



## 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](mailto: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) |
|---|----------------|----------------------------------|
| <b>Mr B Driver</b><br><b>Southern Conservation Officer</b><br><b>Nottinghamshire Wildlife Trust</b> | <b>Name</b>    | Click here to enter text.        |
| <b>The Old Ragged School</b><br><b>Brook Street</b><br><b>Nottingham</b><br><b>NG1 1EA</b>          | <b>Address</b> | Click here to enter text.        |
|   | <b>E-mail</b>  | Click here to enter text.        |

### 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?

|                         |                                     |
|-------------------------|-------------------------------------|
| <b>Yes</b> .....        | <input type="checkbox"/>            |
| <b>No</b> .....         | <input checked="" type="checkbox"/> |
| <b>Don't know</b> ..... | <input type="checkbox"/>            |

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

*Our view remains as per our response to Q1 of the further Options (February 2017) consultation which related to identification of enough land for 2,000 homes, in that:*

*We are unclear why the 'large' sites have been delayed and query why they can't be delivered more quickly. The causes of the delay should be looked at closely and solutions found as a matter of urgency. The situation should not be resolved by permitting new less sustainable village allocations.*

*The danger with identifying additional sites is that less sustainable 'village' developments will be delivered first and then the 'large sites' come forward. The consequences would be that more land is taken than is strictly necessary. Not only will this impact on the villages themselves, many of which will not have the infrastructure in place to cope with the increased population, spreading development 'wide and thin' would have more impacts on biodiversity than concentrating built development on identified sites at the edge of Nottingham, which will have their own Green Infrastructure built in. The approach would lead to a greater degree of habitat fragmentation across the landscape. The approach would also lead to increased unsustainable travel patterns (i.e. more journeys by private car), which would be contrary to sustainable development and would have further adverse impacts on wildlife.*

*This approach would also be contrary to Policy 3 of the Adopted LP Part 1 (Rushcliffe Core Strategy). The settlement hierarchy states, "The sustainable development of Rushcliffe will be through a strategy that supports a policy of urban concentration with regeneration for the whole of Greater Nottingham to 2028".*

*Beyond the main built-up areas of Nottingham (within Rushcliffe) and locations mentioned in paragraph 2b (i to vii, including North of Bingham, former RAF Newton, Cotgrave Colliery, East Leake, Keyworth, Radcliffe on Trent and Ruddington), homes will only be built "in other villages solely to meet local housing needs".*

*Proposed housing allocations should avoid damaging developments near SSSIs, Local Wildlife Sites and Local Nature Reserves and other nature reserves, as well as ensuring that both strategic and local wildlife corridors (GI) are maintained and not encroached upon, following good GI design practice. We are also concerned about biodiversity impacts on sites beyond known or designated sites. Many of the potential village allocations are very likely to have wildlife interest which has not been picked up simply because the sites have not yet been surveyed (i.e. they are on private land).*

*(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.

Due to the brownfield nature of the site, we agree with the allocation of this site for housing but find that it is ridiculous that, in the event that 50 homes delivered on this site, it cannot contribute to the requirement for Local Plan Part 2 to allocate land for the construction of at least 2,000 new homes in total. Even if it is a previously developed site in an urban area, it is still contributing.

(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.

We agree with council view on this for the reasons provided in the supporting text:  
1. Expanding the three strategic sites would not lead to more homes being built over the next few years than is already due to be delivered as they would be likely to be built at the end of the development phase  
2. Heritage value prohibits development of the Simpkins Farm site  
3. No other suitable sites have been put forward.

(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.*

*We agree with the council on this for the reason provided that, “Doing so would not lead to more homes being built over the next few years than is already due to be delivered. Rather, any extra homes would be built further into the future at the very end of the development of this site, thereby having no impact at all on the immediate housing shortfall situation”.*

*(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.*

*We are of this view for the reasons set out in our answer to Q1, that development of strategic sites should be prioritised, over less sustainable small towns and villages. Cotgrave has already accommodated much new housing, with substantial damaging impacts on habitats and species on the former colliery site.*

*(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 checked="" type="checkbox"/> |
| Sites COT09 – Land south of Hollygate Lane (1);<br>COT10 – Land south of Hollygate Lane (2); and<br>COT11a – Land south of Hollygate Lane (3a)<br>(estimated capacity around 180 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.

