

Rolleston on Dove Parish Council Response to the Draft Core strategy

Introduction

Rolleston Parish Council has great concerns about the content of the Draft Core Strategy. This document itemises many of the concerns.

Whilst the Parish Council accepts that natural growth in Burton and Uttoxeter, if managed well, can enhance the lives of residents it is our belief that the numbers and locations proposed for future housing are excessive and will be detrimental to the well-being of the existing population.

One of the main features of the Strategy is the development of four main 'strategic villages'. It is the Parish Council's view that the selection of the villages is wrong and does not sufficiently take into account facilities in the villages; The policy is wrong in that it assumes that just because a village is large it can accept a large development. Logic might say that the opposite is true and extra development in already large villages will threaten the identity of the communities. To make a village a 'service centre' for the surrounding area will change the identity of the village forever.

The Parish Council believe that a number of new houses below 10,000 would be acceptable to the present residents and achievable by ESBC.

The Parish Council accept that the proposed Drakelow Development in South Derbyshire will actually have a much bigger effect on Burton than South Derbyshire, they submit that the inclusion of the proposed development in the ESBC document is misleading and leads to the incorrect calculation of the 5 year supply and should be removed.

Although the projected figures have been derived from Central and Local Government sources, they are by their very nature out of date. The Draft Core strategy anticipates an increase in population of 3,510 by natural growth and an additional 13,100 by inward migration. The latter figure does not distinguish between inward migration from elsewhere in the UK due to job change and immigration from outside the UK. Any immigration content reflects the policies under the previous Labour Government whereas the present Government have pledged to cut net immigration be a factor of 10. In-migration due to outside families finding employment in ESBC must be good, but without robust plans to increase employment in the area may be hard to achieve.

There is no section in the Draft Core Strategy which shows how growth in employment will come about and more significantly how the Council will ensure that any such growth stemming from Government policies is in high value manufacturing and technological industries and not in storage and distribution.

The case of Corby whose Council, when they lost the steel industry, decided that building houses would encourage the inflow of industry, is a salutary lesson. Corby is now the re-possession capital of the UK. Building houses does not attract business investment; increased employment opportunity created by business investment leads to increased demand for houses.

To summarise; the draft Core Strategy has as one of its main aims to improve the quality of life of existing residents of the Borough. It is The Parish Council's belief that the proposed Strategy will be to the detriment of the quality of life of the majority of the existing population.

DETAILED COMMENTS ON THE DRAFT CORE STRATEGY

PREFACE

Preface Para (iv) ESBC claim they are seeking to provide the appropriate level of development in the borough. It is felt that 13,000 new homes is not the appropriate level of development as it is far too high and requires far too much in-migration. ESBC do not provide evidence to show that they can facilitate the number of new jobs needed to sustain such a large increase family formations. The penultimate sentence should read “*It is not a case of no development but rather of how much development and where.*”

INTRODUCTION

Para 1.1 ESBC states that ‘planning’ should make places better for people. Building lots more houses in the strategic villages will increase traffic and therefore make places more congested for people. Therefore improvements to infrastructure resulting in improved traffic flow should be introduced before any large scale development is permitted.

Para 1.2 ESBC state that planning authorities should produce a Core Strategy that reflects local people’s needs and aspirations. The proposals in all three options are for 13,000 new houses to cater for an increase in population of 16,620, 78.8% of which are a direct result of in-migration; therefore they cannot be described as local people. The only true way to establish what local people want is to have a referendum.

Para 1.3 ESBC states that the Core Strategy cannot be contrary to the Regional Spatial Strategy (RSS)/national policy without evidence to support same. The number of houses determined by the RSS was partly determined by East Staffordshire being a Growth Point which meant that central government would provide funds to improve the infrastructure needed for additional housing. Since central government has now stopped funding Growth Points and therefore stopped providing money for the required infrastructure improvements there can be no requirement to adhere to the RSS numbers.

Para 1.6 This contradicts **Para 1.3** when it states that the vision no longer has to be in general conformity with the RSS therefore there is no need to adhere to the 13,000 stated in the RSS.

