

From:
To: [Localdevelopment](#)
Cc:
Subject: Rushcliffe Local Plan – Preferred Housing Sites – Local Plan Part 2: Land at the former Bunny Brickworks.
A247
Date: 23 November 2017 14:53:08
Attachments: [Site location plan 2017 11 23.pdf](#)

I refer to the Council's current consultation with regard to its Preferred Housing Sites (October 2017) relating to the Rushcliffe Local Plan Part 2. This response is submitted on behalf of Mr & Mrs S N Mourtzis whose address is:

P O Box 80427
Piraeus
Greece 18510

The representations are to be read, it is requested, alongside those set out in my E-Mail addressed to the Council on 20 March 2017 on behalf of Mr & Mrs Mourtzis.

The reasoned justification for the selection of the site for approximately 100 new homes within a mixed residential/employment development at the Bunny Brickworks indicates that Bunny is not one of the "other villages" that have been identified as potentially suitable for a limited level of new housing development.

The site favoured by the Council lies outside the village and is located approximately 500 metres, at its closest point, to the nearest facilities within it.

The intervening distance is dominated by the Principal Traffic Route, A60 and by the need for all pedestrian movements to cross Goatham Lane close to its busy junction with the A60. The A60 at Bunny Hill lacks suitable footways and the site is regarded as an unsatisfactory location for new housing development because of this gap between the village and its established facilities.

In addition, the new housing would inevitably be dominated by the mixed employment use, by the significant waste transfer facility to the south and by the considerable mass of the employment development to the west. This makes the chosen site an unsuitable location for new housing development.

As an alternative, the Council should consider favourably an alternative modest development at Bunny which is more sustainably located with regard to the village's established facilities. The site at Loughborough Road, to which the attached plan relates, has previously been submitted as a suitable housing location. This is a choice that should be pursued by the Council since not only will it deliver a modest amount of affordable housing but it will provide also a limited number of new dwellings that is more commensurate with the level of facilities offered at Bunny.

The objection is submitted on this basis.

I shall be grateful if you will acknowledge receipt of this E-Mail upon receipt.

With regards.

John Church
Att

John Church Planning Consultancy Limited
Victoria Buildings
117 High Street
Clay Cross
Chesterfield
Derbyshire
S45 9DZ
Tel: 01246 861174
Fax: 01246 861097
E-mail:

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| Date | Drawn | Revised |
|------|-------|---------|
| | | |

CLIENT
Investment Enterprise Holdi
Simplex Enterprises Inc.

