



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 <http://eaststaffsbc-consult.limehouse.co.uk/portal>

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	Mr
First name	Stephen
Last name	Powell
Job title (where relevant)	Clerk to the Council
Organisation (where relevant)	Tutbury Parish Council
Address	23 Meadow View Rolleston on Dove Staffordshire
Postcode	DE13 9AL
Telephone number	01283 815705
Email address	clerk@tutbury.staffslc.gov.uk
Preferred contact method	Email

Agent's details (if applicable)

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.

Policy SP. 3

The ESBC proposal to allow 11,648 dwellings during the plan period is not justified and will prove to be ineffective.

1. It takes no account of the history of house build rates in the borough.
2. It derives from former Growth Point status and from policies prepared against the revoked Structure Plan and the Regional Spatial Strategy. The ESBC figure of 613 dwellings each year is not valid. Its use in an economic downturn as part of a market led model for housing provision may result in ongoing non-compliance with the 5 year rule, and cause further land speculation. The council will be powerless to refuse such applications (see Red House Farm appeal) and it brings no certainty that such approvals will produce households that meet the stated profile of need.
3. The number of houses proposed (11,648 at 613 a year) is unsustainable within the Bruntland definition; 'it does not meet the needs of the present without compromising the ability of future generations to meet their own needs'.
4. Tutbury Parish Council assumes that the Growth Point rate of 500 houses each year is a legal commitment which ESBC must continue. On that basis the 613 per year should be reduced to this lower figure which still includes an element of growth. Should the assumption of the Growth Point legal commitment be incorrect the proposed figure for the 19 years could be reduced further to reflect historic levels plus a percentage increase to meet population predictions.

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.

In order to correct policy deficiencies the following amendment is required

Remove the first sentence of Policy No. 3 and replace with 'The Borough Council will provide for 9,500 dwellings over the plan period 2012 – 2031, an average build rate of 500 per year.

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.

In order to correct policy deficiencies

The household formation strategy is crucial in determining the success or failure of the local plan and the future of the Borough. Justification for the Local Plan figure is not sound as it depends on an over optimistic economic model which past experience shows is unachievable. A more realistic and sensible approach which does not destroy the countryside must be agreed.

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:	Yes Submission	Yes Inspectors report	Yes Adoption
If you do not want to be contacted at future stages of the Local Plan preparation please tick the box			