In terms of biodiversity, nearby Cotgrave Forest and plantations on the northern and southern edge of the town provide valuable habitat and an important GI resource, leading to Cotgrave and surrounding land being identified as a 'focal area' in the Biodiversity Opportunity Mapping Report for Rushcliffe.

If the listed allocations were to be taken forward, we would wish to see the following design principles/ mitigation provided, in order to protect wildlife and green infrastructure:

COT1– any development should be adequately set back from the woodland, or new woodland planting considered for the boundaries of the site, in addition to protecting any features of archaeological interest.

COT1 and 11a – there must be adequate buffering to protect the wildlife value of the Grantham Canal as this is both an important Local Wildlife Site and a key piece of green infrastructure and is a valuable wildlife corridor running through the Borough

(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 .....

No .....

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

For the reasons provided in the supporting text (more development in East Leake goes against the spatial strategy and that East Leake has no capacity to support further housing), we agree that (aside from permissions already in place) no further sites should be allocated.

(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.

Bearing in mind the 580 new home target (increased from 450), which appears to be based on availability of primary school places (in our minds not the most appropriate overarching factor to determine whether development is sustainable or not), we still think this goes against the principles of the spatial strategy.

(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)<br>(estimated capacity around 150 homes)                | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Site KEY8 – Land between Platt Lane and Station Road<br>(estimated capacity around 190 homes) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

|  | Yes                                 | No                                  |
|--|-------------------------------------|-------------------------------------|
| Site KEY10 – Land south of Debdale Lane (1)<br>(estimated capacity around 190 homes) | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Site KEY13 – Hillside Farm<br>(estimated capacity around 50 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.

Although it contrary to our general view, we have indicated that we ‘support Key 8 and 13 as we consider these to be the least damaging in terms of impacts on biodiversity. We do not support:

KEY4, which is adjacent to a Local Wildlife Site.

KEY10 contains some ridge and furrow, which is an increasingly scarce feature and could be of archaeological and biodiversity interest, along with prominent hedgerows.

(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.

The 820 homes ‘target’ is against the principles set out in the spatial strategy. We also find it absurd that the issue surrounding the availability of primary school places and the requirement for a new school could substantially increase Radcliffe on Trent’s housing allocation from 400 to 820 homes. This would be avoided if the spatial strategy was adhered to, as any new houses built within the strategic sites would have their own new schools provided. The availability of school places should not be the overarching factor determining sustainability of allocations, which in our

*minds appears to be the case.*

*How has the LPA come the conclusion that, “in balancing sustainability, Green Belt, settlement capacity, flood risk, the availability of suitable sites for development and other relevant planning considerations, we propose that six sites (see further below) are allocated for housing development which would deliver around 820 new homes”. We think this could (and should) be lower. Also, any expansion of Gamston (an identified strategic site) or Bingham (already approved) will be serving needs of this area.*

(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 checked="" type="checkbox"/> |
| Site RAD02 – Land adjacent Grooms Cottage (estimated capacity around 50 homes)  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Site RAD03 – Land off Shelford Road (estimated capacity around 400 homes)   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Site RAD05a – Land north of Grantham Road to south of railway line (1a) (estimated capacity around 140 homes)   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Site RAD06 – 72 Main Road (estimated capacity around 5 homes)   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Site RAD13 – The Paddock, Nottingham Road (estimated capacity around 75 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.*

We consider RAD2, 3 and 13 as perhaps the 'least bad' options in terms of minimising impacts upon biodiversity because these are, we understand intensively grazed pastures, or arable sites.

RAD1 impacts upon natural countryside with a strong hedgerow network and a network of grasslands (increasingly scarce in this part of Rushcliffe), occurring in close proximity to a disused railway corridor, which is part of/ connects with the Cotgrave Forest Focus Area as identified in the Rushcliffe Biodiversity Opportunity Mapping Report. It also focuses development on land closer to the complex of wildlife sites, including NWTs Skylarks Nature Reserve and the Trent Valley Corridor and is encroaching upon this strategic Green Infrastructure asset and wildlife corridor.

Once again, it seems absurd that the development of RAD13 could not contribute to housing figures, because it has been counted in the SHLAA as a 'separate supply source'. We strongly think any development of this land should contribute.

(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.

(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)<br>(estimated capacity around 180 homes) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

Although we do not support any of the developments (except RUD11, as it is self-contained), we do think that those sites listed above are more preferable than some of those originally considered. However, they still represent an intrusion into the wider countryside (particularly in the case of RUD05 and 13, which could encourage further sprawl east of the A606) and loss of greenbelt.

