



Planning Policy
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27th November 2017

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Dear Sir

RUSHCLIFFE LOCAL PLAN PART 2: LAND AND PLANNING POLICIES: PREFERRED HOUSING SITES

I write on behalf of my client William Davis Ltd with regard to the Local Plan Part 2 Land and Planning Policies (LAPP) Preferred Housing Sites consultation. My clients own the land at Shelford Road, Radcliffe on Trent that is identified as preferred housing site RAD03 in the consultation. You will be aware that it is also the subject of an outline planning application currently being considered by the Borough Council for the development of up to 400 dwellings, a primary school, health centre and associated infrastructure (13/02329/OUT).

Question 1: Housing Land Supply

The Borough Council will recall the comments submitted on behalf of William Davis in relation to previous stages of consultation, that welcomed the preparation of Part 2 of the Local Plan and its intention to facilitate appropriate and sustainable development to meet the identified housing needs in the Borough. Those representations highlighted that given the continued delay in the delivery of the allocated strategic sites in Part 1 of the Local Plan (the Core Strategy), rapid progress is now required to review the Green Belt around the Key Settlements identified in Policy 3 of the Core Strategy, and allocate sufficient sites for residential development to ensure that the residual housing needs in the plan period are met (taking account of the delay in the delivery of the strategic sites). That is critical if *“the full, objectively assessed needs for market and affordable housing in the market area”* are to be met, and a 5 year housing land supply is maintained as required by the NPPF (para 47).

William Davis, therefore, support the position set out in Section 2 of the Preferred Housing Sites Consultation Paper, to allocate additional land to make up for the expected shortfall in the delivery of new housing in the plan period from the large strategic sites allocated for development in the adopted Core Strategy. In light of the continuing delays to the delivery of the strategic allocations, it is also considered appropriate to allocate land to provide additional flexibility should the anticipated shortfall increase further. On that basis planning to deliver a **minimum** 2,550 dwellings in the LAPP would be appropriate at this point in time, but clearly that should be kept under review.

Moreover it is noted that if the LAPP is adopted in 2018 the remaining plan period will only be 10 years (to 2028). That is somewhat less than the 10 year period specified in the NPPF (para 157). A comprehensive review of Part 1 of the Local Plan, including consideration of the level of housing need in the Housing Market Area through a new SHMA will be, therefore, be required as a priority following the adoption of the LAPP to ensure that the Borough Council continues to positively plan for longer terms housing needs.

In light of the above position William Davis do, however, continue to have concerns in respect of the continued delay to the already prolonged programme for the preparation of the LAPP, and urge the Borough Council to do all that it can to publish a Submission Version of the LAPP at the earliest possible opportunity and also consider how the preferred housing sites could brought forward for development as the LAPP progresses to examination and adoption.

Question 3: Main Urban Area

William Davis' earlier consultation responses highlighted the continuing delay in the delivery of the strategic sites at the Major Urban Area, and therefore, their ability to deliver the level of development required to meet the identified needs in the required timescale. William Davis, therefore, support the Council's view that no further allocations should be proposed adjacent to the Main Urban Area in the LAPP.

Question 10: Radcliffe on Trent

William Davis' earlier consultation responses highlighted that to address the increasing shortfall in the housing land supply in the Borough, a number of sustainable development sites at the Key Settlements, such as Radcliffe on Trent, are required to come forward at the earliest opportunity to accelerate the supply of housing and meet identified needs throughout the plan period to 2028.

Indeed, Radcliffe on Trent is an important population and service centre in the Borough, and it has been recognised as an entirely appropriate and sustainable focus for growth. There is significant capacity for additional development, yet there has been relatively little development over the last 20 years. William Davis, therefore, welcome the acknowledgement in the LAPP Consultation Paper that it is now necessary to accommodate more than the minimum of 400 new dwellings identified in the Core Strategy, and support the proposal to allocate greenfield land to accommodate around 820 homes

The additional development over and above that originally anticipated by the Core Strategy would have a number of benefits for the settlement as it would assist in meeting the Neighbourhood Plan objectives relating to regeneration and the retention of services in the settlement. For example, the secondary school has experienced a declining school role as a result of the aging settlement population, and additional development in the village can help address that.

The LAPP Consultation Paper highlights that the additional development would also help to ensure the delivery of the essential community infrastructure required to meet the needs arising from the planned growth, and refers to the reservation of land for the provision of a new primary school and medical centre within Site RAD03. The Council will be aware that the outline planning application submitted by William Davis in relation to Site RAD03 already makes provision within the site for the delivery of a new primary school and medical centre. William Davis would, however very much welcome further discussions with the Council to understand how other sites proposed to be allocated at Radcliffe will contribute "financially and equitably" to their delivery in due course.

