

# Rolleston on Dove Parish Council

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22<sup>nd</sup> November 2012

Mr J P Malkin Planning Delivery East Staffordshire Borough Council The Maltsters Wetmore Road Burton on Trent Staffordshire DE14 1LS

Dear Mr. Malkin

# **Revised Planning Application P/2012/00636**

# Outline Application for 100 houses on the former Burton College Playing Fields in Rolleston on Dove

Rolleston on Dove Parish Council (RODPC) would like to register its opposition to this revised application for a variety of reasons and whilst the main body of the objections are similar to those raised against the original scheme there are some significant additions.

## Prematurity

With the changes in the planning system, it is now more important than ever that the plan making process is given a reasonable opportunity to establish the strategic principles for the Borough. ESBC is in the process of formulating its Local Plan which is intended to determine how the borough will develop during the next 19 years. At present ESBC are considering the various representations made to their "Preferred Options" consultation.

RODPC responded to this consultation explaining that the information gained through their own consultations throughout the village as part of the information gathering process for their Neighbourhood Development Plan (NDP) clearly showed that the application site was not a preferred site for development instead it should be designated a protected green area and returned to it's former use as a sports field.

Therefore RODPC believes this application should be deferred until the Local Plan is adopted or at least has been subject to independent examination in public and considered to be sound by an inspector. If deferring this application is not considered to be an appropriate option for ESBC, then the application should be rejected. Such grounds have recently been established through decisions made by the Secretary of State.

- 1. Appeal by Wainhomes Holdings Ltd. Land at Treverbyn Road, St. Austell, Cornwall (DCLG ref: APP/D0840/A/10/2130022), 31<sup>st</sup> October 2011. The Secretary of State specifically stated that granting planning permission would "deny the local community the opportunity of determining its preferred choice of housing sites".
- 2. Appeal by Fox Strategic Land and Property. Land off Abbey Road and Middlewich Road, Sandbach, Cheshire (DCLG ref: APP/R0660/A/10/2141564), 29<sup>th</sup> September 2011. The Secretary of State said that "....allowing the appeal in advance of establishing the appropriate level of future housing provision across the Cheshire East would pre-empt decisions on revised settlement boundaries before current uncertainties with regard to population growth and distribution can be settled in a statutory planning context." Such a situation is certainly comparable with the current position ESBC is at in its plan making process.

With the introduction of the Localism Act the Government has indicated its desire for local people to be far more involved in how their communities develop than ever before and to facilitate this, amongst other methods; they have created Neighbourhood Development Plans. RODPC has fully embraced this initiative and is progressing well with the preparation of their draft Plan. To show its commitment to neighbourhood planning the government has allocated £50 million by way of grant funding to help with costs involved in producing them and RODPC has been awarded £20,000 for this purpose. If a development the size of this application were to be approved in Rolleston before the NDP is completed it would destroy the principle of localism in the village, mean that all of the work and expense involved in producing a NDP would have been a waste of time and money and consequently be at odds with Government policy. For this reason prematurity is a significant issue which contributes towards RODPC's view that the application should be refused.

The application is for 80% of the housing allocation made for Rolleston in the "Preferred Options "which destroys the concept of localism in the village. This allocation is subject to challenge in RODPC representations to the "Preferred Options" consultation.

WE now address the extant planning policies of relevance from the East Staffordshire Local Plan.

## **Saved Policy NE1**

Saved Policy NE1 states "Outside the development boundaries shown on the Inset Plans planning permission will not be granted for development unless it cannot reasonably be located within them and is either;"

- *a) "Essential to the efficient working of the rural economy"* which this application is not
- b) "Development otherwise appropriate in the countryside" which this application is not
- c) "Development close to an existing settlement and providing facilities for the general public or local community which are reasonably accessible on foot, by bicycle or by public transport" This application provides no facilities for the general public whatsoever, in fact it specifically excuses itself from providing any new facilities claiming there are enough in the immediate locality already.