PROJECT
Old Bunny Hall Drive
Bunny
Nottingham

TITLE
Plot A & B
Site Plan

| SCALE | DATE | COUNTRY | CADASTRY |
|--------|----------|---------|----------|
| 1:1250 | 24.10.11 | NJ | 01 |

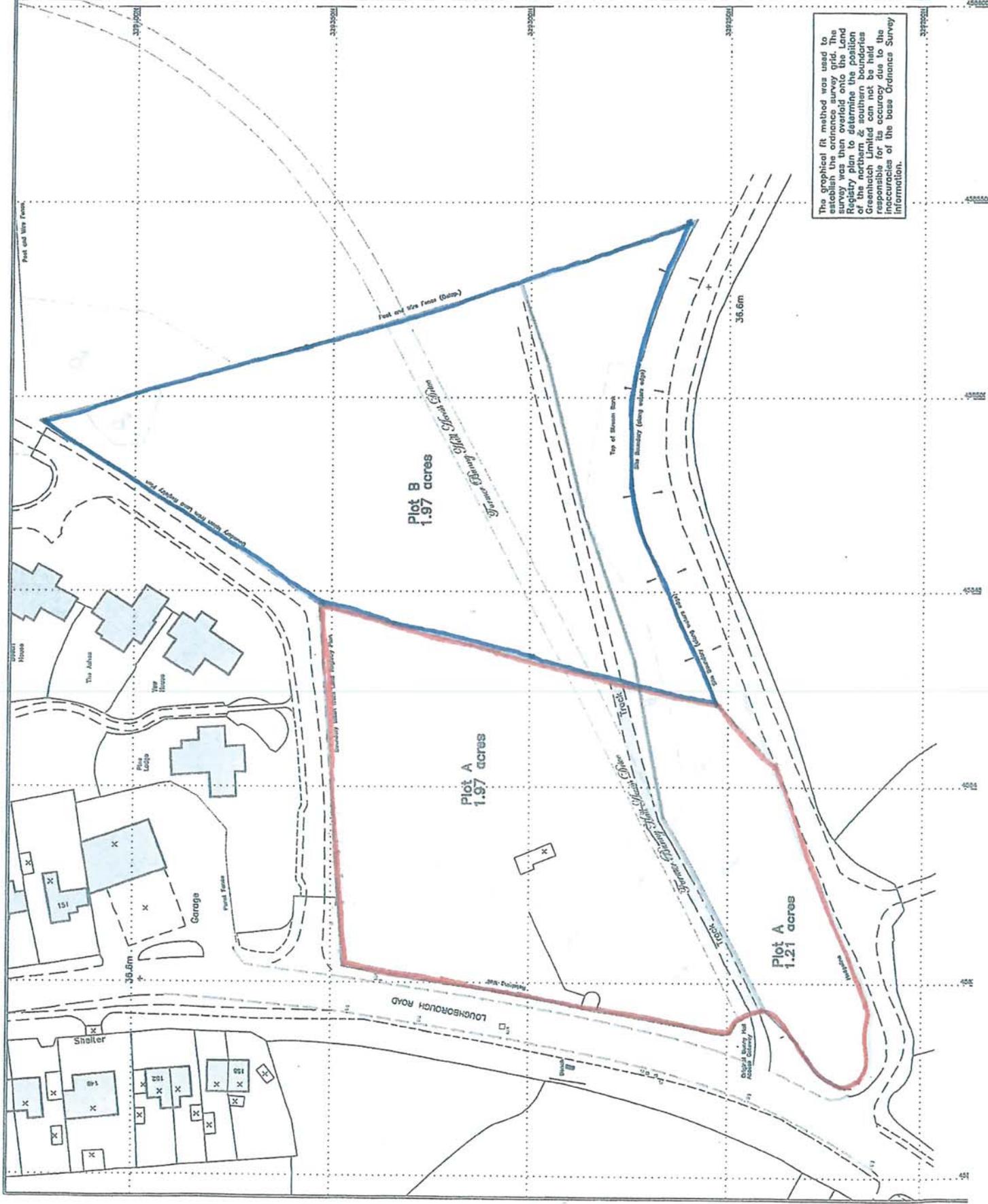
Authorisation
CS (Greenberg)

Subsidiary
S&B

Drawing No.
6084-08

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Comments
This plan should only be used for its original purpose. It is not to be used for any other purpose. The plan is not to be used for any other purpose. The plan is not to be used for any other purpose.



The graphical RT method was used to establish the ordnance survey grid. The plan is not to be used for any other purpose. The plan is not to be used for any other purpose. The plan is not to be used for any other purpose.

From:
To: Rushcliffe Local Plan-Preferred Housing Sites-Local Plan Part 2: Land at the former Bunny Brickworks. (My
Cc:
Subject: file:A247)
Date: 24 November 2017 11:48:50

Further to my representations submitted yesterday with regard to the above site, there is an additional matter that I would ask you to take into account with regard to the objectors' land at Loughborough Road whereon I have suggested that a much smaller development, that would be better suited to Bunny, should be proposed.

You will recall that, for many years, this land was used as a recreation ground. Indeed, the quite substantial sports pavilion still remains. It is clear from the judgement in *Dartford Borough Council v The Secretary of State for Communities and Local Government and others* [2017] EWCA Civ141 that such land, lying outside a built-up area, must be regarded as "previously developed land", in accordance with the definition set out in Annex 2 of the National Planning Policy Framework.

This, I submit, reinforces the objectors' claim that, before any decision on an allocation for new housing is made for land that is less well-integrated with the village framework and its facilities at Bunny, this site which lies immediately adjacent to its built framework, and is more accessible to local facilities, should be considered favourably. Whilst it is smaller in area, as currently proposed, than the land at the former Brickworks, and it would generate less new dwellings, it has considerably fewer disadvantages than that location and it is more suited to the village's capacity to accept additional housing development.

I shall be grateful if you will regard this e-mail and its contents as supplementary to the representations already submitted.

With regards.

John Church
(on behalf of Mr & Mrs S N Mourtzis)