that the housing figure is not accurate and the Council has not met the Duty to Co-operate requirement in working with neighbouring authorities within the Market Area. Representations are pulling East Staffordshire in two directions, either placing it in the Birmingham HMA or the Derby HMA.

<u>Housing</u>

- 3.11 The housing requirement, with its derivation from national household forecasts, past unmet housing need and relationship to employment factors, was questioned by a number of residents and parish councils who thought it was too high, and developers who thought it was too low and not objectively assessed.
- 3.12 The justification for those who thought the figure was too high was the increase in the figure set out in the Preferred Option consultation document in July 2012. The reason for the different figures is set out in the SHMA which was commissioned and completed following the Preferred Option consultation.

- 3.13 The justification for those who thought the figure was too low was the possible requirement for providing housing outside of Birmingham administrative boundary to meet Birmingham City Council's housing need. Many representors also raised the current 5 year land supply as a reason for requiring a higher figure.
- 3.14 The provision of affordable housing and the housing mix in line with need, including housing for older people, featured in a number of representations, with representors generally favouring provision of all types of housing to meet need and developers concerned that the requirements are too onerous and would impact on viability of schemes.

Employment

3.15 Several representations questioned the quantum of employment development set out in the development strategy with Staffordshire County Council specifying that a figure of approximately 158 hectares rather than 40 hectares would be more appropriate.

Soundness of Sites Proposed for Allocation

Burton upon Trent sites Beamhill

3.16 A petition from Friends of Outwoods, signed by 324 individuals was received on this allocation raising concerns over the impact of the development on the landscape, residential amenity and the local road network. The petition wished to see the removal of the allocation from the Local Plan. The Planning Applications Committee resolved to permit this application on the 8th July 2013.

Lawns Farm

3.17 This allocation received fewer comments than other allocated sites with concern from Branston and Tatenhill Parish Council on the impact of the development, particularly on the road network combined with other development. The Planning Applications Committee resolved to permit this application on the 25th November 2013.

Land South of Branston

3.18 This allocation received fewer representations than other allocated sites with concern from Branston Parish Council on the impact of the development, particularly on the road network and local schools when combined with other development within the parish. The Planning Applications Committee resolved to permit this application on the 8th July 2013.

Derby Road

3.19 Issues on the soundness of this allocation and associated policy were raised, particularly the identification of the area on the policies map and the certainty that the site will be delivered, due to current existing employment uses on the site and viability of delivering a scheme.

Pirelli, Guinevere Avenue and Branston Depot

3.20 These sites did not attract representations on soundness. Pirelli, Guinevere Avenue and Branston Depot all had planning permission prior or during the Pre-Submission Consultation period on 26th November 2012, 8th July 2013 and 21st October 2013 respectively.

Molson Coors Middle Yard

3.21 A limited number of representations were received in relation to this site.

Tutbury Road / Harehedge Lane

3.22 Several representations made on this allocation questioned the position of the Strategic Green Gap, the impact on the surrounding countryside, the road network and coalescence with Rolleston on Dove. Many comments requested that the allocation be reduced to 300 dwellings, rather than the 500 dwellings allocated.

Bargates / Molson Coors

3.23 Overall the identification of this area and production of a specific policy was supported with detailed comments from Molson Coors stating that the area should be considered as two separate sites and the requirement for a Masterplan or Development Brief be removed from the associated policy.

Alternative Site Options

- 3.24 Following the beginning of the Pre-Submission consultation period, the appeal decisions on Red House Farm and Forest Road, Burton upon Trent have been published. Both sites now have permission. Several representations requested a change to include both appeal sites in the development strategy.
- 3.25 Other representations requested that the following sites be allocated into the plan in order to meet objectively assessed need:

Burton upon Trent

- South of Henhurst Hill/Forest Road (east and west of Aviation Lane)
- Land west of Postern Road
- Small sites within the urban area of Burton Upon Trent Wetmore Road and Shobnall Road
- Branston Fields, Branston

- Land north of St Mary's Drive, Stretton
- Land west and east of Craythorne Lane, Stretton
- Lawns Farm, Burton Upon Trent (a larger site proposed than the allocation as shown in the Pre-Submission Local Plan)

Uttoxeter sites

3.26 Consultation, in the form of a survey, on the emerging Uttoxeter Neighbourhood Plan took place at the same time as the Pre-Submission Local Plan and this caused some confusion for representors. Several representations focused on the relationship between the Neighbourhood Plan and the Local Plan and wished to see some Uttoxeter site allocations removed in order for the housing quantum to be determined by the Neighbourhood Plan.

Stone Road, Uttoxeter

3.27 This site received considerable opposition, including a petition from the Picknall Valley Preservation Group signed by 2008 individuals. The main concerns were loss of open space, important trees and education land, impact on the landscape of the Picknall Valley and traffic impacts.

West of Uttoxeter

3.28 Representations on this site allocation did not specifically relate to soundness but were more concerned with the detail of the planning application in terms of road access. The planning application for this site was received 2 months before the Pre-Submission consultation. The applicant of the site made representations that the Strategic Green Gap encroaches into the application site boundary and wished to see a larger housing allocation.

<u>Hazelwalls</u>

3.29 This site received a high number of representations relating to the soundness of this site allocation, in particular citing the fact that it was not an allocation in the Preferred Options consultation document in 2012.

Derby Road

3.30 Representations were received regarding this employment allocation specifically seeking the allocation for housing rather than employment, in order to make the plan sound by meeting objectively assessed housing need.

<u>JCB</u>

3.31 Few comments were received on this strategic site allocation, having had the benefit of a planning permission since April 2011. The majority of comments made during the public exhibitions focused on the timetable of the development and wished to see the site developed. Several representors

questioned whether the site would be developed and suggested alternative sites to meet the housing need.

Brookside Industrial Park

3.32 Representations questioned the allocation of this site as it was not identified in the Preferred Options in 2012. Representations focused on the loss of employment land and flood risk but overall supported the redevelopment of the brownfield site.

Alternative sites options for Uttoxeter

- 3.33 In questioning the site allocations, many representors felt that current planning applications such as those on Dove Way should be allocated instead of some of the sites, particularly the Stone Road allocation. There were requests to include the following site allocations into the plan in order to meet objectively assessed housing need and employment land provision:
 - Land east of Highwood Lane, west of Wood Lane
 - Lightbrook Industrial Estate, north of Uttoxeter
 - Land at Blounts Green Farm

Tier 1 – Strategic Villages

3.34 Overall there was support for the quantum of development in Tier 1 settlements through strategic site allocation and development allowance.

Rolleston College Fields and Neighbourhood planning issue

3.35 There were several representations stating that the allocation is not supported by the Publication Neighbourhood Plan and requested that the allocation should be deleted from the emerging Local Plan. Other comments reiterated previous comments that Rolleston should be considered a Tier 2 settlement, not a Tier 1 settlement in the settlement hierarchy underpinning the development strategy.

Alternative site options for Rolleston on Dove

- 3.36 There were requests to amend the settlement boundary to include the following site:
 - Apple Acres

Efflinch Lane, Barton under Needwood

3.39 The Barton under Needwood Parish Council representation questioned the site allocation as represented on the Policies Map, which identified a larger site than that with planning permission. The developer for the strategic site allocation wished to see a higher housing target for Barton under Needwood.

Alternative site options for Barton under Needwood

- 3.40 There were requests to allocate or include the following sites within the settlement boundary:
 - The Green
 - Barton Marina

<u>Rocester</u>

3.41 Several representations of soundness were received relating to the allocation focusing on flood risk implications.

Alternative site options

- 3.42 There were requests to allocate or include the following site within the settlement boundary:
 - Rocester (north)

Tutbury allocation

3.43 Several representations of soundness were received relating to the allocation, mainly focusing on the inconsistency between the allocation and the planning permission boundary. No alternative site options were received for Tutbury.

Level of development in the villages and amendments to settlement boundaries

- 3.44 Many developers did not consider the approach to development outside Burton upon Trent and Uttoxeter to be sound (consistent with national policy) and requested that a higher proportion of housing be allocated to the rural area in order to meet housing needs of rural communities. Many Representors requested a change of the housing figures for Tier 2 and Tier 3 settlements to be presented as minimum figures in order to be consistent with national planning policy.
- 3.45 Overall the level of development for Tier 2 settlements was considered sound by communities. Several representations questioned the soundness of the proposed amendments to settlement boundaries in terms of justification and legal compliance relating to consultation with communities. A petition supporting the inclusion of land at Stubby Lane, Draycott in the Clay within the proposed settlement boundary was received. Representations relating to the amendment of the settlement boundary at Marchington were received, with many Representors, including Marchington Parish Council, raising concerns over soundness. Marchington Parish Council has since indicated that they are producing a Neighbourhood Plan in order to differently distribute the development allowance figure.

- 3.46 Few comments were received on the proposed boundaries for Rural Industrial Estates, with only one representation seeking a change at Fauld Industrial Estate for a larger site area.
- 3.47 Representations requested changes to the settlement boundaries of Tier 1 and Tier 2 settlements at:
 - Abbots Bromley (south)
 - Denstone (south)
 - Draycott in the Clay (increase boundary at north east, reduce boundary at south east and increase at west)
 - Draycott in the Clay (increase boundary to south east)
 - Marchington (south west)
 - Yoxall (south)

Alternative Site Options outside of settlements or industrial estates

- 3.48 There were requests to include the following site allocations into the plan in order to meet objectively assessed need:
 - Twin Rivers
 - Land at The Barns, off B5017, Draycott in the Clay

Strategic Policies

- SP1 Presumption in Favour of Sustainable Development 29 representations, mix of support and objection.
- SP2 A Strong Network of Settlements 28 representations, mix of support and objection for the settlement hierarchy tiers. Main objections come from Rollestons position within the hierarchy and Marchington Parish Council wishing to see development being scattered around the Parish rather than at Marchington village)
- SP3 Provision of Homes and Jobs 2012 2031 30 representations with the majority questioning the justification of the housing and employment figures. Some consultees thought the number should be higher with others thinking it should be lower. There were requested changes to setting figures as minimum in order to remain flexible and to ensure the housing target adequately addresses undersupply.
- SP4 Distribution of Housing Growth 2012 2031 55 representations. Some supporting sites and associated figures, others objecting to sites listed in the policy. Some objections questioned the windfall and thought this wasn't realistic. Others recommended further sites to be included as allocations or

wished to see higher numbers in some allocations or settlements. One requested change was to include specific numbers for Tier 3 settlements. Several representatives wished to see numbers presented as minima. Others wished to see windfall defined as sites below 10 dwellings. The associated trajectory was also questioned by many representations in that it was too aspirational with St Modwen wishing to see higher rate for Hazelwalls