Saved policy NE1 then states; "*Proposals falling into one of these categories will be judged against the following criteria;*"

- a) "The proposed development must not adversely affect the amenities enjoyed by existing land users, including, in the case of proposals for development close to an existing settlement, the occupiers of residential and other property within that settlement" At present the application site is used extensively by dog walkers joggers etc. who will be adversely affected by this proposal should it be approved.
- d) "Landscaping associated with the proposal takes into account both the immediate impact and distant views of the development" It is claimed that the trees screening the view from Craythorne Road will conceal the development but in reality with the trees being deciduous, for six months of the year they will not have any leaves so they will provide very little screening. For a proposal of this significance and location, the only effective screening would be using evergreen trees.
- e) "Access roads can accommodate traffic likely to be generated by the proposed development in terms of number, size and type of vehicles whilst meeting the needs of cyclists and pedestrians too" The college claim that Forest School Street and Ealand Street have been designed to accommodate the increase in traffic, this point is contested. When the college obtained outline planning permission for the former campus site it was for 60 dwellings, the developer then redesigned the site and built 89 dwellings, so resulting in a significant increase in traffic along this proposed access route this means the college had no input into the design so are not qualified to make such claims. Also the former campus site was designed under the now abandoned principal of " if sufficient parking spaces per house are not provided then residents will not buy cars" It is apparent that the residents have bought more cars than the development was designed for which results in a huge amount of on-street parking. This on-street parking coupled with the narrow twisting roads will make it extremely difficult for Lorries carrying materials to the proposal site. It is also likely to prevent emergency vehicles from accessing all the development.

It is therefore proposed that the application fails to meet Saved Policy NE1 on 6 counts.

# Saved Policy BE1

This policy concerns good design and details various parameters that are considered when an application is determined Paragraph (e) states *"How the height of the proposed development relates to the height of surrounding development and any vistas, views or skylines."* This application will be extremely visible from Craythorne Road as it is being built on the highest ground in the area and will adversely affect the skyline. Rolleston on Dove Village Design Statement advocates that there should be no building on the tops of hills affecting existing skylines. It is therefore contrary to this guidance which is also proposed to become policy within the emerging Rolleston Neighbourhood Plan

## Saved Policy H2

Saved Policy H2 details ESBC's position on 'Large Windfall Sites' which the application would be if permitted. This Policy states " *Greenfield sites will not be permitted unless it can clearly be demonstrated that the Structure Plan requirement cannot be met through use of sites on previously developed land*" No attempt has been made to demonstrate that the Structure Plan cannot be met with the sites already included in the 5 year supply.

This site does not form part of the 5 year supply which has been demonstrated by ESBC, therefore there is no need to permit it.

# **Saved Policy H6**

Saved Policy H6 is concerned with Housing Design and Dwelling Extensions and states that permission will not be granted for developments that amongst other things have an adverse effect on loss of amenity space and vegetation, and intensification of traffic. This application will effectively remove 5 hectares of amenity space and vegetation from the local residents use. A use that they have enjoyed, completely unhindered for many years. It will also increase the amount of traffic using the existing, very poorly designed, roads adjacent to the proposal to unacceptable levels.

Policy H6 also states "The Borough Council will require all housing sites to be designed to take account of the needs of people with disabilities in accord with the site's characteristics and will negotiate agreements to ensure that at least 10% of houses on sites of 20 houses or more will be constructed to Lifetime Home standards as set out in Supplementary Planning Guidance" There is no provision within this application for any dwellings to be constructed to Lifetime Homes standards therefore RODPC believes that the application does not satisfy Saved Policy H6. In the absence of this provision, the applicant should provide a viability assessment demonstrating that the scheme is unviable because of such requirements. However, no such assessment has been provided

