



Rolleston-on-Dove Parish Council

**Representations on the East
Staffordshire Local Plan
Preferred Options**

Navigus Planning

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CONTENTS

1	INTRODUCTION	1
2	OVERALL STRATEGY	3
	Strategic matters.....	5
	Phasing	10
3	ROLLESTON’S ROLE WITHIN THE SETTLEMENT HIERARCHY	11
	General approach	11
	Settlement hierarchy methodology	13
4	SCALE OF GROWTH FOR ROLLESTON	17
	General approach	17
	Proposed levels of growth for Rolleston-on-Dove.....	17
5	LOCATIONS FOR GROWTH IN ROLLESTON	19
	College Fields site.....	19
	Preferred locations for growth	20

Appendices

Appendix 1 Letter from 1st Rolleston Scout Group

1 INTRODUCTION

- 1.1 This document forms representations from Rolleston-on-Dove Parish Council in respect of the East Staffordshire Preferred Options Local Plan consultation (also referred to as the 'emerging Local Plan').
- 1.2 **The Parish Council wishes to register its objection to fundamental parts of the emerging Local Plan as currently proposed.** These objections principally concern the consideration of strategic matters relating to the Strategic Villages, with particular focus on Rolleston-on-Dove.
- 1.3 We do not consider that the emerging Local Plan has prepared with sufficient care, nor is the evidence base sound and positively prepared. Paragraph 182 of the National Planning Policy Framework (NPPF) states that a plan must be:
- **Positively prepared** such that it seeks to meet "...objectively assessed development and infrastructure requirements";
 - **Justified** as "the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence"; and
 - **Consistent with national policy**, namely the NPPF.
- 1.4 It is considered the document fundamentally fails these tests.
- 1.5 In summary, the objections of the Parish Council are as follows:
- The overall strategy presented in the emerging Local Plan is confused, illogical and inconsistent with the subsequent policies.
 - There is a total lack of justification for the settlement hierarchy proposing the four strategic villages that it does. The methodology seeks to be spuriously accurate and lacks any form of robustness. The final thresholds for defining whether a village is in Tier 1, 2 or 3 simply uses neat, rounded figures plucked out of the air.
 - The emerging Local Plan considers the scale of growth in the Strategic Villages to be a strategic matter yet it fails to justify why the Strategic Villages are essential to the delivery of the strategy, and so a strategic matter.
 - The emerging Local Plan considers the allocation of the College Field site in Rolleston-on-Dove to be a strategic matter yet it fails to justify why this site is essential to the delivery of the strategy, and so a strategic matter. The threshold of 100 dwellings for a site to be arbitrary does not follow good planning practice and uses a totally arbitrary figure.
 - The allocation of the College Fields site would be contrary to Policy SP7 because of the loss of open space that it would result in.
 - The emerging Local Plan makes reference to the importance of neighbourhood planning yet fails to give the community the necessary scope to address the issues of local importance themselves. The community of Rolleston-on-Dove has undertaken its own sites exercise and has determined that there is potential to deliver approximately 85 dwellings on sites which the community support. This demonstrates its commitment to growth, but growth shaped by its community through the neighbourhood plan process.
 - Rolleston-on-Dove is a village where the facilities which genuinely signify a village with potential to sustain growth are either absent or at capacity. The emerging Local Plan and its evidence base totally fails to consider the capacity of the villages to accommodate growth, a

point acknowledged in the updated Settlement Hierarchy. It therefore lacks credibility and robustness when it seeks to direct over 600 net additional dwellings to just four of these villages over the plan period.

Approach to consultation

- 1.6 The emerging Local Plan makes the commitment to “increase neighbourhood input to policies and proposals in the Local Plan”. Yet this consultation has done no such thing.
- 1.7 The documents being consulted on are large and complex. A considerable amount of terminology is used throughout, with little proper attempt to make this understandable to the layman. No instructions are provided on the method of commenting, no manual forms are available for comments and the portal requires people to register using an e-mail address which many residents of Rolleston-on-Dove do not have. Without the community working together through the Rolleston-on-Dove Neighbourhood Plan, it would have been extremely difficult for the Parish Council to accurately reflect the views of the community.

2 OVERALL STRATEGY

2.1 The overall strategy presented in the emerging Local Plan is confused, illogical and inconsistent with the subsequent policies.

2.2 The overall vision for the rural areas is presented in paragraph 4.16. It states that:

"Rural Areas will have viable, attractive villages and smaller settlements which will continue to foster appropriate, sensitive growth and vitality to support rural living and work. The larger villages will be the rural centres for services, facilities and jobs acting to sustain the rural areas."

2.3 The Parish Council makes the following observations:

- The proposed strategic allocation of the College Fields site in Rolleston-on-Dove in no way can be described as representing 'appropriate' or 'sensitive growth'.
- As a larger village, Rolleston-on-Dove is not a rural centre for services and facilities, as we shall demonstrate in this chapter. It provides basic services and facilities which serve only some, but not all, of the basic needs of the immediate population of the village, as opposed to any wider hinterland.
- Rolleston-on-Dove provides only a small number of jobs and certainly could not be described as a 'centre' for employment. In addition, the settlement hierarchy methodology fails to acknowledge the number or type of jobs provide in the village, so there is no acknowledgement of this issue in determining which villages should accommodate growth.

2.4 The emerging Local Plan then presents a series of strategic objectives. We assess these against the proposals for Rolleston-on-Dove:

2.5

Objective	Parish Council response
<p>Objective 1: Cohesive communities</p> <p>"To develop green infrastructure led strategic housing growth leading to the creation of well designed communities that relate to existing urban forms, provide accessible green space, services and facilities and present opportunities to create individuality, community cohesion and well-being, whilst protecting and enhancing sensitive environments."</p>	<p>The proposed strategic allocation of the College Fields will not be green infrastructure led. In fact, it will result in the loss of a significant green infrastructure asset used and greatly valued by the community. It will provide no new accessible green space by way of mitigation. As a result, it will serve to have a detrimental effect on community cohesion.</p>
<p>Objective 3: Housing choice</p> <p>"To provide a mix of well designed, sustainable market, specialist and affordable homes that meet the needs of existing and future residents and respond to the ongoing and expected population change in the Borough."</p>	<p>The Borough Council proposes generic policies on matter such as affordable housing, and has no policies to direct the mix of housing. The Rolleston-on-Dove Neighbourhood Plan is gathering evidence to put in place policies which will deliver what is needed locally.</p>

<p>Objective 4: Accessibility and transport Infrastructure</p> <p>“To ensure that new development will be supported by high quality transport infrastructure and designed in a way that reduces the need and desire to travel by car through encouraging the use of public transport, walking and cycling.”</p>	<p>The proposed strategic allocation of the College Fields will not provide any contributions towards improving the existing public transport services. The current planning application provides no reasonable contributions towards improving the sustainability of the village or community facilities generally.</p>
<p>Objective 5: Neighbourhood Planning</p> <p>“To ensure local communities have opportunities to help plan their own neighbourhoods and positively and sustainably shape where development is located.”</p>	<p>This objective is fundamentally at odds with what is in the strategy. The College Fields site is not a strategic site and yet, in allocating it, completely fails to allow the community to ‘positively and sustainably shape where development is located’ through its Neighbourhood Plan. This is the same Neighbourhood Plan which the Borough Council has supposedly committed to by seeking and successfully accessing Government funding through the Front Runner programme.</p>

