

Planning Policy
Rushcliffe Borough Council
Rushcliffe Arena
Rugby Road
West Bridgford
Nottingham
NG2 7YG

Direct dial: + Direct fax: +44 (0)115
859 9642 Switchboard: +44 (0)115
936 9369 Email:

By Email Only: localdevelopment@rushcliffe.gov.uk

27 November 2017

Our Ref: DMA/2076/118413/26/DA

Dear Sir/Madam,

Re: Rushcliffe Local Plan Part 2 Consultation – Preferred Housing Sites

I refer to the above consultation and set out below representations in response to the Land and Planning Policies (LAPP) Preferred Housing Sites consultation document on behalf of our client British Gypsum Limited. This letter amplifies and supports the attached response forms concerning housing development within the Borough, notably questions 1, 18, 19 and 22 and builds upon earlier representations submitted in response to consultation of the emerging document.

Background

Core Strategy Policy 3 (Spatial Strategy) details housing provision over the plan period and that sustainable development will be achieved through a strategy that supports a policy of urban concentration with regeneration. The settlement hierarchy to accommodate this consists of:

- The main built area of Nottingham (this includes three Sustainable Urban Extensions at land South of Clifton, land off Melton Road (Edwalton) and land East of Gamston / North of Tollerton);
- Key Settlements of Bingham, Cotgrave, East Leake, Keyworth, Radcliffe-on-Trent and Ruddington;
- RAF Newton; and,
- Other settlements solely to meet local housing needs to be allocated in the Local Plan Part 2.

Policy 3 also sets out the quantum of new homes to be provided as a **minimum** (my emphasis) of 13,150 between 2011 and 2028, with approximately 7,650 homes in or adjoining the main built up area of Nottingham (within Rushcliffe) and approximately 5,500 homes beyond the main built up areas of Nottingham (within Rushcliffe), including: North of Bingham (around 1,000 homes); Former RAF Newton (around 550 homes); Former Cotgrave Colliery (around 470 homes); in or adjoining East Leake (a minimum of 400 homes); in or adjoining Keyworth (a minimum of 450 homes); in or adjoining Radcliffe on Trent (a minimum of 400 homes); in or adjoining Ruddington (a

FREETHS

minimum of 250 homes); and in other villages solely to meet local housing needs. Furthermore, the policy predicts the delivery pattern of new homes over the plan period and indicates that the following strategic sites have the status of allocations, expecting housing delivery by 2015: Sustainable Urban Extension (SUE) on land off Melton Road, Edwalton; SUE to the South of Clifton; North of Bingham; Former RAF Newton; Former Cotgrave Colliery; and SUE to the East of Gamston/North of Tollerton.

Although the residual quantum is not explicitly set out in Policy 3 beyond those prescribed above, recent appeal decisions at Aslockton (refs: APP/P3040/A/14/2227522, APP/P3040/W/16/3143126 and the now most recent APP/P3040/W/16/3162739) provide insight into how the policy should be interpreted and accept that it has a clear intent for some development (broadly 1,980 dwellings) to be undertaken in other villages within the Plan period. It was also acknowledged and accepted that there is no specific definition in the Core Strategy or other adopted policy documents of the terms 'small scale', 'infill' or 'local need'.

In this context of housing provision, the Council's latest monitoring report remains that dated as of 31 March 2016 accounting for the period of 2016-2021 which formed part of the earlier Further Options consultation also. This document acknowledges that a five year supply of housing land cannot be demonstrated and details this to be 3.43 years. As previously stated, this is a further reduction from the earlier monitoring report covering the period of 2015-2020 which detailed a figure of 4.27 years. Further evidence of such decline was voiced more recently in June 2017 by Appeal Inspector Raygen (ref: APP/P3040/W/16/3162739) who adopted in her decision (paragraph 53) a supply in the order of 2.5 years, noting that this was likely to be '...the worst case scenario in order to carry out the planning balance'. Ultimately this decline has remained an ongoing trend for the Authority over a number of years such that the Borough's Objectively Assessed Housing Needs (OAHN) is not being met as required by national policy.

The main reason for this undersupply, as is acknowledged in the Further Options consultation document which sets out that additional housing sites are required to meet the Borough's identified need, is that the Council relies heavily on a number of large scale development sites and SUEs, some of which have failed to deliver as originally anticipated in the Core Strategy. Whilst this situation of significant reliance on SUEs was accepted by the Core Strategy's Examining Inspector (EI), her report acknowledged (paragraph 64) that this is likely to mean a comparatively slow build-up in delivery rates and concluded (paragraph 68) that '...there is inevitably uncertainty as to whether the expected rate of delivery over time will be achieved, but proposed modification MM1(d) confirms that performance will be closely monitored and a full review of the Local Plan undertaken if the numbers are not being achieved'.

