

EAST STAFFORDSHIRE BOROUGH COUNCIL

LOCAL PLAN REVIEW

LOCAL PLAN INQUIRY 2005

TOPIC PAPER : EVOLUTION OF THE LOCAL PLAN

1. Introduction

- 1.1 In April 2000 the Borough Council effectively began a partial review of the Local Plan by publishing an Issue Paper for all interest parties to suggest issues that needed to be addressed for the Review of the Plan.
- 1.2 Our aim at that time was to have an adopted plan by the end of 2002. That ambitious programme has clearly not been met. This Topic Paper is intended to set out the context in which the Plan has evolved in the following years and as now presented to the Local Plan Inquiry beginning in January 2005.

2. The Statutory Context of the Plan

- 2.1 This is the second Borough Wide Local Plan prepared by East Staffordshire Borough Council. When adopted it will replace the existing Plan which was adopted in March 1999.
- 2.2 The Government's Reform of the Planning System has made fundamental changes to the policy framework within which local planning is undertaken.
- 2.3 It is important to note that this Plan's Review has been prepared in accordance with the Town and Country Planning Act 1990, and the Town and Country Planning (Development Plan)(England) Regulations 1999. However, as explained further the Borough Council has always sought to anticipate and structure its reviewed Council plan as close as possible to the new reformed planning system.
- 2.4 The Planning and Compulsory Purchase Bill was introduced into Parliament in December 2002 to take forward the proposal for reform of the planning system set out in the ODPMs Planning Policy Statement "Sustainable Communities": Delivery through Planning (July 2002).
- 2.5 ODPM issued guidance notes on the transitional arrangements for Local Planning Authorities when the Bill was introduced. These set out the implications of the Bill Development Plan to ensure that there was no hiatus in putting plans in place and that transition to the new system was to be as smooth as possible.

- 2.6 The Bill set out “clear guidance” on the transitional arrangements, the objectives of which were to move as quickly as possible from the old to the new system whilst maintaining continuity in the development plan system as a framework for development control.
- 2.7 The new Act was enacted on 28th September 2004.

3. Implication for East Staffordshire Local Plan Review

- 3.1 The Government Guidance note on transitional arrangements set out the different provisions that would apply depending upon the stage of the Local Plan when the Act came into force. At the time of commencement of the Act our Plan was in its second deposit period with arrangements in place for the Inquiry at the beginning of January 2005, with adoption later in 2005. The proposal therefore continues under current procedure. Once adopted, the Plan will be saved for a period of three years. During this period, the Council will bring forward new Local Development Frameworks to progressively replace the policies in the saved Plan. Indeed we are already preparing, as required our Development Plan Framework for submission to GOWM.
- 3.2 Moreover, and significantly for our approach to the Plan review we were encouraged by the ODPM to start thinking about how our work might be adapted to take account of the principles of the new system.
- 3.3 A number of the proposals of the LDFs already represent good practice in plan preparation and current regulations. East Staffordshire Borough Council have enthusiastically embraced those principles, whilst mindful of the context that this began as a partial review of the adopted plan and to avoid irregularity and confusion amongst the uses of the new Plan.
- 3.4 We believe therefore that the 2nd Deposit Local Plan
- Sets out a clear strategic vision for the area;
 - Has more succinct text and policies;
 - Avoids unnecessary or repetitive policies;
 - Provides greater local focus on policy; and
 - Achieves effective community participation in developing policies.
- 3.5 Consequently the 2nd Deposit has involved some significant restructuring to aspire to the objectives so that it has become:
- A more complete version for consultation, presentation to inquiry and adoption, including full Proposals and Inset Maps and appendices;
 - A Plan which in format anticipates the new planning system enshrined in law under the Planning and Compulsory Purchase Act 2004. This will eventually replace the current Development Plan system with one based on Regional Strategy Statements, prepared by Regional Bodies, together with Local Development Documents

prepared by local authorities. The documents now being presented as the Second Deposit Local Plan include:

- A Core Strategy, containing a number of overarching policies on key topics
- Proposals and Policies for Particular Sites or Areas
- Two “Action Area Plans” for the following areas:

Uttoxeter Town Centre
Inner Burton Housing Area

Both areas have recently been the subject of studies by external consultants with a view to their regeneration through a “Masterplan” process. The Masterplans have thrown up a number of issues which require appropriate planning policies to be introduced within these areas

4. Planning Policy of “Others”

4.1 In preparing the Plan the council has taken into account the “Policy of Others”.

- National Planning Policy laid out in Government advice, in particular the development of sustainable communities, achieving quality outcome from the planning process and integrating land use planning with wider community objectives but where appropriate policy implication from new.
- Where more recent Government Guidance has been produced that affects policy this will be introduced to the Inquiry by the Council.
- West Midlands Regional Strategy and Regional Planning Guidance PPS11, in particular the regeneration of the Metropolitan area and growth restraint beyond, supporting rural communities and their range of services; protecting natural, historic and cultural assets and recognising local distinctiveness.
- Staffordshire Structure Plan which provides targets for the rest of the Plan Period for new housing and industrial land and achieving the balance between protecting the countryside in developing sustainable communities.
- A key feature in our Plan preparation and recognised at the outset was the linkages between the Plan and the Community Strategy (Plan).

4.2 As set out earlier, this Plan has been reviewed in the time of Government led change to the development plan making process. We believe that the consultation already carried out, our statement of public involvement,

overriding strategy and core policies, integration of plan issues around the Community Plan aims, our sustainability approach and linkages to others, strategies including housing, rural and employment is a significant step towards the new style of development plans.

- 4.3 Our approach is therefore to demonstrate a transition in Statutory Plan making that places us in good stead to move onwards into local development frameworks.
- 4.4 In discussions with the GOWM there are already matters within the revised Plan that can be carried forward into the new style of plan. Other key areas for future debate specifically arise from the Regional Planning context, and have regard to longer-term housing provision which may follow evaluation of Burton upon Trent as a sub-regional focus (see Housing Topic Paper paragraphs 4.2 – 4.4).
- 4.5 In a sense therefore, the Plan whilst operating within the context of current development plans it anticipates partial reviews of recently adopted strategic plan. Attached as reference are letters from GOWM, the West Midlands Regional Assembly and from Staffordshire County Council which approve conformity with their own plans but already more forward with a new era.
- 4.6 For example, in responding to the Regional Plan, the Minister of State, Keith Hill, references the potential role of Burton upon Trent as a focus for longer-term development, often perceived as a “safety valve” for transferred housing development within Staffordshire. The justification for this is our view in the sub regional context of Burton’s linkages with South Derbyshire and Swadlincote and the opportunities in the longer term to release considerable brownfield sites on the adjacent south Derbyshire area of Drakelow.
- 4.7 In the past cross border planning frameworks have met administrative hurdles, the new local development framework actively promotes joint working and we wish to embrace this as a more sustainable form of development with a shared community of interests.

5. Previous Stages

- 5.1 The Review of the Plan commenced in April 2000 with the release of an Issues Paper which covered:
- The context for consultation and public involvement;
 - What the Council considered to be the principles and objectives which the Plan should help to achieve and against which the policies and proposals should be assessed;
- 5.2 For the first time it recognised the need to relate two documents, the Community Plan and the Local Plan. It specifically included how the priorities of the Community Plan were to be promoted by the Local Plan objectives.

- 5.3 This was well received but also gave rise to a number of suggested sites for development and inclusion in the plan from that process. These too were subsequently widely re-consulted upon.
- 5.4 On 4th December 2000, the Council accepted a report which selected preferred sites and areas of policy review to form the basis of the first draft review plan.
- 5.5 The First Deposit version of the new plan was placed on deposit for a period ending May 2001, and attracted some objections and representations. No Certificate of Conformation was issued from County Council.
- 5.6 Significant amongst those objections were those about the release of employment sites at Lawns Farm, and at Spath, Uttoxeter and West of Uttoxeter.