- 2.6 On the last objective regarding neighbourhood planning, it is also noteworthy that the emerging Local Plan has acknowledged the Borough’s Sustainable Community Strategy and the particular need to ‘focus on matters at a neighbourhood level’ and recognise that ‘individuals want to get involved in helping to shape their future’. The stated Local Plan response is to ‘increase neighbourhood input to policies and proposals in the Local Plan.’
- 2.7 However, it is well known that communities rarely engage in plan-making at the borough level and the Borough Council has done nothing different to suggest that they would increase these levels of engagement. The way that people will engage – and are engaging – in Rolleston-on-Dove is through the neighbourhood plan process. However, at a stroke, the proposed policies in the emerging Local Plan will serve to almost completely eliminate this willingness to engage because they will take out of people’s hands the very issues that are important to them and which they were led to believe would be up to them as part of the production of a neighbourhood plan.
- 2.8 The Planning Advisory Service provides guidance to local authorities on neighbourhood planning and its relationship with the emerging Local Plan process¹. It says the following:

“If you don’t have an up-to-date local plan, you will need to work closely with your community groups to develop neighbourhood and local plans in tandem to minimise any possible conflict between the two.

For example sharing your evidence bases, undertaking joint engagement work. You will need to make clear to your communities the respective roles and relationships between the two processes.”

¹ <http://www.pas.gov.uk/pas/core/page.do?pagelid=2497081>

- 2.9 It is quite clear that the Borough Council has failed in its duty to work closely with Rolleston-on-Dove Neighbourhood Plan Group, despite best efforts. There has been no sharing of evidence bases, nor has there been any form of joint engagement, as there should have been on matters such as housing sites. As a result, the Borough Council has now presented a strategy which, not only was at odds with what had been suggested to Rolleston-on-Dove Parish Council through informal correspondence, but actually seeks to render valueless most of the significant work of the Neighbourhood Plan Group.

Strategic matters

- 2.10 The settlement hierarchy rightly identifies that the main centres where growth is to be directed are Burton-upon-Trent and Uttoxeter. As the Settlement Hierarchy Update, July 2012, notes at page 5, "the rest of the Borough is classed as rural". The adopted East Staffordshire Local Plan does not distinguish between the rural settlements.
- 2.11 Now the emerging Local Plan is distinguishing between settlements in rural areas. It has identified four 'Strategic Villages' to which significant amounts of growth – over 600 dwellings with 450 on strategic allocations - over the plan period. This represents a significant shift in the spatial strategy for East Staffordshire, seemingly driven by the required increase in housing numbers.
- 2.12 This has occurred despite the emerging Local Plan making clear that Option 2 – the preferred option – will have "some limited growth in the rural areas" (paragraph 5.47). Paragraph 5.48 clarifies this:
- "The rural areas need some housing choice to allow communities the opportunity to grow and to ensure that facilities and services such as shops and schools continue to be supported thereby reducing unnecessary travel to Burton and Uttoxeter."*
- 2.13 This was clarified further in the Local Plan Preferred Option Report, written by Borough Council officers to inform the Cabinet meeting of 9th July 2012. This said that the preferred strategy would see "...some **local**, smaller-scale development in villages" [our emphasis]. This is clear that the development in places such as Rolleston-on-Dove is local, not strategic.
- 2.14 Such an approach is broadly supported by the Parish Council and it is these principles that have underpinned the emerging Rolleston-on-Dove Neighbourhood Plan. However, the emerging Local Plan and its evidence base has manifestly failed to justify why, given this aim for the rural areas, it is necessary to identify strategic villages (with high levels of growth) and accompanying strategic allocations in those villages. There is no clarity as to how doing this will enable the strategic delivery of approximately 8,900 dwellings over the plan period.
- 2.15 To add to this, the simplistic approach taken has been to undertake some form of 'sieving' exercise of the rural settlements in order to identify to a 'top four' which are granted strategic village status. Within the context of planning, the term 'strategic' means something **that is essential to the delivery of the strategy**. This is the key test and anything that is not **essential** cannot be considered to be strategic and therefore should either not be included in the plan or, if included, can be contradicted by a neighbourhood plan.
- 2.16 When applying this test to the plan, it falls down in three fundamental areas relating to the Strategic Villages:
- Demonstrating why the villages are essential to the delivery of the strategy.

- Providing clarity over what the strategic function of the villages is.
- Demonstrating how the strategic site allocations within the villages are essential to the delivery of the strategy.

2.17 We shall address all these matters.

Whether the Strategic Villages are essential

2.18 What the emerging Local Plan or its evidence base does not say anywhere is exactly why the Strategic Villages are vital to delivering the spatial strategy. Indeed, the spatial strategy is vague on what its priorities are but it appears that the primary one is the need to deliver the levels of housing required by the plan.

2.19 However, there is no justification as to why the Strategic Villages should take the significant levels of growth that are allocated to them – approximately 2.5 times the levels of growth allocated to the Tier 2 and 3 villages combined. The emerging Local Plan simply says that they are Strategic Villages because they have services and so can support growth.

2.20 What the Preferred Options Local Plan has failed to do therefore is to demonstrate that without the levels of housing allocated to the strategic villages, the strategy could not be delivered. This is the only possible way that the role of the Strategic Villages could be justified. Yet this position cannot be justified. Indeed, the Draft Pre-Publication Strategic Options document, published in August 2011, made clear that the aim was to accommodate at least 85% of the housing requirement in Burton upon Trent. Moreover, this was at a time when the overall housing requirement was significantly higher, so the requirement for Burton upon Trent was higher. The Preferred Options version has failed to say why the position has changed, with Burton upon Trent now accommodating somewhere around 50% of all housing requirements.

2.21 The four options presented in the emerging Local Plan therefore do not represent a realistic range of options because they all considered broadly similar levels of growth in the Strategic Villages. This is shown in Table 2.1.

Table 2.1: Housing levels for the Strategic Villages in the assessed spatial options

Option	Housing requirement, 2012-2031	Requirement per annum, 2012-2031
2a	575	30
2b	500	26
2c	525	28
2d	615	32

Source: Preferred Options Local Plan

2.22 The table shows that all four options are broadly similar, with the annual average housing requirement differing only by six dwellings between the highest and lowest options.

2.23 The Parish Council considers that, with the new housing requirement, the Preferred Options document should have tested a wider range of options. Also, it should have focused more on the strategic allocations around Burton upon Trent to understand whether 85% of the housing requirement could be delivered there.

2.24 On a similar theme, the spatial strategy seems to have been devised through a significant amount of last-minute decisions on what the Borough Council consider to be matters of strategic importance. In particular, the decision-making over which villages were to be allocated as Strategic Villages and what level of growth was to be assigned to each was made very late. Minutes of the meeting between the Strategic Villages Alliance and the Borough Council on 28th March 2012 state that “policy is still being developed around all villages”. Therefore it is not clear how a village can be considered to be of strategic importance if this is only decided at the last minute; it either is or it isn’t and this must be ascertained early on in the process. As if to demonstrate, Abbot’s Bromley has lost its Strategic Village status as a result of the updated settlement hierarchy work, which was only published with the emerging Core Strategy. Strategic policies must be essential to the delivery of the strategy, yet how can it be when these strategic issues around the villages have been determined at such a late stage?