We have raised that the Council's ongoing position of failing to satisfy the Borough's OAHN has led to concerns that this requirement may not be met over the plan period contrary to NPPF requirements resulting in calls for a full local plan review. Appeal Inspector Baker (ref: APP/P3040/A/14/2227522) earlier shared these concerns at paragraphs 34 and 49 of her report, stating the reliance on SUEs and other strategic allocations within the housing land supply and that the anticipated delivery of development on most of the Strategic Sites has slipped significantly from the position presented to the Local Plan Inspector and included within the Core Strategy. In this regard the Inspector concluded at paragraph 52 that '...some of the figures included within the

FREETHS

supply by the Council are likely to be overly optimistic given the difficulties associated with bringing some of the Strategic Sites forward for development' and that the '...current supply is a best case scenario and may well be further reduced and require adjustment through the release of other sites identified in the SHLAA'.

At the time of writing, the recent most appeal decision at East Leake (ref: APP/P3040/W/17/3178343) reaffirms the above housing position, stating that the Borough's deficit in housing delivery is 'significant' (paragraph 9). Inspector Boniface proceeds in his decision that the Core Strategy '...has not been effective in delivering the necessary housing to date...' and in summary states that if the development plan '...is applied with full rigour there is a very real likelihood that the housing deficit will worsen in the area and need for housing will not be addressed' (paragraph 54).

Rushcliffe's Forecast Housing Supply and Shortfall

As per the Further Options consultation document earlier in the year, the latest Preferred Housing Sites consultation document also acknowledges that additional housing sites are required to meet the Borough's OAHN as a consequence of most of the Strategic Sites taking longer to commence than had previously been expected. This latest consultation document reinforces the need to deliver homes 'relatively quickly' in order to contribute to resolving the current shortfall in the amount of land that is available for housing development over the next few years. It is agreed, as it was previously, that the deficit should be corrected as a matter of urgency, particularly as there has been little change in circumstance or indeed housing delivery over the preceding 10 months since consultation on the Further Options document took place. The Council's commitment to closely monitor performance and fully review the Local Plan if the numbers are not being achieved is once again noted.

The purpose of the LAPP is to set out non-strategic allocations (originally envisaged to be sufficient to account for 1,100 new homes) and a number of detailed policies for managing new development, following on from the strategic framework set out in the Core Strategy. In the Further Options consultation document the Council anticipated adoption of the LAPP in June 2018 such that the non-strategic allocations at Keyworth, Radcliffe-on-Trent and Ruddington are then expected to come on-stream shortly thereafter and begin contributing to the Borough's supply of housing sites, projecting 150 homes to be delivered across the three settlements by April 2020. However, the latest Preferred Housing sites document has delayed this further to August 2018 such that there is equally likely to be further to delivery of these non-strategic allocations (the Core Strategy originally envisaged adoption of the LAPP by April 2017).

The Council's revised approach earlier in the year envisaged that the LAPP would seek to allocate additional sites for development across a wider range of settlements (including other villages) than originally anticipated to account for the likely shortfall they anticipate. Of note is that whilst the Further Options document and its supporting background paper identified sites at Cropwell Bishop, East Bridgford, Gotham, Sutton Bonington and Tollerton as potentially sustainable locations for additional growth, two of those explicitly stated to **not** be sustainable locations, these being Bunny and Flintham, are now conversely considered suitable for up to 195 homes in the Preferred Housing Sites document (it is acknowledged that the Flintham site has planning permission for 95 homes). Also of note is that constraints in terms of education capacity and the ability to provide

FREETHS

additional provision at Sutton Bonington and Tollerton have since been identified such that these locations are no longer considered suitable for additional growth/development, further restricting supply options/opportunities.

Notwithstanding the above, the shortfall calculated by the Council, as it was previously, is expected to be in the order of 899 homes for the period of 2019-2024 (i.e. the 5 years subsequent to adoption of the LAPP) and this has formed the basis of this current consultation given that the LAPP is expected to remedy this position through additional housing sites. As a result the Council considers that sufficient land to account for least 2,000 homes will be enough to satisfy the original 1,100 envisaged plus the expected shortfall. The Council acknowledge that further delays to existing strategic allocations could cause the size of the shortfall to increase further and have therefore included provision of buffer (approximately 25%) such that delivery across the proposed sites subject to this consultation would be expected to deliver around 2,550 homes in total.