Question 11: Site RAD03

In light of the above matters, William Davis support the allocation of the entirety of Site RAD03 Land off Shelford Road for housing development.

As stated above the submitted outline planning application proposes that the site is developed to provide up to 400 dwellings (mix to be determined but including 30% affordable housing provision), a primary school, health centre and associated infrastructure, including highway and pedestrian access, open space and structural landscaping. The site is relatively unconstrained, and the development proposals have evolved through an iterative masterplanning exercise that has taken into account the requirements of the various technical and environmental assessments undertaken, as well as best

urban and landscape design practice. Consequently, the application proposals would deliver a high quality housing development that is well related to the built form of Radcliffe on Trent and the services and facilities therein, respects its relationship with the countryside, and uses the site in an effective and efficient manner.

The particular merits of Site RAD03 are, therefore as follows:

- The site has the distinct advantage of being able to accommodate 400 dwellings and associated public open space (5.12ha including play and allotment provision with amenity benefits for future residents and the local community) on a single site.
- The allocation of Site RAD03 can also facilitate the provision of a new primary school and medical centre to meet the needs of the development's residents and address existing capacity and qualitative issues within the village:
 - In commenting on the submitted application, the County Council have confirmed the need for a new school in the village as there is no spare capacity in the existing facilities and those facilities cannot be extended to provide the additional capacity. Subsequently William Davis have agreed with the County Council that a ½ form entry primary school can be provided on the application site as part of the proposed development, with a larger site reserved to allow its future expansion to meet needs arising elsewhere in the settlement. Furthermore, in the pre-application discussions that took place the County Council highlighted the merit of provision on the application site as it would serve a wide (existing) residential area as well as the scheme itself, and, therefore, minimise the need to travel to the southern part of the settlement where all of the existing schools are currently located.
 - Similarly in terms of the health centre , it is widely recognised that the current premises are extremely limited and there is no scope to extend them. There are also significant issues with the physical condition of the buildings. Moreover, despite the GP Practice having actively looked for an opportunity to relocate in the village for a number of years, an appropriate and available site has not yet been identified. In the absence of an alternative solution within the village centre, the provision of a new site within Site RAD03 would help to ensure that health services can still be appropriately provided in the settlement in the future if a solution within the village core cannot be identified
- The site is comparable in accessibility terms to the other potential sites identified on the edge of Radcliffe. Its development would, therefore, also support the other important community services and facilities in the settlement notably in the village centre. The development would also provide financial contributions to maintain and enhance sports provision within the village.
- The application proposals demonstrate that the hedgerows and trees in and around the site can be retained in the development and supplemented with substantial tree planting on the site to reflect and enhance the local landscape character. This would integrate the proposed development into the countryside by softening the settlement edge. The tree planting and provision of SUDS, will also provide notable ecological benefits by creating new habitats and enhancing the quality of the existing habitats improving the biodiversity in the site.
- The introduction of a roundabout on Shelton Road as proposed in the submitted planning application at the entrance to the village would act as a gateway feature and help to slow traffic speeds, together with a traffic calming scheme for Shelford Road funded by the development. The development would also provide new and improved pedestrian crossings

on Shelford Road and in the village centre, improved bus stops and a financial contribution to local bus service enhancements which would improve the frequency of service from 60min to 40min.

- In terms of the Green Belt, it is notable that Site RAD03 is enclosed on 3 sides by the existing urban form of Radcliffe on Trent, there is no risk of physical coalescence with other settlements and in visual terms it is extremely well contained by a combination of the urban form, topography and existing vegetation. The proposed landscape scheme will also provide an enhanced settlement edge that will form a clear and defensible long term Green Belt boundary. Moreover, Radcliffe on Trent is not identified as an historic settlement and contains very limited opportunities for the development of previously developed land. Therefore, the Planning Statement submitted with the planning application highlighted that in terms of the purposes of Green Belt set out in the NPPF that the site performs a limited role and the impact of the site's development would be relatively low.

The merits of Site RAD03 as an entirely appropriate residential development site as set out above are clearly reflected in the site's identification as part of a "broad housing location" within the recently "made" Neighbourhood Plan. They are also acknowledged in the LAPP's emerging evidence base, notably the Housing Site Selection Interim Report and Rushcliffe Green Belt Review Part 2(b).

The site is available, suitable and the proposed development is deliverable and would make a significant contribution to meeting the identified market and affordable housing needs within the plan period. The site should therefore, be allocated for development in the LLAP, and brought forward for development as a priority to address those housing needs and facilitate the delivery of the required community infrastructure.

Please do not hesitate to contact me if you have any queries in respect of the comments made above, but in the meantime I would be grateful if you could confirm safe receipt of this letter by return.

Yours sincerely

Mark Rose
Director