## Saved Policy H12

Saved Policy H12 states "Within defined development boundaries on sites with a capacity of 25 or more dwellings, the Borough Council will negotiate for the inclusion of an appropriate element of affordable housing where a need for such housing is shown to exist. Such housing should address any particular needs identified in any adopted Housing Need Survey as may be updated from time to time. Any affordable housing will be subject to binding arrangements to secure its continuing occupation by those who need it" The application claims any determined housing need for residents of Rolleston should be discounted because it would reduce the value of the application site. This is one of the most arrogant and selfish statements that RODPC has ever seen in a planning application. There is a need for 9 affordable/shared ownership houses in Rolleston. This need was established by the housing needs survey commissioned by ESBC and carried out by Midland Rural Housing 3 years ago. RODPC believes that any affordable housing built in the village should be reserved for existing residents or people with proven links to the village. Since the potential value of land is not a planning consideration but the provision of affordable housing is RODPC believes this application fails to satisfy saved Policy H12. If this application, making such an argument, were to be approved with zero affordable housing, then it would set a precedent that other developers would undoubtedly be keen to follow.

## Saved Policy L1

This policy was introduced to protect existing sports pitches and green spaces. The application states that the application site is "unused". Whilst it is accepted that it is unused for formal sporting activities this is because the applicant will not give permission for this use. There have been several attempts to obtain permission from the applicant to use this site by several groups and organisations but all have been refused.

So whilst it is true to state that site is "unused" for formal sporting activities it is not true to claim that no one wants to use it for such. The applicant has stated that if they allowed the site to be used for sporting activities it could compromise their ability to sell it at a future date.

It is not true to say the site is "unused" as it is used constantly by people walking their dogs and joggers etc. If required evidence can be produced to substantiate the amount of use the site is currently subject to. The applicant states that anyone presently using the site is trespassing but there is a covenant in the deeds requiring the applicant to fence off the site. The chain link fencing along the southern boundary of the site has been broken down for decades and the applicant has never tried to repair it. There have never been any notices forbidding entry to the site therefore it is reasonable for the current users of the site to believe they do so with the full knowledge and agreement of the applicant.

There is a need for more sports pitches in East Staffordshire and RODPC believes it would be an extremely neglectful decision not to bring this sports ground back into the use it was compulsorily purchased for.

#### **Brownfield/Greenfield Land Release Policy**

Last year ESBC adopted a Policy to provide guidance in determining planning applications until such time as its Core Strategy was in place. This Policy considers how applications should be judged both when ESBC can show a 5 year supply of deliverable housing sites and when it cannot.

This Policy states that if the Council can demonstrate a 5 year supply of deliverable housing sites the following conditions apply "Greenfield sites for housing will not be permitted, unless there are exceptional circumstances. These circumstances are likely to be either (i) a rural 'exception site' for 100% affordable housing, in accordance with Local Plan Policy H12 para. 30, or (ii) a large strategic Greenfield site meeting the tests set out in paras. 5 and 6(a - j) below and therefore where there are overwhelming reasons to set aside the 'Brownfield first' principal'' The applicant has not demonstrated that there are no deliverable, sustainable brownfield sites or combination of several deliverable, sustainable brownfield sites within the community. The applicant has defined 'community' as being anywhere that their students live which is clearly not any reasonable person's understanding of the term.

The applicant has not shown sensitivity to the landscape as his proposals are visible from surrounding areas.

The proposal would, if approved, create a prominent urban salient being obtrusive and highly visible in the landscape.

RODPC believes the application does not comply with ESBC's Brownfield/Greenfield Release Policy.

#### **Size of Proposal**

Recently ESBC has consulted on its "Preferred Options" which detailed how it would like to see the Borough develop over the next 19 years. Part of this consultation indicated that ESBC proposed that Rolleston should be allocated 125 houses.

It would therefore seem to be most unreasonable that 80% of this allocation is to be provided in the first year or so of the Plan period.

RODPC have replied to the Preferred Options consultation suggesting that an allocation of 125 is too large for a village with such few services and are hopeful of a lower figure replacing the 125.

## **Surface Water Flooding**

There is a history of surface water flooding from this application site since the former campus site was developed. The last occurrence was on 21<sup>st</sup> November 2012, the fourth this year, when surface water from this site discharged onto the public open space part of the campus site development this then flooded the Parish Council owned Meadow View Open Space and eventually the garden at 23 Meadow View. To date no one has accepted responsibility for this flooding and until such time as the cause is established and rectified RODPC believes development in this area should not be considered.