However, as previously submitted, the shortfall is considered to be significantly underestimated with a more realistic yet inevitably much higher shortfall figure considered to be some 2969 homes by the end of this period, amounting to in excess of 3 times the level of shortfall that the Council envisages. Therefore on this basis, the LAPP would need to deliver a total of **4069 homes** (when accounting for the original 1,100 homes envisaged), rising to **5,761 homes** when attributing a 25% buffer as seen appropriate in the Council's own calculation. This is a particularly challenging position and as a result seriously questions whether the Council's overarching strategy can be achieved.

The rationale for the above calculation is set out in the text and tables below.

Housing Trajectory

As the Council acknowledges, the primary issue relates to delivery of the Strategic Sites. Subsequent to the allowed appeal at Aslockton (ref: APP/P3040/A/14/2227522) where the appellant's concerns about the Council's ambitious housing trajectory were echoed by the Inspector (paragraph 52), the situation has not readily improved albeit nearly 2 years have since passed. Notwithstanding development at Cotgrave Colliery and Edwalton which has taken between 4 to 7 years respectively from outline permission to begin delivering housing, coupled with the recent progress at RAF Newton, there remains no application at the Gamston/Tollerton site, the 2014 outline application at Clifton still remains and undetermined there has only recently been a reserved-matters application(s) submitted for the site at Bingham for some 371 dwellings. On this basis it is therefore unrealistic to consider that these dormant sites, particularly the largest strategic allocations at Bingham, Clifton and Gamston/Tollerton, would likely be in a position to begin delivering homes in the next 2 years as is envisaged in the Council's latest trajectory.

A synopsis of these three Strategic Sites is detailed below and includes a measured but optimistic assessment as to when these could realistically begin contributing to the Borough's housing supply:

Bingham

Outline planning permission was granted in December 2013 for up to 1050 dwellings. A recent Reserved Matters application was submitted in September 2017 proposing erection of 371

FREETHS

dwellings (17/02106/REM) but the Council has raised concerns about how this development sits in the context of the original outline permission and also in terms of the proposed detail itself. There remains a considerable degree of uncertainty as to when this site will deliver but almost certainly this will not be before 2020/21 at the earliest. This delay would result in the loss of some 250 homes from the Council's trajectory for the period 2019-2024.

Clifton

An outline application proposing 5500 dwellings was withdrawn in 2011 and a revised outline application proposing 3000 dwellings submitted in July 2014. This latest application is still pending a decision and therefore no development has taken place to date on this site. Given that there is no permission to date and the need for detailed reserved matters applications, coupled with the discharge of conditions pre-commencement of development, complex legal negotiations and infrastructure works, it is highly unlikely there will be any delivery on this site prior to 2022/23. This delay would result in the loss of some 950 homes from the Council's trajectory for the period 2019-2024.

Gamston/Tollerton

There have been no planning applications submitted for this site and therefore no development has taken place to date. Furthermore, the site requires major infrastructure works, along with the closing and possible relocation of the airport currently in situ. As per Clifton, given that there is no permission to date and the need for detailed reserved matters applications, coupled with the discharge of conditions pre-commencement of development and complex legal negotiations, it is highly unlikely there will be any delivery on this site prior to 2022/23. This delay would result in the loss of some 750 homes from the Council's trajectory for the period 2019-2024.

Table 1 below provides an overview of the above commentary for the Strategic Sites and sets out the likely additional shortfall that would result as a consequence of an amended / updated trajectory for the period 2019-2024. The table also accounts for the delays in commencing delivery from earlier in the trajectory period and this would result in a overall loss of some 2050 homes from deliverable sites for the period of 2011-2024 (the amended housing trajectory in support of these calculations is appended to the end of this letter).

Site	Planning Application Status	Freeths' Forecast To Begin Delivery	RBC Delivery Forecast (2019-24)	Freeths' Delivery Forecast (2019-24)	Deficit
Edwalton	On-site	n/a	750	n/a	0
Cotgrave Colliery	On-site	n/a	44	n/a	0
RAF Newton	Outline	n/a	500	n/a	0
Bingham	Outline	2020/21	750	500	-250
Clifton	None (Outline pending)	2022/23	1200	250	-950
Gamston/Tollerton	None	2022/23	1000	250	-750
<i>Freeths projected 5 year deficit (2019-2024) against Council's April 2016 trajectory</i>					-1950
<i>Plus loss of homes from earlier in trajectory period due to delay in commencing delivery</i>					-100
Total Trajectory Deficit (2011-2024)					-2050

FREETHS

Table 1. Overview of Core Strategy's Strategic Sites comparing the RBC's and Freeths' forecasts for the 5 Year Period 2019-2024 (based on the Council's April 2016 trajectory).

