

TUTBURY PARISH COUNCIL

Objections to Proposed Development at Burton Road Tutbury

28 June 2011

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TUTBURY PARISH COUNCIL

Objections to proposed development at Burton Road, Tutbury.

The main proposal (P/2011/00546/CEH) shows 212 dwellings, 14 industrial units, associated roads and open spaces all accessed from Burton Road with two entry points, one off the A511, the other from the C91.

The site area is 15.2 hectares (37.6 acres) of farm land.

The owner and farmer of the land is Mr G Shaw of New Farm, Rolleston Lane Tutbury. The development company which seeks detailed planning permission to build houses and industrial units on greenfield land is Peveril homes (Belper) via their agents Signet Planning.

A separate application (P/2011/00547/CEH) by the same developer seeks outline approval for a further 12 self-build plots and 24 allotments.

The parish council objection is in four parts:-

- Planning context,
- The effect of the proposals on Tutbury,
- Some observations on the documents deposited
- Summary.

1. Planning Context

The Local Plan for East Staffordshire (1996 to 2011) set a total of 6,500 new homes over 15 years, an average annual build rate of 433 and most of the development is to take place in either Burton upon Trent or Uttoxeter. Villages such as Tutbury are to be contained within development boundaries and separation is to be maintained between villages. Outside of the villages there is a presumption against building in the countryside apart from very few exceptions.

In 2008 ESBC decided it wanted to be a regional Growth Point and formally adopted a plan (based largely on Regional Spatial Strategy forecasts of West Midlands population trends) to increase the number of homes they wish to see built each year during the period 2006 – 2026, up from the Local Plan average rate of 433 to a `growth point` average rate of 650 homes each year for 20 years to an eventual total of 13,000 new homes. All but a few of the proposed homes are to be in Burton upon Trent; dependent upon infrastructure being in place to support such a scale of building.

Tutbury Parish council long believed that this unprecedented rate of house building is both unachievable and undesirable (See appendix A). The theory that fast housing growth brings economic benefits emerged from the Regional Spatial Strategy which government ministers have indicated is to be revoked. The latest Communities and Local Government Housing Statistical Release (26.11.2010) shows that since 2006 (when growth point agreements were made) there has been

a fall in the expected rate of increase in household formations. In the West Midlands the amended projected annual average reduces down from 21,000 (in the 2006 prediction) to 19,000 each year during the period 2008-2033, a percentage reduction in household formation rates of 12.3%. This reduction in growth rate across the region means that East Staffordshire's 13,000 new homes target over 20 years is too high when it is set against the 2006 projection. A more accurate figure would be a reduction by regional proportion i.e., 12.3% or 1,600 houses. That in turn produces a reduction of 80 houses each year (on average) over 20 years, down to 570 in the growth point plan rather than 650.

In addition to an overall reduction which should be made to follow the growth model in the Communities and Local Government Housing Statistical Release there is an economic truth; that the housing market is depressed. There are many houses for sale or rent and unemployment is high. Any calculation of a five year supply of land in East Staffordshire must reflect this truth. The most recent completion figures for East Staffordshire confirm economic downturn. They show only 207 houses completed in the year 2009 to 2010 when growth point expectation was an average of 650 per year.

Official statistics of household growth are an important part of the evidence base for assessing future housing demand and informing national and local policies on housing and planning, they help to avoid mistaken green field approvals based on inaccurate predictions and are therefore a material planning consideration.

At the time of writing this objection to the Burton Road proposals ESBC has not published a draft of its Core Strategy for the new Local Development Framework which will eventually replace policies enshrined in the Local Plan, but it has adopted a Policy Statement on Brownfield and Greenfield Land Release. The Burton Road application, when set against the policy statement, fails to show the range of benefits to the community it needs to demonstrate if it is to be considered 'exceptional'.

The application should be refused because it does not satisfy the council policy statement on Brownfield and Greenfield Land Release.

The Burton Road site brings no benefit to the existing community; no proposal can have been more unpopular or shown so little regard for public opinion. Tutbury's existing infrastructure cannot cope with the addition of so many new residents. The Greenfield Release policy requires developers to demonstrate major infrastructure provision, it is one of the key tests if they wish to overturn the presumption against approval and it is a test they fail to answer. (See 'The effect of these proposals on Tutbury' below)

The application site is said to be the only one deliverable and that there is no alternative in the Tutbury area, but the parish council has been informed that there is another - land off Redhill Lane - which is in the process of being prepared for a planning submission.

The Burton Road site is certainly not sustainable and its drainage scheme alone gives grounds to believe the site may never be developed at reasonable cost. A

contour plan shows the site rises 10 metres from alongside the by-pass roundabout up to the south west. Storm drains that collect rainwater from roofs and paved areas at the lower part of the site can not connect in to the storm water `sustainable drainage system` (SUDS) that is at a higher level than the houses, and as water will not run uphill without being pumped it is obviously not possible for the SUDS system to collect all rainwater and empty it into ponds or reed beds. A huge underground storage culvert, 180m x 2.100 x 1.500, is proposed to catch storm water and (if Severn Trent approve) overflows at peak times may be pumped into the foul sewer. Almost all parts of the site depend on mechanical pumps to get both foul and storm water away.

