

Our Ref: BJH/EAB/LPA91/Bloor
23rd March, 2016

Richard Mapletoft
Planning Policy Manager
Rushcliffe Borough Council
Civic Centre
Pavilion Road
West Bridgford
Nottingham
NG2 5FE



Bloor Homes
658011 agent
Oxalis Planning
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Dear Mr Mapletoft

**RUSHCLIFFE LOCAL PLAN PART 2: ISSUES & OPTIONS
RUSHCLIFFE GREEN BELT REVIEW
REPRESENTATIONS BY OXALIS PLANNING ON BEHALF OF BLOOR HOMES**

Please find set out below and on the attached forms representations on the Rushcliffe Local Plan Part 2: Issues and Options and the Rushcliffe Green Belt Review.

These representations are submitted by Oxalis Planning on behalf of Bloor Homes.

Housing Delivery

Bloor Homes supported the Spatial Strategy set out in the Rushcliffe Core Strategy, which sought to deliver a balance between large scale sustainable urban extensions, and growth in large villages. Bloor Homes has land interests at the Gamston SUE where it is actively working with others to bring forward that site, and in the villages of Keyworth and Ruddington.

The Core Strategy sets out challenging targets in terms of housing requirements and established a delivery approach based on an uneven trajectory allowing time for the large SUEs to come forward and begin to deliver.

However, since the examination into the Local Plan Core Strategy, progress has been slower than anticipated, with delays caused by a legal challenge to the Core Strategy adoption, delays to the preparation of the Local Plan Part 2 (which was due to be in place in 2016) and delays to the delivery of housing including the delivery of the SUEs. As a result the Council is now significantly behind on its housing trajectory and this position is set to deteriorate further prior to the adoption of the Local Plan Part 2 and the delivery of the SUEs.

Even without further deterioration however, the delivery issues in the Borough require direct action and intervention by the Borough Council through the allocation of additional land.

There are two fundamental issues that have resulted from the lack of delivery in the Borough.

Firstly, the Council is currently unable to demonstrate a 5 year supply of land for housing, even based on its uneven trajectory. This position was confirmed by an Inspector considering an appeal on land in Aslockton. Furthermore paragraph 3.3.9 of the Core Strategy states that, upon the adoption of the Local Plan Part 2, an annualised approach to calculating the 5 year supply will be used. Given the historic shortfall in supply, the significant year on year housing requirement and the need to apply a 20% buffer, it is unlikely that the Council will be able to demonstrate a 5 year supply at the point of adoption of the Local Plan Part 2 without the allocation of additional land over and above the minimum requirements set out in the Core Strategy. The Council should, as part of the preparation of the Local Plan Part 2, set out its position on 5 year land supply, so that clear decisions can be made about the need, or otherwise, for additional land to be allocated.

The second problem that arises from the delays to delivery is that the overall minimum housing requirement for the Plan period is unlikely to be met without additional land being brought forward. The delivery rates assumed on the large SUEs are challenging and greater rates will not be possible. Based on the trajectory in the Core Strategy therefore, without additional sites being brought forward, the overall requirement for the Borough would not be met. The Council should as part of the Local Plan Part 2 prepare an updated, realistic housing trajectory to assist it in identifying the quantity of land needed to ensure that its housing requirements are met in full.

In accordance with the NPPF the Council must do all it can to boost housing supply and it must ensure that the housing requirements of the area are met "in full". These issues are fundamental to the soundness of the Plan.

The Council is able, in accordance with the Core Strategy, to rectify its shortfall through the allocation of additional sites. This should include additional land in the main villages where the Core Strategy sets out 'minimum' targets, and the identification of sites identified through the Council's SHLAA. This is made clear in paragraph 3.3.23 of the Core Strategy.

Ruddington and Keyworth are sustainable settlements where growth is envisaged. The Core Strategy minimum levels of growth proposed (250 and 450 respectively) is significantly less than the amount of development committed in similar sized settlements at East Leake and Bingham. Both Ruddington and Keyworth are capable of accommodating additional growth in a sustainable way.

In relation to Keyworth land north of Bunny Lane has been identified as a sustainable location for development and this is strongly supported. Land at Debdale Lane has been identified as land which could be safeguarded for development, however given the land supply issues outlined above, this site too should be allocated for development now to address the Council's immediate housing requirement and help boost supply.