- SP5 Distribution of Employment Growth 2012 2031 13 representations. Majority of representations wished to see land at Branston identified within the policy and on the associated policies map. 1 representation wished to see a further allocation at Branston and 1 representation wished to see allocation at Waterloo Farm, Uttoxeter (aswell as or instead of Derby Road, Uttoxeter). One representation stated that the figure should be increased to 150 hectares.
- SP6 Managing the Release of Housing and Employment Land 10 representations. Majority stating that monitoring would not be effective, the policy should confirm it will maintain a 5 year land supply, a sites and allocations document is a long process to deliver additional sites and that the policy would not ensure delivery of smaller sites and should have additional wording to discourage long term protection of sites or sites not being delivered despite having planning permission
- SP7 Sustainable Urban Extensions 38 representations. Some objecting to the SUEs themselves, others suggesting alternative SUEs, some suggesting amendments, removal or additional criteria
- SP8 Development Outside Settlement Boundaries 18 representations. Objections think the policy is too restrictive, too onerous for economic development in areas outside boundaries, does not provide certainty over where development would take place, does not refer to the Re-use of rural buildings SPD and does specifically allow infill.
- **SP9 Infrastructure Delivery and Implementation -** 20 representations. Most wanting specific reference to the known infrastructure requirements, explanation of the relationship between CIL and S106, and raising concern that a charging schedule is not presented.
- SP11 Bargates / Molson Coors Strategic Allocation 11 representations, majority opposing the allocation due to uncertainty that the site will deliver housing. Other comments wished to see amendments to the policy to include reference to public transport and for the site to be considered as two sites and not refer to a masterplan

- SP12 Derby Road, Burton upon Trent Regeneration Corridor 12 representations, majority opposing allocation due to uncertainty that the site will deliver housing due to current employment uses on the site. Other comments wished to see amendments to the policy to make reference to public transport links, national forest planting and inclusion of sport facilities.
- SP13 Burton and Uttoxeter Existing Employment Land 2 representations wishing to see an amendment to include specific reference to waste uses and the second response concerned that the policy is too restrictive and does not allow for extensions or relocation of existing businesses.
- **SP14 Rural Economy** 6 representations. Most consider the policy to be overly restrictive with 1 comment wishing to see all rural sites identified
- SP15 Tourism, Culture and leisure development 15 representations. Some support but overall consider the accommodation criteria is overly restrictive
- SP16 Meeting Housing Needs 20 representations mostly objecting as the housing mix set out in the justification is too onerous and would not allow flexibility in the market. Staffordshire County Council requested specific mention of extra care housing within the housing mix
- SP17 Affordable Housing 21 representations mostly objecting as they considered the policy to be too onerous and would impact on the viability of schemes.
- SP18 Residential Development on Exception Sites 13 representations mostly objecting as consider exception sites should not be predominately affordable or within or adjacent to settlement boundaries
- SP19 Sites for Gypsies, Travellers and Travelling Showpeople 3 representations. Support from Environment Agency on criteria with Derbyshire Gypsy Liaison Group objecting as they do not consider sites should have to meet all the criteria set out in the policy.
- SP20 Town and Local Centres Hierarchy 7 representations. Some support with others specifically wishing to see the location of rural centres and certainty over where development in the rural area would take place.
- SP21 Managing Town and Local Centres 2 representations both of support

- SP22 Supporting Local Communities 1 representation considering the policy is not comprehensive enough.
- SP23 Green Infrastructure 16 representations. Mix of support and objection (the allocation is not shown on the policies map) with some amendments to policy wording suggested.
- **SP24 High Quality Design** 5 representations mostly of support with some amendments suggested.
- **SP25 Historic Environment** 5 representations mostly of support with some word changes suggested.
- **SP26 National Forest** 3 representations. 1 support, 1 wishing the policy to be aspirational rather than obligatory and 1 wishing the plan to identify where planting will take place.
- SP27 Climate Change, Water Body Management and Flooding 8 representations. Support from EA and objection from developers who consider the policy to be too onerous requiring all developments to provide SuDS as it would be unviable. Barton under Needwood Parish Council consider the policy does not provide adequate flood protection.
- SP28 Renewable and Low Carbon Energy Generation 5 representations mostly suggesting changes to include reference to residential amenity, woodland thinnings and CO2 emissions.
- SP29 Biodiversity and Geodiversity 4 representations. Mostly of support with changes sought to reflect the biodiversity hierarchy as set out in the NPPF
- SP30 Locally Significant Landscape 12 representations. Mostly of objection due to the locally significant landscapes not being identified on the policies map
- SP31 Green Belt and Strategic Green Gaps 23 representations mostly of objection – some wishing to see the Strategy Green Gaps changed to make larger, smaller or taken away altogether.
- SP32 Outdoor Sports and Open Space 13 representations. Mix of support and objection (due to sites allocated and loss of open space). Supported by Sport England.

- SP33 Indoor Sports 3 representations. 2 of support and 1 objection by Sport England
- **SP34 Health and Wellbeing** 2 representations. 1 objection as policy does not include reference to air quality and other objection wishing to see deletion of the policy.
- SP35 Accessibility and Sustainable Transport 6 representations. Mix of support and objection based on transport impacts of strategic allocations

Responses from Statutory Consultees

- 3.49 Organisations such as Staffordshire County Council, the Environment Agency, Natural England, the National Forest Company (NFC), Network Rail and partnerships such as the Central Rivers Initiative (CRI) overall considered the plan to be sound and welcomed policies where previous comments were incorporated. The majority of representations received from Staffordshire County Council suggested minor changes to the plan, focusing on education and infrastructure with key concerns on funding and delivery of infrastructure over the plan period. There were further requests for specific word changes to policies in order for them to be considered sound.
- 3.50 These focused on:
 - Community Infrastructure Levy (CIL) information
 - Employment policies to specifically mention compatible waste uses
 - Amendments to the Cannock Chase Special Area of Conservation Policy to ensure it is consistent with up to date evidence
 - Amendment to National Forest planting guidelines to reflect those used by NFC in applications and specifically mention wood fuel systems in the renewable energy policy
 - Greater emphasis on sustainable modes of travel throughout the plan
 - Amendment to biodiversity policy to reflect national planning policy
 - Word changes to historic environment policies and signposting to the evidence base
 - Inclusion of information and policy wording on rail crossings

Sustainability Appraisal

- 3.51 Four representations on the Sustainability Appraisal were received. A summary of the issues raised is set out below:
 - The SA does not set out an adequate audit trail
 - The SA fails to demonstrate the use of credible and robust evidence in carrying out the assessments

- The SA fails to issue documents for consultation at each stage of the plan document
- The SA fails to show how the findings of the consultants have influenced the plan's development
- There is inadequate explanation of the selection and rejection of options/alternatives
- It is considered that the Sustainability Appraisal retrofits to the plan making process and has not been fully integrated into the development of the plan

Next Steps

3.52 East Staffordshire Borough Council has identified a number of amendments as a schedule of modifications which do not materially affect the policies of the local plan. The schedule of modifications is included in the submission material to be considered through the Examination process.

4. East Staffordshire Preferred Option July 2012

Purpose of the consultation

4.1 The purpose of the consultation was to meet regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Who was consulted?

- 4.2 The following consultation bodies were consulted:
 - Specific Consultation Bodies
 - General Consultation Bodies including:
 - Voluntary bodies (and interest groups/non-profit bodies)
 - Bodies representing racial, ethnic, national, religious groups and disabled persons
 - Businesses and bodies representing businesses, including development industry
 - Residents on the consultation database

How consultees were notified

- 4.3 Many of these bodies and individuals are held in the Council's consultation database, which is updated regularly to ensure it is as up to date as possible. At the point of consultation, bodies and individuals were sent an e-mail via the Council's Limehouse/Objective consultation portal. Those without an e-mail address were sent a letter inviting them to make representations.
- 4.4 The Council also made considerable efforts to publicise the Local Plan as widely as possible to invite representations from those not on the consultation database. The methods used were:
 - Publication on the Council website, including the Home Page as a "Latest News" item with link to Local Plan web page
 - An article in the August 2012 ES News, sent to all households in the Borough
 - Unmanned exhibitions at Burton upon Trent Customer Service Centre and Uttoxeter Library
 - Press releases to Burton Mail and Uttoxeter Advertiser

Details of consultation events

4.5 Officers were available to answer any queries and take views from the public at the following events:

- Coopers Square: Thursday 9th, Friday 10th and Saturday 11th August 2012 9am 5pm
- Uttoxeter Indoor Market, Market Hall: Wednesday 15th and Wednesday 22nd August 2012 - 9.30am – 3pm

A Summary of main issues raised

Concerns over Growth Proposals' Impact

- 4.6 The housing requirement, with its derivation from national household and employment forecasts, was questioned by a number of residents and parish councils who thought it was too high, and some developers who thought it was too low.
- 4.7 There were considerable numbers of comments expressing concern on the impact the growth proposals would have on infrastructure (highways, education, health, employment opportunities, services, facilities, open space, etc). Allied to this, concern was also expressed over the need to phase development to allow new infrastructure provision to keep pace with housing growth.
- 4.8 The provision of affordable housing and housing for older people featured in a number of responses, with individuals generally favouring proper provision of both types of housing, but developers being concerned at the requirements being too onerous.

Sites Proposed for Allocation Generating Significant Comment

Rolleston College Fields and Neighbourhood Planning Issue

4.9 There were over 600 comments on specific concerns regarding the proposal – highways, loss of open space, visual intrusion, flooding/drainage, pressure on local infrastructure the principle of allocating a strategic site in advance of, and contrary to the overall strategy of, the neighbourhood plan. Some respondents, including the parish council, questioned the basis of designating Rolleston as a strategic village. Others challenged the overall housing requirement for the Borough and the share of this requirement Rolleston should be asked to provide.

Stone Road, Uttoxeter

4.10 Considerable opposition was received to this allocation on the basis of traffic impacts, loss of open land in the Picknall Valley, access to schools and school capacity.

West of Uttoxeter

4.11 This site received a mixed response with some, including Uttoxeter Town Council in support in principle with others opposed, mainly due to loss of open land, impacts on the historic landscape and nature conservation, access and traffic issues and the relative remoteness of the location in relation to centre of Uttoxeter and facilities.