Para 1.7 States the importance of community involvement so that the community has a sense of ownership of the plan. The community will never feel that it has contributed if all of its comments are ignored, instead they will think that ESBC has gone through a consultation process purely to put a tick in the appropriate box. Ask the community if it agrees with planning for 13,110 increase in population due to in-migration whilst the local population only increases by 3,510. There is no evidence to show that local employment opportunities will increase to accommodate the large number of in-migrants resulting in increased competition for any local jobs and a considerable number of people commuting large distances to work, which is not sustainable.

POLICY CONTEXT

Para 2.2 Refers to existing Planning Policy Statements (PPS) and Planning Policy Guidance (PPG) that set out central government’s policies but there is a central government consultation that is running concurrent to this one that will replace all of the existing documents with a much smaller document with considerably different policies so why try and conform to something that will be scrapped before the Core Strategy is introduced?

Para 2.3 ESBC states that central government’s planning objectives are based on the 1999 strategy and PPS1 but in the current consultation on the National Planning Policy Framework (NPPF) central government has a new set of definitions and objectives, so why try and develop a Core Strategy on out of date concepts?

POLICY CONTEXT (continued)

Para 2.4 There is nowhere in the Draft Pre-Publication Strategic Options that suggests which sites are to be developed first so how can ESBC claim that a priority will be to develop brownfield sites before greenfield sites? There is no mention of employment land in these options.

Para 2.5 Given that one of the policies in the proposed NPPF is to remove any protection of employment land so that it can be developed for housing, ESBC should have produced details of the 5 years supply (50ha) of employment land that is separate to the housing sites. There is no point in building houses without having employment available for the new in-migration population.

Para 2.7 Acknowledges that the current (PPS) and (PPG) are to be imminently replaced but still works to the existing policies. This will create a Core Strategy that is out of date before it comes into force.

Para 2.8 States that until the (RSS) is abolished they form part of the existing development plan but para. 1.6 states that the 'Vision' no longer has to be in general conformity with the (RSS). Both statements cannot be correct.

Para 2.9 ESBC states that it wants to maintain the ambition and vision that was part of the RSS but ignores the fact that the house requirement numbers set out in the RSS were because the funding for infrastructure to facilitate these numbers was to be provided by East Staffordshire being a Growth Point and this fund has now been withdrawn.

Para 2.11 What is the point in producing a Core Strategy that ESBC acknowledge will need adapting and adjusting as soon as it is created ?

Para 2.12 ESBC suspended their planned programme of producing a Core Strategy in 2010 because they were uncertain of what was going to be in the Localism Bill. The bill has not been finalised so what has changed that they now consider that they can recommence the Core Strategy?

Para 2.15 ESBC states that Local Enterprise Partnerships (LEP) will be empowered to create the right environment for business and economic growth by tackling issues such as planning and housing. If this is true it is introducing an extra layer of regulation in this area which is not what is claimed in the Localism Bill or the (NPPF). Also if this statement is true where is their involvement in the preparation of this Core Strategy?

Para 2.17 This statement is so vague that it is meaningless. If it is not known what power or influence an (LEP) might be given at some future date how can any strategy be formalised? It is possible that the (LEP) could be given power to change anything and everything. The Localism Bill and (NPPF) are quite clear that power should be devolved to local communities to determine how their communities will develop so how can a (LEP) override the aspirations of the local community?

Para 2.18 As already acknowledged by ESBC the (RSS) will soon be replaced by the Localism Bill so its contents will be of no material concern. It is already out of date, in that Growth Point status no longer exists, therefore reference to it is largely irrelevant.

Para 2.19 It seems incredible that ESBC can claim that part of a possible future development in another region can be considered as part of ESBC's housing provision. The proposed development at Drakelow is for 2,200 new houses along with some employment. It seems totally illusory that ESBC can claim that 2,000 (91%) of these houses can be included in their housing provision figures. Also ESBC will have no control over when this development will take place.

SPATIAL PORTRAIT

Para 3.1 It is not clear what makes East Staffordshire's geographic location 'strategic' nor is it understood how Burton on Trent can claim to be the capital of the National Forest. If ESBC consider Burton to be the capital of the National Forest why has no section 106 money from previous developments been used to enhance the National Forest by allocating land and planting trees? Why does tree planting not feature highly in proposed developments?

