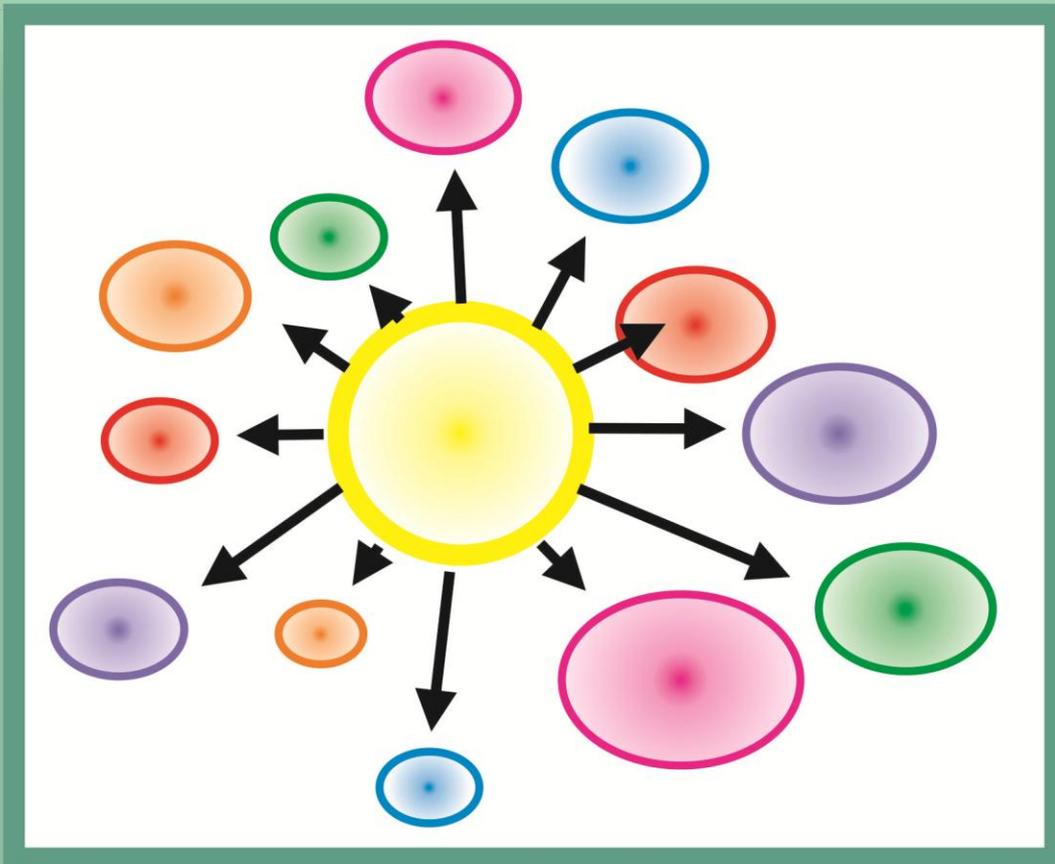


SPATIAL STRATEGY TOPIC PAPER



April 2014

Introduction

This document is a background paper to support the Submission stage of the Local Plan. The intention is that this topic paper provides the context to the Local Plan as it has emerged through the various stages of preparation.

As a result of the national and regional policy framework, East Staffordshire Borough Council has been preparing its Development Plan against a backdrop of change. Reference is made to the national, regional and local policy framework, Local Plan procedure and practice current at the time the stage was reached.

This topic paper is structured in the following way:

- Policy context
- Issues and Options Consultation Oct/Nov 2007
- Strategic Options Consultation Sept 2011
- Preferred Options Consultation, July 2012
- Pre-Submission Consultation, October 2013

Policy Context

This section sets out the national, and regional policy considerations with regards to the development of a spatial strategy. In particular it is necessary to discuss the policy context with respect to previous Local Plan (Core Strategy) consultations to clarify the assumptions and processes underpinning the information published. Specific reference is made to the way in which the Preferred Option consultation document and supporting evidence has included some re-visiting of previous spatial strategy discussions. This is a result of the uncertainties surrounding national policy requirements, the interpretation of these requirements by the Planning Inspectorate, and addressing related misunderstandings on procedural matters in the earlier stages of the Plan's preparation.

National Policy 2004 to 2012

The planning system has been in a state of flux for a number of years. In 2004 the publication of the Planning and Compulsory Purchase Act (PCPA) altered the approach to local planning by replacing Local Plans, a single document setting out policies and proposals to guide the future use of land, with a Local Development Framework (LDF) which sought to do the same as the Local Plan, but required the preparation of a suite of documents. The PCPA also changed the definition of the Development Plan which pre-2004 had consisted of the Local Plan and the County Structure Plan, a Staffordshire wide strategic planning policy document, prepared by the County Council. When combined with the Local Plan, these were the primary documents referred to in the determination of planning applications. The definition of the Development Plan in the PCPA changed so that it consisted of the new Local Development Framework and the regional plan or Regional Spatial Strategy (RSS), with the Structure Plans effectively removed from the system.

In 2010 the Secretary of State for Communities and Local Government Eric Pickles wrote to Local Authority Chief Executives outlining the new Coalition Government's intention to revoke RSSs and return decision making powers on housing and planning to local councils. Now that the RSS has been formally revoked, decisions on housing supply (including the provision of travellers' sites) rests with Local Planning Authorities without the framework of regional housing targets and plans.

Local planning authorities bringing forward Development Plans at the time of the Secretary of State's letter were advised to continue to do so. In deciding to review and/or revise their emerging policies in the light of the revocation of Regional Strategies local authorities were advised to revisit regional planning data and research used to support regional plans until able to put their own alternative arrangements in place for the collection and analysis of evidence. This approach by the Government created considerable confusion amongst local authorities and as a consequence a number of different approaches to evidence base collection have emerged either based on existing regional planning information or from a local based bottom-up approach to the assessment of needs. The Localism Act (2011) formalised the revocation of regional plans. In addition, the Localism Act also introduced optional Neighbourhood Planning which provides local communities with a genuine opportunity to influence the future of the places where they live. The Act introduced a new right for communities to draw up a Neighbourhood Plan which is aligned to the strategic priorities and level of growth in the new Local Plan. Where a Parish Council (in East Staffordshire, since the whole Borough is parished) wish to prepare a Neighbourhood Plan, and when it has passed through Examination and 'Made', the Neighbourhood Plan becomes part of the Borough's Development Plan.

The most recent change to the planning system stems from the recent publication of the National Planning Policy Framework (NPPF) in March 2012. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. The purpose of the NPPF is to streamline the planning system and in doing so has replaced 44 other pieces of national guidance including Planning Policy Guidance Notes and Planning Policy Statements, which had provided a robust national policy framework for many years.

National Planning Guidance 2012

The NPPF clarifies that '*the purpose of the planning system is to contribute to the achievement of sustainable development*'. Guidance in the NPPF, when taken as a whole, constitutes the Government's view of what sustainable development means in practice for the planning system. It is not appropriate or necessary to reiterate large portions of the NPPF in this topic paper but it is worthwhile outlining the three dimensions of sustainable development set out in Paragraph 7 of the guidance.