The application is extremely vague as to where the surface water collected in the balancing pond will discharge. The letter from Severn Trent Water dated 16<sup>th</sup> November 2011 in the Flood Risk Assessment suggests that the pond will discharge into the culverted watercourse subject to permission being granted by the riparian owners. RODPC is the riparian owner of the culvert and to date no application to connect to it has be received. This culvert carries water from a very significant area and no calculations have been included in the application to show that there is capacity within this culvert for this additional water. The Environment Agency have suggested that they would expect to see the calculations justifying that the culvert is large enough and the results of a survey on the culvert to show that it is not blocked or damaged.

## **Revised Flood Risk Assessment**

It is noted that the volume of water to be stored in the balancing pond and the supplying pipework is 2,199 cubic metres which represents just less than 37mm of rainfall over the whole site. Given that as a result of climate change an additional allowance of 30% has to be included in rainfall calculations this equates to 26mm of rainfall over the whole site excluding climate change. Our question is what happens when there is too much water for the balancing pond to handle? If the only answer is that the Parish Council land is flooded then we believe that this is totally unacceptable.

Regardless of what the Environment Agency or Severn Trent say we would point out that as the planning authority you are ultimately responsible for your actions of allowing the various developments within the borough. As the responsible authority we would ask for your comments on this recent example...on Tuesday 20<sup>th</sup> November 2012 Rolleston experienced several hours rainfall which would have filled most of the surface water storage capacity on the application site.....on Wednesday 21<sup>st</sup> November Rolleston and the surrounding area experienced another 40mm of rainfall which flooded parts of the village including the Open Space at Meadow View. 40mm of rainfall on a 6 hectare site equates to 2,400 cubic metres. As a result of the Tuesday's rainfall the balancing pond would still have some water in it so where would Wednesday's rainfall be stored given that it is greater than the total volume of storage capacity proposed.

This aspect alone means the proposal is unsustainable.

RODPC are puzzled how the volume of stored water has reduced from the original flood risk assessment even though the narrative states that there is a need to store a greater volume.

RODPC are also very concerned that it is proposed to discharge 24 litres per second of "new" water into a watercourse that already fails to cope with the current volume and results in flooding Parish Council land and subsequently 23 Meadow View.

To be clear at present the surface water from the application site was designed to be collected in a pond with a manhole type sump which feeds a land drain running down the side of the old school site. It did not discharge into the existing ditch or culvert. There is no existing pipework discharging into the ditch from either the Westbury estate open space or the college application site. The only surface water entering the ditch and Parish Council owned land from the Westbury estate open space and the college application site is as a direct result of the existing drainage system being damaged during construction of the estate and associated paths. This water is causing the Parish Council owned land and 23 Meadow View to flood and needs stopping whether this application is permitted or refused.

## Highways

The applicant states that Ealand Street and Forest School Street were designed to accommodate the additional traffic generated by the proposal. There is no way that the college knew what design principles were used in laying out the road network after they sold the land to Westbury Homes. When the college campus site was designed it was based on the principal of not providing very many car parking spaces thereby encouraging residents not to buy cars. This policy has now been scrapped as it did not work. The application site will therefore attract far more cars than was originally envisaged by the previous failed policy and these additional cars cannot have been included in the original design.

Also as a result of the existing car parking space provision being totally inadequate there are a very large number of cars parked on the estate roads. This has the effect of restricting traffic flow and making it impossible for some larger vehicles to actually gain access.

RODPC would dispute that the existing access roads have been designed to accommodate the expected increase in car journeys that will be generated by the proposal.

#### **Transport Assessment Addendum**

This is the most desperate document RODPC have seen for some time. In paragraph 2; 10 it acknowledges that there are problems with the design of the existing estate through which it is proposed to access the proposal site then Section 4 proposes various modifications to the existing road layout including introducing a new feature mini island where Eland Street joins Forest School Street. No attempt to justify these modifications is made other than to enable the proposal site to be accessed.