In relation to Ruddington land north of the village off Wilford Lane, is extremely well related to the village and can be developed in a sustainable way, including the delivery of community benefits in the form of new open spaces and community facilities. This site should be allocated for development.

I trust that these representations are helpful.

Yours sincerely

A solid black rectangular box used to redact the signature of Ben Holmes.

Ben Holmes

cc. Max Whitehead – Bloor Homes



Rushcliffe Local Plan Part 2: Land and Planning Policies – Issues and Options

Response Form

Please return by **5pm on Thursday 24 March 2016** to:
 Planning Policy, Rushcliffe Borough Council
 Civic Centre, Pavilion Road
 Nottingham. NG2 5FE
 Or to: localdevelopment@rushcliffe.gov.uk

Your Details		Agent details (where applicable)
Bloor Homes	Name	Ben Holmes
c/o Agent	Address	Oxalis Planning Unit 7 Wheatcroft Business Park Landmere Lane Edwalton Notts NG12 4DG
	E-mail	admin@oxalisplanning.co.uk

Housing Development

Housing Development at the Main Urban Area

Question 1: Do you agree with the Council’s view that no other sites on the edge of West Bridgford or Clifton should be removed from the Green Belt and allocated for housing development.

Yes

No

Please provide any comments you wish to make to support your response. If you answered NO, please could you identify which site(s) on the edge of West Bridgford or Clifton should be removed from Green Belt and identified as suitable for

development and why.

(please continue on a separate sheet if necessary)

Housing sites within the Main Urban Area

Question 2: Which sites within West Bridgford should be allocated for housing development in the LAPP?

	Yes	No
Site WB1 – Abbey Road Depot (potential capacity around 50 homes)	<input type="radio"/>	<input type="radio"/>
Site WB2 – Central College (potential capacity around 90 homes)	<input type="radio"/>	<input type="radio"/>
Site WB3 – South of Wilford Lane (potential capacity around 200 homes)	<input type="radio"/>	<input type="radio"/>
Site WB4 – land between Lady Bay Bridge and Radcliffe Road (potential capacity around 25 homes)	<input type="radio"/>	<input type="radio"/>
At any other location (please specify which)	<input type="radio"/>	<input type="radio"/>

Please provide any comments you wish to make to support your answers. For any of the sites, this could include comments on the services and facilities required to support development and the design, mix and layout of development.

Housing Development at the 'Key Settlements'

Bingham

Question 3: Do you agree that the LAPP should not allocate further greenfield land for housing development at Bingham in the plan period (up to 2028)?

Yes

No

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

A significant level of housing is already directed to the village. Additional growth should be focussed elsewhere

(please continue on a separate sheet if necessary)

Cotgrave

Question 4: Do you agree that the LAPP should not allocate further greenfield land for housing development at Cotgrave in the plan period (up to 2028)?

Yes

No

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

(please continue on a separate sheet if necessary)

East Leake

Question 5: Do you agree that, apart from those eight sites that already have planning permission for housing development (as shown on Figure 3), further greenfield land should not be allocated for housing development at East Leake?

Yes



No



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

A significant level of housing is already directed to the village. Additional growth should be focussed elsewhere

(please continue on a separate sheet if necessary)

Keyworth

Question 6: Do you agree that the draft Keyworth Neighbourhood Plan's proposals to allocate land north of Bunny Lane (site KEY A), land off Nicker Hill (site KEY B) and land off Platt Lane (site KEY C) (as shown on Figure 4) are appropriate in meeting the minimum target for 450 new homes at Keyworth over the plan period (up to 2028)?

Yes

No

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

However, for the reasons set out in our covering letter, it is considered that additional land for development should be brought forward and Keyworth can accommodate significantly more growth than the 450 house minimum. Land north of Debdale Lane should be allocated for development in addition to the sites currently proposed.

