



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 29<sup>th</sup> 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](mailto: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)

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

**Agent's details** (if applicable)

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

## Part B

**Please use a separate sheet for each representation**

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

- |               |   |           |   |                 |   |
|---------------|---|-----------|---|-----------------|---|
| a. Paragraphs | <div style="border: 1px solid black; padding: 2px; display: inline-block;">2.16/2.21<br/>2.22/ 2.28</div> | b. Policy | <div style="border: 1px solid black; width: 100px; height: 30px; display: inline-block;"></div> | c. Policies map | <div style="border: 1px solid black; width: 100px; height: 30px; display: inline-block;"></div> |
|---------------|---|-----------|---|-----------------|---|

### 2. Do you think the Local Plan is:

- |  |     |   |
|--|-----|---|
| a. Legally Compliant (see guidance notes for definition) | Yes | <div style="border: 1px solid black; width: 40px; height: 30px; display: inline-block;"></div>                      |
|  | No  | <div style="border: 1px solid black; width: 40px; height: 30px; display: inline-block; text-align: center;">X</div> |
| b. Sound (see guidance notes)                            | Yes | <div style="border: 1px solid black; width: 40px; height: 30px; display: inline-block;"></div>                      |
|  | No  | <div style="border: 1px solid black; width: 40px; height: 30px; display: inline-block; text-align: center;">X</div> |

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             | <div style="border: 1px solid black; width: 40px; height: 30px; display: inline-block; text-align: center;">X</div> |
| b. Justified                       | <div style="border: 1px solid black; width: 40px; height: 30px; display: inline-block; text-align: center;">X</div> |
| c. Effective                       | <div style="border: 1px solid black; width: 40px; height: 30px; display: inline-block;"></div>                      |
| d. Consistent with National Policy | <div style="border: 1px solid black; width: 40px; height: 30px; display: inline-block;"></div>                      |

**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.

The title 'Strategic Village' results from a flawed survey that takes no account of the form and layout of settlements, the sufficiency of provision to meet existing needs or of the role of each village in relation to surrounding villages/hamlets. In the case of Tutbury the doctors and health care services are at capacity and cater for another nearby 'Strategic Village', Rolleston on Dove, which has no such facilities. Tutbury also acts as a service centre for Hanbury, Anslow, Draycott-in-the-Clay; and (in South Derbyshire) Hatton, Sudbury, Foston, Scropton and parts of Hilton. The designation 'Strategic Village', takes no account of Tutbury's ability to cater for growth from all those places while at the same time having to absorb a large number of new households of its own.

The Conservation Area, based on a medieval street pattern and the absence of any highway improvements or car parking in the village centre means that traffic problems will increase and carbon dioxide levels will rise.

The survey that resulted in the creation of 'Strategic Villages' also ignored provision for the elderly; care home provision; a history of drains flooding into people's houses; no police presence and an uncertain future for the youth club or pre-school group. The survey collected only positive information that satisfies a decision already made that larger villages should have big estates added to help ESBC meet their over inflated housing target. (see comment on SP 3).

The 'Strategic Villages' are now a target for speculation against the Borough Council's inability to meet its 5 year land requirement.

Unlike Tier 2 parishes (see paragraph 2.28 page 64) Tier 1 Parish Councils were not visited or actively engaged on their tier classification and dispute the criteria used to define them. The classification of Strategic Village is a flaw in the Local Plan strategy. The plan is not legally compliant with the Council's Scheme of Community Involvement.

**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 action is required

To re-examine the classification of Strategic Villages with the Borough Council and to take into account services/facilities, capacity issues and needs resulting from additional development. This fresh approach will produce a more realistic policy with appropriate outcomes.

**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.

. To be able to properly represent the views of the parish

### 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			