The ASC consultant report states that a Severn Trent Water assessment of Tutbury`s existing combined drainage system will need to be done before such a proposal can be considered to be feasible or sustainable. Experience of flooding elsewhere, particularly in Bridge Street, may not confirm that the developers proposals are possible (see the Severn Trent letter in ASC`s appendix C). This is not a `sustainable` scheme, it brings a risk of flooding both on and off the site. Drainage issues also show that, contrary to claims by the developer, the site is not immediately available.

Pumped drainage arrangements are notoriously prone to breakdown and ultimately bring a high public sector maintenance cost. The drainage proposals for Burton Road have not been demonstrated to be sustainable, another reason why the application should be refused.

The proposal is not sensitive to the landscape or to the historic setting of Tutbury. It will destroy a large area of fields and hedgerows where many wild creatures live. It will be highly visible from the surrounding area and is not in accordance with saved policy NE1 of the Local Plan regarding building outside development boundaries.

The houses have no distinctive character in their design and do not relate well to their surroundings. The proposal represents sprawl across farmland beyond the ridge of hills that surround Tutbury on land that falls away towards Burton and it will destroy the entrance to one of the most historic villages in Staffordshire (contrary to guidance in PPS1 and PPS7). Because the site protrudes out from the edge of Tutbury in such a prominent way it cannot be described as rounding off the edge of the village, it is an encroachment into open countryside, a salient that will be visible for miles.

The developer uses the term `urban grain` to describe Tutbury but the village is not urban, it is a rural community four miles from town and it is not part of Burton or of its fringes. Neither is it part of the growth point plan and should not therefore be used as a target for speculation to meet growth point numbers in the countryside. The same reasoning applies to Rolleston on Dove, Barton under Needwood, Abbots Bromley and Rocester.

Those five East Staffordshire parish councils are so alarmed by the apparent possibility of an abandonment of Greenfield protection and by land speculation in or near villages they have joined together in a coalition. The coalition wishes to meet with ESBC for a review of growth point policy and to assess how each village is to

be protected against ruinous development. The Chief Executive of ESBC has agreed to such a meeting which will take place in the near future.

Tutbury Parish Council held a public meeting to debate the issue on Wednesday 20th April 2011 when over 200 parishioners packed into the Village Hall and unanimously agreed that principles set out in the Local Plan should where possible remain ESBC policy until replaced by the yet to be published Core Strategy (which is not due until early 2012 and will not be approved until late 2012). There have been further parish council meetings since then, all attended by packed audiences totally opposed to the Burton Road scheme.

The public meeting in April agreed that ESBC should review its growth point plans in the light of changes in the economy and proposed legislation that will give people more say over how their towns and villages develop. Many people have contacted the parish council since that meeting and volunteered to help fight the loss of fields and wildlife, an indication of overwhelming public support for the parish council position and despair at the possible destruction of open farm land at the entrance to Tutbury.

A nation that produces less than half of its own food can not carelessly allow fields to be given up to speculative house building. Agriculture is a vital part of the well being of any nation, not a side issue in the race to obtain planning permission without thought as to what is being lost. ESBC should consider the disappearance of 37.6 acres of food producing land as a critical factor in this application and refuse to let it happen because the loss of farm land is a material consideration. PPS7 suggests that 'development in the countryside should be strictly controlled to protect it for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its resources and so that it may be enjoyed by all'.

The parish council expected to see a DEFRA assessment of the use of the land and whether it may be given up as surplus to the nation's need for food production, without such an assurance it is wrong for ESBC to process the proposal any further.

Documents in support of the application state that planning personnel engaged by ESBC have been closely involved in the preparation of the scheme, meetings the parish council was never told about nor had any part in. An assurance that ESBC involvement in no way indicates tacit approval is needed to allay public fears that a decision has been made before the applications went out for consultation.

2. The effect of the proposals on Tutbury

Tutbury is a special place, many parishes will say the same about their village, but there can be no doubt that Tutbury is one of the most historic settlements in Staffordshire. It lies in a fold in steep hills that fall down to the Dove valley. There is nowhere else in East Staffordshire where you can find an Iron Age 'pale', a church first built as part of a Norman Abbey and a medieval castle of national and international notoriety as the prison and eventual entrapment place of the executed Mary Queen of Scots. Tutbury has a large Conservation Area with a medieval street pattern, a High Street that once saw bull running, fine examples of Elizabethan and

Georgian architecture and the last remaining hand made glass studio in East Staffordshire.