Lawns Farm

4.12 Some support was received for this site with some concerns relating to the effect on Tatenhill village, and on attractiveness of the Canal in a rural setting being lost and associated effect on tourism.

Land South of Branston

4.13 There was some opposition to this site on traffic grounds and concerns on ground contamination. Branston Parish Council put forward a proposal for concentrating employment uses at the southern end of this site, with tree planting whilst all housing would be concentrated on Lawns Farm.

Efflinch Lane, Barton under Needwood

4.14 There was some opposition to allocation of this site.

Harehedge Lane

4.15 There was general support for this allocation.

Rocester windfall allowance

4.16 There was some concern and opposition to land off High Street, pointing out a flooding problem on part of site.

Support for Beamhill Not Being an Allocated Site

4.17 Some 531 individuals supported the omission of the Beamhill site as an allocated site in the Local Plan.

Level of Development in the Villages

- 4.18 Varied responses from support for level of development proposed, with some concerns to opposition. Some development in excess of the nominal windfall allocations was sought in some villages by landowners/developers, whilst in Yoxall the parish council would like to see development occur.
- 4.19 There were requests for the tier in the settlement hierarchy to be reviewed in certain villages (up in some cases, down in others), such as Rolleston or for the requirement for the windfall allocation to be spread over several sites in the village to be deleted, or for a relaxation of the requirements for developments on the edge of a settlement, as opposed to within it. There

were criticisms of the methodology used to establish the settlement hierarchy. Many of these requests were from landowners or agents promoting other sites not identified in the Preferred Options. In Tier 3 settlements, where the proposal was for 90 units across all settlements, there were mixed views as to whether or not development in these villages was justified.

Alternative Options

- 4.20 There were requests to add in the following individual sites by different site promoters:
 - Forest Road (Burton)
 - Craythorne Lane (Burton)
 - Newton Road (adjoining Burton but in South Derbyshire District)
 - Hazelwalls Farm (Uttoxeter)
 - Bramshall Road (Uttoxeter)
 - Belmot Road (Tutbury)
 - Stubby Lane (Marchington)
 - Brookhay Village/Twin Rivers Park proposal that straddles Lichfield District
- 4.21 The only alternative Option involving a completely different spatial strategy was that proposing that the concentration of development should be on urban brownfield sites and on greenfield sites in Strategic and Local Service Villages (Tier 1 and 2). A partial option was suggested by a Branston resident of deleting Land South of Branston, but developing Lawns Farm and Outwoods (Red House Farm and Beamhill).

Definition of Sustainable Development

4.22 There was uncertainty from parish councils as to what the generalised definition of sustainable development, and presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF) meant in practice for East Staffordshire.

Duty to Cooperate

4.23 Concern was expressed over the amount of cooperation that has been undertaken, including the meeting of East Staffordshire's housing need in surrounding districts (and vice-versa).

Promoting Enterprise

4.24 There were calls for greater linkage to the aims and planning initiatives of the Greater Birmingham & Solihull Local Enterprise Partnership (GBSLEP) and support for existing employers.

Rural Economy

4.25 Some respondents felt that further clarification was required regarding the rural economy and that Strategic and Detailed Policies were somewhat at odds, with the latter more restrictive than the former. There was also some confusion over the policy on residential and commercial development outside settlements, particularly where there was no development boundary, as to what was edge of settlement or open countryside.

Historic Environment

4.26 A number of individuals and organisations (including English Heritage and Staffordshire County Council) pointed out the lack of adequate policies for the protection of the historic environment, in particular historic parks & gardens, Conservation Areas and archaeological sites.

Landscape Protection

4.27 Comments were submitted on the importance of protecting landscapes of value, both generally and specific examples. Those specifically mentioned were: Battlestead Hill, the Weaver Hills, and the setting of Sudbury Hall (near the Borough boundary, but in Derbyshire Dales District). A request was made for the Churnet Valley Living Landscapes Partnership, of which the Council is a member, to be specifically recognised in the Plan.

Greenspace Protection

- 4.28 Many representees opposed development of greenfield land, and called for a stronger emphasis on brownfield land being developed first.
- 4.29 There was support from Barton under Needwood Parish Council and individuals for the designation of "green gaps" specially protected areas to keep the openness between urban areas, particularly where areas are vulnerable to coalescence.
- 4.30 The Woodland Trust and Natural England called for better protection for ancient woodland. In the context of encouraging the use of renewable energy in new developments, the National Forest Company requested the promotion of the use of woodland thinnings as a "locally distinctive" renewable energy source.

Responses from Organisations with Statutory Responsibilities

- 4.31 Organisations such as the County Council, Environment Agency, English Heritage, Natural England, National Forest Company (NFC) and partnerships such as the Central Rivers Initiative (CRI) made requests for specific wording changes to policies in light of their advice.
- 4.32 The significant issues raised by these organisations are set out below:

- Given their importance as a strategy and delivery agency, the CRI requested a separate policy
- The need to pay due regard to the requirements of the Staffordshire and Stoke-on-Trent Joint Waste Local Plan and the need to consider further, in liaison with the County Council as Waste Planning Authority, the need and location of new local waste processing plants on industrial estates.
- The need to consider the effect of development in areas identified as likely to contain mineral resources in order to avoid sterilisation in liaison with the County Council as Minerals Planning Authority.
- The Environment Agency (EA) advised that the Local Plan should include Policy mention of the Water Framework Directive (WFD), explaining that the Council supports its objectives, and more specifically its local delivery vehicle the Humber River Basin Management Plan (RBMP), as a co-deliverer of this legislation. The EA suggested either a separate policy solely dedicated to WFD issues or its full integration into all policies impacting on: water-based ecology; water quality; pollution; contaminated land; water resources; flood risk; and climate change. EA advised that there should also be wording around the impact of indirect effects from development, particularly aimed at ensuring there is sufficient capacity within the foul sewage receiving infrastructure and ensuring that the timing of development fits in with any required upgrades to the foul infrastructure.
- Natural England requested the use of biodiversity opportunity mapping so that the Council could make requirements of developers to improve biodiversity as part of their development, based on what would be appropriate for that location, and result in a net increase in biodiversity. Staffordshire Wildlife Trust (SWT) exhorted the Council to strengthen protection of UK Biodiversity Action Plan (BAP) habitats and local nature designations.

How representations influenced the evolution of the plan

- 4.33 The following points summarise how the representations made on the Preferred Option influenced the Pre-Submission Local Plan:
 - The Council commissioned substantial work to supplement and update the evidence base. This included the following:
 - o Gypsy and Traveller Accommodation Needs Assessment
 - Strategic Housing Land Availability Assessment update
 - Strategic Flood Risk Assessment update
 - Water Cycle Strategy
 - Biodiversity Opportunity Mapping
 - Employment Land Review
 - Retail and Leisure Study
 - Local Centres Study
 - o Outdoor Sports Infrastructure Delivery Plan

- o Infrastructure Delivery Plan
- Provision for swimming pools and sports halls
- o Strategic Housing Market Area Assessment
- Brownfield Sites Assessment
- Settlement boundary review
- Further work was been undertaken in the light of new household forecasts which resulted in a revised housing requirement and a review of housing allocations.
- The Council carried out a review of settlement boundaries for Tier 1 and Tier 2 settlements.
- The Local Plan includes reference to the extraction of mineral resources and effective use and management of mineral resources.
- Wording in accordance with the EA's comments has been added to the relevant policies.
- A separate section on the CRI has been incorporated into Detailed Policy 10 on Blue Infrastructure and water based recreation.
- Policy 29 on Biodiversity and Geodiversity amended to address the issues raised by Natural England and Staffordshire Wildlife Trust
- Reference to ongoing landscape character work
- Revision to historic environment policies to offer better protection
- The rural economy policies have been amended to present clear, positive, guidance on encouraging the rural economy within the context of protecting high quality landscape
- Clarified within policies where development may or may not be permitted in relation to settlement boundaries, and where settlements do not have these, has clarified in policies the circumstances where development may or may not be permitted.
- Introduced Strategic Green Gaps as an allocation with an associated policy
- Amendments to the Strategic Urban Extensions (SUE) policy
- Greater reference within the plan to the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP)
- The following site allocations were additional sites to that set out in the Preferred Options: Burton upon Trent sites: Beamhill, Derby Road, Middle Yard, Molson Coors High Street, and Guinevere Avenue. Uttoxeter Sites: Brookside, Hazelwalls, Derby Road.
- Increased the amount of brownfield 'windfall' sites
- Specific protection for ancient woodland has been added to the Pre-Submission Plan in Detailed Policy 8.
- The local use of wood as a fuel and as a building material is incorporated into Policy 26 on the National Forest.

- The Council has introduced a new Strategic Policy 1 setting out its definition of what is regarded as sustainable development in East Staffordshire, building on the definition in the NPPF.
- The Council investigated the strategy and site alternatives that were not previously considered and put these through the sustainability appraisal process. The Sustainability Appraisal Report was been published alongside the Pre-Submission document.

5. Pre-Publication Strategic Options August 2011

Purpose of the consultation

- 5.1 From August to September 2011 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.
- 5.2 Maximising the use of brownfield sites with a reasonable expectation of coming forward in the Plan period was taken as a given. However, it was then estimated that some 4000 homes would 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.

Who was consulted?

- 5.3 The following consultation bodies were consulted:
 - Specific Consultation Bodies
 - General Consultation Bodies including:
 - Voluntary bodies (and interest groups/non-profit bodies)
 - Bodies representing racial, ethnic, national, religious groups and disabled persons
 - Businesses and bodies representing businesses, including development industry
 - Residents on the consultation database

How consultees were notified

- 5.4 Consultation methods were in line with the Council's Statement of Community Involvement and included:
 - Front page article in September 2011 edition of ES News sent to all homes within the Borough;
 - Direct mailing to all on the consultee database;
 - A Citizens Panel mailout;
 - Articles in the press;
 - Unattended displays at libraries.
 - Questionnaire sent to 489 Citizens Panel residents
 - Notices in libraries, doctors' and dentists' surgeries; and
 - Notification of all parish councils, some of which organised their own consultation events.

Details of consultation events

- 5.5 Officers attended the following exhibitions:
 - Burton Library 16th August 2011 10am 3pm
 - Coopers Square 26th and 27th August 2011 10am 3pm
 - Uttoxeter Town Hall 1st September 2011 10am 3pm

A Summary of the main issues raised

- 5.6 The main messages from the consultation were:
 - Most comments referred to particular sites, not to an Option as a whole;
 - No one Option clearly favoured over another;
 - 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.
 - 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 are or are not available.
 - Lawns Farm, land west of Uttoxeter, and land south of Stone Road/Bramshall Road received the least objections and some of the comments preferring the site not to 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.