2.25 There is therefore no evidence as to why the Strategic Villages are essential and why a greater proportion of housing cannot be delivered in the urban areas, where it will be more sustainable because it can take advantage of the full range of existing services and infrastructure which are present there.

The strategic function of the Strategic Villages

2.26 It is the Parish Council’s belief that the emerging Local Plan and its evidence base lacks any evidence to demonstrate how or why Rolleston-on-Dove is capable of performing a strategic function that is essential to the delivery of the overall spatial strategy.

2.27 The spatial strategy contained in the emerging Local Plan fundamentally fails to provide clarity on what the criteria are for a strategic village as opposed to a local service village or a small village. Paragraph 5.138 states that, “The Preferred Option seeks to deliver some growth in the rural areas to ensure that existing facilities and services are supported.” This isn’t a strategic matter, this is seeking to ensure that local services are maintained.

2.28 Policy SP1 states:

“In rural settlements, the scale of development will reflect the settlement’s size and function, to meet its identified needs and its immediate area... Strategic villages can accept strategic growth to support facilities and services.”

2.29 So all rural villages, be they Tier 1, Tier 2 or Tier 3, therefore have the same policy requirement, namely to meet the needs of the village and the hinterland that it serves. For the Strategic Villages, there is no difference, yet the policy then says that these villages are able to support strategic growth. There is no clarity provided on what constitutes a ‘strategic’ village.

2.30 So if there has been no logical and coherent way in which the functions of the various villages have been distinguished, how have the Strategic Villages been selected? At least in this respect, ESBC’s rationale for why the four villages of Rolleston-on-Dove, Tutbury, Barton-under-Needwood and Rocester have been considered to be Strategic Villages is clear in the Settlement Hierarchy Update. It is because of the number of facilities that there currently are in the village. Yet if all the Strategic Villages are expected to do is accept growth to support these facilities, how is this in any way essential to the delivery of the strategy, i.e. strategic in nature? If the current population can support the existing facilities (as they certainly can in Rolleston-on-Dove), then why is significant growth required to undertake the same function?

2.31 It is clear that the only way the Strategic Villages have been justified is using a poorly constructed and illogical methodology of points scoring, resulting in a league table where the

Borough Council has decided how many villages qualify for strategic status. We shall address this in more detail in Section 3.

- 2.32 A further consideration that has been ignored is the location of the villages and therefore the hinterland that they serve. Rolleston's proximity to Burton upon Trent means that many of the services that its population uses are not in the village, but are in Burton. Stretton is not a Strategic Village because it is considered to be part of Burton, yet the reality is that it is a village and is located next door to Rolleston-on-Dove. It provides health services for some Rolleston-on-Dove residents (albeit most residents of Rolleston-on-Dove go to Tutbury for their health services), rather than the other way round.
- 2.33 The fact is that Rolleston-on-Dove does not serve a hinterland because it doesn't have one. Its hinterland looks to Burton upon Trent for its services, with Rolleston-on-Dove solely serving its own basic needs and itself looking towards Burton upon Trent and its outer villages for key services such as health.
- 2.34 Based on this requirement, it could well be argued that Abbot's Bromley should be a Strategic Village because it serves a greater hinterland, being further from the main centres than the Strategic Villages which have been allocated.

Strategic allocations in the Strategic Villages

- 2.35 The emerging Local Plan and the supporting evidence base makes clear that there is a size threshold of 100 dwellings for a housing site to be considered 'strategic'. Paragraph 5.124 of the emerging Local Plan makes clear that this is the same whether the site is in an urban area or a rural area. So what is the justification for this arbitrary threshold?
- 2.36 Paragraph 6.6 of the Sustainability Appraisal provides the following statement as justification for the strategic threshold:
- "It was felt that this threshold was low enough to include sites on brownfield land and in the rural areas enabling the authority to allocate sites in these locations which is important to support a growth strategy that is based around brownfield and greenfield growth in both urban and rural locations."*
- 2.37 It is important to return to the accepted definition of 'strategic' namely that it is essential to the delivery of the strategy. Size is simply not a justification for a strategic allocation, particularly not down at a level as low as 100 dwellings, some 1.1% of the overall housing requirement over the plan period. In fact, a site could be much smaller than this, yet could be vital to delivering strategic objectives, for example by unlocking other land for development. Paragraph 5.124 identifies this threshold within the context of the need for sustainable urban extensions and "the delivery of well planned and self sufficient communities". But this fails to recognise that this is a totally different issue in a village compared to an urban area, yet the threshold is the same.
- 2.38 Looking at the smaller strategic sites allocated in the main settlements – around the 100 dwelling threshold – shows the each has a clear rationale for why it has been allocated as a strategic site. Bargates in Burton upon Trent for example, is a mixed use development where the residential development is required to cross-subsidise town centre transformation.
- 2.39 By contrast, no rationale has been given for the allocation of the College site in Rolleston-on-Dove, nor has it been given for any of the other allocations in the Strategic Villages.

- 2.40 The Planning Advisory Service, on its website², sets out a series of questions that should be considered in order to determine if your allocation is necessary and appropriate for inclusion in the Local Plan. We assess these questions against the strategic allocation of the College Fields site.
- *"Is the site critical to the delivery of the spatial strategy for your district or borough? A Local Plan should only contain sites that are critical to realising the strategy."* As we have already shown, this is simply not the case.
 - *"What is the added value in defining clear site boundaries within the core strategy?"* There is no obvious value when the process of identifying sites for development is being undertaken through the Rolleston-on-Dove Neighbourhood Plan.
 - *"Would you fail to meet the spatial vision for the district or borough if the site was not delivered in the plan period?"* It simply cannot be argued that this is the case. The Borough Council can now even demonstrate a 5-year supply of deliverable sites, along with the appropriate buffer required by the NPPF.
 - *"Which of your Local Plan spatial objectives would the site help deliver?"* We have already shown in this section that not only does the site not help to deliver any of the spatial objectives, but the very allocation of a strategic site in a village which is undertaking a neighbourhood plan process – using funding secured by the Borough Council – is actually directly contradicting some of its stated objectives.
 - *"Is the site required to deliver national, sub regional or regional objectives?"* No
 - *"Is it required to deliver infrastructure which is central to the delivery of the plan and its objectives?"* No
 - *"Can you demonstrate stakeholder buy-in?"* As we have stated and will explain in more detail later in these representations, the community has categorically rejected the College Field site and has identified a number of preferable sites through the neighbourhood plan process.
- 2.41 The site simply cannot be justified as a strategic allocation, based on respected national guidance.
- 2.42 The Parish Council also considers that the approach taken by the Borough Council is contrary to the NPPF. Paragraph 155 states with respect to local plan-making:
- "Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made."*
- 2.43 This has not been the case, despite the Borough Council being aware that Rolleston-on-Dove was progressing its neighbourhood plan. The minutes of meetings between the Strategic Villages Alliance and the Borough Council make clear that Rolleston-on-Dove Parish Council was doing so, but the response from the Borough Council was that this was 'not their priority', rather the Core Strategy was. This is contrary to the NPPF which makes clear that the two bodies should work together.

² <http://www.pas.gov.uk/pas/core/page.do?pageId=469051>

2.44 The NPPF also says at paragraph 183 that:

"Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need."