- *an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and*

innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

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- *a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and*
- *an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.*

These three pillars are mutually dependent and their interaction should always seek positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, including (but not limited to):

- making it easier for jobs to be created in cities, towns and villages;
- moving from a net loss of bio-diversity to achieving net gains for nature;
- replacing poor design with better design;
- improving the conditions in which people live, work, travel and take leisure; and
- widening the choice of high quality homes.

The NPPF sets out a Sustainable Development framework through a core set of planning principles – the most relevant ones of which are reproduced here in relation to the development of a spatial strategy:

- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth...set out a clear strategy for allocating sufficient land which is suitable for development in the area...;
- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
- support the transition to a low carbon future in a changing climate, taking full account of flood risk..., and encourage the reuse of existing resources,

including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);

- contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;
- encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);
- conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;
- actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and
- take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

(Source: NPPF para 17).

Regional Planning Context

The West Midlands Regional Spatial Strategy (RSS) was revoked on the 20th May 2013. The early stages of preparing the East Staffordshire Core Strategy/Local Plan relied upon the preparation of the RSS Revision Phase 2 and was a major material consideration. In each section below, describing the stages the Core Strategy/Local Plan has been through, the influence of the corresponding RSS preparation stage has been explained.

A Short History of the RSS

The RSS which was adopted in 2004 sets the planning framework for development across the region. The Regional Assembly, responsible for the preparation of the document initiated an immediate review, because a number of key areas had not been addressed. The main deficiency from a housing point of view was the lack of a breakdown of the County housing requirement figures to individual district level. This made it difficult to plan with certainty at a time when government policy was bringing

forward larger quantities of housing (later enshrined in Planning Policy Statement 3: Housing, published in December 2006). The review was further fuelled by the publication in 2005 of household formation projections. These were at levels which were higher than had been generally predicted.

The review was initiated in three phases, the first covering the Black Country specifically. Phase 1 was adopted and incorporated into the RSS in January 2008. Launched in November 2005, Phase 2 of the RSS Review dealt with the spatial strategy for the region and included the following key areas of policy:

- regional and sub-regional housing needs and requirements and how these can be met in the Region up to 2026;
- employment land provision, including identifying a reservoir of land in each District, and the demand for further regionally significant sites, such as a Regional Logistics Site;
- identifying the investment priorities for the Strategic Centres and options for the balance between new 'in-centre' and 'out of centre' office development;

Phase three was a review of environmental policies. Due to the revocation of the RSS in 2013 but more fundamentally the dismantling of the regional tier the Phase 2 revision the 2004 plan was never adopted. There was an examination in 2009 and the Panel Report was published in September 2009 but the proposed changes were never formally prepared and consulted upon. The Phase 3 revision was not really started beyond an initial scoping exercise.

Issues and Options Consultation October-November 2007

Before publishing the Issues and Options document the Council had already spent time gathering views from individuals and interest groups on their vision for the Borough including holding a visioning event in May 2007. The elements of a vision which respondents felt were important included the following, making it clear that 'no change' was not considered to be acceptable:

From the general:

- "To improve the quality of life for the local population, promote healthy lifestyles and provide health and social care support to meet local needs".
- "To ensure that everyone has the opportunity for a decent home".
- "To develop sustainable communities that meets the needs and aspirations of all household whilst supporting economic, social and environmental objectives".
- To achieve a robust and forward looking economy by 2026 where the current dependency on the three main sectors will have been replaced by a balanced economy built upon traditional strengths and an increased number of growth-sector companies".

To the specific:

- "Burton will have a significant role in revitalising a sub regional area which straddles both sides of regional boundaries. It will broaden its economic base by maintaining investment and employment levels supported by a high level of housing growth that will exceed local need".
- "Uttoxeter will be a multi-functional and attractive town that builds upon its strategic location to serve a wider rural hinterland".
- "Our Rural areas will be economically prosperous and vibrant, together with an enhanced natural rural environment".
- "The diversity of the Borough is to be celebrated in the contribution this makes to the area's development and dynamics".
- "Growth should not be at the expense of the Borough's inherent strengths and qualities".

(Issues and Options Document)

Published in January 2007 the RSS Review Phase 2 Spatial Options document put forward 'spatial options' for consultation which explored various spatial alternatives that could be taken across the region, and also within East Staffordshire Borough Council, regarding a number of spatial topics.

Housing

The RSS review initially covered the period 2001-2026 and three options were put forward for housing provision in East Staffordshire over this period:

Options	How the figure had been established	Number of homes for East Staffs (gross figures at this stage)
Option 1	Continuation of current (adopted) RSS policies, taking into account commitments and identified urban capacity at the time, plus some longer term greenfield allocations where urban capacity not sufficient. (Compare with the Government's 2003-based household projections for East Staffs, for locally generated need only, of 7094 – see Appendix 1 of RSS Spatial Options document).	7700
Option 2	Derived from advice and further discussion with local authorities.	15000
Option 3	Met the overall levels of housing demand associated with the Government's 2003-based household projections, and the need to replace obsolete stock which will be demolished, (Compare with the Government's 2003-based household projections for East Staffs, for locally generated need plus migration, of 15246 – see Appendix 1 of RSS Spatial Options document)	15000

At the RSS Spatial Options stage in January 2007 Burton upon Trent was recognised as being a Sub-Regional Focus, and was accordingly allocated higher numbers of dwellings for all 3 Options than might otherwise be the case. As a Sub-Regional Focus the town was considered to be capable of accommodating strategic housing development, balanced with employment development, over and above meeting purely local needs. The Council was comfortable with the Sub-Regional Focus designation, providing greenfield housing brought in benefits to the areas of Burton requiring housing regeneration – by helping to bring about the redevelopment of brownfield sites and the improvement of existing housing areas; complementary levels of employment land, retail floorspace, leisure facilities, and crucially, infrastructure (transport, utilities, social and community resources).

At the point when ESBC published its Core Strategy Issues and Options stage in October 2007 the Council agreed broadly with Options 2 and 3 .i.e. 15,000 homes gross 2001-2026 subject to further work on housing capacity, strategic housing market assessment, and on the employment land, infrastructure, retail capacity, and leisure facility capacity needs for differing housing levels, and flood risk. At

the time it was not considered that 'significant' greenfield development would be necessary but that this would be tested following the preparation of the Council's Strategic Housing Land Availability Assessment (SHLAA).

The RSS Spatial Options document stated that the levels of housing set out in Options 2 & 3 might imply development in neighbouring Districts. This would most logically be achieved by recognising the potential of the strategic brownfield site in the Drakelow area in South Derbyshire. Within a sub-regional context it was considered that a comprehensive development could help to bring forward employment sites and infrastructure such as a new road link across the Trent. Other facilities, such as those for local shopping, healthcare, community etc, would ensure that a sustainable community was created. The Council in commenting on the RSS Spatial Options document requested a stronger reference to the expansion of Burton requiring land in South Derbyshire, and also urged the West Midlands Regional Assembly to liaise with its counterparts at the East Midlands Regional Assembly so that the two RSSs were in agreement with regard to their approach to the expansion of Burton within a recognised sub-regional framework.

By December 2007, when the RSS Preferred Option was published, the housing requirements had been converted to a net rather than gross figure, and the period of delivery changed from 2001-2026 to 2006-2026. The East Staffordshire requirement was consequently identified as being 12,900 homes. This figure then fed into the Council's work to proceed with preparing the next stage of the Core Strategy.