(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.

We do not agree for the reasons set out in our response to Q1.

(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)<br>(estimated capacity around 90 homes) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Site CBI05 – Land east of Church Street<br>(estimated capacity around 70 homes)     | <input type="checkbox"/> | <input checked="" 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.

Due to the close proximity of CBI02 to the Grantham Canal, there is the potential for adverse impacts on this important Local Wildlife Site and Green Infrastructure Corridor. It is also adjacent to Hoehill Pasture, a grassland LWS which will be sensitive to any changes in management, increased footfall, dog walking (increases in nutrients) etc which might arise following any such development. The development of this site would also have serious detrimental impacts on protected species resident immediately adjacent to the proposed development and which use the site for foraging.

In relation to CBI05, we are pleased this takes in a smaller area of land than previously considered, but this would still be an intrusion into the landscape and would need a strong boundary along its eastern edge, to define the right of way, create a wildlife corridor and to safeguard from any further intrusion into the wider countryside.

(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 checked="" type="checkbox"/> |

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

Although we are pleased to see the 10 sites under consideration being reduced to four, we are still of the view that no allocations are required at East Bridgford, as per our answer to Q1

(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)<br>(estimated capacity around 20 homes)       | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Site EBR07 – Closes Side Lane (east)<br>(estimated capacity around 20 homes)       | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Site EBR8 – Land to the north of Butt Lane<br>(estimated capacity around 15 homes) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Site EBR10 – Land south of Butt Lane<br>(estimated capacity around 45 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.

We don't support any of the sites. EBR 6 and 8 would lead to loss of grasslands, which are relatively scarce in much of Rushcliffe. EBR10 is adjacent to the Springdale Wood nature reserve, an important community wildlife site, which must be adequately buffered if any development were to be taken forward. Part of the development is also adjacent to a species rich wildflower meadow that contains a range of plant species that are scarce in Rushcliffe. Again this must be adequately buffered from any development. EBR10 would also need creation of a significant greenspace buffer to the south and east, to form a defensible boundary and stop any sprawl eastwards along Butt Lane.

(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** .....

**No** .....

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

Whilst we are pleased to see the 8 sites under consideration being reduced to four, we are still of the view that no allocations are required at Gotham, as per our answer to Q1.

(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)<br>(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.

We find inclusion of GOT5a unacceptable as it is situated adjacent to a Local Wildlife Site and would represent a major intrusion into the landscape, with the loss of valuable grasslands, scrub, in-field and hedgerow trees and a loss of a dense network of hedges. Also, once any development is taken forward, we envisage it will be difficult for the LPA to resist any proposals submitted for the adjacent fields immediately to the south. We also think the ridge and furrow to the north (stated in the supporting text as remaining as paddock) would come under increasing development pressure, especially if released from greenbelt.

(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** .....

**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.

*As again this goes against principles set out in the spatial strategy we do not support this allocation. However, recognising it is allocated in the former local plan, should this site be taken forward (either for housing or employment, as originally intended), we would wish to see retention of some of the more valuable naturally regenerated habitats within open space.*

(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.

As this already has planning permission, we think the allocation should be included and contribute to the housing delivery figures.

(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.

In relation to selecting sites for housing development, we think it is important to reiterate that Local Wildlife Sites, Local Nature Reserves, other nature reserves, informal green space and Green Corridors must be avoided. Habitat features with in the 'wider' countryside, such as mature trees, orchards, hedgerows, copses, woodland, ponds and lakes, grasslands, rivers and ditches etc are also important and are largely irreplaceable, within even a generation. Whilst not all are protected, they are of value to wildlife and, in most cases, worthy of retention. In some circumstances, integrating them sensitively into new development Green Infrastructure network may be appropriate, but experience has demonstrated that this approach rarely works, with these features becoming degraded within a few years of the development taking place.

If such sites or habitats are affected (either directly or indirectly), any buffering or mitigation will need to be adequate. Once valuable sites and habitats are damaged or lost, mitigation cannot guarantee fully replacing the lost biodiversity and it will often take many years (decades or even longer) for habitats to develop and mature. Therefore, we recommend taking a precautionary approach.

We would, of course expect to see Biodiversity Policies in the NPPF and Core Strategy being strictly adhered to when considering preferred housing allocation sites.

(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](mailto: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.