Para 3.6 This paragraph does not make sense. It states that the population figures do not take into account expectations regarding future house building but the population is predicted to rise 13,110 as a direct result of in-migration. This increase in population would be untenable without a lot of new homes being built; otherwise the migrants would have to stay in hotels or would be homeless. House building will attract in-migration rather than catering for its' occurrence.

Para 3.7 Table 4 shows the population of East Staffordshire increasing by 16,620, 13,110 of which are due to in-migration. Why is this figure so high? It is nearly four times the increase in population attributed to local people. Are the people who are predicted to move into East Staffordshire coming from other areas in the United Kingdom or from overseas? If they are coming from within the United Kingdom where are they coming from? It would be interesting to check the Core Strategy from the districts where they currently live to make sure their population figures reduce accordingly. How and where is the employment being created for such a large population increase?

Para 3.13 This paragraph states that household projections are based on recent demographic trends which will provide the numbers of projected household formations for existing residents of East Staffordshire but these figures cannot possibly predict the number of households formed by in-migration. This has to be governed by the amount of housing and employment that is available. The source of projected household formations needs to be clarified. It also needs clarifying if Table 8 includes the 12.4% reduction in household formations in the West Midlands and 20.4% reduction in the East Midlands as projected by the Dept. Communities and Local Government (DCLG) in their document published on 26th November 2010.

Para 3.16 This paragraph recognises that East Staffordshire is losing manufacturing jobs and acknowledges the need for world class companies to locate here to create highly skilled jobs but does not explain how it intends to do this. Instead it has allowed too many logistics companies to set up distribution centres here creating a centre of low paid employment. Where are all the new residents in East Staffordshire going to work? The Draft Core Strategy makes no attempt to address current employment shortfalls of existing population, and particularly the is phenomena of NEETs (Not in Education, Employment or Training) in the economy.

Para 3.17 Acknowledges that East Staffordshire has permitted the building of high class office accommodation on Centrum 100 but seems puzzled that a significant amount of this office space is not let. These offices like the huge warehouses that have been built and not let obviously do not fit the criteria set by potential tenants. This would indicate that we do not want speculative building that appears to be filling a need. What we need is well positioned and serviced employment land on which new companies can build bespoke workshops and offices to fit their needs, rather than adjusting their needs to suit that which has already been built.

Para 3.23 The fact that East Staffordshire with 30.4% and nationally 31.3% of the working age population are qualified to degree standard or above indicates that East Staffordshire and the United Kingdom are no longer manufacturing centres. This Core Strategy should attempt to rectify this problem.

Para 3.34 Who crowned Burton on Trent the 'capitol of the National Forest'?

Para 3.44 The Old River Dove is in Rolleston on Dove not Marston on Dove which is in Derbyshire.

SPATIAL PORTRAIT (continued)

Para 3.48 It is not clear what “Similarly in certain villages including Barton and Rolleston flood risk constraints need to be understood “means. It is certainly true that the surface water drains need separating from the foul drains before any more development is allowed in Rolleston. This is a very important point and the wording is again so vague as to be meaningless. The paragraph states the need to understand over the need for action.

KEY ISSUES AND CHALLENGES

Para 4.1

Accommodating Growth:-

Second bullet point; creating sustainable communities when 78.9% of the population is from outside of East Staffordshire and possibly from outside of the UK could be recreating the problems encountered in the fifties and sixties when large numbers of immigrants populated areas of towns and cities

Sixth bullet point; ensuring adequate provision of infrastructure and services is indeed very important but there is no indication what ‘adequate’ is nor how it will be achieved.

Ninth bullet point; also states that adequate infrastructure is provided without defining ‘adequate’ or how it will be achieved.

Housing:-

Second bullet point; there already is an extremely good higher end housing mix with many houses for sale at various prices starting at several million pounds down to less than one hundred thousand pounds, it is therefore suggested that many professional workers live outside of the borough for reasons other than lack of choice.

Fifth bullet point; the Office of National Statistics (ONS) suggest that 78.9% of the increase in population of East Staffordshire between 2008 – 2033 will be due to in-migration. How have they arrived at that figure? It is totally unsustainable, if the whole country was to experience that sort of increase it would amount to hundreds of thousands of people every year, not the tens of thousands that Central Government has set as targets. The reason for large numbers of in-migration in the recent past is largely due to the number of Eastern European countries joining the European Union, since this is not being replicated in the next 20 years there is no evidence to suggest that in-migration will continue at such a high level.