Employment

In January 2007 the RSS Spatial Options plan had suggested that each district should have a "reservoir" of employment land - a portfolio of readily available sites sufficient for 5 years demand. As sites in the reservoir were developed the reservoir would be topped up from a longer-term landbank of sites which may not have been so readily developable initially, but would be capable of being brought forward in 5 to 20 years time. Based on a growth rate which reflected past trends, the Assembly estimated that the 5 year East Staffordshire reservoir would be 51-55ha of land, and its longer term landbank for 2001-2026 would need to be 255-275ha. The supply of land in 2005 in the Borough was 148ha. At that time the Council believed that the 5 year reservoir approach was reasonable and that the figure of 51-55ha for the Borough appeared realistic.

Strategic Centres and Office Development

With the increase in population and with the sub-regional focus status, the RSS Spatial Options document took the view that the amount of retail and leisure provision in Burton would need to grow in a similar fashion. As such, the Spatial Options document identified Burton as a centre that was 'healthy/with aspirations to expand'. The Regional Centres Study, also published by the Regional Assembly, proposed up to 30,000m² of additional comparison goods retail floorspace (i.e not food, grocery "convenience" goods) for the period 2005-2021 for Burton, which is

roughly equivalent in floorspace to another shopping centre about the size of the Octagon Centre.

Also a limit of 10,000-15,000m² of retail floorspace in non-Strategic Centres (such as Uttoxeter) was proposed. At the time the Council had commissioned a Retail Study from consultants (Roger Tym and Partners) that would identify in more detail the capacity for different types of retail development in the Borough. Until that evidence and market capacity information became available the Council did not agree that a limit of 10,000-15,000m² of retail floorspace in non-Strategic Centres such as Uttoxeter should be imposed.

Based on the Regional Centres Study, RSS Spatial Options suggested that the additional office floorspace requirements figures 2001-2021 for East Staffordshire should be 80,000m², with only 20,000m² of this being in Burton Strategic (town) Centre. The Council cautiously accepted the office floorspace requirement set out in Spatial Options, but with the proviso that the quantity of floorspace required needed to be linked to housing and workforce levels in the future, and the identification of actual sites may prove a constraint, particularly in Burton town centre itself.

Responding to the RSS in the Issues and Options document

The Council's Issues and Options consultation set out a series of questions to gauge how various strategies might appeal to residents and stakeholders in delivering the emerging RSS in East Staffordshire. The Council were undecided on which spatial strategy approach to take, and identified alternatives along the lines of: pursue a very intense urban focus for new growth; or, a more dispersed approach and as a consequence the development of brownfield and/or greenfield land. Regardless of which strategy was chosen the underlying principles were to keep impacts on the natural and existing built environment to a minimum whilst at the same time accommodating the long-term housing, employment, retail and leisure requirements of the RSS.

The Issues and Options consultation identified that the higher proposed growth levels emerging in the RSS Spatial Options document may require more growth in the villages than previously experienced. Based on these assumptions the following three options were identified:

Option 1	Burton and Uttoxeter – Urban Extensions
Option 2	Burton, Uttoxeter and Larger Villages
Option 3	Burton, Uttoxeter and Expansion of One Village (eg Barton under Needwood, or Tutbury)

It was difficult to set out clearly the exact amount and distribution of growth against each of the three spatial options consulted upon. This is because the RSS was at a very early stage in its development, and the quantum of growth had not been

determined. For example, there was a significant difference between Options 1 and 2/3 in the numbers of dwellings proposed in the Spatial Options report. This would have led to different spatial strategies underpinning the Council's Core Strategy. The higher housing quantum with Options 2 and 3 (15,000 dwellings gross) would have inevitably led to more greenfield development options needing to be explored and possibly more village growth than the much lower (7700) Option 1.

At the time of publishing the Borough Council's Issues and Options consultation there was little evidence prepared to support options testing including employment and retail evidence to test the assumptions set out in the RSS Spatial Options report. They were put forward to stimulate debate and opinion on how new development should be spread around the Borough and in which general locations. For this reason the three options in the Issues and Options report were generic in their approach and did not attempt to suggest the numbers of homes that might be placed at different locations. As a consequence, it was not appropriate, or indeed possible, to undertake a Sustainability Appraisal, at this stage, other than a scoping report which was prepared by the Council's consultants which set out the Sustainability Appraisal Framework used for subsequent Sustainability Appraisals. In addition, work on arriving at a settlement hierarchy was not undertaken until 2009 and so proposals that directed growth to specific villages were not considered to be a robust approach. Tutbury and Barton under Needwood were shown as example large villages with possible capacity for accommodating additional growth. Work undertaken since 2007 has resulted in a clearer view of which settlements are actually capable of accommodating growth.

Running in parallel with the evolving RSS was East Staffordshire's aspiration to become a Growth Point, a government initiative to increase housing supply. East Staffordshire was granted Growth Point status in the first round designated in 2006. Growth point is not a statutory designation. RSS's and LDF's set out the strategic policies and proposals that set out the scale and distribution of new housing. Growth Point proposals are therefore subject to robust testing and public consultation through the regional and local planning processes.

To be designated a 'Growth Point' the Government had originally required local authorities to deliver at least 500 units per annum or 20% over the existing regional planning housing targets as set out in plans in October 2003. The figure for East Staffordshire was 6,500 dwellings between 1995 – 2011 or 433 dwellings on average per annum. The RSS Preferred Option figures reflected updated 2006 housing and population projections and also recognised the potential of East Staffordshire Borough as a Growth Point. Whilst the Preferred Option figures represented a significantly higher level of growth than that expected by a Growth Point, the Council considered this level of growth to be appropriate. The Growth Point initiative fed into discussions on the RSS and a higher level of growth for East Staffordshire resulted in the RSS preferred Options Figure which significantly higher than the Growth Point criteria. Growth Points were abandoned with the change in Government in 2010

however the Council was in receipt of money which it is has continued to spend to assist in the regeneration of the inner Burton areas.

The Council consulted widely on the Issues and Options document and responses received contributed to the evolution of the Strategic Options document published in September 2011. As well as seeking written responses, groups or bodies with an interest and individuals, officers went to meet with key stakeholder groups such as: Trent and Dove Customer Panel (representing the views of tenants of the Borough's largest Registered Provider of Social Housing as well as its management); the Chamber of Commerce; the Heart of Burton Partnership Neighbourhood Management Pathfinder Sub Group (representing the residents and businesses in the inner parts of Burton); and Members of the Council at a workshop.

Strategic Options Consultation August/September 2011

The RSS Influence

The Strategic Options Consultation document was informed by the West Midlands RSS Preferred Options document published in December 2007 and also the Panel Report following the Examination in Public into the RSS (2009).

The underlying spatial principle of the RSS was to halt the decentralisation of population and investment out of the two Major Urban Areas (MUAs) - West Midlands and North Staffordshire conurbations. Some settlements outside the MUAs needed to accommodate growth over and above their own generated needs especially where this supported sustainable forms of development that met housing and employment requirements at the local level. This was in order to relieve the problems some MUA authorities were having in providing new building land without incursion onto greenfield and Green Belt sites. However, this growth could only occur in those towns located sufficiently far away from the MUAs not to exacerbate the problem of population drift out of these conurbations. Burton upon Trent was regarded as being sufficiently far away so as not to undermine the aim of stemming decentralisation from the West Midlands.