With the above in mind, the key output to consider is the Council's likely housing supply position (with 20% buffer) to determine whether enough additional sites are proposed in the emerging LAPP to address any shortfall that may exist and ultimately result in a development plan able to meet the Borough's OAHN. Utilising Appendix A of the Further Options consultation document as a template, Table 2 below sets out and compares our assessment of the potential shortfall in homes to be built between 2019 and 2024 in contrast to that expected by the Council. Our assessment is that by 2024, there will be a shortfall of 2969 homes as noted earlier.

		Homes (RBC)	Homes (Freeths)
A	Housing target over Plan Period (2011 to 2028)	13150	13150
B	Housing target for period 2011 to 2019	4150	4150
C	Housing target for period 2019 and 2028 (annualised when LP Pt 2 adopted)	9000	9000
D	Annual target 2019 to 2028	1000	1000
E	Projected total number of homes built between 2011 to 2019	3268	3168
F	Projected shortfall in homes built between 2011 and 2019 (B – E)	882	982
G	Housing requirement for 5 year period 2019-2024 with 20% buffer (D x 5 + F x 1.2)	7058	7178
H	Total number of homes expected to be built on deliverable sites between 2019-2024 (see Council / Freeths' trajectories)	6159	4209
I	Potential shortfall in homes built between 2019 and 2024 (G – H)	899	2969

Table 2. Potential shortfall in homes built between 2019 and 2024 (RBC and Freeths' comparable assessments).

Objectively Assessed Housing Need

It is again submitted that the Council's strategy is clearly currently failing to meet the Borough's OAHN and there are serious concerns that this may not be satisfied even by the end of the plan period (2028) as a result of failing to 'catch up'. These are concerns shared very recently by Inspector Boniface at paragraph 11 of his decision stating that it has not been demonstrated '...how the trajectory set out in Policy 3 will be achieved over the coming years'.

Irrespective of disquiet regarding expected delivery rates over a sustained period, market delivery and proximity of competing sites within a concentrated area, it remains that this position of failing to meet the OAHN would also be exacerbated by any further delays to adoption of the LAPP and/or the delivery of Strategic Sites, particularly Bingham, Clifton and Gamston/Tollerton. This is further compounded by concerns about the envisaged delivery of the non-strategic sites so soon after adoption of the LAPP, especially when considering that settlements such as Keyworth, Radcliffe-

FREETHS

on-Trent and Ruddington are bounded by tightly drawn green belt boundaries and that no planning permissions currently exist. Again, Inspector Boniface voiced his concerns at paragraph 13 of his decision, noting that the 'vast majority' of further sites identified are located in the Green Belt such that '...the prospects of these being delivered in the short term, prior to adoption of the emerging local plan, are very limited' and he is '...not persuaded that the Council's efforts will significantly alter the delivery position in the short term'.

On this basis the Council must maximise sustainable housing supply and use robust, considered evidence to justify its projected housing trajectory. More deliverable sites are undoubtedly required within the Borough to ensure choice and competition in the market and that the plan is positively prepared such that the Council can seek to meet their OAHN as required by paragraphs 14, 17, 47 and 182 of the NPPF. Furthermore, it is clear that a component of the Borough's housing requirement should be directed towards 'Other Villages' as concluded by the appeal Inspectors, enabling sustainable development in such locations that will contribute to the Borough's overall housing supply and reduce the shortfall. The plan should therefore allocate additional sites in this regard as advocated by Inspector Baker (paragraph 52), particularly in the larger villages which are inherently more sustainable and able to accommodate associated services and facilities.

Gotham

As is recognised in the Council's Settlement Background Paper (February 2017) and Housing Site Selection Interim Report (September 2017), Gotham offers facilities and services that includes a shop, post office, primary school, a village hall, library, healthcare, pubs and recreational facilities, along with various employment provision which also includes a bus depot. We have previously submitted that when such services and employment provision are considered alongside Gotham's good transport links, it is therefore appropriate to accept that reasonably substantial growth in the context of meeting local housing and employment need would be acceptable in this sustainable settlement in accordance with Local Plan Part 1: Core Strategy Policies 3 and 5.

In this regard it is disappointing that the Preferred Housing Sites document proposes only a single site, referred as GOT5a, with a proposed capacity of around 100 homes. It is noted that this site is susceptible to a high risk of surface water flooding, bounds a Local Wildlife Site and would need to account for the Grade II listed barn. Development solely in this location would, in our view, appear unusual in form and result in an incongruous extension to the village.