2.45 The allocation of a 100-dwelling site on an important piece of land as far as the community is concerned, is not creating a shared vision. It is also not delivering the development that the Parish Council considers it needs because such a quantum of development is well in excess of the needs of Rolleston-on-Dove, which only functions to serve its own needs because it doesn't have any surrounding rural communities to serve.

Phasing

2.46 We have concerns in respect of Policy SP2 and the lack of balance it creates. All sites in the Strategic Villages expected to come forward in the short to medium term, i.e. the first 10 years of the plan period. This then begs the question as to what happens in the longer term? The Parish Council is concerned that an unjustified label of a Strategic Village, coupled with a large allocation which will be delivered in the short term, will then open Rolleston-on-Dove up to further development as part of a subsequent review of the plan.

2.47 There is also an issue over why the plan has all of the sustainable urban extensions (SUEs) delivering housing in the medium to long term. Whilst, by their nature, SUEs are going to take time to come forward, this doesn't mean that they cannot provide some form of contribution towards housing delivery over the short to medium term. However, the strategy appears to be require a large number of greenfield sites – with many in the Strategic Villages – to come forward ahead of the SUEs. It is not considered that this represents a sustainable strategy. The SUEs are far more sustainable forms of development than large greenfield sites in villages, even if they are labelled as 'Strategic Villages'. The strategy should be more proactive in bringing forward at least some of these SUEs as soon as possible.

3 ROLLESTON'S ROLE WITHIN THE SETTLEMENT HIERARCHY

- 3.1 The justification for Rolleston-on-Dove's inclusion as a Tier 1 settlement – a Strategic Village – is given in the Settlement Hierarchy Update, published in July 2012. As you are already aware through correspondence, the Parish Council has substantial concerns over the approach and the application of the approach. More generally, for matters involving the villages, it is of considerable concern that we were so poorly consulted. Again, paragraph 155 of the NPPF is relevant – "Early and meaningful engagement and collaboration with neighbourhoods...is essential." This has not been achieved in any sense.
- 3.2 This section therefore considers in detail the approach taken to establishing the settlement hierarchy and, in particular, the justification for the four Strategic Villages, making particular reference to Rolleston-on-Dove.

General approach

- 3.3 The general approach to understanding whether the villages perform a strategic role is established in the emerging Local Plan as whether they "meet their own local needs and also those of the surrounding rural communities." To do this requires consideration of the respective communities within the context of their geographical location.
- 3.4 Rolleston-on-Dove is not near to any of the Tier 2 or 3 settlements in the settlement hierarchy. Therefore it does not serve any surrounding rural communities. In fact, Rolleston-on-Dove is very close to Burton upon Trent and so many of its services used by local residents are provided in the main urban centre but not in the village.
- 3.5 Therefore it is only the needs of the local population of Rolleston that need to be met. We now consider how well Rolleston achieves that aim within the context of the significant levels of growth that the emerging Local Plan seeks to allocate there.

Rolleston-on-Dove's role in providing fundamental services

- 3.6 The Updated Settlement Hierarchy methodology has a long list of different services which it collectively uses to justify the settlement hierarchy. This list has substantially expanded from the initial methodology. However, one can consider the number of pubs, or shop units, or places of worship - whatever you like - but this fails to properly consider whether a village plays a fundamental role in serving wider communities. For that, you must focus on the most important services and consider their provision and whether they provide for existing needs as well as whether they have the capacity to provide for future needs.
- 3.7 On this last point, p18 of the updated Settlement Hierarchy states that,
- "It is recognised that improvements to existing services and facilities may be necessary for the future but this study only looks at current provision and does not take into consideration quality and size."*
- 3.8 This is a fundamental weakness in the approach because you could therefore argue that any villages could take growth, provided that they were provided within the necessary additional facilities. This is certainly the case when the strategy makes clear that the Strategic Villages most only serve their own needs and those of the immediate hinterland. You have to consider whether the existing infrastructure and services – which represent the core of a village's capacity – can

support growth and whether it is possible to increase capacity. The failure of the methodology to consider the capacity to accommodate growth is a fundamental weakness.

- 3.9 We demonstrate this by looking at what the Parish Council would consider to be the most important services which must underpin any sustainable settlement.

Health

- 3.10 Health services are vital services that a community cannot live without. Access is crucial. Yet Rolleston-on-Dove lacks a doctor's surgery, dentist and pharmacy. For these services you have to go to Tutbury, Stretton or Burton upon Trent. The emerging Local Plan states at paragraph 5.138 that, "The purpose of directing growth to villages is to reduce unnecessary car based travel." Allocating significant growth to Rolleston-on-Dove does the opposite.
- 3.11 Meanwhile, the Neighbourhood Plan has been considering the need to deliver a GP surgery in Rolleston-on-Dove but there will be vehement opposition to this if it is seen as a way of underpinning growth of a scale and on sites that are not considered appropriate by the community. This is a classic example of where a collaborative approach, driven by the neighbourhood plan, would have a far greater prospect of creating a sustainable village.

Education

- 3.12 John of Rolleston Primary School currently has 26 spare places (source: Department for Education). This can be filled quickly, particularly if there is growth in North Burton upon Trent, as is proposed in the preferred option 2d. Staffordshire County Council's 'Education Planning Obligations Policy', which was most recently updated in 2008/09, states that 21 primary school pupils are generated for every 100 net additional dwellings constructed. Therefore an additional 125 dwellings in the village equates to 26 additional pupils at the school. This would mean that the school would be full and there would be no slack to accommodate additional needs at short notice, as is preferable.
- 3.13 There is no potential to expand the school to accommodate further capacity without building on part of the existing playing fields. This would be contrary to Policy SP7 which states that playing fields should not be built on unless there is an excess of provision. This is not the case in Rolleston-on-Dove.
- 3.14 The additional level of development proposed would put an unacceptable strain on the education facilities in the village that are deemed to be one of the reasons why it is a Strategic Village.

Retail

- 3.15 Whilst the updated Settlement Hierarchy states that Rolleston-on-Dove has two general stores³, people do not do the bulk of their shopping in general stores. Such stores are only used for top-up shopping, with most people doing their convenience shopping in supermarkets. There are five supermarkets within five miles of Rolleston, so the bulk of the community will go to these stores to do their shopping. Whilst the neighbourhood plan consultations have shown that the stores in Rolleston-on-Dove are important, it does not mean that this is sufficient to justify large growth.
- 3.16 The fact is that these general stores are important for people to do small amounts of shopping in – one or two items, maybe a basket of goods at most. The list of items included in the definition of a general store - including fresh baked bread and newspapers - do not "contribute to the sustainability of a settlement" as is stated by the Borough Council in its letter to the Parish

³ As we will state later in this section, the Parish Council is of the opinion that Rolleston-on-Dove only has one general store

Council dated 31st August 2012. These are 'nice-to-haves' and if people cannot get them locally then it does not impact to any degree on them or the sustainability of their settlement.

- 3.17 This demonstrates that such stores do not fulfil all of the needs of people for their convenience goods shopping and do not play any more than a negligible role in ultimately deciding whether a village should accept significant levels of new housing.