Consultation Results

5.7 The key messages from the Core Strategy Strategic Options consultation are as follows:

Drakelow

5.8 Mixed response on this location varying from support to including it within the development strategy to objection due to no formal agreement with South Derbyshire in place.

Land South of Branston

- Many viewed this area as a well located site for mixed use development already within the settlement boundary
- The issue of education provision was raised
- Concerns over infrastructure provision were raised particularly transport, education and access.

Lawns Farm

- Many representees recognised the opportunity to provide a standalone development with all of the community facilities to support itself whilst being well linked to Burton.
- The Character of the Trent and Mersey Canal conservation area and presence of archaeology were raised as issues
- Many representees felt this area should be protected as green space as it would join Burton with Burton, leading to a loss of character and identity

Harehedge Lane

- Road and traffic concerns were raised along with road safety, parking, cycling routes and public transport provision
- Many representees considered the drainage infrastructure in this area to be inadequate
- Loss of character was considered an impact of developing this site with the views of many representees being that Stretton is accommodating enough development
- Some support based on the location being close to schools and other facilities and therefore a sustainable location

<u>Beamhill</u>

- Concerns raised over infrastructure
- Impact on the open countryside, agricultural land and habitats
- Concerns over impacts on road network
- Distance from transport links
- Not in walking distance from town or essential facilities

Redhouse Farm, Burton

- Concerns over access, road infrastructure
- Visual impact
- Impact on public footpath
- Inadequate sewerage
- No over-riding constraints that would prevent the early delivery of housing on this site have been identified.

Uttoxeter: Summary of responses received

5.9 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.

<u>General</u>

- 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

- Concern the development 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;

Balance Hill

- Would extend the town southwards making it the furthest from existing schools, shops and leisure facilities.
- Concerns over access and public transport provision
- Concern over flooding and wildlife impacts
- Town Council welcome this development as this appears to be a logical extension to housing development with close links to major roads.

South of Stone Rd/Bramshall Rd

- Many felt that 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.
- Town Council do not support this development due to access, traffic impacts and loss of education land.
- Flood Zone 3 implications raised.

Village Sites

Efflinch Lane, Barton under Needwood

- 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 amenities and services
- Would rebalance housing market, meet local housing need and fund social infrastructure.
- Provide a rounded off extension to village

Radhurst Farm/Crowberry Lane, Barton under Needwood

- Access considered unsuitable.
- Concerns over road traffic congestion and road safety.

<u>Rolleston</u>

- Problems with inadequate infrastructure including education
- Traffic congestion inadequate roads
- Loss of sports provision
- Flood risk
- Impact on landscape

Rocester Issues

- 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

Tutbury Issues

• Site would need thoughtful landscape treatment.

Other issues not linked to specific sites include:

- Criticism of the spread of employment potentially giving rise to unsustainable traffic access in the longer term.
- Where SBIs are located on or near possible sites the findings of the GI study should be used to establish approach to the development in this location.

How the responses influenced the evolution of the plan

- 5.10 The consultation responses led to the formation of the development strategy, selection of sites and wording of strategic and detailed policies as set out in the Preferred Options Local Plan. In particular the responses influenced the following:
 - Need for further work on household projections, economic growth and migration. This was subsequently reflected in the Preferred Option housing requirement figure.
 - A number of brownfield sites were identified in the Preferred Options report.
 - Sustainability Appraisals assessed all reasonable options and individual sites.
 - Further work was undertaken on Infrastructure Deliverability
 - Policies in the Preferred Options developed to ensure that necessary infrastructure enhancements are in place before each phase of building a sustainable community commences.
 - The principle of mixed use sustainable communities was brought through to the Preferred Option and underpins each sustainable urban extension or major development.
 - Further work to study the relationships between the Burton and South Derbyshire housing markets was undertaken by consultants GVA in an updated Strategic Housing Market assessment (SHMA).
 - Drakelow was no longer identified as part of the suite of proposed site allocations in the Preferred Option.
 - Regarding local knowledge of particular sites, these issues were considered as part of selecting sites and raised with applicants early in the plan process. Policies have also been worded to address a range of issues from highways, access, design, environmental impacts, and local amenity.

6. Core Strategy Issues and Options 2007

Purpose of the consultation

- 6.1 The Issues and Options Core Strategy for East Staffordshire identified the key issues that the Core Strategy needed to address in the future development of the Borough. The consultation took place between May 2007 and January 2008.
- 6.2 The consultation was presented as a background paper with an associated questionnaire with questions on a number of broad themes including the vision, growth options, housing, employment, shopping and town centres, natural environment, built environment, services and infrastructure, climate control, waste, tourism, art leisure and recreation, transport and delivery.
- 6.3 A total of 283 responses to the questionnaire were received from a range of stakeholders including statutory consultees and local residents in the borough.

Who was consulted?

6.4 There was a direct Mailout to Planning policy consultees list (over 240 on list), including stakeholders, developers, and agents, utilities, statutory consultees, community groups, parish councils, neighbouring authorities and parish councils and individuals.

How consultees were notified

- 6.5 An extensive public consultation programme was undertaken which used the following methods to notify as many people as possible:
 - Mail out internally to key officers of all ESBC departments
 - Documents published on the East Staffordshire Borough Council Webpage
 - ES News article October 2007 edition sent to all households in the Borough
 - Burton Mail coverage 17th September 2007
 - Article in "Good for Business" magazine October 2007
 - Questionnaire sent to the Citizens Panel on October 7th 2007
 - Leaflets were provided to the Community Outreach Officer for distribution at local surgeries
 - Leaflets were made available on the Borough Council stand at the 'Winning Business Exhibition', Drayton Manor, the Midland Grain Warehouse and Shobnall Leisure Centre

Details of consultation events

- 6.6 The following consultation events took place:
 - Presentation and discussion to Trent and Dove Customer Panel, 25th July 2007
 - Heart of Burton Sub Group September 25th and December 5th 2007
 - Chamber of Commerce meeting at Burton College 24th October 2007
 - Drop-in meeting at Uttoxeter on 18th September 2007 and at Burton on 26th September 2007 for Parish Councillors with 50 invitees attending the Burton meeting
 - Roving exhibition October and November 2007 at Coopers Square and Octagon Centre, Burton Upon Trent and Uttoxeter, Barton under Needwood and Burton libraries, Customer Service Centres at Burton and Uttoxeter
 - Members workshop September 11th 2007

Summary of main issues raised

- 6.7 Responses focused around the following key themes:
 - Growth options developing on greenfield and brownfield land
 - Housing the mix of housing types and tenures
 - Employment the type of employment and skills requirement
 - Shopping and town centres the quality of the environment and improvements needed
 - Natural environment and tourism capitalising on the boroughs natural assets
 - Built environment promoting the industrial heritage of the borough and improving the quality of development
 - Art, leisure and recreation comprehensive gaps in facilities
 - Transport improvements to public transport and local road networks

Growth Options

- 6.8 Stakeholders were aware of the growth agenda for East Staffordshire and the need to provide additional housing within the borough, in line with the West Midlands Regional Spatial Strategy. However, the location of development was regarded as a contentious issue, with respondents suggesting a variety of sites, including brownfield land and broad locations such as Burton, Uttoxeter and main villages as the focus of new development.
- 6.9 Respondents made clear the need for any new development to follow sustainability principles in the design of developments and that infrastructure and facilities including employment, education, health, leisure and recreational facilities are provided alongside housing in order to help create sustainable communities.

<u>Housing</u>

- 6.10 The mix of housing on offer, particularly in terms of new build, was raised as a concern for local residents, particularly the perceived abundance of apartments being built, especially in Burton town centre. When asked to identify what type of housing was in short supply in East Staffordshire, a real range of answers was given from starter homes, family homes, through to executive style homes.
- 6.11 Affordability of housing was a key concern for local people, and this was particularly emphasised for younger people and first time buyers. Participants were also asked to suggest locations for gypsies and travellers sites. The consultation responses indicated that it would be challenging to deliver sites for gypsies and travellers within the Borough boundary.

Employment

- 6.12 The issue of distribution warehouses in East Staffordshire was a particularly sensitive subject with many comments concerned with the quality of jobs and amount of land that is taken in generating such employment. Just over half of respondents were supportive of a policy to encourage high value uses on employment sites and to restrict warehouse use. However, some noted the benefits that distribution brings to the borough in terms of employment and investment.
- 6.13 Participants supported the need to provide a range of employment sites to attract inward investment, and also to allow existing businesses to expand and relocate within the borough.
- 6.14 As well as encouraging employment growth, respondents emphasised that there is a parallel need to increase the skills level of the local population so they can take advantage of the future higher value added jobs provided in the borough. It was also emphasised that any economic growth must match the proposed housing growth to ensure the borough does not become a commuter location.

Shopping and Town Centres

- 6.15 Responses demonstrated that Burton and Uttoxeter town centres are valued by local residents and have a role to play in the local economy. However, there were criticisms of them with improvements sought in order for people to continue to shop in their local town and not be drawn away by nearby competition such as Derby, Lichfield and Birmingham.
- 6.16 Stakeholders suggested improvements for both town centres, which related to reducing traffic congestion, increasing the variety of shops, improving the general appearance of the town centres and improving car parking provision.

Tourism and the Natural Environment

6.17 There was recognition across stakeholders that the borough is home to a diverse landscape and a number of high value environmental assets. Comments focused on the need to preserve these, but where possible assets should be capitalised on.

- 6.18 When asked specific questions, stakeholders showed strong support for promoting Burton as an example of urban forestry and to promote the delivery of the National Forest Strategy as part of development. The provision of open space and green infrastructure were considered key components of growth in the borough.
- 6.19 There was also support for encouraging the growth of "natural assets" such as the National Forest and the boroughs canals and associated infrastructure along with some attractions. In addition, it was felt that more tourist accommodation is required, particularly B&B's and Self-Catering provision.

Built Environment

- 6.20 The industrial heritage of the borough was identified as an important and valued characteristic by a number of people. There was support for protecting the heritage of the borough whilst also allowing flexibility in the sustainable re-use of buildings.
- 6.21 People emphasised the need to improve the quality of development in the borough, and that any new development should be of high quality in terms of design and specification. In answer to a specific question of "Do you think the quality of development in the borough needs to improve?" 55 percent of respondents answered yes.