Housing

The RSS Phase 2 Preferred Options set out the housing requirement (2006-26) for the Borough as 12,900 dwellings (by now expressed as a net figure) or an average 645 dwellings per year and following the Examination in Public the Panel recommended this be rounded up to 13,000 or 650 dwellings per year (Panel Report published Sept 2009).

Burton upon Trent's status as a Growth Point led to the town being recognised in the RSS as a "Settlement of Significant Development" (a term that replaced "Sub-Regional Focus"). This designation was in recognition that larger scale development sites and infrastructure to attract higher quality housing and facilitate significant job creation opportunities needed to be brought forward.

RSS Policy CF3 stated that:

"In certain circumstances the most sustainable form of housing development may be adjacent to the settlement but cross local authority boundaries. Where housing market areas cross local authority administrative boundaries co-operation and joint working will be necessary to ensure that sites are released in a way that supports sustainable development."

In expressing this policy the RSS was very clear on how much development should be accommodated by local authorities adjacent to each other. For example Lichfield District Council had to accommodate 1,000 dwellings of Cannock Chase District Council's housing requirement adjacent to Rugeley, and Tamworth Borough Council had to accommodate 1,000 dwellings of Lichfield's housing requirement north of the town. In relation to East Staffordshire there was no such direction in relation to South

Derbyshire and the Panel report states that East Staffordshire '*cannot count Drakelow provision*'.

In contrast the East Midlands RSS which was adopted in 2009 included the following wording: "*In South Derbyshire consideration should be given to the functional relationship between Burton upon Trent and Swadlincote. This may involve the preparation of a joint study by the respective regional partners to investigate the development potential identified on each side of the regional boundary, including transport improvements such as the A38/A511 corridor and the National Forest rail line. Co-operative working on core strategies in South Derbyshire and East Staffordshire would be appropriate in view of the role being considered for Burton upon Trent through the West Midlands RSS revision and the status of the town as "new growth point". As a result of this co-operative working additional provision may be made in South Derbyshire.... where this would result in the most sustainable form of development to meet the needs of East Staffordshire as identified in the West Midlands RSS.*"

Therefore whilst there was some encouragement from both the East and West Midlands RSS to facilitate joint working, neither strategy actually set out how specific requirements could be dealt with cross-border, leaving the detail and agreement very much up to the individual authorities to arrive at a solution on their own.

The 12,900 Preferred Option requirement/13,000 Panel report requirement was split so that 11,000 (85%) dwellings were to be provided in and around Burton upon Trent and 1,900 (15%) elsewhere in the Borough.

Other settlements, such as market towns like Uttoxeter, were recognised as locations for smaller scale housing development, balanced with employment. Sites were to be within or adjacent to these settlements, and already have a range of local services.

Employment

For East Staffordshire, the 5 year reservoir was 50ha, and the indicative longer term requirement 150ha. A specific reference in the West Midlands RSS plan instructs that '*proposals for the development of employment land on the site of the former Drakelow Power Station should be taken into account during the preparation of East Staffordshire's Core Strategy*'.

Strategic Centres/Offices

The RSS set out that East Staffordshire should plan 65,000m² of additional comparison goods (non-food/grocery) gross shopping floorspace area within Burton upon Trent town centre between 2006 and 2026, which equates to about 49,000m² net sales area. These figures were accepted by the Council as they broadly accorded with the Council's own retail evidence base.

With regard to comparison goods retail floorspace in non-strategic centres (such as Uttoxeter) a limit of 10,000m² on schemes could be exceeded if there was clear local need.

In relation to office development the Council was required to plan for 30,000m² gross new office space in and around and Burton upon Trent town centre and the District-wide targets were dropped. Whilst the emphasis required office development to be located on in or edge-of-centre locations it was accepted that there might be circumstances where out-of-centre developments could be necessary. This approach was welcomed by the Council because Burton upon Trent town centre has not historically accommodated a large amount of B1 type general office space and it has not been seen as an attractive location for new developments of this nature.

Responding to the RSS in the Strategic Options document

The Council recognised that in accordance with the RSS the delivery of 13,000 dwellings, and in particular 11,000 in Burton upon Trent over a twenty year period, would result in a substantial increase in the size of Burton upon Trent. Coupled with the Growth Point status of the town a number of studies were commissioned to assess the infrastructure requirements that this scale of building would require, and whether the potential capacity of brownfield sites might be reduced due to flood risk. It was recognised that building 11,000 homes in Burton upon Trent could only be achieved if infrastructure was in place in time.

Various studies were commissioned including:

- North Staffordshire Strategic Housing Market Assessment (2007)
- Green Infrastructure Study (2009)
- Retail and Leisure Capacity Study (2007, and 2010/11)
- Strategic Flood Risk Assessment
- Employment Land Review Report (2009)
- Burton Town Centre Office Market Report (2009)

Other work undertaken by the planning policy team to support the development of a spatial strategy at this time included:

- Settlement Hierarchy
- Strategic Housing Land Availability Assessment

These reports, within the broad overall policy framework provided by the RSS, provided the basis upon which the options were generated in the Strategic Options report published in September 2011.

Constraints on Identifying Strategic Options

In preparing Strategic Options, the constraints on the development potential of land around Burton upon Trent and Uttoxeter needed to be identified, especially any that would essentially act as showstoppers and prevent development in certain directions or add considerable cost to developing such that deliverability might be affected.

The following section provides an overview of the key constraints which have a direct influence on the spatial strategy and realistic options in East Staffordshire.

Green Belt and flood risk are the two key issues constraining the outward growth of Burton Upon Trent with flood risk also being a constraint for Uttoxeter. Whilst neither are actually showstoppers in combination they do emphasise that certain locations around Burton upon Trent in particular, but also Uttoxeter, should be avoided if other sites which are sustainable are available.

Green Belt

The National Planning Policy Framework (Planning Policy Guidance 2 at the time the Strategic Options document was prepared) sets out the importance of Green Belt, the fundamental aim of which is to prevent urban sprawl by keeping land open.

Once defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or improved damaged and derelict land.

Paragraph 83 states clearly that Green Belt boundaries should only be altered in exceptional circumstances. Paragraph 84 clarifies that local planning authorities should take into account of the need to promote sustainable patterns of development and consider the consequences of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

The Green Belt land to the east of Burton upon Trent represents a small amount of land which undulates and rises towards the South Derbyshire District Council local authority area. The Council would wish to keep these small areas of Green Belt free from development and direct growth instead to alternative locations not constrained by Green Belt. The original purpose of designating this Green Belt – avoiding the coalescence of the urban areas of Burton and Swadlincote – continues to be relevant today.

Flood Risk

National planning policy in Planning Policy Statement 25 (now para 94 of the National Planning Policy Framework) requires local planning authorities to adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations. Paragraph 100 clarifies that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.

Sequentially development should not be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.

Other constraints

Other constraints work in combination with Green Belt and Flood Risk although they are not showstoppers. Other constraints contributing to the spatial strategy include the proximity of the South Derbyshire District Council local authority boundary, and sand/gravel and gypsum/anhydrite consultation areas. There are also coal measures lying 50-1200m below the surface of a relatively small area in the very southern most part of the Borough and some petroleum exploration and development licences (PEDLs) have been issued for the east side of the Borough. The County Council's emerging Minerals Core Strategy does not seem to give the same protection to these areas, by designating consultation areas, as it does to other mineral resources.