6. Key Cabinet Stages

5 December 2002

Local Plan Programme

- 6.1 Confirmation that Members agreed to a revised programme:
- Allowing us to amend the Plan to conform with the new approach.
 - Strengthen linkages with other strategies, notably the Community Strategy and Regional Plan and the emerging recommendations from the Scrutiny Panel on Housing Strategies.
 - Identify potential Action Areas.
 - Undertake master planning programmes for areas already identified by Members for more immediate attention;
- 6.2 And that the Cabinet receive a report on the representations to the First Draft Local Plan and respond with interim recommendations:
- That interim responses inform the preparation of a Local Plan that follows the new style and which will be the Second Deposit Plan in place by Autumn 2003;
 - That the Council does not immediately proceed to a Second Deposit but continues to use the adopted Local Plan for development control purposes;
 - That a revised timetable be prepared for the next twelve months.

28 September 2003

Local Plan: Way Forward

- 6.3 A series of recommendations accepted by Council which apart from the management of the review confirmed a review of key strategic sites in the first Draft, including Lawns Farm, Spath and West of Uttoxeter; details of how work on Important Sites was to be progressed; and for the first time set a target date for an Inquiry of January/February 2005.

18 May 2004

Local Plan Review

- 6.4 Cabinet accepted four reports:

Responses to the First Deposit Representations
Key Sites
Housing Policy and Allocations
Programme and Timetable

12 July 2004

Local Plan: Second Deposit

- 6.5 Agreement to a revised second Draft being placed on Deposit 16th August 2004 for a six week period. Confirmation also that subject to the level of representations and objections received to the Plan an agreement that any subsequent proposed amendments to the Second Deposit where they did not substantially affect the meaning of a policy or policy be confirmed with the Leader of the Council.

7 October 2004

- 6.6 Each of the objections and representations received to the Second Draft Deposit Plan considered by the Leader of the Council and responses were formulated under the delegated powers.

7. Important Sites

- 7.1 The Council's Corporate Plan emphasises most emphatically the objectives of promoting higher standards in the scale, location and design of new development. Consequently, since the formation of a new political administration of the Council post May 2003, a higher priority is attached to Design Briefs as Supplementary Planning Guidance.

- 7.2 This programme has run alongside the local plan review programme and is complementary to the release of site for development and again has anticipated provisions of the Planning and Compensation Act.

8. Action Areas

- 8.1 Two major areas for change have received considerable focus since May 2002 and address:

- (i) Uttoxeter Market Town Initiative
Masterplan for Town Centre

(ii) Inner Burton Housing Regeneration Strategy.

Following the recognition of Uttoxeter by the Countryside Agency as part of their market town initiative, the Borough Council together with Uttoxeter Plus commissioned consultants Taylor Young to prepare a Masterplan for the Town Centre. This strategy is supported by the Borough Council, Uttoxeter Town Council and Staffordshire County Council. It does not however have the status of supplementary planning guidance. Rather, as key sites come forward for development, individual design guidance and development briefs are to be prepared, for example, Brookside to the East of the town, and currently for the key Cattle Market development. These will be adopted as SPG. A Shop Front Design Guidance has similarly been prepared and adopted.

For the Inner Wards of Burton upon Trent, Colin Buchanan and Partners have prepared for the Borough Council a regeneration Masterplan which details projects, proposals and approaches to regeneration of the significant swathes of housing through the centre of the town.

The Borough Council has received the final report on this and will present to the Inquiry an Action Plan for the short, medium and long term programme. Within this key sites and parts of the area will be identified and carried forward through Supplementary Planning Guidance.

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HoPP/HL

23 August 2004

Dear Mr. Jones,

EAST STAFFORDSHIRE REVISED LOCAL PLAN

I refer to your letter of 23 July 2004 requesting a Statement of General Conformity with the Staffordshire and Stoke-on-Trent Structure Plan 1996-2011 in respect of the Revised East Staffordshire Local Plan.

I now enclose the appropriate statement which is issued in accordance with Section 46(2) of the Town and Country Planning Act 1990 as amended, without prejudice to any other comments the County Council may wish to make on the Plan concerning its other functions and areas of responsibility.

It is anticipated that the County Council will wish to submit detailed representations on the Plan during the deposit period.

Yours sincerely,

Hugh Lufton
Strategic Planning Policy Advisor
for Corporate Director (Development Services)

Enc.