Art, Leisure and Recreation

- 6.22 Respondents considered there to be comprehensive gaps in the provision of arts, leisure and recreational facilities in the borough. In particular, a lack of an 'evening economy' with very few facilities for evening activities with the exception of pubs and clubs which is expected in a town like Burton.
- 6.23 There were concerns over the loss and provision of leisure and sporting facilities, particularly in relation to the condition of Meadowside and the loss of the bowling alley. The capacity of the Brewhouse was also mentioned by a number of respondents as being too small for a town of this size.

Transport

6.24 Transport networks and infrastructure were identified as a key concern for local residents and a service that needs improving. People were critical of the public transport facilities in the borough, in particular the bus and train services in relation to frequency, reliability, affordability and quality. The lack of a bus station in Burton was seen as a major issue, as was the poor links between the train station and the rest of the town.

How representations influenced the evolution of the plan

- 6.25 The consultation responses influenced the challenges set out in the Prepublication Strategic Options under the following headings:
 - Employment
 - Transportation
 - Renaissance of Town Centres
 - Tourism
 - Leisure
 - Provision of Utility Services
 - Infrastructure
 - Villages and Rural Areas
- 6.26 The responses also shaped the Vision, alternative options and the 3 options set out in the Pre-publication Strategic Options consultation document. Consultation responses also contributed to the following options being discontinued:
 - Equal distribution of housing provision across villages and towns
 - All / majority of development to be located in Uttoxeter
 - Development to the east of Burton upon Trent
 - Developing to the north-east of Burton upon Trent
 - Creating a brand new settlement
 - Including development in adjoining South Derbyshire to meet housing and employment needs

Appendix 1 – List of consultees invited to make representations at Regulation 18 and 19 stages

Specific Consultation Bodies

Coal Authority English Heritage Natural England Highways Agency Derbyshire County Council Stafford Borough Council Derbyshire Dales District Council British Telecom Environment Agency Marine Management Organisation Network Rail Staffordshire County Council Lichfield District Council Staffordshire Moorlands District Council South Derbyshire District Council Mobile Operators Association c/o Mono Consultants Ltd (on behalf of mobile telecommunications operators in Borough) [E-ON Central Networks] *superseded by Western Power Transmission*

[Burton Hospitals NHS Foundation Trust] being superseded by Clinical Commissioning Groups and Staffs County Council Public Health function National Grid Gas South Staffordshire Water (water undertaker)

Severn Trent Water (sewerage undertaker) Homes and Community Agency

General Consultation Bodies

Voluntary bodies (and interest groups/non-profit bodies)

All Parish Councils in Borough:

Abbot's Bromley; Anglesey; Anslow; Barton under Needwood; Blithfield, Branston; Brizlincote; Burton; Croxden; Denstone; Draycott in the Clay; Dunstall; Ellastone; Hanbury; Hoar Cross; Horninglow & Eton; Kingstone; Leigh; Marchington; Mayfield; Newborough; Okeover; Outwoods; Ramshorn; Rocester; Rolleston on Dove; Shobnall; Stanton; Stapenhill, Stretton; Tatenhill; Tutbury; Uttoxeter Rural; Uttoxeter Town; Winshill; Wootton; Wychnor; Yoxall

Inland Waterways Association Cyclists Touring Club Campaign to Protect Rural England (Burton and Stafford representatives) National Trust Consolidated Charity of Burton upon Trent Staffordshire Police Tutbury Civic Society Planning Aid England Uttoxeter Civic Society Peak District National Park Authority CAMRA Burton & South Derbyshire Branch and Stafford, Stone & Central Staffs Branch All neighbouring Parish Councils: Walton on Trent; Colwich; Stowe by Chartley; Fradswell; Milwich; Farley; Newton Solney; Edingale; Draycott in the Moors; Bretby; Checkley; Norbury and Roston; Clifton and Compton; Sudbury; Waterhouses; Marston Montgomery; Cotton, Snelston; Hatton; Alton; Hilderstone; Alrewas and Fradley; Mavesyn Ridware; Blore with Swinscoe; Marston on Dove; Doveridge; Egginton.

Sport England Theatres Trust Princess St Training Education Centre

National Farmers Union Staffordshire Wildlife Trust Rolleston Civic Trust Burton Day Services Burton Sure Start Staffordshire Youth Service National Organisation of the Widowed Burton Civic Society Derbyshire Wildlife Trust Westlands Road Action Committee Community Council of Staffordshire Canal & River Trust Central Rivers Initiative Civil Aviation Authority Cross Street Clinic (NHS) Burton British Waterways Shobnall Traffic Action Group College Field Action Group Uttoxeter Wind Turbine Action Group Trent & Mersey Canal Society Uttoxeter Labour Party

Bodies representing racial, ethnic, national, religious groups and disabled persons

Burton Caribbean Association Church of England Lichfield Diocese Derbyshire Gypsy Liaison Group Burton upon Trent YMCA Kurdish Society Derby Street Baptist Church Disabled Christian Fellowship Pakistani Community Centre Afghan Society Immigration Advisory Service Riverside Church Burton Filipino Association East Staffordshire Racial Equalities Council Salvation Army Evergreen Club Burton Blind and Partially Sighted Group Horninglow Darby & Joan Club Uttoxeter Blind Club Connecting Communities Project Shobnall Pensioners Group Persian Cultural Association

Businesses and bodies representing businesses, including development industry

Burton & District Chamber of Commerce Instaffs **DPDS Consulting Group** Briggs of Burton Wynniat Hosey Ltd Gainsborough Property Urban Designs Ltd **Barton Willmore** East Midlands Trains Signet Planning Ltd St Modwen Properties plc Burton Place Shopping Centre Fisher German WYG Planning David Lock Associates WW Taberner & Sons Abbotsholme School **Roxden Developments** Addleshaw Goddard LLP **CB** Richard Ellis **David Burd Architects** Dunmar Developments Ltd **Phillips Planning Services** Northern Trust Housing 21 Housing Association Howard Sharp & Partners Hammans & Associates Tyler-Parkes Partnership Ashmead Price Wheeldon Brothers Ltd Godfrey-Payton **EWYG** Planning

Business Enterprise Support Country Land and Business Association **Coopers Square Shopping Centre Fusion Online** P.Massey & Son Broadleaf Ltd Peter Diffey and Associates Jones and Clark (Burton on Trent) Ltd **Turley Associates Co-operative Group** Andrew Martin Associates Octagon Shopping Centre Aldersgate Property Group West Properties Providence Land Ltd Nurton Developments Ltd **GVA** Grimley The Football Association Miller Strategic Land EDIT **Grosvenor Estates** Matthews & Co Haston Reynolds Ltd Nathaniel Lichfield and Partners JVH Town Planning Consultants Ltd Donaldsons LLP **RPS** Planning JMW Planning Ltd Molson Coors Brewing Company The Space Studio Hallam Land GL Hearn

Armstrong Burton Planning DTZ Steven Abbott Associates **BNP** Paribas Real Estate DWG Design Ltd Ashtenne Estates **GJ** Perry Burton & S. Derbyshire College **DLP Planning Peveril Homes Reeves Royall Partnership** Sywell Land Ltd **Barton Consortium** Trent and Dove Housing Gough Planning Services Midland Heart Development SCPDL William Davis Ltd MADE Barberry Developments Ltd **Tetlow King Planning** Burton Town Centre Management Strategic Projects Management Ltd Alliance Planning Savills IPS Ltd **STRATMOR** Bartonfields Patio & Garden Centre Ltd Hawksmoor Property Services Ltd Gez Willard Peter J Rhodes Architectural Planning Design Neil J Bland Ltd **Gladman Development** Anthony Aspbury Associates **RCA** Regeneration **Rushton Hickman** JS Wilks Mather Jamie Gordon Smith Associates Define Barwood Brian Barber Associates Jones Lang Lasalle

Network Rail Higham & Co Pegasus Planning Group **Drivers Jonas** Bagshaws Planning & regeneration Ltd DPP Amalgamated Construction Mercia Building Consultancy Stewart Ross Associates Fox LP Michael Sutcliffe & Associates Black & White (UK) Ltd Hollins Murray Group Marstons plc **Duchy of Lancaster** Central & Country Developments Ltd Catalyst Recycling Michael Ramus Architects Ltd National Forest Company **Burton Albion FC** Stretton Day Nursery Planning Design Capita Symonds Acorus Rural Property Services Wm Morrison Supermarkets plc Leavesley Group Kirkwells Planning Consultants **Gleeson Strategic Land** Linden Homes **Brooke Smith Planning** JMW Planning Ltd **Planning Potential** Chris Greenhalgh Building Design Knight Frank **CT** Planning Sigma Planning Services Peacock & Smith J&J Design First City Ltd Framptons Planning Wardell Armstrong Chris Thomas Ltd

Individuals registered on consultation database as at 20/3/2014

| Mr. | Malcolm | Bennett |
|-----|----------|-------------|
| Dr | Craig | Stenhouse |
| Mr | David | Collingwood |
| Mr | | Perry |
| Mr | David | Smith |
| | Samantha | Pinnock |
| Mr | Geoffrey | Morrison |
| Mr | Tom | Brooks |

| Mr | Rob | Walker |
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| | Richard, June and Ken | Bush |
| | Sue | King |
| Mr | Syd | Bill |
| | lan | Fullilove |
| | Chris | Reynolds |
| Mrs | Marie Louise | York |
| MRS | DIANNE | HOULT |
| Mr | David | Crooks |
| Mr | David | Gould |
| Mrs | Gail | Stenhouse |
| Mr | Leo | Fahy |
| Mr. | Tom | Gordon |
| Mr | | Scott |
| Mrs | Deborah | Glover |
| Miss | Emma | Lewsley |
| Mr | Ashraf | Patel |
| | Carol | Palmer |
| Mrs | Rachael | Jordan |
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| Mr | William | Miles |
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| Mr & Mrs | | Bachada |
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| Mr | Andrew | Griffiths |
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| Mrs | Donna | Clark |
| Mrs | Celia | Lowe |
| Mr | Ron | Skipper |
| Mrs | Patricia | Evans |
| Mr | David | Potter |
| Mr | Μ | Bullock |
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| Mr | David | Pickering |
| Mr | Dave | Benstead |
| Mr | Elwyn | Rees-Jones |
| | Sarah | Whiteman |
| Mr | Μ | Timmins |
| Ms | | Rhead |
| Mr | Tim | Hall |
| | Albert | Golding |
| | Philip | White |
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| Mrs. | Christine | hemming |
| Mr | Lyn | Richardson |
| miss | louise | glut |
| Mrs. | Allison | Dean |
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| Mrs | Julie | Matthews |
| Mrs | Debra | Smith |
| Mrs | Sonia | Belsey |
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| Mr | Christian | Taylor |
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| Mrs | Lindsay | Whitlock |
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| Mr | Patrick | Rooney |
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| Mrs | Ruth | Hill |
| Mr | Brian | Barton |
| Mr | Gavin | Moore |
| Mr | Timothy | Warner |
| Mrs | Sarah | Banks |
| Mr. | lan | price |
| Mr. | David | Thornhill |
| Ms | I | Glut |
| Mr | Simon | Wells |
| Mr | lan | Vanes-Jones |
| Mrs | Jane | Pratt |