Section 3 criticises the existing residents for parking on the pavements and in Section 4 indicates that refuse Lorries will only be able to access the proposal site by driving on the pavements.

Section 1 states that the conclusions they have made about the existing residents parking habits were made following one 2 hour survey undertaken between 4-00 and 6-00pm one afternoon. No attempt has been made to establish how many cars are owned by residents of the existing Westbury Estate apart from using average car ownership statistics for the village as a whole when it is fairly obvious given the values of the property on the existing development that the residents would not fit this average classification.

An assumption has also been made that everyone living on the existing estate would be home by 6-00pm; this is just unrealistic in today's business environment.

## **Travel Plan**

Unfortunately the Travel Plan is designed for Utopia not Rolleston on Dove. It is also disappointing that the author of the Plan did not do his homework and establish the names of the roads in the village as it confuses Station Road with Dovecliffe Road.

The Travel Plan is very specific about the appointment of a Travel Plan Coordinator (TPC) who has very specific duties and responsibilities but it is not clear who will pay for the TPC or for how long the TPC will be employed.

One thing the Travel Plan does not make clear is that the village shops are more than 2km from the application site meaning residents will use a car to go to the shops and exacerbate an already unacceptable parking problem in the village.

#### **Range of House Types**

The application does not include any terraced houses or bungalows. RODPC believes that any development of this size should include a full range of house types in keeping with the vernacular, i.e. either one or two storey dwellings. The analysis for the Neighbourhood Plan also shows that the greatest increase in new residents in the village will be people of retirement age. Such people will need bungalows and other small properties appropriately built to Lifetime Standards. This development does nothing to provide for the housing needs identified by ESBC and reaffirmed locally within the emerging Neighbourhood Plan.

## **Public Open Space**

RODPC is most unhappy that almost all of the usable public open space is taken up by the proposed balancing pond. In practice this means that for a lot of the time this area will be unusable. The application states that the balancing pond will be one metre deep with sides that slope at a one in three gradient. The drawings indicate a wet area measuring approximately 15 metres by 20 metres and overall pond dimensions of 70 metres by 45 metres. This would suggest that the wet area should actually be 64 metres x 39 metres meaning that the drawings are misleading in this aspect. It also means that the majority of the public open space is virtually unusable therefore it should not be considered as such.

A large proportion of the public open space provided by this development is the narrow strip adjacent to the site boundary which will be of no amenity value whatsoever and should not be included in calculations for the area provided.

RODPC believes that this application fails to provide adequate useable public open space and believe it is not acceptable for the size of useable open space to be less than recommended in ESBC saved Policies because of the proximity of Parish Council owned land. The applicant and ESBC have absolutely no control over this land and therefore should not make assumptions about its continued use.

# **Community Gain**

The applicant was gifted this site and the site of the previous college campus which was developed in the last decade. When the college campus was developed the College built a sports hall in Shobnall Fields. This sports hall was supposed to replace the facilities 'lost' in Rolleston as a result of the College moving out.

What the village actually 'lost' was

- An evening education establishment
- A swimming pool
- A running track
- A number of tennis courts several cricket nets
- A football pitch
- A rugby pitch
- An athletics field
- Some basketball courts
- A hall which hosted dances and concerts
- A community centre

In its place the College provided the community with the use of a sports hall several miles away at times when the College did not want to use it and as long as it was not pre-booked by someone else. No new sport pitches or swimming pool was built. So in reality, this application and whatever community benefits it purports to provide should be assessed against this level of provision and within the context of an overall shortfall of sports facilities in the Borough.

This application suggests that the village will gain a public open space and the adopting authority will be given a sum of  $\pm 50,000$  to maintain it. There have been no discussions with RODPC relating to the adoption of this land and since ESBC is in line to adopt the public open space from the campus site development it would be logical for them to adopt this new public open space as well. This means Rolleston will benefit by having a muddy area to use and nothing else.