Beyond the rim of surrounding hills there is productive farmland and open countryside criss-crossed with public rights of way and green lanes. Contrary to statements made in the application there is abundant wildlife in and around the application site. Buzzards regularly patrol there; owls can be heard and may occasionally be seen. A range of garden and game birds, cuckoos and birds of prey are present, people shoot over the land while others simply enjoy the countryside.

But it is the fall of the site away from the village that is so precious to the setting and character of Tutbury. When a visitor arrives at the place ESBC itself designated as `Tourist Tutbury` he/she first passes fields that rise gently to the ridge of Ironwalls Lane and there sits the castle, as dominant now as it has been for a thousand years, with its village contained in the valley. Should permission be given to overspill a housing estate onto fields that slope away towards Burton, the visitor's first glimpse of Tutbury will be industrial units and sprawled out behind them a vast housing estate. The proposed site will utterly ruin the nature of this gateway into the village. It will in no sense be a natural extension and can only spoil one of the more precious assets Tutbury has retained through various Local Plan inquiries; its sense of being a separate, special place.

The A511 has seen ribbon development in the past at Lodge Hill and along Tutbury Road towards Burton, such development has long been considered to be the epitome of bad planning yet these proposals are to a great extent little more than ribbon development and would be visually ruinous to this ancient settlement.

Tutbury is said by people who do not live there to have facilities for further growth. ESBC carried out a simplistic hierarchy survey that missed more than it discovered. The questions were so leading that the parish council refused to tick the boxes. The survey made no attempt to gauge the quality of provision or its ability to cater for population increase. A letter of complaint about the survey was sent at the time with full parish council reasoning (See appendix B), and yet from such a seriously flawed exercise Tutbury has become a major target for speculation.

Traffic movement and a lack of sufficient car parking are major problems in Tutbury. The road to Fauld (C91) runs through the village centre and it would be impossible for traffic to pass through for much of the time if people did not park their cars partly on the pavement. The proposals have no strategic overview of C91 traffic related problems and offer no planning gain to Tutbury. There was no planning gain from the recent Crystal Court development and Ludgate Street is now even more difficult to use for access into High Street. There is an urgent need for C91 traffic improvements and for more parking spaces for people to be able to shop and visit the Health Centre without incurring a fine.

A further traffic problem will be created by the addition of yet more vehicles onto Green Lane and Ironwalls Lane when new Burton Road residents go off to join the A38 at Barton under Needwood. As the main points of access are on to the A511/C91, all such increase in traffic must pass through those two residential streets with no infrastructure improvements to cater for them.

Tutbury has no filling station, no care home, no professional services, no butcher, no DIY store, no police station and the village hall has very few parking spaces. The doctors and health care services are at capacity, there is no provision for the elderly and the youth club has uncertain tenure. To add 224 families on to the existing infrastructure is irresponsible and could eventually lead to alterations in the village centre that might destroy the Conservation Area.

The County Council warns of the danger of oversized developments (more than 10 houses) to Conservation Areas. Their Strategic Land Use Planning Policy response to the ESBC consultation says `It is not only development within the Conservation Area boundary itself that needs to be considered, but safeguarding the views, into and out of the area` (Policy NC19 Staffordshire and Stoke on Trent Structure Plan). The same response states that proposals which would result in over-development, undue disturbance and traffic movement detrimental to the Conservation Area will not be permitted. (PPS5) and under Planning of the Historic Environment Policy HE3.14 states that `.....plans should consider the qualities and local distinctiveness of the historic environment.....and promote a sense of place`. The parish council believes that the Burton Road proposals will destroy the sense of place Tutbury presently enjoys.

Flooding has long been a problem in a many parts of Tutbury, from Redhill Lane down to Bridge Street. When it happens there is evidence of foul sewage washed onto roads from gullies and disturbed manhole covers. The application wants both foul and storm drain overflows to be pumped into this already troubled combined sewer system: and that will be a risk, because at peak times the existing drains may not be able carry both types of additional water away without flooding. Householders are expected to accept the risk of having water through their homes again and may not be able to re-insure against the cost of flood damage. A further risk is that at peak rainfall the mechanical pumps may fail.

The parish council, at its recent public meeting, gained unanimous support for a policy of no development that might increase the risk of flooding in Tutbury. This application, if approved will certainly increase that risk.

3. Observations on the documents deposited

There are so many drawings and support documents it is impossible, in such a short time, to read, discuss and decide the details which, should approval be given, will be most important.

The planning application implies that the land does not have an agricultural use, but it does. Crops are set and cattle graze behind Green Lane. (See the parish council call for DEFRA report).

Contrary to claims that there has been public consultation there has not been any public consultation by the developers. There was a display of drawings at The Institute (a private members` licensed club) in November. The parish council was not informed and just a few people in the Ironwalls/ Green Lane area knew about it.

Now there is a formal planning application which states that everyone within 5 minutes of the site has been notified: this is not true, even people who live adjoining the site have not been notified. This lack of public consultation is contrary to ESBC's Statement of Community Involvement which expects developers to seek a wide range of public opinion.