STAFFORDSHIRE COUNTY COUNCIL AND STOKE ON TRENT CITY COUNCIL
EAST STAFFORDSHIRE BOROUGH LOCAL PLAN – AUGUST 2004
STATEMENT OF GENERAL CONFORMITY

WHEREAS

- (1) The Staffordshire County Council and the Stoke-on-Trent City Council are jointly Local Planning Authorities for the purposes of Sections 46(2) and 50(7) of the Town and Country Planning Act 1990 (as amended); and
- (2) East Staffordshire Borough Council are a Local Planning Authority for the purposes of the said Act in respect of the area referred to in the East Staffordshire Local Plan (August 2004); and
- (3) East Staffordshire Borough Council have pursuant to Section 46(1) of the said Act served on the County Council and the City Council a copy of the Local Plan for the Borough Council's area; and
- (4) The County Council and the City Council are under the said Section 50(7) required to supply to East Staffordshire Borough Council a statement pursuant to the said Section 46(2) as to whether or not the Local Plan is in general conformity with the Structure Plan for Staffordshire and Stoke-on-Trent (1996-2011) as adopted on 10th May 2001.

NOW

The Staffordshire County Council with the concurrence of the Stoke-on-Trent City Council having considered the Local Plan HEREBY STATE that the Revised Deposit East Staffordshire Local Plan (August 2004) is in general conformity with the Staffordshire and Stoke-on-Trent Structure Plan (1996-2011) as adopted by the County Council on 10th May 2001.

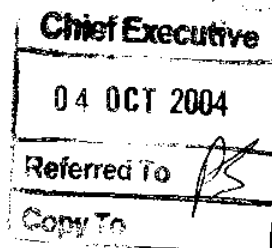
Dated this Twenty-Third Day of August 2004

N. PURSEY
Chief Executive

West Midlands Regional Assembly

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Mr P Somerfield
East Staffordshire Borough Council
Policy and Corporate Affairs
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30th September 2004

Dear Mr P Somerfield,

East Staffordshire Borough Council Local Plan Review: Second Deposit Consultation

Thank you for forwarding a copy of the above document for our comment. Having considered the Second Draft of the East Staffordshire Local Plan Review against the Regional Planning Guidance for the West Midlands (RPG11 June 2004), I would advise that the policies and proposals it contains are in general conformity with the RPG. Notwithstanding this conclusion, there are a few specific comments I would wish to make.

Regarding housing provision, the plan is able to make provision on a scale to meet the adopted Structure Plan housing requirements without the need to develop on new green field sites, indeed the estimate of capacity represents a slight over provision in relation to the Structure Plan figures. This reliance on the reuse of previously developed land is in conformity with RPG Policy CF4. The identification of three significant additional sites with a total capacity of 550 dwellings (brownfield sites at Riverside Centre, Burton and JCB Works, Uttoxeter and a greenfield site West of Uttoxeter) as sites for further investigation but only for release if there is a significant change to the strategic planning context, is acknowledged. However, the preponderance of this capacity in Uttoxeter (some 500 dwellings) is not likely to be consistent with the current RPG which does not specifically recognise Uttoxeter as a centre for significant new provision. While Burton is currently recognised as an 'Other Large Settlement', Uttoxeter can only be considered a Market Town with a role limited to serving its rural hinterland (RPG Policy RR3). Consequently, it is questioned whether the greenfield development, in particular, could be justified.

The potential for additional development capacity in Burton, and its future investigation, is consistent with the requirement of the Minister for State for Housing and Planning, expressed in his covering letter in relation to RPG, to consider the role of Burton as a focus for development to serve Staffordshire and the adjoining parts of the East Midlands.