(please continue on a separate sheet if necessary)

Radcliffe on Trent

Question 7: With respect to general directions around the village, do you support housing development:

	Yes	No
To the east of the village	<input type="radio"/>	<input type="radio"/>
To the south of the village	<input type="radio"/>	<input type="radio"/>
To the west of the village	<input type="radio"/>	<input type="radio"/>

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

(please continue on a separate sheet if necessary)

Question 8: Do you support housing development at:

	Yes – all of site	Yes – but only part of site	No
Site RAD1 – land north of Nottingham Road (potential capacity around 300 homes)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Site RAD2 – land adjacent Grooms Cottage (potential capacity around 50 homes)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Site RAD3 – land off Shelford Road (potential capacity around 400 homes)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Site RAD4 – land north of Grantham Road to north of railway line (potential capacity around 900 homes)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Site RAD5 – land north of Grantham Road to south of railway line (1) (potential capacity around 200 homes)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Site RAD6 – 72 Main Road (potential capacity around 7 homes)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Yes – all of site	Yes – but only part of site	No
<i>Site RAD7 – land north of Grantham Road to south of railway line (2) (potential capacity around 180 homes)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>Site RAD8 – land south of Grantham Road (potential capacity around 20 homes)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>Site RAD9 – land at Radcliffe on Trent Golf Course (west) (potential capacity around 10 homes)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>Site RAD10 – land at Radcliffe on Trent Golf Course (east) (potential capacity around 10 homes)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>Any other location (please specify which)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any comments you wish to make to support your answers. For any of the sites, this could include comments on the services and facilities required to support development and the design, mix and layout of development.

(please continue on a separate sheet if necessary)

Ruddington

Question 9: With respect to general directions around the village, do you support housing development:

	Yes	No
To the north of the village	<input checked="" type="radio"/>	<input type="radio"/>
To the north east of the village	<input type="radio"/>	<input type="radio"/>
To the east of the village	<input type="radio"/>	<input type="radio"/>
To the south of the village	<input type="radio"/>	<input type="radio"/>
To the west of the village	<input type="radio"/>	<input type="radio"/>

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

Land to the north of the village, west of Wilford Lane, is a sustainable location for growth. It would relate well to the existing built-up area and provide opportunities for enhanced community facilities. The development of the site could be undertaken in conjunction with adjacent Parish Council land.

Development at this location would not be detrimental to the purposes of Green Belt and indeed through the provision of landscaped open space a new, strong and permanent Green Belt boundary could be established.

(please continue on a separate sheet if necessary)

Question 10: Do you support housing development at:

	Yes – all of site	Yes – but only part of site	No
<i>Site RUD1 – land to the west of Wilford Road (south) (potential capacity around 180 homes)</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>Site RUD2 – land to the west of Wilford Road (north) (potential capacity around 440 homes)</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<i>Site RUD3 – land adjacent to St Peter’s Junior School (potential capacity around 60 homes)</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>Site RUD4 – Easthorpe House and adjacent land (potential capacity around 15 homes)</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>Site RUD5 – land south of Flawforth Lane (potential capacity around 40 homes)</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>Site RUD6 – land at Loughborough Road (potential capacity around 30 homes)</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>Site RUD7 – land north west of Asher Lane (potential capacity around 250 homes)</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>Site RUD8 – land west of Pasture Lane (potential capacity around 370 homes)</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>Site RUD9 – land south of Landmere Lane (potential capacity around 10 homes)</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

	Yes – all of site	Yes – but only part of site	No
<i>Site RUD10 – land adjacent to Landmere Farm (potential capacity around 5 homes)</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>Any other location (please specify which)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any comments you wish to make to support your answers. For any of the sites, this could include comments on the services and facilities required to support development and the design, mix and layout of development.

Site RUD1 covers around 20 hectares west of Wilford Road to the north of Ruddington Village. The proposals cover part of the field and the existing Sellor’s Playing Field, which could be replaced with a larger, more comprehensive public open space and a potentially new community hall. Most of the land is controlled by Bloor Homes and it is proposed that the land used for housing would be located south of the brook and be adjacent to the existing housing to the north of the village, including the Silk Gardens new homes currently under construction. Off the site, land could be created for public open space to the north of the new housing. This could be available for formal sports pitches, informal recreation and meadowland. Some of the new homes could be built on the existing Sellor’s Playing Field, which is owned by the Parish Council. To compensate for this, new, larger public open space could be made north of the new development, which could include a new community hall. The site is extremely well-related to the existing urban area and development here, in the form proposed, would not extend the built up area to the north of the existing building line. Indeed existing development runs along the southern, western and much of the eastern boundaries of the site. The site is also well-related to public transport services and the local highway network with a large proportion of traffic able to travel northwards out of the village, away from the congested centre of the village.