Supporting documents state that the proposed buildings will only be partly visible from the road, that is not true, they will be prominent and highly visible from as far away as Lodge Hill and not `glimpsed` through trees.

Viewpoints supplied prove that the site lies on ground that falls away towards Burton and is not a natural extension of Tutbury, it is nothing more than a housing and industrial estate beyond the edge of the village's natural boundary.

The two main site access points open onto busy roads. According to the traffic survey there will be 1,570 movements each day, a huge increase of traffic onto a fast road with only the national speed limit to slow vehicles.

The sight line towards Tutbury does not allow for the ridge at the Ironwalls Lane/Burton Road junction where traffic suddenly appears from Burton Street.

A statement that the road network close to the site has seen 83 accidents in five years, 2 of them fatal, 8 serious and 73 slight, means that when so many more traffic movements happen the probability of road accidents will increase.

Should residents of the estate go to village shops they will find streets already overcrowded and will probably turn their cars away to find a town where it is easier to park. The estate will always be a separate non-sustainable community having little direct contact with the village.

Derby commuters headed for the A38 north will probably go through Rolleston on Dove and that will mean a large increase in the number of vehicles through Rolleston village centre.

The applicant says that foot traffic assessments take no account of hills which must be climbed to get to Burton Road from the village centre. Burton Street, Castle Street, Ironwalls Lane and Close Bank are all very steep and difficult in the winter. Bungalows shown on the plans are no doubt for older people, but the walking distance and hills of Tutbury will mean constant car use in to the centre for all but a few of those elderly residents.

It is not known what users the industrial estate might attract, but should they require large vehicles a new hazard will be added to Burton Road. The mixture of industrial units and houses has proved to be so problematic at Fauld that a new road has been built to get industrial traffic away from the residential area. Tutbury Parish Council can not understand why such a mixture is thought to be desirable at Burton Road or why industrial buildings are needed when there are so many vacant units at Fauld and elsewhere.

If there are further applications to extend along the A511 or towards Rolleston on Dove how will they be resisted once such an intrusive scheme has been allowed?

The parish council challenge an assertion that the proposed properties are special and designed to suit Tutbury. Three storey houses and a mix of styles shown are typical of any new estate anywhere, as are the industrial units.

Some of the proposed homes are very close to the A511 and despite the site being so large many houses have tandem parking bays. This arrangement is more often associated with space difficulty in older developments when car use was less than 21st century style. In many cases cars will be reversed unsighted on to the road from shared drives. Some of the proposed gardens are tiny; compare them to the pre-war Green Lane houses to see how small they are. Part of the reason for this may be because the rainwater settlement arrangements take up so much land. Whatever the reason, the plots are not generously sized and represent poor outdoor space for intended residents, contrary to recommendations in PPS3.

One statement attempts to show that people have moved away from Tutbury to more affordable areas, there is no evidence of any sort to support such a claim.

The applicants confuse Tutbury with Outwoods, as though they are close together, they are not. They are miles apart from each other, artificially joined only to create a ward for district council electoral reasons. Tutbury is not part of greater Burton and it is not urban.

It is said that Tutbury does not have a high proportion of rented houses, this is untrue. Trent and Dove manage over 250 former council houses and there are housing association homes in Holts Lane and Monk Street. In contradiction to the application statement Tutbury has a high proportion of rented houses. In addition to social housing there are private landlords with houses and apartments available to rent. A recent Midlands Rural Housing Needs Survey showed that only three starter/affordable homes are required in the village and they could be met by purchase of some of the many empty houses.

Trade effluent is not described and some or all of it will end up in the foul drain mentioned above.

Green Lane, a twisting narrow road, will have a car and footpath entrance opening directly on to it. The parish council is concerned about the movement of cars and pedestrians at that new access and of the mixture of cars and pedestrians around the houses proposed in that area.

Supporting documents suggest that the design of houses shown are in some way superior with regard to sustainability and emissions mitigation, but they aspire to little more than current minimum standards.

The application to approve 12 self build houses and 24 allotments is in outline and would be less visually obtrusive, but it does form part of the whole scheme in the proposal. It does not meet criteria set down in the Brownfield and Greenfield Policy and should be refused.

4. Summary

Objection to proposed development at Burton Road, Tutbury.

1. There is no significant shortage of housing in East Staffordshire, or in Tutbury. The proposed 224 houses and 14 industrial units do not meet a need.
2. The proposals do not comply with requirements set out in ESBC's 'Policy Statement on Brownfield and Greenfield Land Release', nor with retained policy NE1 of the Local Plan or with relevant Planning Policy Statements.
3. The site protrudes out from the edge of Tutbury, it is not rounding off, it is a salient and an encroachment into open countryside.
4. Tutbury's infrastructure is not capable of supporting the proposals.
5. The proposal is not sustainable in a number of ways. One significant lack of sustainability is a drainage scheme which depends on pumps to dispose of both sewage and storm water. It is technically complicated and creates the risk of flooding in Tutbury.
6. The proposals will have a negative impact on Tutbury. They are insensitive to the historic setting of the village and the surrounding countryside.
7. 15.2 hectares (37.6 acres) of food producing land will be lost forever.
8. The proposed buildings are of uninspired design; they offer poor outdoor living space and will be highly visible from many different viewpoints.
9. The parish council urges refusal of all proposals.