Coal consultation areas reflect potential areas of coal mining. It would not be sensible to locate strategic development in these locations and potentially sterilise this resource by preventing future mining operations. The Council takes the view that these locations should be avoided and within East Staffordshire Borough Coal consultation areas are located both on the eastern side of Burton upon Trent and in more remote rural parts of the Borough.

For the same reason gypsum as a resource in the building industry is mined within the Borough at a scale which is nationally significant. The Council takes the view that strategic development should not be located within gypsum areas to ensure that future mining operations are not compromised.

The South Derbyshire District Council local authority boundary represents a significant constraint given that there is no agreement between the two authorities to consider growth along this boundary that could be regarded as part of the East Staffordshire housing requirement. Only a very small amount of land exists on the eastern edge of Burton upon Trent which could be considered for strategic growth and in places there is not enough land that could accommodate a strategic site.

The National Planning Policy Framework (Planning Policy Statement 9 at the time the Strategic Options document was being prepared) confirms that local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. The Council has a large number of rich and varied nature conservation sites including 6 nationally designated Sites of Special Scientific Interest, 2 Local Nature Reserves and 3 Sites of Geological Interest. There are also approximately 800 locally designated Sites of Biological Importance, 155 Sites of Biological Interest and 77 Biodiversity Alert sites.

The National Planning Policy Framework (Planning Policy Statement 5 at the time the Strategic Options were being prepared) also clarifies that local authorities should have a positive strategy for the conservation and enjoyment of the historic environment. There are 25 Conservation Areas, 59 Scheduled Monuments and nearly 900 Listed Buildings in the Borough.

Strategic development sites will be directed away from important nature conservation areas and historic sites. A Habitats Regulations Assessment has been undertaken to identify any impact upon European sites, none of which are located within the Borough itself. Sites of Special Scientific Interest present a showstopper and will be avoided.

The National Planning Policy Framework (Planning Policy Statement 7 at the time the Strategic Options were being prepared) also directs local planning authorities to take into account the economic and other benefits of the “best and most versatile” agricultural land, and where agricultural land has to be developed, seek to use poorer quality land in preference to higher quality. The Government defines “best and most versatile land” as being Grades 1, 2 and 3a in the Agricultural Land Classification.

Unfortunately, surveying to distinguish between Grade 3a and Grade 3b is only done on an *ad hoc* basis, so much of the Grade 3 in the Borough has not been surveyed in detail to make this important distinction. The majority of land around Burton and Uttoxeter urban areas are classed as Grade 3 with Grade 4 land located along the Trent and Dove river valleys. A small amount of Grade 2 land is located south of Tutbury. On the whole farming in the Borough can be described as pastoral which is farming aimed at producing livestock, with some arable.

In summary and on balance due to the combination of constraints which perhaps individually are not showstoppers and can be mitigated with good design and appropriate siting, in the case of Green Belt or flood risk, the Council considers there are less constrained sustainable locations around both Burton upon Trent and Uttoxeter that should be focussed upon. In addition the Strategic Housing Land Availability Study identifies land around the urban areas and in doing so also directs growth to specific locations, many of which correspond to the less constrained areas.

Strategic Options

In August 2011 the Council undertook extensive consultation on potential development options for the Core Strategy via the ‘Strategic Options’ document. This non-statutory stage set out three potential strategic housing scenarios for the public to comment on. (Technically, the consultation accorded with s.25 of the Regulations¹). Prior to setting these out a number of alternative options were considered, some of which were dismissed including the following:

All / Majority of development to be located in Uttoxeter	Constraints around Uttoxeter, and the need to provide more homes in and around Burton upon Trent
Developing to the east of Burton upon Trent	Constrained by Green Belt and all land is in South Derbyshire, and therefore not in

¹ The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008

	the Council's control
Developing to the north east of Burton upon Trent	Not considered, as in South Derbyshire and poor connectivity to the town centre
Creating a brand new settlement	The settlement would have to be very large to ensure it is truly sustainable.
Equal distribution of housing provision across villages and towns	Contrary to creating sustainable communities, and would mean some villages receiving in appropriate levels of growth

In broad terms the favoured distribution of growth within the Borough is that the majority is directed to Burton upon Trent and the remainder to the rest of the Borough including Uttoxeter and key strategic villages, which is in line with the distribution split envisaged in the RSS. This approach is underpinned by a desire to focus regeneration and growth on Burton upon Trent, whilst recognising the need for Uttoxeter and the strategic villages to also grow at an appropriate rate to maintain their health as settlements.

The housing requirement adopted by the Council for the publication of the Strategic Options document (in 2011) was not however underpinned by RSS targets due to the clear intention of Government, at that time, that top-down planning and in particular the RSS framework would in the future not form part of the development plan. The approach taken with regards to housing numbers was to set the housing requirement by taking the ONS/CLG household forecast (2008 based data, released in 2010) increase between 2006 and 2031 (11,000) and add a 2,000 dwelling allowance to cater for the economic growth the Borough is planning for, resulting in a total housing requirement of 13,000 between 2006 and 2031. The additional 2,000 dwellings would provide choice and flexibility to support both the economic growth of Burton upon Trent and future economic activity elsewhere in the Borough. It was proposed that the plan period was extended to 2031 in response to economic cycles and in particular the current recession which has seen a marked slowdown in the housing completion rate for the Borough. The Council extended the Plan period by 5 years in the acknowledgement that the house building rate would remain low in the next few years, but would recover sufficiently over the longer period for the Council to be able to show a housing trajectory that demonstrated an ongoing commitment to growth.

Whilst the additional 2,000 houses were a general provision to promote growth, the Council was aware that a similar number of homes were being planned at Drakelow in South Derbyshire. At this stage, the Council considered whether this site, effectively an urban extension of Burton, could be regarded as part of the overall housing requirement for East Staffordshire.

The purpose of the Strategic Options stage was primarily to test reaction to a wide range of potential options. There has been a large gap in publishing the Strategic Options following the earlier publication of Issues and Options in 2007. The reason

for the gap was the uncertainty in the regional tier of planning and the change of Government in 2010. The Strategic Options was more of an information awareness document to reinvigorate the debate around sites and broad locations. Still at the frontloading stage of plan preparation it had the desired effect of catapulting the Local Plan back into the limelight. As a consequence a sustainability appraisal was not undertaken despite the level of information set out in the document.

It was not the Council's intention to restrict the public's ideas on where greenfield development should be distributed about the Borough (once the maximum amount of developable and deliverable brownfield sites had been identified). However, three suggested broad distributions were put forward for discussion:

- Option 1 concentrating growth on two sites in Burton and some growth in Uttoxeter and the strategic villages.
- Option 2 concentrating most growth in the Outwoods and Stretton Areas of Burton and some development in Uttoxeter and the strategic villages
- Option 3 more dispersed growth surrounding Burton and some development in Uttoxeter and the strategic villages.

These covered the realistic directions of growth outwards from the urban areas of Burton and Uttoxeter, drawing on the SHLAA to identify broad site locations which could be regarded as developable, together with an Option for a more dispersed pattern of development.

It was clear from responses to consultation that there was no one Option which stood out as being more favoured than the others, the attention being focussed on certain sites, rather than types of location.