Community

- 3.18 The updated Settlement Hierarchy states that Rolleston-on-Dove has a village hall, a facility that should be capable of being accessed by all of the community. As you are aware, there has been correspondence between the Parish Council and the Borough Council on this issue. Whilst the Parish Council still does not accept that the Rolleston Scout Headquarters constitutes such a facility, the greater issue is the capacity of this facility to accommodate the additional community activities that would arise from a significantly expanded population.
- 3.19 Whilst it is theoretically capable of being hired, the Scout Headquarters is already used significantly. The letter in Appendix 1 from the Group Scout Leader of the 1st Rolleston Scout Group makes clear that:

"...the Scout Headquarters is extensively used for Scouting activities, and has no capacity for availability for Community use."

- 3.20 The Group Scout Leader goes on to make clear that the land is owned by the Scout Association, the building was erected using Scout Association funds and is totally maintained by the Scout Group. It is therefore not a usable community facility. Moreover, even if it were, this would become even more difficult if the proposed amounts of new housing are built. The village will then not have sufficient community facilities to address its needs, so reducing the sustainability of the village according to the Borough Council's criteria.

Settlement hierarchy methodology

- 3.21 The Parish Council has already made clear that it is unhappy with the consultation process used to derive the methodology for the Settlement Hierarchy. The first version produced had no consultation with the villages in question and it was only through strong representations made that led the Borough Council to reconsider the methodology. Again, there has been no input into this and the updated Settlement Hierarchy was published in July 2012 without any prior sight of it by the villages.
- 3.22 For a document which dictates the future of the villages in the Borough, this is unacceptable and the Parish Council wishes to voice its dissatisfaction with the level of consultation.
- 3.23 Notwithstanding the approach to consultation, the Parish Council also considers that the methodology used to underpin the settlement hierarchy is not robust and lacks credibility. There are two main aspects to this:
- The approach to assigning points.
 - The thresholds for determining which tier a village lies in.

Approach to assigning points

- 3.24 The fundamental aim of the settlement hierarchy work is to establish which the most sustainable rural settlements are for accommodating growth. The major issue that the Parish Council has with the points-based approach is that it is inconsistent and illogical when looked at objectively.

3.25 We have already stated that the list of criteria which are scored fails to properly consider the sustainability of a settlement, both for its existing residents and for new residents who would come in as a result of proposed development. The latter is a major weakness in an approach supposed to support plan making which, by definition, needs to consider the impact of future development.

3.26 We shall now address the detailed concerns with the scoring methodology:

Accessibility

- Bus service: there is only 2 points difference between a service that is largely useless – once a week – and one that is useful – more than one a day. There should be a greater spread. The same applies to 'Access to main towns on public transport'.
- Bus service suitable for daily commute: this fails to acknowledge whether there is capacity on the bus services. The evidence collected by the Rolleston-on-Dove neighbourhood plan is that, at peak times, the buses are often full by the time they reach Rolleston, so people are unable to board them.
- Bus service suitable for daily commute/Road distance to main towns/employment sites: this does not factor in travel time. This is an important consideration for a lot of people in their decision to take the bus versus the car.
- Generally, an illustration of the impact of the scoring system is that Tutbury scored 15 on Accessibility whereas Rolleston-on-Dove scored 14. Yet Tutbury is one of the places that Rolleston-on-Dove residents go, for retail and leisure activities. The two places cannot be said to be almost comparable.

Shopping and retail

- Fresh Food Retail/General Store: There is a lower score for a fresh food retail store than for a general store, yet the presence of fresh food stores more commonly underpins the vitality and viability of a village retail offer because it will be used regularly by those wanting to buy fresh goods locally, so bringing people into the retail centre.
- Other A1 Shops: The points system is inappropriate for assessing the strength of a centre by virtue of the number of shops it has. A settlement could have 49 shops – making it a very large retail centre that will attract people from a wider hinterland but you will only get 3 more points than a settlement that has 1 shop, which would only serve a small amount of the needs of the population of that settlement alone. As an example, Tutbury got 5 points whereas Rolleston-on-Dove got 3 points, yet Tutbury has 38 shops whilst Rolleston has only 3 shops.
- Other A1 Shops: There is no consideration of what the particular shops are, with a differential scoring system used accordingly. A village may have two take-away outlets which would score 3 points whereas a post office would score 2 points. No one would seriously suggest that the ability to buy a curry or pizza represents a greater contribution towards sustainability than the services that a post office offers.
- Post office: There is no understanding of the level of services provided at each post office, which can differ substantially. The Rolleston-on-Dove post office does not provide many of the services offered at larger post offices, including car tax (which is available in all of the other strategic villages) and passport checking. Such facilities are more vital in rural areas, particularly for older people who may not be able to get to the larger post offices easily.

- Bank/Building Society: This should recognise and score appropriately the number of these facilities in the village. If you don't bank with the single bank that is located in the village then it is useless to you, whereas if all the main high street banks are represented then there is range and choice.
- As with 'Accessibility', an illustration of the impact of the scoring system is that Tutbury scored 18 on Shopping and Retail whereas Rolleston-on-Dove scored 14. It is simply not credible to suggest that Rolleston's retail offer is anywhere near that of Tutbury.

Community facilities

- Village Hall/Community Centre: If you score 3 points for having one facility, then why do you score only 4 points for having two or more facilities? The major issue in assessing the sustainability of the settlements is their capacity to support growth. Therefore, having twice as many facilities as another village should be recognised properly in the points scoring system by scoring 3 points per facility.
- Police station: What does the presence of a police station have to do with sustainability? The police are legally required to provide their services irrespective of whether they have a built facility there, so this has no relevance.
- Public Recreational Facilities: As with 'Other A1 Shops', the points system fails to properly reflect the difference between a settlement that has lots of these facilities – because it is large – and one that has very few.
- Public Recreational Facilities: This fails to assess the quality of facilities. Many recreational facilities, whilst present, are unusable because they are old and not fit for purpose. In addition, it fails to understand whether these facilities are used and whether they are valued by the community. This is one example of how the methodology takes no account of what the local communities in question consider to be important and what they want.
- Member Recreational Facilities/Members Clubs: This gives no sense of the popularity of these institutions (by virtue of member numbers) or their capacity to accommodate new members. A members club may just as easily be three people meeting once every couple of months in the pub.
- Telephone box: The numbers of people who use telephone boxes now are so low that it is highly likely that British Telecom will withdraw the service altogether. This is not a realistic criterion.
- As with retail, the points scoring system for community facilities is shown to be illogical when comparing Tutbury – 19 points scored – with Rolleston-on-Dove – 20 points scored. There is not a single person in either of those villages who would say that Rolleston has a stronger community facilities offer than Tutbury.

Health Care

- Doctors: Why is a doctor's surgery considered more important – 3 points – than a secondary school – 2 points? The presence of a secondary school is usually an indicator of a more sustainable location because it has to serve a wide catchment area, which is what a more sustainable village should demonstrate.
- Doctors: There is no consideration of capacity at the doctor's surgery. Whilst a doctor is unable to turn patients away, if the surgery list is so full that people cannot get an appointment reasonably quickly, then they are going to seek to use a surgery further away,

thereby creating less sustainable patterns of movement. Also if people do not have access to a car, then their inability to access healthcare services at their local surgery easily could have significant consequences for them. This is particularly relevant for older people.