As has previously been submitted during the earlier rounds of consultation, our client currently operates the British Gypsum Works at Gotham and has a number of land interests throughout the village due to various operational requirements. These sites are identified as SG1, SG2, SG3 and SG4 on the attached plan outlined in red and present available, deliverable and sustainable opportunities to increase the supply of housing land within the Borough. Sites SG2 and SG4 were identified as potential housing sites in the Further Options consultation document, referred to in Figure 11 (page 42) of the document as GOT1 and GOT7 respectively, although it was submitted at that time that additional opportunities may exist at SG3 in order to address the housing shortfall and meet the Borough's OAHN. Unfortunately, however, the latest consultation document fails to consider SG3 once again.

FREETHS

As outlined previously, the existing premises south of Gypsum Way (SG1) are currently used for storage and distribution in relation to our client's operational needs and this is likely to continue for the foreseeable future. SG2 (GOT7) and SG3 are not currently used for operational purposes although SG3 was used relatively recently for open storage which is its lawful use. It is envisaged that SG2, whilst not currently in use, may have operational potential in the future in relation to the business, but there may also be scope to utilise the land north of the pylons for housing (subject to impact in terms of constraining operational functions of land to the south). SG4 (GOT1) remains surplus to operational requirements and it has previously been an aspiration of Gotham Parish Council to acquire some of this land for a small affordable housing scheme with amenity space. An affordable housing provider has previously demonstrated an interest in such development and set out that a Housing Needs Survey conducted for Gotham identified a need for twelve affordable properties within the village. Consultation responses to the draft Gotham Neighbourhood Plan also support development of this site.

It is acknowledged that Gotham and these sites are currently washed over by the Green Belt designation as identified in the Non-Statutory Replacement Local Plan (NSRLP). The British Gypsum Works to the south of the village (SG1) are also identified in the Plan for employment purposes through Policy EMP5 which permits redevelopment (for employment purposes) subject to impact on the openness of the Green Belt in addition to amenity and access considerations. Saved Local Plan (1996) policy E7 'Redevelopment of Employment Sites' is similar in this regard.

Policy 4 of the Local Plan Part 1: Core Strategy committed to reviewing the Green Belt of a number of settlements, including Gotham, as part of the LAPP process '...to accommodate development requirements until 2028'. The earlier 2016 draft Green Belt Review (Part 2b) reviewed various settlements and in relation to Gotham, the new inset boundary proposed had been tightly drawn with sites SG1-4 remaining in the Green Belt. Such tightly drawn boundaries, as we have previously submitted, inhibit flexibility for alternative sustainable development opportunities to come forward should unforeseen problems occur with existing consents or allocations (as the Council acknowledge may well occur), exacerbated by the fact that there are severe housing supply difficulties in the Borough, including affordable housing in rural areas. The PPG sets out that '...all settlements can play a role in delivering sustainable development in rural areas and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided' (Paragraph: 001 Reference ID: 50-001-20140306). Further, the NPPF's core principles at paragraph 17 is to '...take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it', re-emphasised at paragraph 55 by way of to '...promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities'. We therefore objected to the proposed Green Belt boundary and trust that the additional / current consultation currently underway will inform further amendments, being minded that the additional assessments recently undertaken in the consultation document result in low scoring Green Belt functionality and importance for all our client's sites. It is considered that sites SG1 and SG2, whilst not considered as part of the current and earlier rounds of consultation, would score equally as low.

FREETHS

On this basis, to reinforce earlier submissions, sites SG1-4 should be released from the Green Belt as set out on the attached plan (amended Green Belt boundary outlined in blue) and included within the settlement to provide support for not only employment related development opportunities in existing plant, along with supporting the sustainability and vitality of the village in terms of employment and new housing, but also for the longer term business aspirations of this important and longstanding enterprise as set out in paragraph 28 of the NPPF. It is suggested that SG1 should be allocated for employment purposes, sites SG2 and SG3 allocated for employment and/or mixed use purposes (given their housing potential), with SG4 allocated for housing in line with the Parish Council's earlier aspirations for affordable housing. Alternatively in absence of specific allocations, sites SG2-4 could simply be presented as whiteland.

These sites are available and deliverable opportunities for additional housing land, having no major constraints and being in single ownership. The site at SG1 essentially acts as a book end to the southern extent of the settlement and it would not be inappropriate for development to extend up to Gypsum Way. Our client's sites are connected to the village via the road network and lit footpaths and would accordingly form sustainable and logical extensions with public transports links available nearby. The ecological value of site SG4 is disputed with any development, as acknowledged in the Council's Housing Site Selection Interim Report (September 2017), providing opportunity to facilitate improvements. Any subsequent application would be supported by an appropriate study.