(ONS) predict that there will be 6,301 household formations by existing residents of East Staffordshire between 2008 – 2033. ESBC are planning for 2,000 additional households formed as a result of economic growth, surely these additional 2,000 household will be the element of in-migration making a total of 8,301 new households formed during that period. It is totally unreasonable for East Staffordshire to formulate policies to accommodate an additional 4,699 households from outside of the district.

Sixth bullet point; the requirement for finding sites for 8,771 dwellings is challenged above. The concept of claiming 2,000 houses in another County, the old Drakelow power station site was not allowable when the Regional Assemblies existed so what has changed to make them allowable now? Have South Derbyshire District Council agreed to ESBC including 2,000 dwellings in their figures?

KEY ISSUES AND CHALLENGES (continued)

Table 9

The housing requirements from 2006 – 2031 should be 8,301 not 13,000

8,301 less 2,080 = 6,221 houses to be built in the next 20 years = 311 houses per year not 520

Total Completions and Housing Capacity- Outstanding are facts = 4,229

8,301 – 4,229 = 4,072 dwellings requiring sites

4,072 – 2,717 = 1,355 dwellings needing Greenfield sites instead of 4,054 See Appendix 1

Par 4.2 ESBC state that their priority will be to bring forward predominantly brownfield sites ahead of releasing Greenfield, this view will be supported by all except land owners and developers but there no indication how this will be controlled. The conditions in ESBC's Policy Statement on Brownfield and Greenfield Land Release do not support this priority in as much as ESBC cannot show a 5 year supply of deliverable brownfield sites. It is suggested the Policy Statement should be revisited to support the priority.

First bullet point; it is disappointing that ESBC are not including the whole of the Core Strategy in their consultation.

EMPLOYMENT

First bullet point; it is not clear what is meant by low value manufacturing but manufacturing jobs of any type should be encouraged. If, as a country our manufacturing base continues to erode we will be dependent on imported goods, with an economy reliant on the tertiary sector which is plainly unsustainable. What evidence does ESBC have to suggest that they can attract more knowledge based industries to the area?

Second bullet point; to retain high value added jobs and people with high level skills will entail keeping manufacturing companies in the Borough. Burton on Trent used to be world leaders in manufacturing industrial buildings but now all of those companies have gone, as have all their management and design teams.

Third bullet point; this paragraph seems to suggest that ESBC is aiming too high, it should be encouraging all manufacturing companies to the area not just the high tech companies. What evidence does ESBC have to indicate that they will be able persuade advanced manufacturing operations to the Borough instead of other areas within the Local Economic Partnership (LEP) to which it belongs?

LEISURE

Given everything in this document prior to this section it is incredible that the statement "if population growth is significant" is used. Does this mean that ESBC do not know if this plan is deliverable? How can ESBC be claiming that the 'strategic villages' will have to be subjected to largely unwanted development when they are unsure of how much the population will increase.

Para 4.3 It is agreed that policies need to be established for improving services etc. within the villages and rural areas but these policies must take account of what local residents want. There must be proper consultation with existing residents before any policies are determined.

Para 4.4 It is not true to say that the future health of villages and rural areas is dependent on whether or not rural employment and enterprise flourish, most people who live in villages do so because of the absence of industrial estates and they pay a premium in house price for the privilege.

VISION

Para 5.1 It is very interesting and confusing to read the responses to Issues and Options East Staffordshire Core Strategy Local Development Framework document where only 51% of the respondents thought the Vision reflected the needs and character of the different parts of the borough. Why has such a poorly supported vision been adopted?

Para 5.2 Now that the (RSS) is being replaced by the Localism Bill which does not set housing targets and, bearing in mind that the housing requirements in the (RSS) were increased because East Staffordshire was a Growth Point which meant it could apply for central government funding to provide infrastructure for additional housing a situation that has now been discontinued, why are ESBC still trying to achieve the housing targets set by the (RSS)?

Para 5.3 whilst accepting that some growth is inevitable and necessary too much growth created by too much in-migration is not going to sustain the qualities and attractiveness of the area that existing residents value. If we wanted to live in a large city we would move to one. The true strength of East Staffordshire are the people who live here so to dilute the input of local people by such large in-migration will inevitably change what existing residents value.