- Doctors: There is no consideration in the scoring system of the impact of not having a doctor's surgery present. Rolleston-on-Dove does not have a surgery, with most people having to travel to Stretton or further. This promotes less sustainable patterns of travel. The absence of a vital facility such as a doctor's surgery should be reflected in the scoring system with a negative score. It should be noted that Rolleston-on-Dove is the only Strategic Village which lacks a doctor's surgery.

General comments

- In total, there are a maximum of 25 points for 'Shopping and Retail' and 25 points for 'Community Facilities', yet there are only 17 points available for 'Accessibility', only 6 points for 'Health Care' and 9 points for 'Education Provision'. With no weighting system it is possible to score more points for having two churches, a café and a police station than having a primary school and a doctor's surgery. This highlights the illogicality of the scoring system as it is simply not credible to suggest that churches/cafes/police stations are more important than schools/medical facilities in determining the sustainability of a settlement.

Thresholds for establishing where a settlement lies in the hierarchy

- 3.27 The updated Settlement Hierarchy having undertaken its assessment and given each village a score out a maximum of 82 points, then sets thresholds to distinguish between Tiers 1, 2 and 3. Even if the scoring system was adjusted and altered to reflect the comments given, how is it decided where these thresholds are placed? How can it be justified that 50 points is an appropriate threshold between the Tier 1 and 2 villages? As with the strategic dwelling threshold, this appears to simply be a nice round number.
- 3.28 The updated Settlement Hierarchy does not give any justification for the thresholds. Indeed, it could be set anywhere depending on how many settlements the Borough Council wanted to include as Strategic Villages. If the methodology had established clear principles to objectively assess whether a village was sufficiently sustainable to accommodate growth, i.e. a Strategic Village, then these could be judged in order to set the threshold. But no criteria have been presented and as such, the Borough Council can have no reasonable understanding of the differing levels of sustainability of the villages.
- 3.29 This is where the methodology lacks any form of credibility. A far better approach would have been to consider objectively what the main aspects of sustainable rural living are and to consider the range, quality and importance of such facilities to the local communities that they serve. This is important because the spatial strategy is clear about the importance of working with the local communities, something in this instance which has fundamentally not been done.
- 3.30 The best way to undertake such an approach is to work closely with the villages, their respective parish councils, community groups, businesses and service providers. In Rolleston-on-Dove, the perfect vehicle to do this is in place in the form of the neighbourhood plan. However, the Borough Council has singly failed to provide appropriate support to this process, instead choosing to make up its own arbitrary and illogical approach to supposedly assessing sustainability of the very place where the communities themselves live and work. The result is a process which is totally unfit for purpose and on which an inappropriate and poorly evidenced strategy is based.

4 SCALE OF GROWTH FOR ROLLESTON

General approach

- 4.1 Paragraph 5.63 of the emerging Local Plan provides the justification for the selection of Option 2. One of the stated requirements was:

"In the strategic villages, development would have to be sympathetic and appropriate to their needs. Growth would therefore need to protect the scale and character of the villages, while supporting them through appropriate levels of development."

- 4.2 However, the emerging Local Plan has failed to properly assess what is appropriate for each of the Strategic Villages, including Rolleston-on-Dove. The Borough Council has simply undertaken a sites-based exercise, with an assessment of sites which can deliver at least 100 dwellings (the arbitrary 'strategic' threshold) in isolation.
- 4.3 Options 2a-d, which have been assessed as part of the work to establish a preferred option, looked at dwelling numbers ranging from 50 to 150 in Rolleston-on-Dove. However, it gave no commentary on these at all, instead only focusing on the major, truly strategic growth locations. This highlights that these are not strategic villages and that the allocations are not strategic either.
- 4.4 What the Parish Council is seeking is twofold:
- Firstly, proper justification of an overall dwelling allocation for the combined Strategic Villages – which we consider to be reasonable and a strategic matter. We do not consider that there is adequate justification that the 615 dwellings in Policy SP1 have been justified in terms of their sustainability against the emerging Local Plan's own criteria.
 - Secondly, the recognition that the distribution of this strategic dwelling requirement is either dealt with through (non-strategic) site allocations or, where a neighbourhood plan is known to be in process, through that statutory part of the development plan. This would properly reinforce the Borough Council's commitment to neighbourhood planning.

Proposed levels of growth for Rolleston-on-Dove

- 4.5 The Parish Council considers that the allocation of 125 dwellings for Rolleston-on-Dove is too high and has not been justified. The Parish Council wishes to make clear – as it has made clear all along to the Borough Council – that it understand and accepts the need for the village to accommodate growth. But this must be appropriate and must reflect the needs of the village and the capacity of its infrastructure and services.
- 4.6 The most appropriate approach is one which combines an understanding of the sites with potential to support development with an understanding of the capacity of infrastructure and services in the village to support growth. Even at the levels of growth proposed – 125 dwellings – there is little prospect of securing anything meaningful in the way of community infrastructure that will help to increase the capacity of the village to accommodate growth in a sustainable manner.
- 4.7 The consideration of sites is presented in the next section and this includes a theoretical alternative level of housing for Rolleston-on-Dove (albeit that the Parish Council does not consider it appropriate for any figure relating to an individual strategic village to be given in the Local Plan as these are not strategic matters by virtue of the fact that the Borough Council has

failed to justify the role of the Strategic Villages). Below we look at the capacity of infrastructure to support growth and the potential to secure additional infrastructure.

Capacity to support growth

- 4.8 As we have already discussed in the previous section, two of the most fundamental pieces of community infrastructure which are vital to ensure that growing villages remain sustainable are health and education. The absence of any healthcare facilities in the village, coupled with a primary school that would in reality be beyond capacity with the additional growth proposed, mean that additional provision would be needed. The cost of this would be considerable.
- 4.9 By way of a rough calculation, the way in which developer contributions will be collected over the majority of the plan period will be through the use of the community infrastructure levy (CIL). The calculation below shows how much CIL may be secure through the development of 125 houses in Rolleston-on-Dove.

i. Total number of dwellings	125 dwellings
ii. Affordable housing requirement <i>= 30% (source: Housing Choice SPD)</i>	88 market dwellings liable for CIL
iii. Average house size = 100m ²	8,800m ² gross floorspace liable for CIL
iv. Development on existing built sites <i>= reduce total area liable for CIL by 10%</i>	7,920m ² net floorspace liable for CIL
v. CIL rate <i>= £60 per m², based on emerging CIL rates in other areas with equivalent house prices</i>	£475,200 CIL funds raised

- 4.10 This shows that 125 dwellings could raise just under £0.5m. Such a figure will fund very little in the way of meaningful infrastructure that may be required to accommodate additional population in a sustainable manner. It certainly would not even begin to contribute towards the provision of a new GP surgery or any theoretically possible extension to the existing primary school.
- 4.11 The advantage of CIL is that money earned anywhere can be spent anywhere. As such, money earned from development in Uttoxeter or Burton upon Trent could be used to help contribute towards the needs in Rolleston-on-Dove. However, the practical reality is that these funds will be concentrated on delivering the truly strategic growth of the SUEs in those main urban centres. There is therefore little prospect of Rolleston-on-Dove seeing the infrastructure capacity improvements that it would need in order to accommodate the proposed levels of growth in a sustainable manner.