(please continue on a separate sheet if necessary)

Housing sites within key rural settlements

Question 11: *Should any sites within ‘key settlements’ be allocated for development in the LAPP?*

Yes

No

Please provide any comments in support of your response. If you answered YES, please could you identify which site(s) should be allocated for housing development.

(please continue on a separate sheet if necessary)

Housing development at 'other villages'

Question 12: Do you agree that the LAPP should not allocate any land for housing development at 'other villages' across the Borough?

Yes

No

Please provide any comments in support of your response. If you answered NO, please could you identify which site(s) should be allocated for housing development.

(please continue on a separate sheet if necessary)

Question 13: Should we allocate any sites for purely 'affordable housing' at 'other villages' across the Borough?

Yes

No

Please provide any comments in support of your response. If you answered YES, it would be helpful if you are able to identify which site(s) should be allocated for purely affordable housing development.

(please continue on a separate sheet if necessary)

Accessibility and wheelchair housing standards

Question 14: Should we introduce policy in the LAPP to require a proportion of new homes to meet the enhanced Building Regulation standards for 'accessible and adaptable dwellings' and/or 'wheelchair user dwellings'.

Yes

No

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

(please continue on a separate sheet if necessary)

Gypsies, Travellers and Travelling Showpeople

Question 15: *Should the LAPP allocate any specific sites for Gypsy and Traveller accommodation?*

Yes

No

Please provide any comments in support of your response. If you answered YES, it would be helpful if you are able to identify which site(s) should be allocated.

(please continue on a separate sheet if necessary)

Custom and self-build housing

Question 16: *How should we specifically meet needs for custom and self-build housing across Rushcliffe?*

The Government's policy to encourage custom and self-build housing is aimed at trying to further boost housing supply. In this regard additional, specific sites for self and custom build housing should be identified and allocated. An approach whereby parts of general housing sites are required to be delivered as self-build would not help boost supply and would be difficult to manage and deliver, potentially constraining rather than boosting housing delivery.

(please continue on a separate sheet if necessary)

Other issues

Question 17: Please identify any matters related to housing development which are not covered here or elsewhere.

Please see attached covering letter in relation to housing delivery and the need for additional allocations to address housing supply.

(please continue on a separate sheet if necessary)

Green Belt

Alterations to existing Green Belt 'inset' boundaries

Question 18: Do you support the alterations recommended by the draft Rushcliffe Green Belt Review (Part 2b) to the Green Belt inset boundaries at:

	Yes	No
<i>Cotgrave</i>	<input type="radio"/>	<input type="radio"/>
<i>Cropwell Bishop</i>	<input type="radio"/>	<input type="radio"/>
<i>East Bridgford</i>	<input type="radio"/>	<input type="radio"/>
<i>Keyworth</i>	<input type="radio"/>	<input type="radio"/>
<i>Radcliffe on Trent</i>	<input type="radio"/>	<input type="radio"/>

	Yes	No
<i>Ruddington</i>	<input type="radio"/>	<input type="radio"/>
<i>Tollerton</i>	<input type="radio"/>	<input type="radio"/>
<i>Please provide any comments in support of your response.</i>		
<p style="text-align: right;">(please continue on a separate sheet if necessary)</p>		

Creation of new Green Belt ‘inset’ boundaries

Question 19: *Do you support the Green Belt inset boundaries recommended by the draft Rushcliffe Green Belt Review (Part 2b) for:*

	Yes	No
<i>Bradmore</i>	<input type="radio"/>	<input type="radio"/>
<i>Bunny</i>	<input type="radio"/>	<input type="radio"/>
<i>Cropwell Butler</i>	<input type="radio"/>	<input type="radio"/>
<i>Gotham</i>	<input type="radio"/>	<input type="radio"/>
<i>Newton</i>	<input type="radio"/>	<input type="radio"/>
<i>Plumtree</i>	<input type="radio"/>	<input type="radio"/>

	Yes	No
Shelford	<input type="radio"/>	<input type="radio"/>
Upper Saxondale	<input type="radio"/>	<input type="radio"/>

Please provide comments to support your response.

(please continue on a separate sheet if necessary)

‘Safeguarding land’ within the Green Belt

Question 20 Should we designate any further ‘safeguarded land’ within Rushcliffe?

- Yes
- No

Please provide any comments in support of your response. If you answered YES, please could you identify which site(s) should be identified as ‘safeguarded land’.

