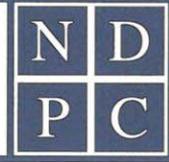


Natalie Dear Planning Consultancy



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Our Ref: ND300
Date: 24th November 2017

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

Dear Sir / Madam,

Land at The Crescent, Radcliffe on Trent Rushcliffe Local Plan Part 2: Land and Planning Policies Preferred Housing Sites Consultation October 2017

I am instructed by my client Pedigree Wholesale Ltd to make representations in relation to the current consultation regarding the Rushcliffe Local Plan Part 2: Land and Planning Policies Preferred Housing Sites document. These representations follow up the representations made in March 2017 to the Further Options Consultation (for which your reference for Pedigree Wholesale Ltd is 1073456 and agent reference 963774).

Advice has been sought through a telephone conversation and exchange of e-mails with Liz Beardsley, Planning Policy Officer, and this has been taken into consideration in relation to the representations set out below.

Pedigree Wholesale Ltd own and operate land at The Crescent, Radcliffe on Trent and wish this site to be allocated for residential development, as set out in the previous representations to the Further Options consultation earlier this year. It appears that this site has not been assessed in your Housing Site Selection Interim Report September 2017 and is not included within the most recently published SHLAA, as this dates from 2016. The site is not included within the Preferred Housing Sites consultation document as a potential allocation for Radcliffe on Trent. Your officer, Liz Beardsley, has advised that the Local Plan allocations will be focussed on Green Belt sites and larger brownfield sites and hence the land at The Crescent is not included within the current consultation document.

It is considered that the land at The Crescent should be included within the Local Plan Part 2 as an allocated site within Radcliffe on Trent. The current approach of focussing the delivery of new homes in this key settlement on allocations on Green Belt sites and larger brownfield sites will result in greater areas of Green Belt land being allocated, and therefore lost, than is necessary and therefore this approach is considered to be flawed.

It is noted that the Housing Site Selection Interim Report states that a key element of the current approach is to identify new sites for housing on the edge of settlements (paragraph 1.2) and that *"The Core Strategy sets a target of a minimum of 400 new homes that need to be built on greenfield sites within the existing Green Belt*

surrounding Radcliffe on Trent up to 2028". It is acknowledged that the Core Strategy sets a target of 400 new homes for Radcliffe on Trent, however, Policy 3: Spatial Strategy does not state that these should all be on Green Belt land, indeed, the policy states that these new homes should be delivered *"in or adjoining Radcliffe on Trent"*. The Housing Site Selection Interim Report is therefore misleading and is significantly more narrow than the approach set out in Policy 3 of the Core Strategy. In addition, the supporting text to Policy 3 does not state that all of these new homes will, or should, be delivered on Green Belt sites either.

Furthermore, it is noted that the Inspector's Report (December 2014) into the Core Strategy also refers to housing being delivered *"in and around key settlements"* (paragraph 37) and there is nothing to suggest that all of these sites would, or should only, involve existing Green Belt land. The Inspector's Report goes on at paragraph 60 to state *"Substantial new housing development is planned in or adjoining the key settlements of ... Radcliffe on Trent ... The precise locations for new development here ... will be determined through the Part 2 Local Plan."* Again, there is no suggestion that this would all be required to be delivered on existing Green Belt land.

Policy 4: Nottingham-Derby Green Belt of the Core Strategy states that *"When reviewing Green Belt boundaries, consideration will be given to whether there are any non-Green Belt sites that are equally, or more, sustainably located to cater for development needs within the Borough before making alterations to the Green Belt"*. The sites put forward in the current consultation document for Radcliffe on Trent almost all involve Green Belt land (it is acknowledged that RAD13 "The Paddocks" is not Green Belt land but is nevertheless a greenfield site). It appears that no assessment has been undertaken of the proposed allocation site at The Crescent to establish whether this is a more suitable site which would not in itself involve altering the boundary of the Green Belt, in accordance with Policy 4. The allocation of the land at The Crescent could reduce the loss of Green Belt land in meeting the requirement for new housing in Radcliffe on Trent and should be assessed and given very careful consideration as such. Indeed, Policy 4 of the Core Strategy requires this approach to be taken prior to sites being removed from the Green Belt. This site has not been considered through any previous SHLAA and therefore will not have been taken into account in any calculations of potential previously developed land to come forward within the plan period. It is therefore considered that the site at The Crescent should be allocated for residential development and that this will reduce the pressure to release Green Belt land adjoining Radcliffe on Trent, albeit that it will be a modest contribution. This will also ensure compliance with Core Strategy Policy 4.

If, however, it is the intention of Rushcliffe Borough Council to only allocate Green Belt sites and large brownfield sites through the Local Plan Part 2, as has been stated, it is considered that the document should be very clear that it is adopting this more limited approach than appears to have been envisaged at the time the Core Strategy was written, examined and adopted. It is also imperative that the Local Plan Part 2 contains a policy, or policies, which provide a clear presumption in favour of the redevelopment of existing brownfield sites within settlement boundaries for new housing, even if the housing targets set out in the Core Strategy and updated in the Local Plan Part 2 can be met through existing allocations. If this approach is not taken forward, it will prejudice site such as those at The Crescent, Radcliffe on Trent, which are highly sustainable, previously developed sites within key settlements. This would be contrary to the principles of sustainable development.

I trust that these comments will be taken into consideration in the preparation of the next stage of the Local Plan Part 2. If you have any queries regarding any matters raised within these representations, please do not hesitate to contact me.

Yours faithfully,

Natalie Dear
Principal

[nk](#)

(unsigned as sent electronically only)