Agreed by the parish council at their meeting on 28 June 2011

Councillor P Steadman
Chairman of the Council

Appendices

Appendix A - Parish council response to ESBC Strategic Housing Land Availability Assessment (15/04/09)

Appendix B - Parish council response to ESBC Hierarchy Assessment (14/07/09)

Clerk:
S Powell

TUTBURY PARISH COUNCIL

Telephone:
(01283) 815706

23 MEADOW VIEW

ROLLESTON ON DOVE

BURTON UPON TRENT

STAFFORDSHIRE

DE13 9AL

15 April 2009

Mr P Somerfield
Development and Regeneration
East Staffordshire Borough Council
Town Hall
BURTON UPON TRENT
DE14 2EB

Dear Mr Somerfield

RESPONSE TO THE EAST STAFFORDSHIRE BOROUGH COUNCIL DRAFT STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT CONSULTATION (SHLAA)

PARISH COUNCIL POLICY

The parish council responses to the SHLAA are based on six long held principles:

- ❖ No overspill towards Burton and Rolleston
- ❖ No separate community at Fauld
- ❖ No housing on land important to the setting of the castle and older parts of Tutbury
- ❖ No development that might exacerbate the flooding problems in Tutbury, either directly and or indirectly
- ❖ No increase in the volume of traffic passing through the centre of the village
- ❖ No easing of controls within the Conservation Area

EAST STAFFORDSHIRE BOROUGH COUNCIL (ESBC) POLICIES

When the Structure Plan was in the process of consultation the parish council opposed the ESBC increase in housing numbers up to 12,900 over twenty years and pointed out that it was completely out of line with neighbouring local authorities, the table below shows the current situation.

LOCAL AUTHORITY	HOUSES PROPOSED 2006 – 2026
Cannock	5,800
ESBC	12,900 + 5,000 due to growth point policy
Lichfield	8,000
Moorlands	6,000
South Staffordshire	3,500
Stafford	10,000
Tamworth	2,900

ESBC has far the highest number of houses planned when compared to any adjoining local authority, including South Derbyshire where the encroachment of the City of Derby adds 6,400 at the fringes of Mickleover leaving 5,600 as a better comparator for the remainder of the South Derbyshire towns and villages to absorb.

Building 12,900 houses in ESBC over the twenty years of the plan means an average of 645 new houses every year compared to the current average of 390 each year (over the last 6 years). The proposal by consultants engaged on behalf of the West Midland Regional Office (Nathaniel Lichfield & Partners) is that a further 5,000 should be added to an already over stated total, bringing it up to 17,900 or 895 new houses every year for twenty years, almost 2.5 times the present rates. This alarming despoliation of so much open space must be resisted by ESBC. The whole exercise of land availability is beginning to look like a charter for land speculation with no thought of need or consequence.

The SHLAA survey is, of course designed to bring one outcome, to find land for house building. Such crude economics are no doubt a product of the recent house price bubble, which left multiple associated credit problems in its wake. It has nothing to do with housing needs or with good planning; it is about numbers that fit some predetermined global number dreamed up by somebody who knows nothing of the end of such chaotic planning requirements and cares even less.

THE OPTIONS 1,2 AND 3

The consultancy offers three options. Option 1 says no growth in this part of the West Midlands so no increase in the number of new houses already agreed. Option 2 says some growth and proposes a further 2,500 houses on top of the existing allocation. How Option 2 can flit from 0 to 2,500 in such an arbitrary way is not explained; Option 3 is yet more bizarre, ESBC wants to be a growth point so they have now brought down an allocation of a further 5,000 houses onto themselves and are in conflict with the proposals their own policy has led to. And this parish council is supposed to make sense out of it all with thoughtful proposals about further ruination of their village via an invitation to add more sites to the list.

THE DEBT BURDEN

If 17,900 new houses are to be built in East Staffordshire over the twenty-year period of the plan and if the average cost of a new house is (for round figures) £200,000, the burden of debt would be at least £3,580,000,000 (£3.58 billion) largely supported by local employment. The parish council feels that would be an impossible debt to fund. At the present build rate the debt is approximately 395 houses x £200,000 = £79,000,000 borrowed each year. The proposed debt would be more than double the present debt and unemployment is rising.

There will also be a public debt. No doubt it is presumed that internal roads and services will form part of the private debt owed by the house purchasers, but what of the public debt taken on to pay for road improvements, car parks, public transport, footpaths, drains, schools, health services, care homes, community facilities, police, fire, ambulance, waste disposal and so on. Councils already struggle to maintain a decent level of service, how will they provide for so many new people, surely nobody any longer believes that Gross Domestic Product will constantly rise and provide for such complex infrastructure, if they do they are deluded because it will not.

