

Mr Richard Mapletoft
Planning Policy
Rushcliffe Borough Council
Rushcliffe Arena
Rugby Road
West Bridgford
Nottingham, NG2 7YG

27th November, 2017

Dear Mr Mapletoft,

Rushcliffe Local Plan Part 2 Preferred Housing Sites Consultation: Representation by Featherstones PDD Ltd

Please find attached completed forms and supporting statements in relation to the Local Plan Part 2 Preferred Housing Sites Consultation.

Featherstones are promoting a number of sites around Rushcliffe on behalf of landowners. Different forms have therefore been completed for different client's interest and whilst some matters repeat what has been said elsewhere, each form is unique in the information and detail provided regarding particular sites.

Featherstones overarching concern is the Borough Council's approach to its housing requirements and current housing land supply shortfall. The current approach seeks to downplay the shortfall and ignores the need to plan appropriately for a contingency. Given recent experience in the Borough and having regard to National Policy and recent proposals set out by the Local Plans Experts Group and in the White Paper, this approach is not sound.

The emerging plan is also too narrow in its approach to site allocations and housing delivery. It fails to grasp the need (as now demanded by Government) to increase the range of sites, the form of development proposed and to support the growth of villages. A greater number of sites (or outlets) will help increase housing supply. Sites should also be allocated for specific purposes, in particular to meet the need for self and custom house building and the need to provide specific accommodation for the elderly. The increase in the variety of forms of new housing will help serve different market and help increase housing supply.

A more positive and proactive approach to housing supply must be embraced, taking full account of the thrust of emerging Government Policy as set out in the housing White paper.

Featherstones would welcome further discussions with the Council about these issues and the specific sites it is promoting.

Yours sincerely

John Holmes



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)
Mr & Mrs Elton	Name	Featherstones PDD Ltd
C/O Agent	Address	The Elms Main street West Leake Loughborough Leicestershire LE12 5RF
Click here to enter text.	E-mail	

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.

See attached Statement

(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.

In part, but it is unclear how the site could be brought forward because the Council have not identified a suitable site for the relocation of its depot service.

(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.

All land should be reviewed to ensure the housing requirement is met in full.

(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.

Cotgrave can accommodate additional development.

(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)	✓	
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)		✓

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.

There are better, more appropriate sites elsewhere around the village.

(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.

This question is now out of date given recent appeal decision.

(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

No

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

Keyworth is capable of accommodating a greater number of dwellings.

(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 checked="" 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 checked="" 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.

These sites have a greater impact on the landscape and character of the area than

other potential sites. Key13 is not, and has never been, a preferred site in the emerging Neighbourhood Plan and as such has limited community support.

(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	<input checked="" 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 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"/>

	Yes	No
Site RAD05a – Land north of Grantham Road to south of railway line (1a) (estimated capacity around 140 homes)	<input type="checkbox"/>	<input type="checkbox"/>
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



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 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)	✓	
Site RUD05 – Land south of Flawforth Lane (estimated capacity around 50 homes)	✓	
Site RUD11 – Old Loughborough Road (estimated capacity around 10 self and custom-build homes)	✓	
Site RUD13 – Land opposite Mere Way (estimated capacity around 170 homes)		

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

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

Click here to enter text.

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 checked="" 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 checked="" 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 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 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)

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 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.

It is unclear how development at Bunny Brickworks could be made to be sustainable

given the sites remoteness from the village and services and facilities.

There are a wide range of more suitable and sustainable sites located on the immediate edge of other villages (some lie outside the Green Belt). Development of these site would result in a more sustainable form of development. The nature of the Bunny Brickworks site does not provide sufficient justification to depart from core sustainable development principles.

(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.

It is a committed site and should not be allocated. It is relevant to note that it is wholly inconsistent of the Council to conclude that development is acceptable and sustainable at Flintham for 95 dwellings, whilst concluding that other equally or more sustainable locations are not considered suitable for development

(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.*

(please continue on a separate sheet if necessary)

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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.

FEATHERSTONES PDD - REPRESENTATIONS TO RUSHCLIFFE LOCAL PLAN PART 2 PREFERRED HOUSING SITES CONSULTATION

Statement in response to Question One:

We strongly disagree with the Council's assessment of its housing supply and more generally to its approach to delivering its housing requirement.