There is also the sum of £50,000 being offered for play equipment but the applicant acknowledges that Rolleston is very well equipped in this area and it has been suggested that this play equipment could be provided anywhere in the borough. This would not comply with the Community Infrastructure Regulations 2010 which now place the tests of a planning contribution in law. Any contribution has to be directly related to the proposed development, which the provision of play equipment elsewhere in the borough clearly would not.

There is no suggestion of any added facilities or amenities in Rolleston which will properly mitigate the impacts of the proposed development on the existing community.

So once again the College is proposing that Rolleston gets no benefit whatsoever from another large development in the village. RODPC believes this to be contrary to the basic principles of planning and not in keeping with NPPF

## Sustainability

The application does not attempt to demonstrate a need in Rolleston for 100 houses, all it seems concerned with is selling the application site for as much money as they can, and because they claim they have a need for the monies raised to finance their 5 year plan. This is not a relevant planning issue so must be disregarded.

RODPC is in the process of producing a Neighbourhood Development Plan and as part of its consultation process have distributed questionnaires to all dwellings in the village. We have received almost 600 questionnaires back and 71.5% of those suggest that Rolleston has a requirement for up to another 50 houses during the emerging Local Plan period.

Within the Sustainability Appraisal submitted with this application are a number of controversial statements;

- Paragraph 1.1 claims the landscape will not be adversely affected by the development. RODPC believes that by building on the highest ground in the area it will be.
- Paragraph 2.1 claims the site presently has no use and is redundant. In fact the site is used extensively for recreational purposes including jogging, dog walking, kite flying etc. The only reason that it is not used for formal sports activities is because the applicant refuses to give permission. RODPC believes the site is used and is not redundant.
- Paragraph 3.1 informs of the Green Travel Plan but does not explain who will be financing the Travel Plan Coordinator or their expenses. RODPC believes the Green Travel Plan is aspirational rather than realistic.
- Paragraph 3.3 claims a positive grading for cycle access however Station Road is not suitable for young children to ride cycles on. It is the main road through the village and always has a large number of parked cars reducing the carriageway to a single lane. RODPC does not believe Station Road is suitable for young children to ride cycles on.
- Paragraph 3.4 claims the village has a very good bus service where in fact it is not possible to travel to The Queens Hospital by public transport without changing buses. Indeed it has recently been announced that the bus service from Stretton to The Queens Hospital is to be withdrawn making the journey there from Rolleston by public transport even more difficult.
- Paragraph 4.1 states the site will not flood. Unfortunately the site is responsible for flooding adjacent land and properties a matter that should be addressed before the site is even considered for housing.
- Paragraph 6.1 is not a planning matter and should have no relevance to the sustainability of this application.
- Paragraph 8.1 the housing mix on the indicative layout does not include terraced houses or bungalow so does not cater for the lower paid or elderly.
- Paragraph 8.2 there is an established need in Rolleston for affordable housing but this application totally discounts this need which is a saved Policy in ESBC Local Plan
- Paragraph 9.1 there two shops within the 2km accepted walking distance of the application site, a butcher and florist, with the newsagent, post office and grocery store all being outside of this distance when the actual route is measured.

RODPC does not believe that the applicant has demonstrated that the application site is sustainable.

#### **Preferred Use of Application Site**

The application site was the best sports field in the area and should be returned to this use. It has herringbone land drainage pipes laid over it and could facilitate several sports at the same time. When the former campus site was developed it was claimed that the College provided alternative sports facilities at Shobnall recreation ground. The truth was that a sports hall was built, but there were no new sports pitches created and in fact some recreation ground at Shobnall was lost where the sports hall was built. None of the sports that were enjoyed at Rolleston were replicated at Shobnall so the borough actually had a net loss in sports facilities.

ESBC's emerging Local Plan is predicting an increase in population of 16,620 by 2033 an increase of 15% so basic logic dictates that there should be more sports and recreation facilities created to deal with the inevitable increase in demand, not less, which logically would suggest this existing sports facility should be returned to sports usage. Given the difficulty in financing new facilities and the land for them, missing such an opportunity would be highly wasteful.