The NPPF is quite clear. Paragraph 157 states that it is ‘crucial’ that Local Plans ‘take account of longer term requirements’. In this regard safeguarding of land can help to address the needs for coordinated long term planning. However the safeguarding of land should not be used in place of allocating sufficient land now, to meet the housing needs of the area.

(please continue on a separate sheet if necessary)

Other matters

Question 21: Please identify any matters related to Green Belts and Green Belt policy not covered here or elsewhere.

(please continue on a separate sheet if necessary)

Employment Provision and Economic Development

Allocation of land for employment development

Question 22: Should we allocate any new sites for employment development in Rushcliffe?

Yes

No

Please provide any comments you wish to make to support your response. If you answered YES, please could you identify which site(s) should be allocated for employment development.

(please continue on a separate sheet if necessary)

Remaining rural employment land allocations

Question 23: *Should the following sites (as shown on Figures 8 to 10) continue to be allocated for employment development?*

	Yes	No
<i>Sites at Chapel Lane, Bingham</i>	<input type="radio"/>	<input type="radio"/>
<i>Site at Hollygate Lane, Cotgrave</i>	<input type="radio"/>	<input type="radio"/>
<i>Site at Hathern Works, Sutton Bonnington</i>	<input type="radio"/>	<input type="radio"/>

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

(please continue on a separate sheet if necessary)

Bunny Brickworks and British Gypsum Works

Question 24: Should the following sites (as shown on Figures 11 and 12) continue to be identified as suitable for employment redevelopment?

	Yes	No
Bunny Brickworks	<input type="radio"/>	<input type="radio"/>
British Gypsum Works, Gotham	<input type="radio"/>	<input type="radio"/>

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

(please continue on a separate sheet if necessary)

Langar and Langar Airfield

Question 25: Should the LAPP allow for employment development to take place on the three areas at Langar, as defined on Figure 13?

Yes

No

Please provide comments in support of your response. If you answered YES, we would be interested to know whether you think the boundaries of the three defined areas are in the right place or whether one or more of them should be altered and, if so, how?

(please continue on a separate sheet if necessary)

Existing employment sites

Question 26: *Should we continue to protect viable employment sites through the inclusion within the LAPP of a criteria based policy similar to Policy EMP4 of the Rushcliffe Non-Statutory Replacement Local Plan?*

Yes

No

Please provide comments in support of your response. If you answered NO, it would be helpful to identify what alternative approach you think we should take.

(please continue on a separate sheet if necessary)

Centres of Excellence

Question 27: *Should the LAPP include further policy in relation to the Centres of Excellence?*

Yes – further detailed policy is required

No – there is sufficient policy already within Core Strategy Policy 5.....

Please provide any comments you wish to make to support your response. If you answered YES, we would be interested to know what policy should be included in the LAPP and whether any land should be allocated to allow for the expansion of any of the sites.

(please continue on a separate sheet if necessary)

Rural Diversification

Question 28: *Should the LAPP include further policy in relation to rural diversification?*

Yes – further detailed policy is required

No – there is sufficient policy already (e.g. Core Strategy Policy 5).....

Please provide any comments you wish to make to support your response. If you answered YES, we would be interested to know what policy should be included in the LAPP.

(please continue on a separate sheet if necessary)

Other matters

Question 29: Please identify any matters related to economic development and employment land provision not covered here or elsewhere.

(please continue on a separate sheet if necessary)

Regeneration

Question 30: Should the following sites be identified as suitable for regeneration and be allocated as such through the LAPP?

	Yes	No
Bunny Brickworks	<input type="radio"/>	<input type="radio"/>
Former Islamic Institute, Flintham	<input type="radio"/>	<input type="radio"/>
At any other location (please specify which)	<input type="radio"/>	<input type="radio"/>

Please provide any comments you wish to make to support your answers. For any of the sites, this could include comments on the design, mix and layout of development and any services and facilities required to support development.

(please continue on a separate sheet if necessary)

Other matters

Question 31: Please identify any matters related to regeneration not covered here or elsewhere.