The additional messages we heard at the Strategic Options consultation stage are set out at in the consultation statement, and again these points helped to shape the Preferred Option document. In particular very few comments were received regarding spatial strategy options, but the voluminous amounts received on individual sites underlined that it would be crucial to test individual sites, as well as different spatial options, through sustainability assessment and infrastructure delivery assessment. This forms a key part of the process at arriving at a Preferred Option, which is set out in the Preferred Option document itself.

The Preferred Option (2012)

The most important change put forward by the Borough Council at this stage was the switch from a Core Strategy to an 'all-in-one' Local Plan. The stimulus for this was the National Planning Policy Framework and the need to meet objectively assessed need, the Localism Act which allows neighbourhood plans to come forward and assist with the delivery of growth and the need to get in place as quickly as possible a plan and 5 year housing land supply. More security was felt to flow from a Local Plan which dealt with both the strategic and site specific issues rather than leaving site information to a Site Allocations DPD. It almost felt as though to arrive at a deliverable and justifiable overarching spatial strategy the detail of site delivery, infrastructure and impact needs to be known at a detailed and local level to ensure that the spatial strategy is achievable. Rolling together these two spatial levels into one plan was a pragmatic and timely response to delivering a Local plan quickly.

Evidence Base Work Commissioned for the Preferred Option Stage

In order to ensure the evidence base is kept up to date, the Council commissioned a number of pieces of work that updated and move forward our understanding of the Borough. They consisted:

- A fresh Strategic Housing Market Assessment which re-assessed market demand for housing in the light of up to date population forecasts (interpolated to household forecasts in the absence so far of official figures from central government) and forecasts of economic growth. The forecast migration figures between South Derbyshire and East Staffordshire were carefully considered to take into account the possible effects on the Burton housing market.
- A new Settlement Hierarchy study with changes to the types of data collected compared to the previous study
- Work began on producing an Infrastructure Delivery Plan. This initially included a high level assessment of the infrastructure needs of the various options being evaluated.
- Sustainability Appraisal work was progressed on all Options put forward.
- Outdoor Sport Investment and Delivery Plan to complement existing work on open space and recreation

There was a commitment to the following further pieces of work and studies:

- Employment Land Study, a review of the existing study.
- A new retail and leisure study to update the existing one, prepared before the present economic conditions had made any impact, and in need of revised forecasts for future floorspace growth needs, and more in-depth analysis of different retail sectors.
- Continued work with Staffordshire County Council on the Preferred Option's transportation infrastructure requirements and delivery.
- Ongoing discussions with providers on delivery and phasing of a wide range of infrastructure networks.

- A refresh of the Strategic Flood Risk Assessment and Water Cycle Study to incorporate updated Environment Agency data
- Liaising with Staffordshire County Council on Landscape Character work

Testing the Broad Spatial Options

The following options have been considered by the Council and tested through the SA process to determine if they should form a Preferred Option in full, in part or in combination. Initial considerations were aimed at strategic thinking about the distribution of growth more generally across the Borough.

Option 1	Urban extensions	Development in and around just Burton and Uttoxeter, no village development
Option 2	Urban extensions plus villages	Development in and around Burton and Uttoxeter plus two or more strategic villages
Option 3	Equal distribution	Development distributed equally across villages and towns
Option 4	Single urban focus	All development to be in and around either Uttoxeter or Burton
Option 5	New Settlement	Create a brand new settlement in the rural areas

Options 1 and 2 were presented in the Issues and Options Consultation whereas Options 3, 4 and 5 were presented as possible alternative growth solutions in the Strategic Options document. A high-level sustainability appraisal (SA) was undertaken and a preferred strategic approach was arrived at which is Option 2. The SA provides the detail of the assessment.

Options 2 a, b and c were published in the Strategic Options document. They explored in more detail the preferred spatial approach. All options deliver growth in Burton upon Trent and to a lesser extent in Uttoxeter and the Strategic Villages.

Options 2a, b and c were presented as possibilities to stimulate debate on identifying the greenfield part of the spatial strategy. As such, it was considered that the sustainability appraisal was inappropriate at Strategic Option stage because no preferences or judgements about sites were being made at that stage. However, it is accepted in retrospect that it would have been prudent not to identify specific sites so early on, and to focus instead on more general, broad locations. The Interim Sustainability Appraisal included an appraisal of a number of sites as well as high-level options before any final decisions on options or sites are made.

Options 2a	Concentrating growth on two sites in Burton and some growth in Uttoxeter and the strategic villages
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2b	Concentrating most growth in the Outwoods and Stretton areas of Burton and some development in Uttoxeter and the strategic villages
2c	More dispersed growth surrounding Burton and some development in Uttoxeter and the Strategic villages
2d	Concentrating growth in the South of Burton and some development in Uttoxeter and villages.

All four options looked at delivering growth in Burton upon Trent in a North West, west or southerly direction.

As part of the preparation of the Preferred Option, a new Strategic Housing Market Assessment (SHMA) was commissioned from consultants. This looked closely at the housing market interactions between Burton and Swadlincote (coordinated with a similar study being carried out by South Derbyshire at the same time) and between Burton and the Derby Housing Market Area. It has also taken into account more up to date population projections, the effects of economic growth and the level of housing that might be required to stimulate this, and likely migration levels. This work has resulted in a robust revised housing requirement of 8935 homes over the period 2012 to 2031. (See evidence base document “Housing Requirements and SHMA Update”, GVA, June 2012).

A further option was considered relating to the development of Drakelow in South Derbyshire. This alternative development option was put forward as a potential location to accommodate some growth associated with Burton upon Trent. The only way that East Staffordshire could accommodate growth in an adjacent authority is by having a Memorandum of Understanding with South Derbyshire which agrees to the Drakelow site meeting East Staffordshire housing requirements and not South Derbyshire housing requirements. It became apparent that this could not be achieved procedurally by agreement with South Derbyshire. The purpose of the Strategic Options stage was primarily to test reaction to a wide range of potential options. South Derbyshire responded with a clear indication that they would not entertain the option of part of East Staffordshire’s requirement being met in South Derbyshire and that they regard Drakelow as satisfying part of their requirement only. Therefore, having fully explored this option at Strategic Options stage, it was formally discounted as a possible way forward.

The following option was discounted and as such has have not been tested through the sustainability appraisal process.

Including development in adjoining South Derbyshire to meet housing and employment needs	The Borough Council accepted that insufficient impetus was given in the East and West Midlands Regional Strategies to give recognition to development at Drakelow. With the demise of this context the Council have reviewed this and now will allocate land wholly within the Borough to accommodate their housing
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Members of the Council accepted the position that whilst the Drakelow development is geographically adjacent to the Burton urban area, as a site located within South Derbyshire, it was not possible to count the site towards meeting housing need in Burton upon Trent.

Selecting a Proposed Preferred Option

Sustainability Appraisal is an important and integral part of the plan making process. It ensures that sustainability considerations (social, economic and environmental) are incorporated within the plan and taken into account. The sustainability appraisal contributes to the evidence base and helps to test other evidence on housing, employment, flood risk etc- and the development of the options. It is also a statutory requirement.

A sustainability appraisal was not undertaken to support the Issues and Options or Strategic Options stages for the reasons set out. However, the Council recognised the need to test each of the options put forward which seeks to distribute growth around the Borough as a way of testing alternatives to a specific scenario chosen.