Amending the Green Belt boundary to incorporate these sites in this manner for development would not impact on its openness given that they are within the existing urban framework and flanked by development such that it is not necessary to keep the land permanently open as prescribed at paragraph 85 of the NPPF. Gotham is also self-sufficient and relatively remote from other villages such that the suggested amendments would not dilute the Green Belt's role in preventing coalescence with other settlements, or its role preventing encroachment into the wider countryside beyond the established urban framework. Although Gotham contains a number of listed buildings, it is not a historic town with special character or setting requiring protection by the Green Belt. On this basis, amendment of the Green Belt boundary would comply with the provisions of the NPPF.

Ultimately it is clear that whilst there is no specific definition in the Core Strategy or other adopted policy documents of the terms 'small scale', 'infill' or 'local need', the quantum of the housing 'intent' to be accommodated in other settlements and the identified need for affordable housing suggests clearly that 'small scale' in this context (and by comparison to the numbers allocated to Key Settlements) means that sites of circa 100+ dwellings will be needed in some other settlements, of which there are only a limited number of these able to accommodate such intended growth.

Conclusion

The Council acknowledges that additional deliverable housing sites are required to meet the existing and projected shortfall resulting from delays to the SUEs and Strategic Sites; this position is supported. However, the Council expect this shortfall figure (with 20% buffer) to be in the region of 899 homes by 2024 but this is considered to be significantly underestimated such that any additional provision in this regard would fall considerably short of resolving the Borough's longstanding predicament.

FREETHS

Our calculation is that by 2024, the shortfall (with 20% buffer) will be in the order of 2969 homes principally as a result of delayed delivery. In turn this results in the LAPP needing to deliver a total of **4069 homes** (when accounting for the original 1,100 homes envisaged), rising to **5,761 homes** when attributing a 25% buffer as seen appropriate in the Council's own calculation which is particularly challenging.

Our amended trajectory (attached) merely provides a greater degree of realism, albeit optimistic, for these sites but caution is identified that the position could indeed be much worse as a result of delays to the LAPP, delivery rates or market capacity for example, concerns shared by Planning Inspectors also. It is considered that this figure should be used by the Council as starting point to understand the extent of the likely shortfall to be addressed in order to satisfy its OAHN.

Gotham is considered to be a sustainable, larger village able to accommodate associated services and facilities such that it would be suitable for residential development that would valuably contribute towards the Council's housing supply in a rural location. It also hosts a longstanding and important business which supports village vitality although the existing and proposed Green Belt boundaries will continue to constrain its operational requirements unless amended accordingly. The suggested amendments would not impact on the various roles of the Green Belt and such development would accord with NPPF requirements insofar that rural communities and enterprises should be supported and their vitality enhanced or maintained through sustainable development.

I would be grateful if you could confirm receipt of these representations. Please do not hesitate to contact me should you require any further information or wish to discuss.

Yours faithfully,

Darren Abbott
Senior Planning Executive
Please respond by e-mail where possible

Enc. Response Form
Freeths' Trajectory
Sites SG1-4 Location Plan with suggested Green Belt boundary



Rushcliffe Local Plan Part 2: Land and Planning Policies – Preferred Housing Sites

Response Form

Please return by **5pm on Monday 27 November 2017** to:
 Planning Policy, Rushcliffe Borough Council
 Rushcliffe Arena, Rugby Road
 Nottingham. NG2 7YG
 Or to: localdevelopment@rushcliffe.gov.uk

Please note that your comments can be directly entered through the Borough Council's online consultation system: <http://rushcliffe-consult.objective.co.uk/portal>

Your Details		Agent details (where applicable)
British Gypsum Limited	Name	Darren Abbott
C/O Agent	Address	Freeths LLP Cumberland Court 80 Mount Street Nottingham NG1 6HH
Click here to enter text.	E-mail	d

Housing Development

Housing Land Supply

Question 1: Do you agree with the Council's proposal that Local Plan Part 2 should identify enough land for around 2,550 new homes?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>
Don't know	<input type="checkbox"/>

Please provide any comments you wish to make to support your response.

This figure should be increased - see supporting letter

(please continue on a separate sheet if necessary)

Housing Sites within the Main Urban Area

Question 2: *Do you agree with the Council's proposed allocation of the Abbey Road Depot (site WB01) for the development of around 50 new homes?*

Yes

No

Please provide any comments you wish to make to support your answers.

You may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

Housing Sites adjacent to the Main Urban Area

Question 3: *Do you agree with the Council's proposal that no sites adjacent to the main urban area of Nottingham (within Rushcliffe) should be allocated for housing development through Local Plan Part 2?*

Yes

No

Please provide any comments you wish to make to support your response.

Click here to enter text.