5 LOCATIONS FOR GROWTH IN ROLLESTON

- 5.1 As has already been acknowledged, the Parish Council understands and accepts that Rolleston needs to accept growth. In this respect it is willing to accept growth and has been proactive in working towards this by preparing a neighbourhood plan. Paragraph 6.6 of the emerging Local Plan says:

"The Council fully embraces the provisions of the Localism Act with regard to Neighbourhood Planning, and will work with Parish Councils who prepare a Neighbourhood Plan, so that they can determine where their communities want development to take place."

- 5.2 If this was true – and the Parish Council was certainly led to believe that it was true throughout the consultations it has had with the Borough Council’s neighbourhood planning officers – then the amount of development and the location of that development would be matters left to the neighbourhood plan. As we have said, and again wish to reiterate, these are considered to be matters of local detail so should be dealt with by the neighbourhood plan.

College Fields site

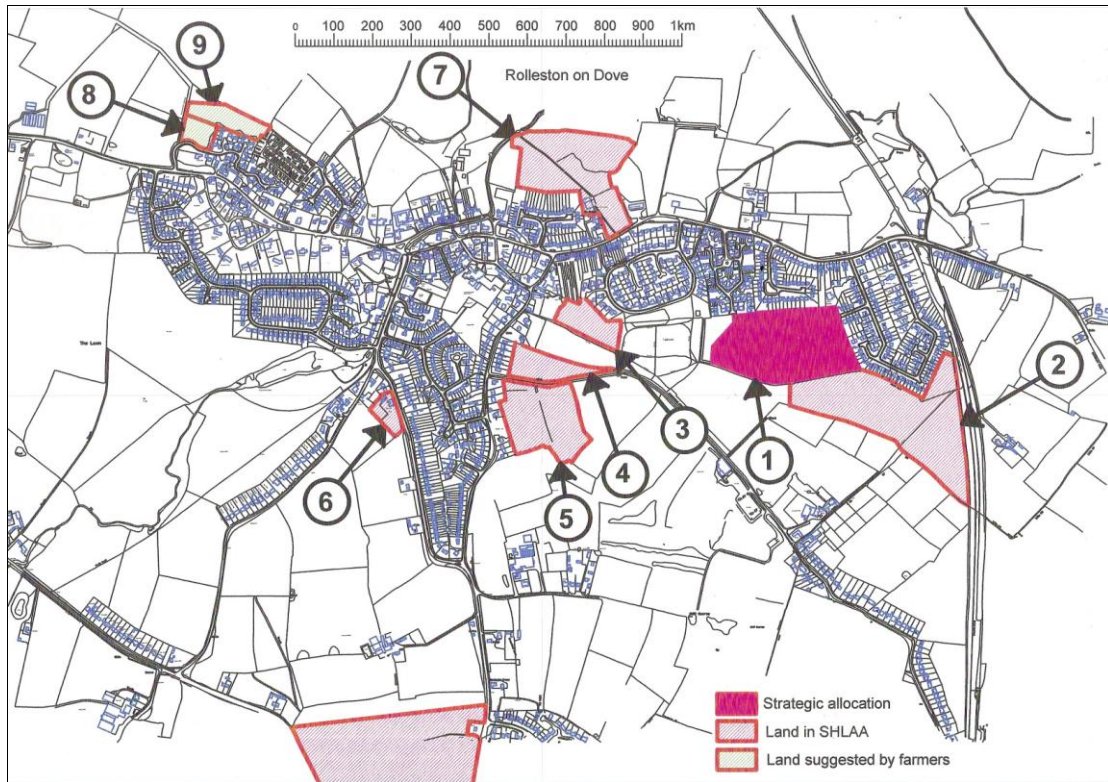
- 5.3 We have already made clear that the arbitrary threshold of 100 dwellings that the emerging Local Plan has established for strategic sites lacks any form of justification. Therefore, because the College Fields site is deemed to be large enough to accommodate over 100 dwellings, it is deemed strategic. We do not consider that such a site performs any form of strategic function.
- 5.4 One of the principal issues with the College Fields site is that its development would be contrary to Policy SP7 because of the loss of open space it would result in. Through the current planning application, we know that Sport England are believed to consider that the land continues to comprise sports land and the Borough’s SHLAA assessment categorises the land as vacant sport fields.
- 5.5 Moreover, Sport England considers there to be a shortfall of playing fields in Rolleston-on-Dove and we know that it has already advised the Borough Council that any development of this site would be in conflict with paragraph 74 of the NPPF.
- 5.6 Part of the reason that the village is in deficit in terms of playing field facilities is because of the earlier actions of Burton and South Derbyshire College. 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
 - the Forest Youth Club
 - a hall which hosted dances and concerts
 - a community centre
- 5.7 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 sports pitches or a swimming pool were built. Rolleston-on-Dove now lacks any of these facilities.
- 5.8 Not only would the site result in the loss of what is currently used as open space by the public (without complaint by the College), but any development of the site would not be able to provide any form of usable space for new sports facilities, irrespective of whether you take into account the overall loss of open space. This is our view and also the view of the statutory body in this matter, Sport England.
- 5.9 The SHLAA says that 125 dwellings could be developed on 3.1ha of the 6ha site. This would be at a density of 40 dwellings per hectare (dph). This density is far too high for a village location and highlights the weakness of the SHLAA. However, we note that the allocation is for 100 dwellings.
- 5.10 So, if the site were to be delivered at a lower density, the following is what would result:
- At 20dph, there would only be 1ha for green space.
 - At 30dph, there would be less than 3ha for open space – as a guide, this would accommodate only two football pitches.
- 5.11 Although as yet undetermined, the current application on the College Fields site fills up almost all of the usable public open space with a required balancing pond. The vast majority of the public open space provided by the proposed development would be in the form of a narrow strip adjacent to the site boundary which would be of no amenity value whatsoever.
- 5.12 Policy SP9 seeks affordable housing, with the Housing Choice Supplementary Planning Document (SPD) considering that 30% should be the target figure. Again, although undetermined, the current application does not propose to provide any affordable housing whatsoever. Whilst this is a development management issue, it is worrying that the applicant for one of the Borough Council's proposed strategic allocations would appear willing to come forward with an application providing no affordable housing.

Preferred locations for growth

- 5.13 In late August 2012, the community of Rolleston-on-Dove was consulted on the potential sites in the village for development. This was done by a series of exhibitions which nearly 200 people attended and gave views at. The sites were those included in the SHLAA and other sites subsequently put forward direct to the Parish Council. Each site was given a theoretical yield, based on reasonable density assumptions and taking into account known constraints on each site. This process has identified the community's preferred locations for development.
- 5.14 In total, 9 sites were considered. These are shown in Figure 5.1 below.