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| Mrs | Susan | Smith |
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| Mrs | MJ | Draycott |
| Ms | Beth | Dixon |
| miss | Tanya | Ellson |
| | К | Lewis |
| | Linda | MacDiarmid |
| | Raymond | Tutty |
| Roger Bell | Roger | Bell |
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| Mrs | D | Hendy |

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| Mrs | Μ | O'Regan |
| Mr | James | Rooney |
| Mr | L | Meaks |
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| Mr | John | Cheadle |
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| | Lynne | Bailey |
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| Miss | Rebecca | Socci |
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| Mr | Р | David |
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| Mr | Р | Wooding |
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| Mr | John | McKiernan |
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| Mr | Р | Charlesworth |
| Mrs | A | Smith |
| Mr | Stuart | Haigh |
| | Lisa | Ball |
| Mrs | Nicky | Bayliss |
| Mrs | Sally | Walker |
| Mr | D | Johnson |
| Ms | Helena | Tipper |
| Mrs | Lamley | Lamley |
| Mr | James | Loffredo |
| Mr | Jim | Wood |
| Mrs | J | Bell |
| | JC | Rimmington |
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| Mr | Mark | Roberts |
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| Mrs | R | Frost |
| Miss | J | Cheadle |
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| Mrs | R | Bradley |
| Mr | G | Loffredo |
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| Mr | | Cobley |
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| Mrs | Carol | Brake |
| Mr | Graham | Milton |
| Mr | Dennis | Turner |
| Miss | Rebecca | Adkins |
| Mr. | Peter | Craddock |
| Mr | Oliver | Mitchell |
| Miss | Johanna | Fox |
| Mr | Gordon | Whitehead |
| Mr | Arthur | Gilbert |
| Miss | M | Nixon |
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| Mr | Elliot | Staley |
| Mr | Stephen | Bayliss |
| Mr | Andrew | Smith |
| Mrs | S K | Johnson |

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| Mr | Andrew | Brown |
| Mrs | Alison | O'Share |
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| Mr | JW | Clarke |
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| Mr | Thomas | Thornewill |
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| Mrs | Linda | Creighton |
| Mr | Peter | Walker |
| Mr | Christopher | Williams |
| Mrs | N | Marshall |
| Mr | Bryan | Chinn |
| Mr | lan | Hardie |
| Mr | David | Faulkner |
| Mr | Phillip | Richardson |
| Mrs | Н | Carline |
| Mr | Duane | Smith |
| Mr | Bryan | Chinn |
| Mr | James | Preston |
| Mrs | Olive | Neale |
| 1411.5 | Mr and Mrs T, I & J | |
| | Robinson, Mr & | Mrs Hill and Mrs Newstead |
| Mr and Mrs | John and Delia | Wyers |
| Mrs | E | Faulks |
| Mr | SG | Dunn |
| Mr | РJ | Staley |
| Mr | J | Roe |
| Mrs | Gillian | Booth |
| Mr | J | Hallam |
| Mr | Μ | O'Share |
| Mrs | Jane | Curl-Carter |
| Mr | Liam | Holmes |
| Mrs | G | Brown |
| Mrs | PM | Gough |
| Mr | John | Rees-Jones |
| Dr | Joyce | Bourman |
| Mr | Scott | Barlow |
| Mrs | J | Devlin |
| Mr | Murali | Srinivasan |

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| Mr | | Prosser |
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| Mrs | Shirley | МсСоу |
| Mrs | K | Bailey |
| Miss | Vicki | Richardson |
| | Claire | Price |
| Mr | Robert | Hird |
| Mr | Nik | Holmes |
| | Kristina | Tilley |
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| Miss | Tracey | Brotherton |
| Mr | Р | Frost |
| Mr | William | Holmes |
| Ms | Emily | Barlow |
| Mr | S | Tjon Soei Len |
| Mrs | J | Pellecchia |
| Mrs | Daphne | Groves |
| Mrs | J | Crow |
| Mr | Stan | Knopik |
| | Pat and Harry | Hanshaw |
| Mr | Alan | Payne |
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| Mr | AJ | Frezza |
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| Ms | Louise | Loffredo |
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| Mr | David | Forster-Williams |
| Mr | M | Taylor |
| Cllr | Liz | Staples |

| Mr | Michael | Platt |
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| Mrs | Kymberley | Fearn |
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| Mr | R | Godber |
| Ms | Angelina | Socci |
| Mrs | Sandra | Gilmore |
| Mrs | Alison | Farrington |
| Mr | Daniel | Smith |
| Mr | R | Fraser |
| Mr | R | Allen |
| Mr | Martin | Smith |
| Mr | Μ | Marshall |
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| Mr and Mrs | Linda and Jeffrey | Greenwood |
| Mr | Keith | Sunley |
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| Mrs | С | Inwood |
| Mr | | Gotheridge |

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| | LR | Seddon |
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| Miss | К | Smith |
| Mr | Haydn | Vernon |
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| Mr | | mawer |
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| Mr | Chris | Collison |

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| Miss | Jem | Archer |
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| Mrs | R | Anderson |
| Mr | Edward T | Robinson |

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| Mrs | Α | Wooding | |
| Mrs | | Taylor | |
| Mrs | Р | Mousley | |
| Mrs | Sheila | Barrington | |
| Mr | Mark | Roberts | |
| MR | LLOYD | JAMES | |
| Mr. | Jeffrey | mcmahon | |
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| Mr | Robert | Dodman | |
| Mr | Geoff | Mills | |
| Mr | Geoff | Mellor | |
| Mr | Р | Drew | |
| Mrs | С | Dunn | |
| | Mr S Clarke | | |
| | Mr Mike Petrouis | | |

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| Mr | Andrew | Watton |
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| Mr | SJ | Swain |
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| Dr | Robert | Barrington |
| Miss | Andrea | Penniket |
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| Mrs | PM | Hurd |
| Mr | Ν | Crosby |
| Mrs | К | Pott |
| Mr | Paul | Reynolds |
| Mrs | Tessa | Clay |
| Mrs | Kelly | Moore |

| Mr | Peter | Speed |
|----------------|-----------------------|----------------|
| Mrs | Jane | Tomlinson |
| Mr | Malcolm | Thacker |
| | Freya | Anderson |
| Ms | Chloe | Humphreys-Page |
| Mr | Ryan | Pain |
| Mr | Lance | Bird |
| Mrs | John | Abdella |
| Mr | Stephen | Dunion |
| Mrs | Lynn | Mills |
| Mr | David | Burns |
| Mr | Peter | Craddock |
| | Mr & Mrs S Richardson | |
| Mrs | Anne | Marrison |
| Mr | Stuart | Miller |
| Mr | Julian | Mott |
| Mrs | Margaret | Miller |
| Mr | lan | Haywood |
| Revd | George | Crossley |
| Mrs | Carole | Leader |
| Mrs | Susan | Paxton |
| MR | JOHN | MARSON |
| Mr | Andrew | Barton |
| Mrs | Hazel | Faulkner |
| | | |
| Mr | Des John | Mycock Kirk |
| Mr Mr 8 Mrs | | |
| Mr & Mrs | Lawrence and Anne | Witton |
| Mrs | C | Parker |
| Mr | Jim | Allan |
| Mrs | Louise | Richardson |
| Mr | James | Chadwick |
| Mr | John | Connolly |
| Mr | Julian | Green |
| Mr. | Peter | Walker |
| Mr | Clifford | Beck |
| Mr | Anthony | Phillips |
| Mr | Martin | Lipscombe |
| Mr | William | Smith |
| Mrs | H | Davies |
| Mr | Timothy | Tams |
| Mr | Peter | Woodthorpe |
| Mrs | Jacqueline | Payne |
| Mr | | Breckons |
| Mr | Robert | Hughes |

| Mr | clive | Jones |
|------------|-------------------------|-----------------|
| Mr | WН | Chapman |
| Mr | Martin | Dunn |
| Ms | Melanie | Dixon |
| Mr | Paul | Simpson |
| Mrs | Karen | Dunn |
| Miss | Gillian | Booth |
| Mr | john | raby |
| Mr | Jonathan | Brooks |
| Mr | Ronald | Whetton |
| Mrs | Jackie | Hunt |
| Mr | Shaun | Adams |
| Mr | 4 | Smith |
| Mr | David | Shilton |
| Ms | Amy | Tipper |
| Mr | Tom | Frankland |
| Cllr | Stephen | Smith |
| Mr | Barry | Edwards |
| Mr | Richard | Green |
| Mr | Paul | Chamberlain |
| Mrs | Elizabeth | Rush |
| Mr. | john | roobottom |
| Miss | Maureen | Brandrick |
| Mrs | L | Mousley |
| Messers | - | Critchley |
| | Tesco Stores Ltd | Mr David Burkey |
| Ms | Кау | Brookes |
| Mr | Barry | Morgan |
| Ms | D | Richards |
| Mr. | allan | Barnes |
| Miss | Charlotte | Merrick |
| | Mr & Mrs Fox and Mr & N | Ars Petrouis |
| Mr | Frank | Thompstone |
| Mrs | Kathleen | Arnold |
| MRS | NICOLE | SOWTER |
| Mr | Paul | Blackshaw |
| Mr | Andrew | Barkas |
| Mr | Julian | Mott |
| | Heather | Whiteman |
| Mr and Mrs | William and Yvonne | Cossar |
| Mr. | martin | Horan |
| Dr | Darren | Staniforth |
| Mr | Alan | White |
| Mrs | Sharon | Walker |