The Borough has a very serious housing land supply issue. It has failed to bring forward enough land in the right place, at the right time. This is due in part to the lack of delivery on almost all of the Borough's Strategic sites but also due to the significant delays in the preparation and adoption of the Local Plan Part 2.

It is essential that the Borough adopt a pragmatic approach to planning for the delivery of its minimum housing requirement together with realistic assumptions in relation to delivery on existing and proposed sites.

It is critical that the Council's assumptions about the deliverability of sites is realistic and robust. In particular, and especially given past and recent experience, the assumptions should not be, individually and collectively, overly optimistic, such that the housing shortfall is down played and future delivery issues are inevitable.

Having regard to the recommendation of the Local Plans Expert Group, the Council's assessment of five year land supply should include lapse rates. This should be applied to all sites and given the lack of specific local evidence this should be set at 10% as recommended by the Experts Group.

The Local Plans Expert Group (LPEG) Report also recommended that;

'the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF' (para 11.4 of the LPEG Report).

Whilst the Council has now acknowledged the need for a buffer it is considered that this is inadequate given the complexity of sites and history of under delivery. A much greater buffer is required to take account of inevitable delays and non-implementation. The realities of the housing market (as experienced in Rushcliffe) are that some allocations and permissions are not implemented and others are delayed or delivered at slower rates than what might have been reasonably assumed. A contingency for this is essential, which means the need to plan for more permissions (more land for housing) than the minimum housing requirement.

Whilst there have been, and continue to be, major delays to the delivery of most of the Borough's strategic sites, experience at Cotgrave and East Leake demonstrates that delivery on sites can be consistently high if suitable sites are brought forward. Experience at East Leake in particular has shown how new houses can be brought forward quickly, when there are significant permissions granted on different sites.

There is no reason to believe that this experience could not be replicated in other villages across the Borough, provided sufficient sites are made available. Rushcliffe is a very strong housing market area and demand is unlikely to constrain delivery rates.

Having regard to the growth of East Leake, more houses than indicated in the Preferred Housing Sites document could be accommodated in the larger villages of Keyworth and Cotgrave

The Borough Council's recognition that growth is both necessary and sustainable at East Bridgford, Cropwell Bishop and Gotham is welcomed. However, given the housing requirements, development in other villages should be identified too. The reason for the Council's approach, as set out in the Housing Site Selection Interim Report, is not sound. Other villages are also capable of accommodating development and making a meaningful and sustainable contribution to meeting the Borough's challenging housing requirements and current supply shortfall. In particular, Aslockton and Sutton Bonington which have a wide range of services and facilities, and Costock which, also has good access to services and facilities as a result of close proximity to and direct relationship with East Leake are suitable villages where additional development can be accommodated. All these villages are outside the Green Belt and have suitable sites available for development.

It is inconsistent to conclude that development on land at Bunny Brickworks, Bunny and the former Islamic Institute at Flintham (for 100 and 95 houses respectively) is sustainable, whilst development in villages with a better range of services and facilities on sites better related to those villages and those services and facilities, is not sustainable. Both sites are remote from the village centres, in settlements with limited access to services and facilities. The fact that these isolated sites have been previously used does not in itself justify the allocation of these sites before, or instead of, better located, more sustainable, green field sites.

When allocating sites the Council should maximise housing supply via the widest possible range of sites, location and by size of site. A greater range of sites, by type and size, will improve the rate of delivery of new homes. Increasing sales outlets will increase overall delivery of housing. In general increasing the number of sales outlets available means increasing the number of housing sites. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand.

This approach is also advocated in the Housing White Paper. The White Paper, 'Fixing Our Broken Housing Market' presents a range of measures to increase delivery and ensure housing requirements are met. A Key emphasis of the White Paper is to encourage development in villages and to support the development of small and medium sized sites. Under the Heading 'Supporting small and medium sized sites, and thriving rural communities' it states that changes are proposed to the NPPF to:

'Expect local planning authorities to identify opportunities for villages to thrive, especially where this would support services...'

As well as recognising the importance of development within villages to support local communities and contribute to housing delivery, the White Paper seeks to encourage greater variety in the form of housing local planning authorities plan for. In particular it emphasises the need to plan for more self and custom build housing and for specific sites to meet the needs of an ageing population.