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Speaking out for the region

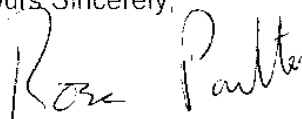
West Midlands Regional Assembly Limited, registered in England No 4860074

In relation to employment land provision, RPG contains no specific employment land provisions for East Staffordshire or the towns within the district. However, Burton is identified as a 'Local Regeneration Area' in the RSS and as referred to above, Uttoxeter can be regarded as a Market Town. As a consequence of these designations some new land provision at each settlement would appear to be consistent with RPG. Employment land commitments are concentrated in and around Burton and the major new allocation in Burton at 'South of Branston', totalling some 40 hectares, on land previously used for mineral extraction and then tipped with PFA, has had outline permissions recently renewed. Development of this site is seen by local authorities as an important part of the regeneration strategy for the town involving European funding support, and Highways Agency investment and the first stages of the provision of a route that could lead to a third River Trent crossing and a link with the regeneration sites of South Derbyshire in the East Midlands.

The new site provision at Uttoxeter (two 10 hectares sites with the provision to extend one by a further 15 hectares beyond 2011) involves the use of greenfield land. While existing commitments in Uttoxeter are very limited, in our opinion there is justification for some limited new provision in keeping with the market town character of the town. A site/s of the order of ten hectares are similarly in keeping in scale consistent with the 'Portfolio of Employment Land' RPG Policy PA6. The prospect of the identification of a larger 25 hectare site, albeit with development phased, could be construed as allocating a Regional Investment Site in which case the criteria in Policy PA7 should be considered. In this context Uttoxeter is not a location that would be supported by the criteria in Policy PA7. Consequently, the West of Uttoxeter employment proposal is questioned, particularly in view of its intended scale of development.

As you will be aware the Planning Act was enacted on the 28th September 2004 upon which the Regional Spatial Strategy became part of the Development Plan. The duty of considering general conformity of Development Plan Documents with the RSS came into force upon enactment. The East Staffordshire Local Plan was considered in advance of this date, therefore the comments above are informal officer comments.

Yours Sincerely,



Rose Poulter
Director of Policy

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cc Tony Lovett Staffordshire County Council

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Speaking out for the region



GOVERNMENT OFFICE
FOR THE WEST MIDLANDS

Chief Executive
06 OCT 2004
Referred to AS
Done

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Date: 30 September 2004

Dear Mr Somerfield

**THE TOWN AND COUNTRY PLANNING (DEVELOPMENT PLAN) (ENGLAND)
REGULATIONS 1999
REVISED DEPOSIT – EAST STAFFORDSHIRE LOCAL PLAN**

Thank you for your letter dated 20th August 2004 sending the Government Office for the West Midlands copies of the above plan and seeking our views. You will be aware that we made a number of objections to the first deposit draft of the plan which will be carried forward to the forthcoming Local Plan Inquiry. Copies of our objections to the second draft are enclosed using the forms provided. We have also taken the opportunity in this letter to give more general comments on the plan. May I also ask that these are brought to the attention of the Inspector.

Firstly, it is encouraging that you are taking steps to embrace elements of the new planning system within your emerging plan. This approach can be taken forward and developed as part of the Council's work on the Local Development Framework.

As a general point I note that the Council has renumbered a number of policies from the first deposit. This could be confusing to the public in their continuous engagement in the planning process. You may wish to give further thought to your approach to this in the future.

Whilst we are pleased that you are progressing the plan broadly in line with the Government's objectives as set out in PPG12: Development Plans, a number of policies do appear to be quite detailed and too lengthy in terms of the advice contained therein.

As you will no doubt be aware, commencement of Parts 1 and 2 of the Planning and Compulsory Purchase Act was on the 28th September. We trust that you are aware of



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the transitional arrangements for development plans and the requirement for each local authority to submit a Local Development Scheme to the Secretary of State within six months of commencement of the Act. In terms of progressing your emerging plan to adoption, I would also remind you of the requirements of the EU Directive 2001/42/EC concerning Strategic Environmental Assessment, in particular its application to plans which have not been adopted by 21 July 2006. Given the above commencement date, it would also be good practice to seek the views of the Regional Planning Body in respect of the plan being in general conformity with the Regional Spatial Strategy.

Comments specific to particular chapters of the plan are set out below:

Introduction

Paragraph 11 could mention that upon commencement Regional Planning Guidance became the Regional Spatial Strategy, forming part of the development plan. This should also be reflected throughout the Plan where reference to RPG is made, including the housing and employment chapters.