PLANNING

It is an accepted truth that there is a need to plan, to control the potential for excess that individual decisions can create to the detriment of the majority. Development must not be allowed wherever a firm or an individual sees an opportunity to make money. Any exercise designed only to find sites for house building is mindlessly narrow, it cuts through the planning process and produces disorder.

And this is what makes the ESBC plan for 12,900 houses and their desire to be a growth point with its consequence of 5,000 more houses so disconcerting. Tutbury Parish Council is now faced with a threat against most of the policies we know to be important to our village. Between them ESBC and the West Midlands consultants have taken away what little protection this historic place has against mass housing sites that will spoil it forever.

There seems to be no place for the opposite argument in favour of the things we all need, such as farmland, the ability to feed ourselves, space between communities and a sense of order in the scheme of things.

EMPTY HOUSES

The consultant's report that of the 447 empty houses, 360 are in rural villages such as Tutbury, yet they state that "**factoring in an allowance for the number of empty houses that will be brought back into use does not fit with the spirit of the guidance**". Perhaps not, but for a place like Tutbury such numbers make a big difference and could save a field from concrete.

LIAISON WITH OTHER COUNCILS

The same blasé attitude appears with regard to any liaison with such authorities as South Derbyshire dismissed as “ **not possible because of different time scales**”. When the importance of the redevelopment of Drakelow Power Station is considered and its proximity to Burton we would have expected liaison to be of the greatest importance.

THE PARISH COUNCIL RESPONSE

The format provided is flawed and the answer boxes leave insufficient opportunity to properly contribute to the survey. In addition to this it is not possible to save and print off our responses. These notes should be read as part of a return made under protest because we do not accept the philosophy that drives the exercise.

Site No. 10. Land at Belmot Road, Tutbury. 8.5 ha, 298 houses.

The ESBC comments are correct in that this site is not required for development in the foreseeable future. In addition to that 298 houses on these fields would destroy the setting of the castle and views across the Dove Valley. An estate at Belmot Road would constitute a separate community.

Site No. 21. Land south west of Tutbury 15.24 ha, 533 houses.

The ESBC comments are correct in that this site is not required or suitable for development. ESBC comments make no mention of the fact that development of these fields would represent undesirable overspill beyond the East-West ridge that rings Tutbury. 533 houses would sprawl out towards Burton upon Trent across rolling countryside and have no true link with the village centre; it would unquestionably be a separate dormitory settlement with ruinous visual impact.

Site No. 134. Youth Centre, Cornmill Lane, Tutbury. 0.25 ha, 13 houses.

The report says that the site will be available in 2009, it may be but there is good reason to hope that this site will be retained for community use. And the site represents much of what is wrong with the survey. The SHLAA see the former school as a 13-house ‘gain’ when in fact it would be a social disaster. If thirteen families do take up residence they might ask where a suitable premises may be found in Tutbury for a pre-school group, a youth club or a scout troop, all lost in the interest of numbers needed to fill a chart. The same can be said of fields, trees, hedgerows and countryside.

Conclusion

The Parish Council understands the purpose of the SHLAA survey and the need to plan where new houses should be located. Tutbury is unquestionably a special case and needs careful control of all development. It has a particular topography, a medieval centre that forms the basis of the conservation area and an historic castle.

Parish council policy towards development is set out at the beginning of this document. The Council trust that the truncated responses on the forms provided reflect public opposition to the sites proposed.

Yours sincerely

S Powell
Clerk

Comments on the Draft Strategic Housing Land Availability Assessment

1. Do you consider that the methodology used for SHLAA is suitable and in line with Government guidance?

Insufficient information to form an opinion

2. Do you agree that ESBC has considered the correct stakeholders, or are there others that should be consulted?

If by 'stakeholders' it is meant the usual consultees in the planning process – yes. But if it means everyone who will be effected by the outcome – No.

3. Do you consider that ESBC have used all the necessary sources of sites to inform the SHLAA? If there are additional sources of sites that should be included please list these here and state why you consider they should be included.

None known to this council.

4. Do you consider that ESBC have used all the necessary data sources to inform the SHLAA evidence base through the desktop review? If not, what additional sources do you consider should be included?

Other sources not known to this council.

5. Do you agree with ESBC's approach of assessing all proposed sites, or should a threshold be set or criteria developed to determine which sites to survey?

Yes – there are more important planning considerations than solely finding sites for new houses. See response to No.6

6. Do you agree with the proposed method to undertake site surveys and types of information being collected? If not, what additional criteria do you feel should be included?

The impact of development on farmland, necessary space between settlements, the character of existing settlements, countryside, open views and a sense of order.