The Sustainability Appraisal process that has been undertaken to support the Preferred Option consultation includes a sites assessment based upon sites identified through the Strategic Housing Land Availability Assessment This process allows for the assessment of 'reasonable' alternatives. An interim SA was undertaken to both support and integrate with the Local Plan at the Preferred Options stage.

The options for development presented in the Preferred Options document reflect all the options previously published, the purpose of which is to ensure that the Council fulfils its legal obligations in relation to Sustainability Appraisal. It also provides consultees with a further opportunity to influence the Plan.

A fourth option was been added to those published at the Strategic Options stage referenced in the Preferred Option as 2d. This reflects growth to the south of Burton upon Trent, a growth direction that was not presented previously as a potential growth option. It is the Council's view that Option 2d was to be preferred as a broad locational strategy.

In a separate high level Infrastructure Assessment the requirements for new or upgraded utility and highway infrastructure were investigated for each option. This was a crucial area to investigate as the deliverability of any particular option could be called into question should the provision of new infrastructure be prohibitively expensive, or environmentally unacceptable. Additionally, phasing of the development may be possibly affected by the timescales required to provide major infrastructure upgrades.

Any preferred spatial strategy must address the role of the villages, and balance the equally important factors of preserving the character of a village as against the need for some development to help support local facilities. The options for varying levels of development from none through to substantial development within and adjacent to the strategic villages have been considered.

The Council has undertaken work to establish a settlement hierarchy based on the presence or absence of a selection of representative amenities. This has helped to establish that there are four villages that are of significant size, and the option of expanding these four – termed strategic villages – by sizeable amounts have been explored. A second tier of villages might be suitable for limited development, and this, too, forms part of the Preferred Option for consultation.

By considering all these factors, the Council has come to a decision on its preferred spatial strategy. This is set out in the Preferred Option document, along with summaries of the findings of the Sustainability and Infrastructure studies.

The Proposed Preferred Option

Building on the earlier stages of consultation and messages received from the public and stakeholders, and taking into account the outputs from the SA process, and other evidence base work the Council has reached a view on its Preferred Option for the future planning framework for East Staffordshire.

As explained in the Preferred Option consultation document, this is based around a strategy of Sustainable Urban Extensions to the major towns, with some development in villages. The Strategic Options consultation of 2011 contained a number of options based around this approach, and the further evidence base work done since, shows that this is a sound way forward. This option emerged as the Preferred due to the close alignment with the vision and objectives set for the Plan, but also due to the judgements and evidence relating to the sustainability of this approach.

The Preferred Option would see a number of significant mixed-use urban extensions to Burton and Uttoxeter as the main focus for development in the Borough. The scale of these extensions is seen to enable the delivery of high-quality new places, characterised by high levels of design and green infrastructure, and which can deliver the required infrastructure to ensure a critical mass of activity and high degree of sustainability. Other strategic housing sites have also been identified to meet the identified housing requirements, and to ensure a diverse, and flexible portfolio of land supply. This includes a large proportion of brownfield development within the urban areas, allowing for the regeneration and further improvement of existing areas and communities. The choice of which sites should be allocated (both greenfield and brownfield) has been made by judging each site's performance in the Sustainability Appraisal and Infrastructure Delivery Study exercises conducted as part of the Preferred Option preparation work.

The Preferred Option allowed for development in many villages, albeit at a smaller scale than the urban areas. The Council had chosen this spatial strategy (rather than concentrating growth solely in or around the two urban areas) after considering the views expressed at Issues and Options stage (see Consultation Statement). Some 33% of respondents felt any necessary greenfield development should be on the edge of Burton whereas 37% felt development should be scattered amongst existing settlements. This is not a clear-cut view, but there was not a total opposition to village development.

The Council gained a more in-depth appreciation of the function of each settlement outside Burton and Uttoxeter following the production of a new Settlement Hierarchy study in 2012. As a result, it was able to identify the range of facilities, amenities and services each village has and where further development would help to support the viability of these. Villages are placed in one of three categories according to the extent of facilities they offer:

- Tier 1 Strategic Villages meet rural needs by providing a good range of facilities and services to their own populations and a wider rural catchment area.
- Tier 2 Local Service Villages meet local needs by providing a more limited range of facilities and services which sustain village life.
- Tier 3 –Small villages - these are very rural and small and have very limited facilities and services.

The strategy allowed for the development over the Plan period of a strategic allocation (100 units or over) in Strategic Villages and smaller numbers of new homes in Local Service Villages. It was felt that this threshold of 100 units was low enough to include both urban sites on brownfield land, and also greenfield sites in the rural areas, so that the authority could make allocation to support a growth strategy based around brownfield and greenfield growth in both urban and rural locations.

In Small Villages, anything more than a handful of new properties over the Plan period, granted permission in exceptional circumstances (set out in policy), would not be acceptable.

In keeping with views expressed by many communities and elected Members, this allows for some development in Tier 2 and Tier 3 villages, as well as in the larger 'Strategic Villages'. However, sites are not identified below a strategic threshold of 100 units, and this is seen to be important in the context of localism and providing opportunities for community-led involvement in where development goes. The expectation is that in some areas, Neighbourhood Plans will play a role in shaping where such developments are located. However, it is an option for consultation, and the Council expects comments and views on it, and on the evidence base which sits behind it.

The suggested split of development across the Borough is:

- **Burton upon Trent:** around 67% (assuming the majority of brownfield windfalls are in Burton)
- **Uttoxeter:** around 20% (assuming the remainder of brownfield windfalls are in Uttoxeter)
- **Villages (all tiers):** 13% most within Strategic Villages .

This reflects the following broad characteristics of the proposed Preferred Option:

1. THE MAJORITY OF NEW DEVELOPMENT SHOULD BE CHANNELLED TO SITES IN AND AROUND BURTON. This is the largest settlement in the Borough, and the one with most regeneration needs, particularly with regard to attracting investment in industries that will provide a more varied economic base to the town. It is also the part of the Borough with the most facilities to serve an increased population, or with the most potential to be upgraded to serve an increased population. New development which is able to access existing facilities is likely to be the most sustainable option. The Council's consultants (GVA) have identified indicators (such as low vacancy rates and relatively strong house prices) suggesting that there is confidence in there being a strong market demand in the future of the levels the Council is proposing.

2. A SIGNIFICANT AMOUNT OF DEVELOPMENT SHOULD BE CHANNELLED TO SITES IN AND AROUND UTTOXETER. Uttoxeter is a successful market town, but the Council is aware that to remain successful its economic base needs to be bolstered and sites regenerated to attract investment. Additional housing will help to provide a sustainable location where new employees can live without the need to commute from other towns. The Council has overseen a continuing programme to regenerate Uttoxeter Town Centre, and an increased population will help to underpin this.

3. SOME DEVELOPMENT SHOULD BE CHANNELLED TO THE VILLAGES. The reasons are set out above, but centred around the need to help support facilities in certain villages, the level of development appropriate being dependent on the village size, its hinterland and the nature of its facilities.

From Preferred Option to Pre-Submission

- The Council consulted with the public and stakeholders on the Preferred Option of the Local Plan for a lengthy period from 25th July until 21st September 2012. The consultation was publicised in a variety of ways, in accordance with the adopted Statement of Community Involvement (2007 - a revision to this document has been undertaken with the new Statement of Community Involvement being adopted in September 2013). This involved notification directly to the consultee database, article in ES News and press releases, exhibitions with officers in attendance in Coopers Square and Uttoxeter Indoor Market, website news item and library displays, including the

mobile libraries. Parish Councils were also involved in publicising the consultation.