The Local Plan Part 2 should respond positively to these requirements, both in terms of allocations within smaller villages, but also specific allocations for custom build schemes and retirement housing. Suitable sites are being promoted specifically for this purpose. The Borough Council should adopt a positive and innovative policy approach (as sought by Government) rather than ignoring these issues. As the White Paper recognises, an increase in the choice of sites, both in terms of size and locationally, together with policies and allocations which encourage different forms of housing, will greatly assist with improving the rate of delivery of new homes. These are important measures, made essential in Rushcliffe as a result of its supply issues

RUSHCLIFFE LOCAL PLAN PART 2: PREFERRED HOUSING SITES CONSULTATION

REPRESENTATIONS ON BEHALF OF the Hon E. & Mrs C ELTON

1.0 Questions 22: Other Issues

Land at Sutton Bonington

- 1.1 The Council's approach to site selection, as set out in the Housing Site Selection interim Report, is flawed. As set out in response to Question One it is considered that the Council are not planning for enough housing and will need to allocate more sites. However the Council's approach to site selection is also unsound.
- 1.2 The Housing Sites Selection Interim Report states that the key constraint on development in Sutton Bonington is an indication from the Education Authority that the school cannot accommodate more growth. However the evidence for this position is extremely limited. Furthermore the position of the Education Authority regarding capacity has been brought into question at a recent appeal decision for land off Rempstone Road, East Leake. Within this context it is considered that there is insufficient evidence to limit the amount of new development in Sutton Bonington. In addition, the Primary School which has a capacity of 210 pupils, currently has 193 on roll.
- 1.3 There is no clear case to limit growth in the village. The arguments put forward for this limit are wholly inconsistent with the approach to allocations in other villages of a similar, and indeed in some cases, smaller size.
- 1.4 Sutton Bonington has a wide range of services and facilities which can meet residents day to day needs. Importantly, in terms of the Borough wide context, it lies outside the Green Belt, where national policy (reinforced by recent Ministerial statements and the Housing White Paper) seeks to direct development prior to the consideration of Green Belt locations.
- 1.5 Sutton Bonington is directly comparable with East Bridgford and Cropwell Bishop. Whilst the precise mix of services and facilities the villages contain are different, the villages are extremely similar in their overall scale and sustainability. At Cropwell Bishop the Council have concluded that it could accommodate 160 new dwellings. At East Bridgford, up to 100.
- 1.6 Perhaps more striking is the approach the Council have taken on sites at Bunny Brickworks, Bunny and the Former Islamic Institute at Flintham. It is inconsistent to conclude that development on land at Bunny Brickworks and the former Islamic Institute at Flintham (for 100 and 95 houses respectively) is sustainable, whilst development in villages with a better range of services and facilities on sites better related to those villages and those services and facilities, is not sustainable. Both sites are remote from the village centres, in settlements with limited access to services and facilities. The fact that these isolated sites have been previously used does not in itself justify the allocation of these sites in preference to, or instead of, better located, more sustainable, green field sites.
- 1.7 Land adjacent to the rear of the Tennis Club on Landcroft Lane in Sutton Bonington is considered to be suitable for development. As a result of the significant expansion of the

university campus and recent development along College Road, the site is well related to existing built development and would fit with the overall form and function of the village as it has grown.

- 1.8 The peculiar geography of Sutton Bonington has, over time, created a linear form of development which relates directly to the main road, from Park Lane to Marle Pit Hill and College Road. Development 'in depth' along this 'spine' is very limited.
- 1.9 Over recent years, the University has expanded significantly, in terms of build accommodation and sports facilities. An increase in local employment has occurred.
- 2.0 Notwithstanding this expansion, the, not insubstantial, buildings have been well assimilated into the fabric of the village because of the existing and increasing green landscape context. The impression remains of a truly rural environment.
- 2.1 The development of the 'Tennis Club Field' would not undermine this atmosphere. Because of its size and scale, the site would not 'suburbanise' the village, it would not impact adversely on the character of the village and it would not threaten the amenity of neighbours. Access is straightforward, being west of the access into the University.
- 2.2 Functional integration with facilities in the village will be good. For example, there is a closer link to the church, shop and pub than would be the case with development at the south of the village.
- 2.3 Consequently, we strongly believe that the site is suitable and appropriate for housing development. Furthermore, it is available for early delivery of new houses to assist in meeting the required 5 year supply.

Illustrative Development Plan