(please continue on a separate sheet if necessary)

Retail Centres

Defining the boundary of centres and primary shopping areas

Question 32: Do you support the suggested centre boundaries, primary shopping areas, primary frontages and secondary frontages, as defined at Appendix C, for:

	Yes	No
<i>Bingham District Centre</i>	<input type="radio"/>	<input type="radio"/>
<i>West Bridgford District Centre</i>	<input type="radio"/>	<input type="radio"/>
<i>Cotgrave Local Centre</i>	<input type="radio"/>	<input type="radio"/>

	Yes	No
<i>East Leake Local Centre</i>	<input type="radio"/>	<input type="radio"/>
<i>Keyworth (The Square) Local Centre</i>	<input checked="" type="radio"/>	<input type="radio"/>
<i>Keyworth (Wolds Drive) Local Centre</i>	<input checked="" type="radio"/>	<input type="radio"/>
<i>Radcliffe on Trent Local Centre</i>	<input type="radio"/>	<input type="radio"/>
<i>Ruddington Local Centre</i>	<input checked="" type="radio"/>	<input type="radio"/>

Please provide comments to support your answers. If you answered NO for any one of the centres, we would be interested to know what alternations you think should be made.

(please continue on a separate sheet if necessary)

Non-retail uses in centres

Question 33: *Do you have any comments to make on what the approach should be towards the proportion of A1 (shops) uses and non-A1 uses within the primary shopping areas of District and Local Centres?*

(please continue on a separate sheet if necessary)

Allocation of sites within or on the edge of retail centres

Question 34: *Should we allocate land for new retail or other commercial development in or around any of Rushcliffe's district or local centres, or elsewhere in the Borough?*

Yes

No

Please provide any comments you wish to make in support of response. If you answered YES, we would be interested to know which land should be allocated, what for and why?

(please continue on a separate sheet if necessary)

Centres of Neighbourhood Importance

Question 35: *Should we designate those 'areas set out at Appendix D as Centres of Neighbourhood Importance (CoNI)? If so, are the boundaries correctly defined?*

(please continue on a separate sheet if necessary)

Question 36: Are there any other locations that should be defined as CoNIs?

(please continue on a separate sheet if necessary)

Question 37: Should a mix of Use Classes A1, A2, A3, A4 and A5 be supported within CoNIs?

(please continue on a separate sheet if necessary)

Retail development in edge-of centre and out-of-town locations

Question 38: Should we set a local threshold requiring an impact assessment for all retail proposals with a gross floorspace of 500m² or more across the whole of Rushcliffe?

- Yes
- No

Please provide any comments you wish to make to support your response. If you answered NO, we would be interested to know what you think the locally set threshold should be.

(please continue on a separate sheet if necessary)

Other matters

Question 39: Please to identify any matters related to retail centres and retail development not covered here or elsewhere.

(please continue on a separate sheet if necessary)

Design and Landscape Character

General Design

Question 40: Should the LAPP include more detailed policy in relation to the design of new development

Yes – further detailed policy is required

No – there is sufficient policy already (e.g. Core Strategy Policy 10).....

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

(please continue on a separate sheet if necessary)

Landscape Character

Question 41: *Please make any comments you have about what should be included in the LAPP in respect of the landscape character, including whether there are any areas of locally valued landscape requiring additional protection.*

(please continue on a separate sheet if necessary)

Other issues

Question 42: *Please identify any matters related to design and landscape character that are not covered here or elsewhere.*

(please continue on a separate sheet if necessary)

Historic Environment

Question 43: Please identify any elements of the historic environment of Rushcliffe Borough that should be specifically identified in the LAPP?

(please continue on a separate sheet if necessary)

Locally listed assets

Question 44: Should we identify a local list of heritage assets within Rushcliffe Borough?

No

(please continue on a separate sheet if necessary)

Question 45: Please make any comments you have about what a local heritage assets policy should include or any other comments you have about the issue of locally listed heritage assets.

(please continue on a separate sheet if necessary)

Development affecting designated heritage assets

Question 46: *Should we include within the LAPP policies on development affecting designated assets?*

Yes – *policies are required for designated assets*.....

No – *they have sufficient policy protection already (e.g within the NPPF)*.....

Please provide any comments you wish to make to support your response. If you answered YES, please provide information about what such policies should include.