| Mrs | Pauline | Mellor |
|------------|----------------|----------------|
| Dr | Glenn | Jones |
| Miss | Gemma | Rhodes |
| | Heather | Gould |
| Mr. | Adrian | George |
| Mr | lan Laurence | Brown |
| Ms | Кау | Arblaster |
| Mrs | Ann | Wynniatt-Husey |
| Ms | Cheryl | Evans |
| mrs | Natalie | Bancroft |
| Mr | John | Wheat |
| MR | DAVID | CROUCH |
| Mr | Gordon | Skipper |
| Mr | Gordon | Skipper |
| Mrs | Kim | Bayliss |
| Mrs | Daphne | Fearn |
| Mr | Trevor | Clark |
| Mr | | Ashmole |
| | Sue | Frezza |
| Miss | М. | Hewitt |
| Mr and Mrs | | Alderson |
| | Peter | Jones |
| Mrs | | Clamp |
| | Paul | Larking |
| | R | Acton |
| | R F | Wood |
| | Μ | Curran |
| Mr | Jacob | Dixon |
| Mr | Jon | James |
| Mr | Frank | Rushmer |
| Mr | | Noakes |
| Mr | Paul | Bennett |
| Mrs | Μ | Wooley |
| | S | Roberts |
| Mrs | Jeanette | Farrow |
| Mrs | Enid | Ashford |
| Mr | | Carpenter |
| Mrs | Joanna | Gilbertson |
| Mr | Philip | Atkins |
| Mrs | | Hornblow |
| | Paul and Linda | Hoptroff |
| Mr | Andrew | Shepherd |
| | MB | Соре |
| | R P | Besford |

| | G | Barnett |
|----------|-------------|------------|
| | MA | Salisbury |
| Mr and M | | Harris |
| Mrs | СН | Bradshaw |
| | В | Keylie |
| Mr | James | Brady |
| | Diane | Armshaw |
| | Nathan | Anderson |
| | Μ | King |
| | Penny | Hoose |
| Mr | John | Goodman |
| Mrs | Felicity | Sellers |
| Mr | Phillip | Wood |
| Mrs | Kathleen | Waterhouse |
| Mr | JS | Wilkes |
| Mr | Julian | Blakemore |
| Mr | Bob | Keys |
| Mr | Cyril | Burton |
| Mr | Raymond | Cooper |
| Mr | John | Goodhead |
| Mr | Malcolm | Barrett |
| Mr | Stephen | Dennis |
| Mrs | Sally | Selby |
| Mr | Jim | Whitaker |
| Mrs | Т | Allen |
| | Fiona | Brown |
| Mr | George | Brown |
| | Μ | Akhtar |
| Mr | Mark | Bennett |
| | В | Curran |
| | А | Booth |
| | Jane | Howell |
| | Tracy | Genderi |
| Mr | John | Wakefield |
| Mrs | Carol | Hardy |
| Mr and N | Mrs Pearson | Pearson |
| Mrs | Vivienne | Walsh |
| | Luke | Jolly |
| | Μ | Wooley |
| Mr and N | Mrs | Ridgwick |
| | Ben | Garton |
| | Emma | McCarthy |
| | Т | O'Farrell |
| | К | Booth |

| | D | Bradshaw |
|-----------|----------|-------------|
| Mrs | | Elmore |
| Mr | Lionel | Smith |
| Mr | | Gallagher |
| Mr & Mrs | | Gothard |
| Mr | Tom | Starbuck |
| | Julie | Strange |
| | Joanne | Hodson |
| | E | Mantle |
| Mr | | Bradshaw |
| | Vicky | Hall |
| Mrs | Jane | Pratt |
| | Liam | Elmore |
| Mr and Mr | | Quy |
| Mr | Barrie | Houlihan |
| | Carol | Holmes |
| | T | Boyle |
| Mr | RA | Ward |
| | Rebecca | Arcon |
| | June | McCarthy |
| | D | Keyte |
| Mrs | Loraine | Perkins |
| | Anna | Johnson |
| | Russell | White |
| | | |
| | Rita | Ross |
| | Susan | Hewitt |
| N A #0 | Helen | Michie |
| Mrs | | Horlock |
| Mrs | Teresa | Shaw |
| | Eluned | White |
| | Paul | Bayley |
| Mr | John | Brown |
| Mrs | Sheila | Hallmark |
| | Geri | Cruise |
| Mrsrs | | Watson |
| | Rosemary | Scott |
| | Michael | Hoose |
| | lan | Hewitt |
| Mrs | MA | Cotton |
| Mrs | Elise | Wraight |
| Dr | Nahla | Abounawareg |
| Mrs | Audrey | Hall |
| | Beryl | Fellows |
| Mr | | Hill |

| Mr | Robert | Taylor |
|------------|----------------|------------|
| Dr | E | Tattersall |
| Mr and Mr | S | Hall |
| | Graham | Butler |
| | Jayne | Hudson |
| | | Holmes |
| Mr | Gavin | Walters |
| Miss | Kathryn | Stanley |
| | Gary | Hall |
| | John | Wedd |
| Mr | Peter | Chambers |
| | GA | Jeffrey |
| Dr and Mrs | WR | Taylor |
| Mr | PE | Allen |
| Mrs | M. | Rostance |
| Mr | John | Phillips |
| Mr | Richard | Purser |
| Mrs | Carol | Mellor |
| | David | Westwood |
| Mr | D | Hornsey |
| Mrs | E | Ashforth |
| Mr and Mr | | Marshment |
| Mr | David | Garratt |
| Miss | Julia | Coffey |
| | Lisa | Braisby |
| | J. | Pegg |
| Mr | | Ward |
| | JA and BM | Potter |
| | Christine | Anderson |
| | Gemma | Doherty |
| | Katie | Clarke |
| | Karen | Grimsey |
| | Christian | Sorensen |
| Mrs | Sandra | Belcher |
| Mr | R | Kirkland |
| Mrs | | Hudson |
| | Ray and Arlene | Thompson |
| | P | Gaskin |
| Mrs | MA | Barratt |
| Mr and Mr | | Cross |
| Mr | | Marriott |
| | Kanjana | Khamwong |
| Mrs | E F | Turner |
| | CU | Arley |

| | Р | Westlake |
|------------|---------------|---------------------|
| | Angela | Anderson |
| Mrs | Ann | Waldron |
| Mr | | Ralphs |
| Mrs | Alison | Knight |
| Mr and Mrs | Shaun and Sue | Carlton Greaves |
| | Barbara | Bayley |
| Mrs | Anna | Wellens |
| | Patricia Mary | Brown |
| Mr | Scott | Richardson |
| Mrs | Justine | Slater |
| Mr | Peter | Cheetham |
| | Christine | Carlton |
| | Robin | Cruise |
| | Clive | Holland |
| | Philip | Hallam |
| Dr | Sikandar | Khwaja |
| | lan | Wright |
| Mrs | S | Wilson |
| | SM | Rudd |
| Mr | Andy | Hawker |
| Mr | John | Hooper |
| | J | Ross |
| Mr | Neil | Mistry |
| Mrs | Pauline | Wright |
| | Sally | Toft |
| | l. | Anderson |
| | Roy | Brassington |
| Mrs | J | Joyce |
| Mr and | | |
| Miss | | Gillatt and Abbotts |
| Mrs | S | Clark |
| Mrs | | Ralphs |
| Mr | | Clarke |
| Mrs | FA | Whitworth |
| Mr | G | Nobody |
| Ms | Julie | Green |
| | Claire | Reed |
| | С | Manning |
| Mrs | | Hodson |
| Mrs | В | Jordan |
| | Nigel | Patrick |
| | Sandra | Di-Rito |
| | L | James |
| Mrs | Wendy | Allcock |

| Dr | David | Anderson |
|------------|----------|---------------|
| | Mark | Weaver |
| | Mary | Besford |
| | ME | Mayne |
| Mr | M | Belcher |
| | Rachel | Reilly |
| | L | Andrews |
| Mrs | E | Mackrory |
| Mrs | Shirley | Brailsford |
| | Colin | McLean |
| Mr | | Brown |
| Mrs | PE | Mayne |
| Mrs | E | Newman |
| Mr | J | Сох |
| | MA | McKeown |
| | Simon | Goodchild |
| | Joan | Roberts |
| | Karl | Colebrook |
| Mr | Chris | Matthews |
| | Susan | Irwin |
| | Terrence | Brown |
| Dr | Marian | Stevenson |
| Ms | | Hanson |
| Mr | BR | Smith |
| Mr and Mrs | S | Powell |
| | D. | Pegg |
| Mr and Mrs | + | Hunt |
| Mrs | S | Turner |
| Mrs | | Henry |
| Mrs | Janet | Dean |
| | J | King |
| Miss | Claire | Stanley |
| Mrs | | Coates |
| Mr | Patrick | Grant |
| Mrs | - | Silito |
| Mr | ID | Cross |
| Mrs | К | Norris |
| | S | Johnson Field |
| | MJ | Billings |
| Mr | G | Gowtridge |
| | Michael | Hale |
| | Tracey | Wright |
| | Ĺ | Stuart |
| | Robin | Chapman |

| | A | Andrews |
|----------|-----------|---------------|
| | M | Grimsey |
| Mrs | Susan | Wakefield |
| Mr | Darren | Slater |
| | Samuel | Hannibal |
| | Helen | Hannibal |
| Mr | JW | Carlton |
| | Daniel | Taberner |
| | W | Buxton |
| | Adrian | Gaunt |
| Mrs | E Carol | Ball |
| Mrs | Andrea | Richardson |
| Mr | Theo | Hollier |
| Mrs | Elizabeth | Evans |
| | Charles | Farron |
| | Jane | Irving |
| Mrs | CA | Pickering |
| Mrs | Pauline | Wood |
| | David | Bradshaw |
| | Chris | Genderi |
| | Georgina | Taylor |
| Ms | N | Worsley |
| Mrs | Elaine | Keyte |
| Mrs | Margaret | Stokes |
| Mrs | Margaret | Betson |
| | Anne | Chadderton |
| Mr | Edward | Ward |
| Mr | Gary | Cooke |
| Dr | Α | Hanson |
| Mr | David | Walsh |
| | Steve | Alexander |
| | K | Brittain |
| Mrs | M | Lathbury |
| | Linda E | Wheildon |
| Rev | Glenn | Reading |
| | Jack | Silito |
| Mrs | Sue | Lovelock |
| Mrs | Sharon | Sorensen |
| | Liam | Pegg |
| | Alison | Dilks |
| Mr and M | /lrs | Кау |
| | AJ | Wheildon-Salt |
| Mrs | L | Wright |
| | Joan | Deverson |