(please continue on a separate sheet if necessary)

Housing Development at the 'Key Settlements'

Bingham

Question 4: Do you agree with the Council's proposal that no sites adjacent to Bingham should be allocated for housing development through Local Plan Part 2?

Yes

No

Please provide any comments you wish to make to support your response.

Click here to enter text.

(please continue on a separate sheet if necessary)

Cotgrave

Question 5: Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Cotgrave for around 350 homes in total?

Yes

No

Please provide any comments you wish to make to support your response.

Click here to enter text.

(please continue on a separate sheet if necessary)

Question 6: Do you support the proposed allocation for housing development of the following sites at Cotgrave:

	Yes	No
Site COT01 – Land rear of Mill Lane/The Old Park (estimated capacity around 170 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Sites COT09 – Land south of Hollygate Lane (1); COT10 – Land south of Hollygate Lane (2); and COT11a – Land south of Hollygate Lane (3a) (estimated capacity around 180 homes)	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you wish to make to support your answers.

For each of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

East Leake

Question 7: Do you agree with our proposal that only sites EL01, EL02, EL04, EL05 and EL08 (as shown at Figure 4) should be allocated for housing development at East Leake?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please provide any comments you wish to make to support your response.

Click here to enter text.

(please continue on a separate sheet if necessary)

Keyworth

Question 8: Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Keyworth for around 580 homes in total?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please provide any comments you wish to make to support your response.

[Click here to enter text.](#)

(please continue on a separate sheet if necessary)

Question 9: Do you support the proposed allocation for housing development of the following sites at Keyworth.

	Yes	No
Site KEY4a – Land off Nicker Hill (1) (estimated capacity around 150 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site KEY8 – Land between Platt Lane and Station Road (estimated capacity around 190 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site KEY10 – Land south of Debdale Lane (1) (estimated capacity around 190 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site KEY13 – Hillside Farm (estimated capacity around 50 homes)	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you wish to make to support your answers.

For each of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

[Click here to enter text.](#)

(please continue on a separate sheet if necessary)

Radcliffe on Trent

Question 10: Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Radcliffe on Trent for around 820 homes in total?

Yes

No

Please provide any comments you wish to make to support your response.

Click here to enter text.

(please continue on a separate sheet if necessary)

Question 11: Do you support the proposed allocation for housing development of the following sites at Radcliffe on Trent.

	Yes	No
Site RAD01 – Land north of Nottingham Road (estimated capacity around 150 homes), with employment development to the west of the powerlines that separate the site.	<input type="checkbox"/>	<input type="checkbox"/>
Site RAD02 – Land adjacent Grooms Cottage (estimated capacity around 50 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RAD03 – Land off Shelford Road (estimated capacity around 400 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RAD05a – Land north of Grantham Road to south of railway line (1a) (estimated capacity around 140 homes)	<input type="checkbox"/>	<input type="checkbox"/>

	Yes	No
Site RAD06 – 72 Main Road (estimated capacity around 5 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RAD13 – The Paddock, Nottingham Road (estimated capacity around 75 homes)	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you wish to make to support your answers.

For each of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

Ruddington

Question 12: Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Ruddington for around 410 homes in total?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please provide any comments you wish to make to support your response.

Click here to enter text.

(please continue on a separate sheet if necessary)

Question 13: Do you support the proposed allocation for housing development of the following sites at Ruddington.

	Yes	No
Site RUD01 – Land to the west of Wilford Road (south) (estimated capacity around 180 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RUD05 – Land south of Flawforth Lane (estimated capacity around 50 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RUD11 – Old Loughborough Road (estimated capacity around 10 self and custom-build homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RUD13 – Land opposite Mere Way (estimated capacity around 170 homes)	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you wish to make to support your answers.

For each of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

Housing Development at the 'Other Villages'

Cropwell Bishop

Question 14: Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Cropwell Bishop for around 160 homes in total?

Yes

No

Please provide any comments you wish to make to support your response.

Click here to enter text.

(please continue on a separate sheet if necessary)

Question 15: Do you support the proposed allocation for housing development of the following sites at Cropwell Bishop.

	Yes	No
Site CBI02 – Land north of Memorial Hall(1) (estimated capacity around 90 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site CBI05 – Land east of Church Street (estimated capacity around 70 homes)	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you wish to make to support your answers.

For both of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

[Click here to enter text.](#)

(please continue on a separate sheet if necessary)

East Bridgford

Question 16: Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at East Bridgford for around 100 homes in total?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please provide any comments you wish to make to support your response.