7. Do you have comments on the assumptions made regarding potential density/ yields on these sites?

Sufficient amenity space around property should be provided and sufficient off road car parking together with green spaces. These requirements will not be met by the densities specified in the site assessments.

8. Do you agree with the criteria to assess sites as on the Site Proforma? Is there anything additional that should be included?

The following factors must also be considered – The impact of development on farmland, necessary space between settlements, the character of existing settlements, countryside, open views and a sense of order.

Sufficient amenity space around property should be provided and sufficient off road car parking together with green spaces.

9. Do you consider that the proforma will provide a sufficiently robust indication of whether a site is suitable, deliverable or developable?

Not able to determine.

10. Do you agree with the approach taken to identifying and assessing the housing potential of broad locations?

No – because it considers only quantity rather than quality.

11. Do you agree with the approach taken to determine the housing potential of windfall?

No – windfalls and empty houses should be added in to help reduce the global numbers.

Site Specific Comments:

Do you have any comments or information on specific sites outlined in the SHLAA? If so, please provide below. Please fill in a separate form for each site.

12. Are you aware of any information related to the suitability of that site? (Please note the site number in your answer)

Site No.'s 10, 21, 134

10. This site is not suitable for development; an estate at Belmot Road would constitute a separate community. In addition to that 298 houses on these fields would destroy the setting of the castle and views across the Dove Valley.

21. ESBC comments are correct in that this site is not suitable for development, but their comments make no mention of the fact that development of these fields would represent undesirable overspill beyond the east-west ridge that rings Tutbury. 533 houses would sprawl out towards Burton upon Trent across rolling countryside and have no true link with the village centre; it would unquestionably be a separate dormitory settlement with ruinous visual impact.

134. This site may be retained for community use. The former school is seen as a 13-house gain when in fact it would be a social loss. If 13 families do take up residence they might ask where a suitable premises may be found in Tutbury for a pre-school play group, a youth club or a scout troop. If developed these would be all lost in the interest of numbers needed to fill a chart.

13. Are you aware of any information related to the availability of that site? (Please note the site number in your answer)

Site No.'s 10, 21, 134

10 *Not known*

21 *Not known*

134 *May be retained for community use.*

14. Are you aware of any information related to the achievability of that site?

Site No.'s 10, 21, 134

10 & 21 There are doubts that roads and services and infrastructure can be met by public bodies for such provision as car parks, public transport, footpaths, drainage & sewage disposal, schools, health services, care homes, community facilities, police, fire, ambulance, waste disposal and so on.

134 This site is on a dangerous bend with a lot of 'on street' parking from adjoining terraced houses, which would make access extremely difficult and unsafe. The site also abuts the Dove Valley flood plain and is situated in the Tutbury Conservation area.

15. Do you have any comments to make on the deliverability/developability of individual site?

10, 21, 134 – see previous comments

16. Do you have any information or suggestions on how constraints affecting particular site can be overcome or ameliorated?

10, 21, 134

Tutbury is a settlement which presents too many difficulties for major housing developments. It has a particular topography, an historic castle and medieval centre that forms the basis of its conservation area. Over development will destroy the very essence of Tutbury.

17. Please use this box to provide any further comments related to the SHLAA which are not covered in the questions above

Further comments related to the SHLAA not covered by the questions above:

- ❖ The public and private cost of 17,900 new houses and the impossibility of meeting either.*
- ❖ The impact and loss of so much possibility for food production.*

- ❖ *The arbitrary way, huge growth has been assumed to be desirable and necessary.*
- ❖ *The absence of qualitative comparisons*

TUTBURY PARISH COUNCIL

Clerk:
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14 July 2009

Mr P Somerfield
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East Staffordshire Borough Council
Town Hall
BURTON UPON TRENT
DE14 2EB

Dear Mr Somerfield

SETTLEMENT HIERARCHY CONSULTATION

Your letter of 3 June 2009 states that the purpose of the latest consultation is to give an opportunity for the parish council to comment on and validate certain data. The response sheet shows what you believe to be the relevant services and facilities in East Staffordshire villages, and that includes Tutbury. At first sight the form appears to be a 'tick the box' gathering of obvious facts; the parish council have concerns about this approach. The responses set out below attempt to qualify the points in your survey.

History – Tutbury is a village that has developed around its Norman castle, much of the village lies within the Iron Age Park Pale. The presence of a castle explains why Tutbury has established itself as a small town set in productive farmland. This type of settlement will naturally draw certain amenities which partly explains the presence of doctors and a dentist when bigger communities have none; but it does not in any way inform your authority as to where proposed development referred to in the 'Strategic Housing Land Availability Assessment' could be placed. A copy of this council's response to the SHLAA is attached for your information to remind policy makers of our objections to ESBC proposals up to 2026.