#### **Comments on Indicative Layout**

The indicative layout would appear to be very old fashioned in its concept with long straight roads, no connectivity between areas and with large expanses of unbroken brickwork whereas in Rolleston generally there are trees everywhere. The front gardens on the indicative layout are not large enough to accommodate trees that will grow to any significant size. The public open space is located outside of the developed area instead of being an integral part of it and is largely unusable.

#### **General Comments**

RODPC finds it very disappointing when the application departs from the truth to try and make points that support the application. For instance to claim that this site was the only site to be included in all three options of the Draft Pre Publication Strategic Options is simply untrue. There were sites in Rocester and Tutbury which were in all three options.

Drawings 04C and 06B both indicate the existing children's play area to the west of the existing tarmac path when in fact it is to the east of the path in line with the kerbs on Forest School Street. This is an extremely dangerous location for a play area and would never have been permitted had the proposed development been built at the same time as the development on the old campus site.

RODPC does not understand how in some sections of the application it is claimed that the boundary treatment to the south of the site will screen the development from view when drawing 06B indicates the houses adjacent to this boundary are "properties with views." It is impossible for both statements to true.

Drawing 04C includes a Partial Indicative Street Scene, whilst accepting that all images on the submitted drawings are indicative only RODPC believes it is a fundamental requirement that drawings should be compatible with each other. We cannot identify where the street scene is supposed to be. There are far more trees indicated on the street scene than there are on the plan views.

If the argument put forward by the applicant is accepted, i.e. that is that they should be excused from complying with saved Local Plan Policies because all of the money raised by the development would be used for the benefit of the wider community, a large percentage of whom do not reside in East Staffordshire, what is to stop other developers using the same argument as a precedent would have been set?

The college claim to need £7 million to complete their five year plan part of which is to double glaze some existing buildings. This type of work is classed as "maintenance" and as such should be paid for with their Revenue account not their Capital account, therefore monies raised from the sale of assets should not be used for this purpose.

Section 2.2 in the Design and Access Statement there are details of the applicant's "Involvement and Consultation" with RODPC and the community. It is disappointing to note that within some letters obtained via a Freedom of Information Request the applicant's agent suggests laying "bait" for the Parish Council. RODPC understood that they were taking part in a completely open discussion when they met the College's representative and are most concerned that they now find that this was not the case.

The public meeting hosted by the College could only be described as a handover of information to the community from the College. The College's representatives were arrogant, rude, patronising and did not want to listen to criticism of their ideas. Moreover none of the suggestions made have been incorporated in the final proposals. NPPF policy states that applications which demonstrate how they have taken on board the suggestions, made as part of genuine pre-application consultation, should be considered favourably. This clearly was not the case and therefore the opposite must apply, particularly given how blatantly this application flies in the face of the now-established principles of localism.

## **Conclusions/Summary**

RODPC believes this application should be refused for the following reasons;

- The application is premature
- The application does not comply with a number of the saved Policies in the existing Local Plan
- The application does not comply with ESBC Brownfield/Greenfield Land Release Policy
- The size is far greater than the housing need in Rolleston
- The site is responsible for flooding other land
- The highway layout of the access roads are not suitable to be subjected to the amount of traffic that would be generated by the proposal
- The Travel Plan is totally unrealistic nor is there an allowance made to fund it
- The mix of proposed house types is not broad enough
- The proposed public open space is totally inadequate with significant parts being unusable
- There is no community gain for the village of Rolleston on Dove

- The proposed SUDS system is totally inadequate making the proposal unsustainable
- The site should be returned to being a sports field to meet the inevitable increase in demand for recreation that will arise due to the projected population increase
- The proposed layout is very poor and old fashioned and will form a prominent salient that will be visible on the skyline from surrounding areas

Yours Sincerely

Heidi Light Clerk to Rolleston on Dove Parish Council