(please continue on a separate sheet if necessary)

Other issues

Question 47: *Please identify any matters related to the Historic Environment which are not covered here or elsewhere.*

(please continue on a separate sheet if necessary)

Climate Change, Flood Risk and Water Use

Renewable and low carbon energy generation

Question 48: *Should we identify areas of the Borough as suitable for renewable and low carbon energy generation?*

Yes

No

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

(please continue on a separate sheet if necessary)

Reducing carbon dioxide emissions

Question 49: *Should we introduce further policy in the LAPP on how development should contribute to reducing carbon dioxide emissions?*

Yes

No

Please provide any comments you wish to make to support your response. If you answered YES, we would be interested to know what policy should be included in the LAPP.

This is appropriately covered by Building Regulations

(please continue on a separate sheet if necessary)

Water efficiency standards

Question 50: *Should we introduce further policy in the LAPP to require the lower optional Building Regulations standard of 110 litres per person per day water use.*

Yes

No

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

(please continue on a separate sheet if necessary)

Managing flood risk

Question 51: *Please make any comments you have about how we should define areas within Flood Zones 2 and 3 where windfall site development is appropriate in flood risk terms, subject to the application of the exception test.*

(please continue on a separate sheet if necessary)

Question 52: *Is there a need for any further policy on managing flood risk and Sustainable Urban Drainage Systems?*

Yes

No

Please provide any information in support of your response.

(please continue on a separate sheet if necessary)

Other issues

Question53: *Please identify any matters related to climate change, flood risk and related issues that are not covered here or elsewhere.*

(please continue on a separate sheet if necessary)

Green Infrastructure and Biodiversity

Green infrastructure networks

Question 54: Which types of land use should also be incorporated into the Green Infrastructure network?

	Yes	No
<i>Parks and County Parks</i>	<input type="radio"/>	<input type="radio"/>
<i>School playing fields</i>	<input type="radio"/>	<input type="radio"/>
<i>Allotments</i>	<input type="radio"/>	<input type="radio"/>
<i>Sports pitches</i>	<input type="radio"/>	<input type="radio"/>
<i>Amenity space (e.g. information open space)</i>	<input type="radio"/>	<input type="radio"/>
<i>Golf courses</i>	<input type="radio"/>	<input type="radio"/>
<i>Designated and non-designated nature conservation sites</i>	<input type="radio"/>	<input type="radio"/>
<i>Flood alleviation areas</i>	<input type="radio"/>	<input type="radio"/>
<i>Other (please specify which)</i>	<input type="radio"/>	<input type="radio"/>

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

(please continue on a separate sheet if necessary)

Question 55: *What are your views on the following:*

a) *Where are Rushcliffe's existing local Green Infrastructure corridors and how do they relate to the strategic priorities?*

(please continue on a separate sheet if necessary)

b) *What evidence exists to support the identification of existing and proposed Green Infrastructure?*

(please continue on a separate sheet if necessary)

c) *How should new Green Infrastructure corridors be identified? Does Core Strategy Policy 16 (part 3) provide suitable selection criteria?*

(please continue on a separate sheet if necessary)

d) *Core Strategy Policy 16 (part 2d) refers to 'areas of identified deficit', where are these and how do they relate to the strategic priorities?*

(please continue on a separate sheet if necessary)

e) *Once an identified network is established, does the Core Strategy provide sufficient policy guidance to ensure multi-functional Green Infrastructure is delivered, protected and enhanced?*

(please continue on a separate sheet if necessary)

f) *How should the network be recognised within the Local Plan, for example should it be identified within the proposals map and supported by a detailed policy, or within a stand-alone Green Infrastructure Strategy?*

(please continue on a separate sheet if necessary)

Local Green Spaces

Question 56: *Are there any spaces in Rushcliffe that should be designed as a Local Green Space and what should a policy within the LAPP to ensure their protection from development include?*

(please continue on a separate sheet if necessary)

Protection of Parks and open space

Question 57: *Should the LAPP include further policy to protect parks and open space?*

Yes – further detailed policy is required

No – there is sufficient policy already (e.g. Core Strategy Policy 16).....

Please provide any comments you wish to make to support your response. If you answered YES, we would be interested to know what policy should be included in the LAPP.