The Settlement Hierarchy – Some of the statistics are obvious and need no verification but many are more complex than a simple YES or NO for example:

Distance to Employment – The parish council has little knowledge of where people work. Some are known to commute to nearby towns, some to cities and some to

European countries. There was a time when jobs could be found in and around Tutbury but ESBC decided that village employment sites should have houses built on them. There are a few jobs at Fauld but how that could be relevant to planning is not possible to say. Fauld traffic has increased and is a major problem as there is only one road (C91), and it goes straight through the village centre, but parish council objections for development at Fauld are always ignored. The point here is that in today's mobile society, proximity to employment on a scale suitable for Tutbury, is not a crucial determinant for future development in the parish.

Post Office – Tutbury does still have a post office, but all such amenities are subject to review and closure.

A Village Shop – The parish council is uncertain what is meant by this description. Does it mean a 1950's 'sell everything' shop with a man behind a counter or does it mean a modern supermarket?

What Tutbury does have is a range of shops, a great number of which relate to tourism; they in turn rely on a historic and unspoilt connection in order to flourish. Most people travel to Burton, Derby or Uttoxeter for their weekly shop. Should a major development happen on the outskirts of Tutbury the new residents would do the same, some may go to Hatton for milk or meat because there is a car park there.

Doctor and Pharmacy – The Tutbury practices serve a wide area; Hatton, Hilton, Rolleston, Stretton, Hanbury, Draycott and so on. It is pertinent to ask why those villages were allowed to be over-developed without either amenity. If the already busy doctors and chemist is thought able to absorb major additions that belief would be wrong. It would make more sense to carry out a survey of existing provision and plan what should go where before adding a great burden to the Tutbury provision.

Dentist – Tutbury does not have a NHS dentist. If residents can afford the annual insurance plan plus the fee for treatment Tutbury could be said to have a dentist. If the residents are less well off they have to register in Burton or Uttoxeter. YES or NO?

Library – The travelling library is good but limited, a permanent public building that includes a library and reading room is needed.

Place of Worship – Does this mean C of E, Catholic, free church, muslim or any other? . There is a lack of clarity here.

Village Hall – A village hall that is not big enough for a Tutbury Band concert or a school presentation and has only 8 car parking spaces cannot be classed as adequate, there is a hall, it is in the wrong place and is too small – YES or NO?

Recreational Open Space – ESBC maintains an area at the former Tutbury Plaster Mill, and other small areas apart from these there is only Cornmill Lane where teams can play organised sport. Recent growth in football teams means that the only field is under pressure and already inadequate, more so since the Burton College's Rolleston campus was closed to allow houses to be built and recent proposals suggest yet more pressure if the playing fields there are approved for

housing.

Public Houses – Even public houses in large towns struggle for trade, Tutbury is no exception. Under these circumstances how crucial public houses are to the planning assessment is not understood by the parish council.

Opticians – There is an optician, not the first to be set up.

Early Years Nursery – The former primary school in Cornmill Lane has such a group, but the building is to be sold by the county council and this provision will have to cease because there is no other suitable premises in Tutbury.

Primary School – A LEA school which operates on a site largely owned by the Tutbury School Charity. The school playing fields do not belong to the LEA, they are left as a legacy but must go back to the Newton family if the school does not need them.

Omissions – The settlement hierarchy does not consider other important facilities, some of the more obvious omissions are:

Youth Provision – Youth Club uses the Cornmill Lane premises, soon to close.

Scouts/ Guides – Scouts use the same premises

Guides and Brownies rent a room at the school. This is not an option for the scouts because of equipment storage.

Retirement provision

Care home/s

Garage/petrol

Professional services

DIY store

car parking

Police station

The hierarchy makes no attempt to list facilities in order of relevance, nor does it call for qualitative responses – only YES or NO.

There is no mention of Conservation Areas or how they are compromised by careless planning control or by the absence of specialist officers.

The parish council wishes to repeat the words used in the SHLAA.

'Tutbury is unquestionably a special case and needs careful control of all development. It has a particular topography, a medieval centre that forms the basis of the Tutbury Conservation Areas and an historic castle.'

In that same response the parish council said

'It is an accepted truth that there is a need to plan, to control the potential for excess that individual decisions can create to the detriment of the majority. Development must not be allowed wherever a firm or an individual sees an opportunity to make

money. Any exercise designed only to find sites for house building is mindlessly narrow, it cuts through the planning process and produces disorder.

And this is what makes the ESBC plan for 12,900 houses and their desire to be a growth point with its consequence of 5,000 more houses so disconcerting. Tutbury Parish Council is now faced with a threat against most of the policies we know to be important to our village. Between them ESBC and the West Midlands consultants have taken away what little protection this historic place has against mass housing sites that will spoil it forever.

There seems to be no place for the opposite argument in favour of the things we all need, such as farmland, the ability to feed ourselves, space between communities and a sense of order in the scheme of things.'

The parish council fears that because at first glance there is a reasonable spread of amenities, ESBC will use this to override proper planning considerations. For these reasons we have not ticked any of the boxes, our response is set out in this letter.

Yours sincerely

S Powell
Clerk