| Mr | R | Smith |
|-----------|-------------|------------------------|
| | Emma | Chapman |
| Mr | Simon | Anderson |
| Mr | Р | Haynes |
| Mr | John | Gadsby |
| | D | Wright |
| | Μ | Hickman |
| Mr | H.M. | Clarke |
| | R D | Bentley |
| | Andrew | Wood |
| | Pam | Wood |
| Mrs | Julie | Walters |
| | E | Stuart |
| Mr | Philip | Hickman |
| | Hilary | Cooke |
| | Brian | Howell |
| Mr | | Coates |
| Mrs | | Horobin |
| Mrs | Lynsey | Sheehan |
| Mr and Ms | | Fellows and Cartwright |
| Mr | Martin | Shaw |
| Mr | Т | Allen |
| Mrs | | Nixon |
| Mr | Robert | Whetton |
| Mr | Tim | Horobin |
| Mrs | | Gallagher |
| | Philip | Irwin |
| Mrs | B.N. | Clarke |
| Mrs | Valerie May | Parton |
| Mr | Alan | Woods |
| | Claire | Adams |
| | David | Fower |
| Mrs | | Wood |
| | S | Smith |
| Mrs | Dorothy | Sellers |
| | Julie | Price |
| Mr | John | Edmonds |
| Mr | Richard | Slator |
| Mrs | Marion | Perry |
| | Emma | Richards |
| Mrs | Jane | Henderson |
| | Mike | Moseley |
| | Т. | Pegg |
| | C Davies | |

| | D | Stride |
|-----------|-------------|-------------------------|
| Mr | M | Piert |
| | Gary | Hickman |
| Mr | lН | Cotton |
| | S | Buxton |
| Mr | Trevor | Hathaway |
| Mrs | G | Jackson |
| | Jen | Popplewell |
| Mr | Eric | Satchwell |
| Mrs | В | Pugh |
| Ms | Yasmin | Donlon |
| Mr | Julian | Smith |
| Mrs | Elizabeth | Morgan |
| Mr | Peter | Stone |
| | Ν | Sherratt |
| Rev | Р | Skillings |
| Mr | J | Backhouse |
| Mrs | Kathy | Lamb |
| Mrs | Carol | Cheetham |
| Mr and Ms | | Derbyshire and Scothorn |
| | Alexander | Aitken |
| | Diane | Milner |
| Mr | Michael | Fabricant |
| Mr | R | Smith |
| | Stuart | Hannibal |
| Mr | Stephen | Brown |
| Mr | Brian | Belcher |
| | Joan | Dannicliff |
| Mrs | Α | Brewin |
| | L and C | Tench |
| Ms | Stephanie | Allen |
| Mr | Philip | Taylor |
| Mr | Michael | Ryan |
| Mrs | К | Hudson |
| Mr | David | Yorke |
| | Jennifer | Rickards |
| | Gordon | Smith |
| Mr | Christopher | Charlton |
| Mr | | Crook |
| Mr | Tony | Lloyd |
| | A. | Langham |
| Mr | Nicholas | Harrison |
| Mr | | Bacon |
| Mr & Mrs | R | Erroch |

| Mr | Richard | Campbell |
|-----|-----------|----------|
| | Robert | Taylor |
| Mrs | Christine | Kilby |
| Mrs | Olive | Hall |

Appendix 2 Pre-Submission Representation Form



Ref: (for official use only)

East Staffordshire Borough Council Pre-Submission Local Plan Representation Form Representations should be submitted by no later than 12:00pm on Friday 29th November 2013 Online at <u>http://eaststaffsbc-consult.limehouse.co.uk/portal</u> By returning this form to East Staffordshire Borough Council:

By post to: Planning Policy Team – The Maltsters, Wetmore Road, Burton upon Trent, DE14 1LS

By email to: lpconsultation@eaststaffsbc.gov.uk

By fax to: 01283 508388

This form has two parts:

Part A – personal details

Part B – your representation, Please fill in a separate sheet for each representation you wish to make

Part A

Personal details (if an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent below)

| Title | |
|-------------------------------|--|
| First name | |
| Last name | |
| Job title (where relevant) | |
| Organisation (where relevant) | |
| Address | |
| Postcode | |
| Telephone number | |
| Email address | |
| Preferred contact method | |

Agent's details (if applicable)

| <u></u> | |
|-------------------------------|--|
| Title | |
| First name | |
| Last name | |
| Job title (where relevant) | |
| Organisation (where relevant) | |
| Who are you representing? | |
| Address | |
| Postcode | |
| Telephone number | |
| Email address | |
| Preferred contact method | |

Part B Please use a separate sheet for each representation

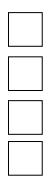
1. To which part of the Local Plan does this representation relate?

| a. | Paragraph b. Policy | c. Policies map |
|----|---|-----------------|
| 2. | Do you think the Local Plan is: | |
| a. | Legally Compliant (see guidance notes for definition) | Yes |
| | | No |
| b. | Sound (see guidance notes) | Yes |
| | | No |

If no, please select which test(s) of soundness by ticking the relevant boxes below and provide further details overleaf.

3. Tests of Soundness

- a. Positively Prepared
- b. Justified
- c. Effective
- d. Consistent with National Policy



4. Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible.

Alternatively, if you wish to support the legal compliance of soundness of the Local Plan, please also use this box to set out your comments.

Please continue on a separate sheet if necessary

5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations prior to Submission.

After this stage, further submissions will be only at the request of the planning inspector, based on the matters and issues he/she identifies at the examination.

- 6. If your representation is seeking change, do you consider it necessary to speak at the examination in public?
 - a. No, I do not wish to participate in the examination
 - b. Yes, I wish to participate in the examination
- 7. If you wish to speak at the examination in public, please outline why you consider this to be necessary. Please note the planning inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the examination.

Continue on a separate sheet if necessary

Data Protection Statement

In complying with the Data protection Act 1998, East Staffordshire Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation and Local Plan examination. It is intended to publish responses to the Pre-Submission Local Plan consultation on the Borough Council's website.

Personal information will be added to the Council's Local Plan consultation database and will be used to keep you informed of progress with the Local Plan and in order to consult with you further at each stage of the process to enable you to make further comments.

Personal information will also be shared with the Government appointed planning inspector (from the Planning Inspectorate), who may wish to contact you to discuss your comments and concerns, prior to formal examination of the Local Plan and supporting documents.

| If you wish to be contacted at different stages of the plan process please tick the boxes: | Submission | Inspectors report | Adoption |
|---|------------|----------------------|----------|
| If you do not want to be contacted at future stages of the Local Plan preparation please tick the box | | | |

<u>Appendix 3 – Pre-Submission consultation</u> <u>letter, constituting the statement of</u> representation procedure

Philip Somerfield B.A. Dip T.P., D.M.S. M.R.T.P.I Head of Regulatory Services

| Direct Line: | (01283) 508618 |
|--------------|-----------------|
| Direct Fax: | (01283) 508388 |
| Reply to: | Planning Policy |

Dear Sir/Madam

East Staffordshire Pre-Submission Local Plan Consultation October 2013

East Staffordshire Borough Council is now consulting on the Pre-Submission Local Plan. The Local Plan proposes a policy framework to deliver growth in East Staffordshire including approximately 11,650 homes and 40 hectares of employment land by 2031.

The Pre-Submission document is the version of the Local Plan which the Council intends to submit to the Secretary of State in spring 2014 for public examination by an independent government inspector. The Local Plan covers the whole area of East Staffordshire Borough.

Following the previous 'Issues and Options', 'Strategic Options' and 'Preferred Options' consultations, the Pre-Submission Local Plan sets out the Council's spatial strategy and proposed strategic site allocations. The consultation document also contains policies on several topics, such as town centres, infrastructure, open space and recreation, the rural economy and design. This consultation document reflects the input provided by stakeholders and communities, the evidence base and the Sustainability Appraisal (SA). The SA and a non-technical summary is also available for comment.

This **Pre-Submission** stage will start on Friday 18th October and **last for 6 weeks until 12:00pm Friday 29th November 2013**, and is an opportunity for everyone to provide their comments. **Please note** that the Council is requesting comments in relation to the <u>Legal</u> <u>Compliance and Soundness</u> of the document only. We are not able to accept comments that do not relate to the specific questions set out in the response form. A guidance note has been prepared to help explain what is meant by 'Legally Compliant' and 'Sound' and can be viewed alongside the document and response form.

Paper copies are available to view at the Council's Customer Service Centres in Burton upon Trent and Uttoxeter, and the libraries at Burton upon Trent and Barton under Needwood during normal office hours. A copy will also be available in the mobile library. Electronic documents are available to view online at:

http://www.eaststaffsbc.gov.uk/Planning/PlanningPolicy/LocalPlanCoreStrategy/Pages/defau It.aspx You can submit comments:

- Electronically via our consultation portal: <u>http://eaststaffsbc-consult.limehouse.co.uk/portal/</u>
- By post to: Planning Policy, East Staffordshire Borough Council, PO Box 8045, Burton upon Trent, DE14 9LG
- By e-mail to: <u>LPconsultation@eaststaffsbc.gov.uk</u>

If you would like to ask us questions about the Plan before sending in your representations, a Planning Officer will be available:

- At Burton Customer Service Centre, Market Place, Burton upon Trent, DE14 1HA between 11a.m. and 4p.m. on Tuesday 29th October and 5th November, and Thursday 31st October and 7th November.
- At Uttoxeter Customer Service Centre, Uttoxeter Library, High Street, Uttoxeter ST14 7JQ between 11a.m. and 4p.m. on Wednesday 13th and 20th November and Friday 15th and 22nd November.

For further information please contact Planning Policy on 01283 508618 or e-mail <u>LPConsultation@eaststaffsbc.gov.uk</u>

Your representations may be accompanied by a request to be notified (at a specified address) of any of the following:

- (i) the submission of the Local Plan for independent examination;
- (ii) the publication of the recommendations of the person appointed to carry out an independent examination of the Local Plan (the Inspector); and
- (iii) the adoption of the Local Plan.

The Council has published on its website all the comments that were received at the previous stage - Preferred Option – together with a response to these comments. They can be found at:

http://www.eaststaffsbc.gov.uk/Planning/PlanningPolicy/LocalPlanCoreStrategy/Pages/Local PlanComments.aspx

If you have received this letter in error or do not wish to be contacted again please inform us and we will remove you from our database.

We look forward to receiving your representations.

Yours faithfully

Philip Somerfield Head of Regulatory Services