Para 5.8 Before ESBC imposes changes to the rural areas it is suggested that they discuss what changes the rural areas want. Turning rural villages into small towns will not be seen as a benefit.

Para 5.11 In the past twenty years East Staffordshire has lost so many manufacturing firms and jobs and replaced them with low paid low skilled logistics type of industries and jobs that it is refreshing to see that ESBC intends to attract high skilled, highly paid jobs that require sufficient housing provision across the borough that reduces the overall levels of commuting. Would it not therefore be prudent for ESBC to identify where these new industries and jobs will be located so that housing development can be located accordingly? There is no point in creating jobs in one area and housing in another area and then expect people not to commute, which is against the concept of sustainable development promoted by initiatives such as the Carbon Challenge. Somewhere in this document should be a section explain how the high tech and management jobs will be created. Otherwise this is just whistling in the wind.

Para 5.17 The acknowledgement that Uttoxeter has not increased employment opportunities to match the amount of housing that has recently been built is the very reason why it is believed that the provision and location of employment sites should be determined before it is decided where new housing development should take place.

Para 5.19 Growth in rural villages is expected but the growth suggested in the three options that form part of this consultation cannot be described as sensitive. Meaningful discussions should take place with rural communities to see how they would like to see development take place as it is obvious that those producing this consultation document do not understand what is important to them.

Para 5.20 an explanation is required as to where the local job opportunities will come from.

Para 5.22 Surely there is an argument for integrating communities rather than ensuring they remain separate by catering for their separate needs.

Para 5.24 By proposing to build 11,000 new homes in and around Burton on Trent it is inevitable that the Borough will become an area of large residential developments. The numbers being planned for are far too high.

VISION (continued)

Para 5.25 Since this Core Strategy is so ambitious it would make sense to ensure that all of the identified Brownfield sites for housing and employment are developed before releasing any Greenfield sites. This could easily be achieved by revisiting the Policy Statement on Greenfield and Brownfield Land Release.

Para 5.26

First bullet point; given the size of the proposed developments in the rural areas it is highly unlikely that the existing bus services will be altered without a subsidy being provided by ESBC. Is this what is being envisaged to create the excellent transport connections that are mentioned?

Second bullet point; The scale of additional housing proposed by this strategy will certainly have broadened the choice of housing, there will be that many empty houses that people will be able to take their pick.

Fourth bullet point; the only way to truly preserve the open countryside is not to build on it. The only truly sustainable field is a field. Once built on a field is no longer a field.

THE DEVELOPMENT OF THE CORE STRATEGY

Para 6.1 It is correct that community involvement is essential but this involvement must include listening to what is said by the community even though it might not be what ESBC want to hear. Have the community been asked if they want 78.9% of the population increase to be as a result on in-migration?

Para 6.3 It is stated that the Strategic Options document is based on the evidence gathered from previous consultations; unfortunately there was virtually no firm consensus of opinion on most questions posed and probably the most important question 'do you agree that East Staffordshire needs 13,000 new homes building' was not asked. Why not hold a referendum on the issue?

Para 6.6 All of the questions set out in previous consultations revolve around ESBC facilitating the building of 13, 000 new homes by 2026 and to achieve this it is inevitable that there would have to be significant change in the Borough. However since the last consultation both the (RSS) and Growth Point status have been scrapped and since Growth Point status influenced the number of houses to be built in the (RSS) there can be no justification in maintaining the figure of 13,000 set out in the (RSS). Growth Point money was to provide the infrastructure needed to facilitate the building of 13,000 new homes. Now that Growth Point status has been abandoned where will the funding for infrastructure to facilitate the building of 13,000 new homes come from?

Para 6.8 Building on Greenfield sites was seen as inevitable because there is insufficient Brownfield land to build 13,000 new homes on; again it is felt that 13,000 homes is too high a target. There is also nowhere in this consultation for respondents to give their views on which Greenfield sites should be developed first and this was an accepted requirement expressed in the previous Issues and Options consultation.

Para 6.9 As mentioned before it is felt that the location of employment land should be addressed before locations for housing developments are decided as is the phasing of the creation of new employment opportunities. Why has this not been done?