[Click here to enter text.](#)

(please continue on a separate sheet if necessary)

Question 17: Do you support the proposed allocation for housing development of the following sites at East Bridgford

	Yes	No
Site EBR06 – Closes Side Lane (west) (estimated capacity around 20 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site EBR07 – Closes Side Lane (east) (estimated capacity around 20 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site EBR8 – Land to the north of Butt Lane (estimated capacity around 15 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site EBR10 – Land south of Butt Lane (estimated capacity around 45 homes)	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you wish to make to support your answers.

For each of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

Gotham

Question 18: Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Gotham for around 100 homes in total?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Please provide any comments you wish to make to support your response.

There is scope to accommodate a greater quantum of development in Gotham which is considered a sustainable location - see supporting letter

Question 19: Do you support the proposed allocation for housing development of the following site at Gotham:

	Yes	No
Site GOT5a – Land east of Gypsum Way/The Orchards (1) (estimated capacity around 100 homes)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please provide any comments you wish to make to support your answers.

You may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

See supporting letter

(please continue on a separate sheet if necessary)

Bunny Brickworks

Question 20: Do you support the proposed allocation of the former Bunny Brickworks (site BUN01) for a mixed development of around 100 new homes and employment development?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please provide any comments you wish to make to support your answers.

You may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

Flintham – Former Islamic Institute

Question 21: *Do you support the proposed allocation of the former Islamic Institute at Flintham for the development of up to 95 new homes?*

Yes

No

Please provide any comments you wish to make to support your answers.

Click here to enter text.

(please continue on a separate sheet if necessary)

Other Issues

Question 22: *Please identify any matters related to housing development which are not covered here or elsewhere and which you wish to raise.*

See supporting letter

(please continue on a separate sheet if necessary)

Please return by **5pm on Monday 27 November 2017** to:

Planning Policy,
Rushcliffe Borough Council
Rushcliffe Arena
Rugby Road
Nottingham. NG2 7YG

Or to: localdevelopment@rushcliffe.gov.uk

Please note that your comments can be directly entered through the Borough Council's online consultation system: <http://rushcliffe-consult.objective.co.uk/portal>

Data protection: The details you submit to the Borough Council will be used in the plan making process and may be in use for the lifetime of the Local Plan and associated processes in accordance with the Data Protection Act 1998. Please note that comments and personal details cannot be treated as confidential and may be made available for public inspection both physically and/or through the Borough Council's website. We may publish all names, addresses and comments received, including on our website. We will use our best endeavours to not publish signatures, personal telephone numbers or email addresses. By sending the Council your details you will automatically be informed of future consultations on planning policy documents unless you indicate otherwise.

Freeths' trajectory (based on LP Part 2 April 2016 trajectory)

	LP Pt 1										LP Pt 2										5 Yr Period					Beyond Plan Period				
	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2011 - 2028									
Completions	293	209	199	373	375	365	299	293	281	87	190	91	1	1	0	100	90	50	13	0	3247									
Completions and identified SHLAA capacity																					1500									
Land at Melton Road, Edwalton (1500)						50	100	150	150	150	150	150	150	150	150	150					456									
Land at Former Cotgrave Colliery (450)					112	100	100	100	44																					
Land at Former RAF Newton Phase 2 (550)								50	150	150	150	50									550									
Land North of Bingham (1050)									50	150	150	150	150	150	150	150	100				1050									
Land South of Clifton (3000)											50	200	200	250	250	250	250	250	250	250	1250									
East of Gamston/North of Tollerton (2,500 - 4000)												50	200	250	250	250	250	250	250	250	1250									
Infill and Changes of use in broad locations									103	103	103	103	103	103	103	76	76	76	76	76	873									
Outstanding East Leake to be allocated (400) Policy 3																					0									
Outstanding Keyworth allocations (450) Policy 3									50	50	50	50	50	50	50	50	50				450									
Outstanding Radcliffe on Trent to be allocated (400) Policy 3									50	50	50	50	50	50	50	50					400									
Outstanding Ruddington to be allocated (250) Policy 3									50	50	50	50	50								250									
Projected Completions	293	209	199	373	487	515	499	593	878	690	893	794	954	1,004	1,003	1,076	816				11,276									
Cumulative Completions	293	502	701	1,074	1,561	2,076	2,575	3,168	4,046	4,736	5,629	6,423	7,377	8,381	9,384	10,460	11,276													
Housing Requirement as per CS	250	250	470	470	470	470	470	1300	1000	1000	1000	1000	1000	1000	1000	1000	1000				13150									
Cumulative Requirements as per CS	250	500	970	1440	1910	2380	2850	4150	5150	6150	7150	8150	9150	10150	11150	12150	13150													
Projected Delivery against Need (+/-)	43	2	269	366	349	304	275	982	1,104	1,414	1,521	1,727	1,773	1,769	1,766	1,690	1,874													