- In all, 825 individuals, groups, companies and organisations made representations. These comprised, 741 private individuals, 40 from landowners/developers/agents, 5 from utility providers and businesses, 25 from non-governmental organisations and interest groups, 11 parish councils and 3 local authorities. In all, these respondents made some 2267 comments. A summary of the consultation responses is set out in the Consultation Statement.

The Pre-Submission Local Plan (2013)

Evidence Base Work Commissioned for the Pre-Submission Stage

A significant level of work was undertaken to ensure that the evidence base was up to date and robust to support the Pre-Submission Local Plan.

A list is found in paragraph 1.42 of the Pre-Submission Local Plan. Only a few items of evidence are outstanding and all are underway – these include further education information, a revised gypsy and traveller assessment, further information relating to facilities planning modelling and the finalisation of the transport strategy. All will be available prior to examination and some at the point of Submission. The Landscape Assessment commissioned and managed by Staffordshire County Council is unlikely to be completed until the hearing sessions.

The Pre-Submission plan responds to new housing evidence. GVA, with the support of GL Hearn, were commissioned to undertake a refresh of the original report that they prepared. The purpose of the refresh was to:

- consider and respond to critiques presented through recent representations made during the Local Plan Preferred Option consultation;
- take account of the latest demographic - population and household data - releases; and
- ensure a direct connection to the economic evidence assembled by the Council (noting that this was not available for the initial SHMA Update study).

New evidence supporting a new housing land requirement was published by the Council in July 2013. The new figure has increased from 8,935 houses to 11,648 houses over the period of the Local Plan (2012-2031). The Pre-submission plan and supporting evidence base including a refreshed sustainability appraisal determined the most sustainable and appropriate sites to bring forward.

The spatial strategy in the Pre-submission plan will comprise a mix of both brownfield and greenfield sites, to meet this new higher housing requirement. In identifying the the additional sites required to meet the new and higher objectively assessed need a number of opportunities were identified.

Firstly, brownfield sites over 100 units within existing urban areas were identified for allocation where there is a known and robust position in terms of deliverability and timescales. The majority of the brownfield sites in the SHLAA willingly set out a timescale for development but when looking at the types of constraints associated with such sites including multiple landownerships, demolition, contamination, location in relation to other uses there are fewer sites that the Council wanted to rely upon an allocate in the knowledge that they can be delivered.

Secondly, it was clear that the publication of the Preferred Option document brought forward a number of sites that fell outside of the development strategy (and in some cases were published as part of the Strategic Options document) for development. In 2013 a number of sites were approved for development owing to the lack of 5 year land supply (5YLS). These sites were then absorbed into the Pre-Submission plan for inclusion as allocated sites.

The third opportunity that presented itself was to increase the number of dwellings on certain Preferred Option allocated sites. This was the case in relation to Harehedge Lane. The preferred Option spatial strategy also presented a broad location of growth as a southern crescent to the south of Burton upon Trent – a quantum that, it was hoped, would come forward between two sites – Land South of Branston and Branston Locks (also known as Lawns Farm) through negotiation and discussion with the landowners and development. This location was constrained at the Preferred Options stage not due to constraints but due to the level of growth that would be experienced by communities in this part of Burton e.g. the majority of additional growth would end up in the Ward of Branston in particular. This approach was amended in the Pre-Submission document owing to the fact that applications were submitted for both Branston Locks and Land South of Branston independently of each other, both of which were capable of being delivered and impacts mitigated.

The resulting strategy has brownfield sites in the urban areas of Burton and Uttoxeter, some of which were sizeable and capable of significant regeneration. The increased capacity of greenfield sites and the inclusion of new greenfield sites has resulted in a spatial strategy which has shifted slightly from Option 2d to Option 2d/c which equally scored highly in the sustainability appraisal at the Preferred Options stage. Development is directed to the south and west in Burton. In Uttoxeter an additional site was included at Hazelwalls, a site which scored highly in the Preferred Option sustainability appraisal.

Part 2 of the Pre-Submission Local Plan sets out in some details the approach to the spatial strategy for the Borough. The split in development is set out in paragraph 2.17 with Burton receiving over 70% of the growth.

Submission Local Plan

Very little has changed in the Submission Local Plan. In terms of strategy only the removal of a small 100 allocation at Stone Road in Uttoxeter due to overwhelming objection is proposed as a modification. The 100 units is proposed to be redistributed with 50 assigned to Land West of Uttoxeter and 50 to Hazelwalls.

Updated supply position

The following table demonstrates that the majority of the spatial strategy has planning permission or has an application sat with the Planning Services team for determination. There was a high number of permissions around the time that the Preferred Options went out to consultation.

LOCATION	CAPACITY	STATUS	COMMENTS
Burton Upon Trent			
Branston Depot	483	Approved*	s.106 to be signed by late summer 2014
Bargates/Molson Coors High Street	350		
Molson Coors Middle Yard	300	Pre-application discussions	
Derby Road	250		
Pirelli	300	Approved	s.106 agreed
Land South of Branston	660	Approved	s.106 agreed. Phase 1 Reserved Matters expected by spring 2014
Branston Locks	2580	Approved*	s.106 to be signed by summer 2014. Phase 1 Reserved Matters expected end 2014.
Tutbury Road/Harehedge	500	Application in	Determination at May Planning Committee. 24 units already with permission following appeal.
Beamhill/Outwoods	950	Approved	s.106 agreed
Guinevere	100	Approved	s.106 agreed
Uttoxeter			
Brookside Industrial Estate	150	Pre-application discussions	Application expected late summer 2014
JCB, Pinfold Site	257	Approved	Requirement to complete s.106 agreement prior to development commencing.

Uttoxeter West	700	Approved*	s.106 to be signed by summer 2014
Hazelwalls	350	Pre-application	Application expected May 2014
Tier 3 Strategic Villages			
Barton under Needwood	135	Approved	s.106 agreed. Reserved Matters submitted.
Rolleston on Dove	100	Refused	Relationship with Neighbourhood Plan. Appeal. SoS call in decision expected July 2014
Rocester	90	Application in	Determination at May or June Planning Committee
Tutbury	224	Approved	s.106 agreed. Construction underway
Tier 2 Villages			
Abbots Bromley	40		
Yoxall	40	Application in	Determination at April committee.
Marchington	20		
Mayfield	20		
Denstone	20		
Draycott in the Clay	20		

*Resolution to approve.

There are many other opportunity sites that are coming forward which do not form part of the strategy set out in the emerging Local Plan. Two sites were approved following appeals in 2013:

- Red House Farm, Burton upon Trent: 250 units
- Forest Road, Burton upon Trent: 300 units

To be determined at Planning Committee in April is Roycroft Farm, Uttoxeter for 140 units. The Borough Council is aware of other sites amounting to 1000+ units mostly

on the western boundary of Burton upon Trent which have been the subject of robust pre-application discussions. Some of these sites are on the boundary with South Derbyshire and which fall within that district but adjoin the Burton existing urban area.

The majority of these applications are exploiting the Borough Councils 5 YLS position which currently stands at 3.9 years. This calculation was adjusted following appeal decisions in 2013 and includes a 20% buffer and the Sedgefield approach. The most up to date position is set out in the examination library.