Para 6.10 It is claimed that the Core Strategy is supported by a number of technical studies.

The Growth Point Programme of Development is no longer relevant.

The Strategic Housing Land Availability Assessment has not been adopted; it does not impact on how many houses are needed

The Settlement Hierarchy has no sound basis other than the size of the villages; it does not establish what facilities and services are available in the villages.

CORE STRATEGY STRATEGIC OPTIONS

Para 7.1

Third bullet point; This constant reference to the (RSS) is confusing. The (RSS) was a 20 year programme starting in 2006, it is not clear if the first 50ha of employment land was theoretically developed between 2006 – 2011 or is it from 2011 to 2016 ? Is ESBC making provision for 200ha over the 20 year period 2011 – 2031 i.e. 50ha per 5 year period, or are they making provision for 200ha over a 25 year period i.e. 40ha per 5 year period?

Fourth bullet point; Again reference to the (RSS) is confusing as the (RSS) specified 80% of new homes were to be built in Burton on Trent which ESBC state they are going to be guided by but in ***Para 4.1 Housing*** first bullet point; it is stated that at least 85% of new homes will be built in Burton on Trent. And in para. 8.10 it states 11,700 out 13,000 which is 90% will be built in Burton on Trent. Which is the correct figure?

Para 7.3 States that the Key Diagram will indicate the broad locations for delivering the housing, employment and other strategic development requirements, but unfortunately the diagrams in the consultation do not indicate the employment locations and, since the relationship of new housing to employment sites is extremely important, it is difficult to see how anyone can form an informed view. This makes the whole consultation impractical.

PLANNING DELIVERY: CORE STRATEGY STRATEGIC OPTIONS

Para 8.1 the most fundamental variable in these Options is the number of new homes wanted in the borough. Why is this not part of the consultation?

Para 8.2 The Settlement Hierarchy does not include the aspirations of the villages nor did it solicit the views of villagers in this respect. Why was this?

Para 8.11 It is totally unreasonable for a development in a 'strategic village' to incur a financial contribution to the regeneration of inner Burton. Any development in a 'strategic village' should provide a contribution towards the amenities, infrastructure and services in that village.

Para 8.13 It is agreed that countryside protection policies need agreeing to bring certainty in decision making on planning applications but it is felt that these policies should form part of this consultation. Why are they not included?

Para 8.15 It is felt that once a settlement has a defined boundary this should only be varied by a majority vote in a local referendum in accordance with the Localism Bill. Can this be incorporated into the Core Strategy?

Para 8.16 Reference to PPS3 seems pointless when it is very soon to be replaced.

As general comment to all three proposals Rolleston on Dove Parish Council only feel qualified to comment on the site allocations in Rolleston :-

In all three Options the old Forest of Needwood High School's playing field is the only land put forward for development. If we have any choice we believe that this field should be returned to its former condition as it was the best level playing field in the area and, once built on, will be lost forever as a playing field.

We also believe that there is inadequate access to this site from either Walford Road or Forest School Street.

It has always been ESBC's aim to ensure that the rural villages remain separate and in this respect we would point out that 'Site 4' in Option 1, 'Sites 2, 3 and 5 in Option 2 and Site 5 in Option 3 all reduce the green space between Rolleston and its neighbours.

CONCLUSIONS

Rolleston Parish Council believe that the housing numbers proposed in the Draft Core Strategy are too high by a substantial amount and that development on this scale will do irreparable harm to the quality of life of many existing residents; especially to those in the 'strategic villages'.

They believe that the choice of these villages and the whole idea of 'strategic villages' as service centres is wrong.

They believe that growth in housing must be preceded by improvement in infrastructure and increase in employment opportunities.

The Draft Core Strategy contains numerous examples of ambiguity, and rests on a large assumption of in-migration. It has a major weakness by not addressing the unemployment issues of the existing population before increasing competition for jobs from in-migration, and is vague in its method to attract business investment to provide jobs for the in-migration.

The Draft Core Strategy should address the creation of employment which will then lead to planned growth in demand for housing.

Rolleston Parish Council believe wider consultation with existing populations in the areas proposed to be affected should take place, with consideration given to a referendum on the issue, because the Strategy if implemented will by its' nature forever change the landscape of the housing and employment in the area and the quality of life for the current populations.