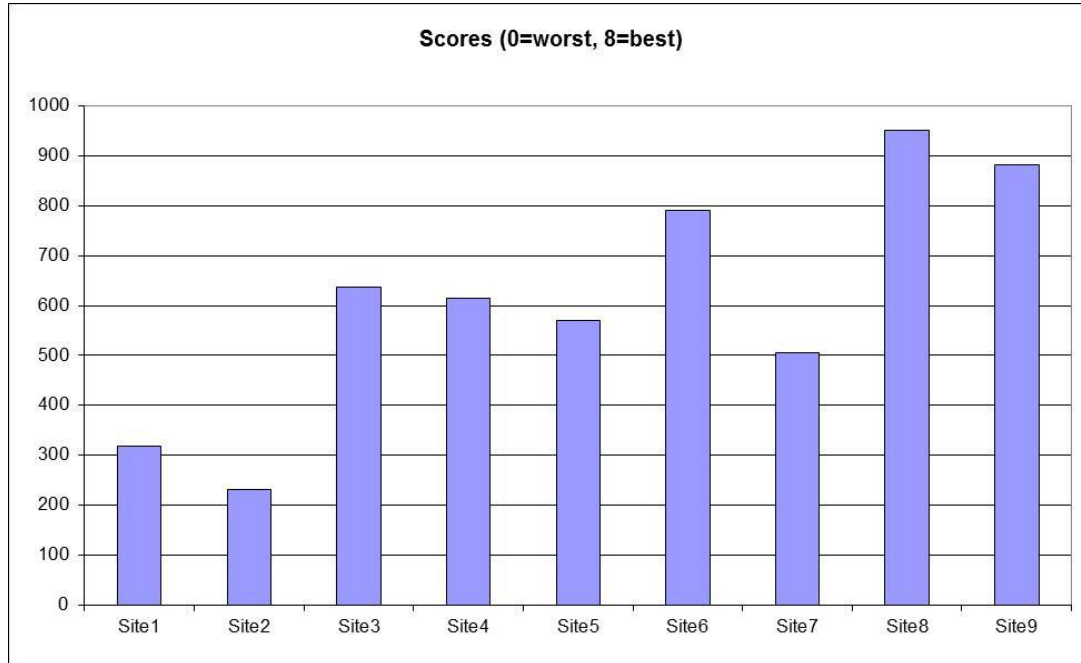
5.1: Sites considered through the Rolleston Neighbourhood Plan consultation



SITE 1	The College Playing Field	
	Size 6 hectares	Yield 120 houses
SITE 2	Land South of Walford Road	
	Size 7.53 hectares	Yield 226 houses
SITE 3	Land off Meadow View	
	Size 1.2 hectares	Yield 36 houses
SITE 4	Land at Craythorne Road	
	Size 1.23 hectares	Yield 37 houses
SITE 5	Land at Craythorne Road/Beacon Road	
	Size 3.4 hectares	Yield 102 houses
SITE 6	Land at Knowles Hill	
	Size 0.51 hectares	Yield 15 houses
SITE 7	Land off Station Road	
	Size 2.03 hectares	Yield 61 houses
SITE 8	Land off Shotwood Close	
	Size 0.5 hectares	Yield 13 houses
SITE 9	Land off Shotwood Close	
	Size 1.1 hectares	Yield 27 houses

5.15 Consultees were asked to rank the sites in order. The higher the overall score, the more favoured the site. The results of the consultation are shown in Figure 5.2 below:

Figure 5.2: Results of consultation on potential sites for development



5.16 This shows that the most favoured sites were sites 8 and 9 (both on land off Shotwood Close) and site 6 (land at Knowles Hill). All three of these sites had an average rank of over 4, which means that the average respondee considered that site to be more towards the favoured end of the range than the unflavoured. In total, these sites have a theoretical yield of 55 dwellings.

5.17 What is instantly noticeable is that two of these sites did not come through the SHLAA process so, as far as the Borough Council is concerned, were never sites that had the potential to deliver housing.

5.18 The consultation also shows that the College Field site (site 1) was considered to be the second least popular site by the consultees. It had an average ranking score of less than 2 out of a possible 8. This demonstrates the strength of feeling against the site’s development by the local community.

5.19 Therefore, the Parish Council is considering that the neighbourhood plan allocate these three sites. This would be subject to further assessment of the non-SHLAA sites, using the same criteria. These would total 55 dwellings.

5.20 The Parish Council is also aware that site 3 (land off Meadow View), the 4th most popular site, currently has a planning application for 23 dwellings pending a decision. If this is brought forward, then the total would increase to 78 dwellings.

5.21 The Parish Council also accepts that there needs to be a degree of slack in any housing requirement to allow for windfall sites (although it is noted that the Borough Council considers that the neighbourhood plan should allocate windfalls although, by definition, windfalls are unidentified sites, so this is an illogical approach). It is suggested that a figure of 10% is reasonable, bringing the total up to approximately 85 dwellings.

- 5.22 This demonstrates the Parish Council's commitment to delivering growth. 85 dwellings would represent the maximum amount of development that would be considered sustainable and it would be vital that this is pushed to provide growth throughout the plan period and avoid all the sites coming forward in the first five years, so leaving the village exposed to additional growth as part of the new Local Plan review.
- 5.23 However, the Parish Council again wishes to reiterate that this is what it considers is likely to come forward through the neighbourhood plan. It does not consider that a housing requirement in the Local Plan is appropriate because this is not a strategic matter. Therefore, for clarity, it is not proposing an allocation of 85 dwellings in the Local Plan, it is saying that this is a local matter and this is the scale of growth that is expected to come through the neighbourhood plan.

Appendix 1 Letter from 1st Rolleston Scout Group



**24th BURTON UPON TRENT
1st ROLLESTON SCOUT GROUP**

Registered Charity Number 513164

Headquarters: Station Road, Rolleston-on-Dove.
www.rollestonscouts.org.uk



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Rolleston-on-Dove Parish Council,
Mrs. Heidi Light – Clerk of the Council,
8 Beacon Drive,
Rolleston-on-Dove,
Burton-Upon-Trent,
Staffs. DE13 9EL

18th September, 2012

Dear Sirs,

With reference to the Scout Headquarters availability for Community use, please find below the current schedule for the 1st Rolleston Scout Group.

Monday 5pm – 6pm Beavers (1) Colony.
Monday 6.30pm – 8pm Cubs (1) Pack.
Tuesday 6pm – 7.15pm Beavers (2) Colony.
Wednesday 7.30pm – 9.30pm (approx) Explorer Scouts.
Wednesday 5.30pm – 6.30pm Brownies.
Thursday 6.30pm – 8pm Cubs (2) Pack.
Friday 7.30pm – 9.30pm (approx) Scouts.

As we are a very active Scout movement and have a long waiting list we are always working towards increasing the number of sessions that are available to our youngsters, and to this aim we hold training sessions for leaders, parents meetings, strategy events, etc., the Executive Committee also meet monthly, and all these are based at the Scout Headquarters, working around the scheduled meetings as detailed above.

In addition to the above schedule the Executive Committee of the Scout Group organise the following events specifically to raise funds for the direct use of the Group, e.g. Building Maintenance, Building Running Costs, etc., and affords the means to uphold the sustainability of the Scout Association.

Last Sunday in each month – Car Boot Sales.

At least 4 times per year – Saturday Rummage Sales.

The Scout Group Carnival and the Rollestonbury Concert, which are both held annually, are major fund raisers for the Group – and were initiated with this sole purpose in mind – and are mainly attended by our youngsters, their parents, friends and relations.

The above information clearly shows that the Scout Headquarters is extensively used for Scouting activities, and has no capacity for availability for Community use. The land is owned by the Scout Association, the building was erected using Scout Association funds, and is totally maintained by the Scout Group.

We trust this information will afford clarification to yourselves.

Yours faithfully,
1st Rolleston Scout Group



Mr. Graham Jacks.
Group Scout Leader