It is encouraging that the plan illustrates the linkages between the Local Plan and the Community Strategy at paragraphs 16 and 17.

The second deposit of the plan is being consulted upon at the same time as significant changes are being made to national planning policy. This includes the review of a number of Planning Policy Guidance Notes and their replacement with Planning Policy Statements, a number of which have now been issued. This should be taken into account in the plan that is taken forward to adoption.

Core Strategy

I note that this entire chapter has been included since the first deposit of the plan. The structure of this chapter, containing a vision, key objectives and spatial approach are welcomed.

I note, however, that the six Core Policies are not supplemented by explanatory text. I would advise you to reconsider the content of these policies, in terms of both whether they do in fact constitute policy or information that would more appropriately be included as supporting text. This approach would support the Government's objective of developing shorter, more succinct policies. Policy CSP 1 also appears to be a repetition of national policy, which should be avoided.

Action Area Plans

As with the Core Strategy chapter, I note that the Action Area Plans have been included at the second deposit stage. Whilst I appreciate the reasons for including the



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Action Area Plans within the second deposit, I would question how appropriate it is to include them at this stage. You may wish to consider whether they would more appropriately be brought forward at an early date as Area Action Plans as part of the Local Development Framework.

Uttoxeter Action Area

Policy UMAA 1 and 2 are supporting statements rather than policy. The policies should be redrafted or the information included within the supporting text.

Inner Burton Action Area

I am unclear as to how an interim draft section of an Action Area can be included within an emerging plan and at what stage in the plan preparation process the Council envisages incorporating the final document. Again I would ask you to consider whether this would more appropriately be brought forward as an early Area Action Plan within the Local Development Framework.

Employment

You will be aware of the objection made to the first deposit of the plan in respect of the number of greenfield sites allocated for employment use. Whilst I note that certain sites are proposed to be deleted from the plan, a new site south of Branston has been included. We therefore continue to raise an objection to the plan on this matter.

The text of this chapter refers to the Structure Plan allocation being met in Policy E2. The text should reflect the fact that there is a small shortfall in supply.

In terms of the referencing of individual site allocations, it would be helpful if each site could be given a different reference number for ease of understanding.

Policy E4 states that any development on the extension of land to the West of Uttoxeter will be treated as a formal alteration to the plan. I would question how this would be possible with the transfer over to Local Development Frameworks. I would also question whether Uttoxeter is the right location for an employment allocation of sub-regional scale prior to the work on the partial review of the Regional Spatial Strategy with regard to identifying sub-regional foci. Furthermore, given the deletion of the housing site to the West of Uttoxeter, the contiguity of the employment site with the existing settlement should be reconsidered.

Housing

I would reiterate the need to refer directly to the RPG/RSS in respect of the spatial strategy and strategic housing requirements.



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The deletion of the greenfield site to the west of Uttoxeter and the increased emphasis on previously developed land is welcomed. However given the excess housing that is now proposed and in the light of the RSS requirements I would expect to see these issues addressed in an early Housing DPD.

Transport

Paragraph 1 of this section should be slightly amended to include reference to the Regional Spatial Strategy and the Regional Transport Strategy.

The first and second bull points in paragraph 6 should be amended along the following lines:

"The Secretary of State for Transport, through the Highways Agency, is responsible for the management and maintenance of the trunk road network and the funding and delivery of the targeted programme of improvements."

"The Secretary of State for Transport, through the Government Office for the West Midlands is responsible for the allocation of funding towards the delivery of measures indicated in the Annual Progress Report of the Local Transport Plan.

The first paragraph of Policy T3 should include reference to the recommendations coming out of the West Midlands to East Midlands Multi-Modal Study especially in so far as they impact on the A38.

The first sentence of paragraph 16 should be slightly modified to include reference to community severance i.e.....give rise to problems of community severance, noise ...

Implementation, Monitoring and Review

To reflect sustainability objectives, Policy IMR 1 should be amended to support redevelopment on all 'sustainable' sites within development boundaries.

I hope that you have found the points made in this letter helpful to you.

Yours sincerely,

Sarah Hunt