(please continue on a separate sheet if necessary)

Open space, sports and recreation standards

Question 58: *Please make any comments you have about what the LAPP should include in respect of open space, sports or recreation space standards.*

(please continue on a separate sheet if necessary)

Biodiversity

Question 59: *In relation to improving the Biodiversity Network, what are your views on the following:*

- a) *Where are Rushcliffe's existing biodiversity networks, what habitats do they consist of and where do opportunities to enhance the network exist?*

(please continue on a separate sheet if necessary)

- b) *What evidence exists to support the identification of existing and proposed biodiversity networks?*

(please continue on a separate sheet if necessary)

c) *How should the networks be recognised in the LAPP?*

(please continue on a separate sheet if necessary)

d) *Does Core Strategy Policy 17 sufficiently protect, restore and expand the biodiversity network without the need for further policy in the LAPP?*

Policy 17 is sufficient

(please continue on a separate sheet if necessary)

Question 60: *In relation to the protection of designated and non-designated nature conservation interests, what are your views on the following:*

a) *Does Core Strategy Policy 17 sufficiently cover the level of protection necessary for designated and non-designated sites or is further policy required in the LAPP?*

Policy 17 is sufficient

(please continue on a separate sheet if necessary)

b) *Should the LAPP have a specific policy to protect and enhance ancient woodland and veteran trees and, if so, why?*

(please continue on a separate sheet if necessary)

c) *Should the LAPP include a policy on biodiversity off-setting, to ensure compensation is delivered and, if so, why?*

(please continue on a separate sheet if necessary)

Other issues

Question 61: Please identify any matters related to Green Infrastructure, Biodiversity and recreation space which are not covered here or elsewhere.

(please continue on a separate sheet if necessary)

Culture, Tourism and Sports Facilities

Question 62: Should we allocate any new sites for cultural, tourism or sports development in Rushcliffe?

Yes

No

Please provide any comments you wish to make to support your response. If you answered YES, please could you identify which site(s) should be allocated for development.

(please continue on a separate sheet if necessary)

Question 63: *Should the LAPP include further policy to determine proposals for new cultural and sporting facilities and/or to protect existing facilities?*

Yes – further detailed policy is required

No – there is sufficient policy already (e.g. Core Strategy Policy 13).....

Please provide any comments you wish to make to support your response. If you answered YES, we would be interested to know what policy should be included in the LAPP.

(please continue on a separate sheet if necessary)

Safeguarded recreational facilities

Question 64: *Should the LAPP also include policy to safeguard the following locations from development which would prejudice the ecological, recreational, tourism and commercial potential?*

	Yes	No
<i>the River Trent</i>	<input type="radio"/>	<input type="radio"/>
<i>the River Soar</i>	<input type="radio"/>	<input type="radio"/>
<i>the Grantham Canal</i>	<input type="radio"/>	<input type="radio"/>
<i>the Great Central Railway</i>	<input type="radio"/>	<input type="radio"/>

	Yes	No
<i>any other location (please specify which)</i>	<input type="radio"/>	<input type="radio"/>

Please provide any comments you wish to make to support your response. If you answered YES, we would be interested to know what policy should be included in the LAPP.

If you answered YES in relation to the Grantham Canal, we would be interested to know whether you think a route should also be safeguarded for a new canal link between the existing canal and the River Trent.

(please continue on a separate sheet if necessary)

Other issues

Question 65: *Please identify any matters related to culture, tourism and sports facilities which are not covered here or elsewhere.*

(please continue on a separate sheet if necessary)

Contamination and Pollution

Contamination and land instability

Question 66: *Should we include more detailed policy in the LAPP in relation to the contamination and land instability.*

Yes – further detailed policy is required

No – there is sufficient policy already (e.g. within the NPPF).....

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

(please continue on a separate sheet if necessary)

Noise pollution

Question 67: *Should we include more detailed policy in the LAPP in relation to the noise pollution:*

Yes – further detailed policy is required

No – there is sufficient policy already (e.g. within the NPPF).....

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

(please continue on a separate sheet if necessary)

Light pollution

Question 68: *Should we include more detailed policy in the LAPP in relation to light pollution:*

Yes – further detailed policy is required

No – there is sufficient policy already (e.g. within the NPPF).....

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

(please continue on a separate sheet if necessary)

Air quality

Question 69: *Should we include more detailed policy in the LAPP in relation to the air pollution:*

Yes – further detailed policy is required

No – there is sufficient policy already (e.g. within the NPPF).....

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

(please continue on a separate sheet if necessary)

Other issues

Question 70: Please identify any matters related to contamination and pollution which are not covered here or elsewhere.

(please continue on a separate sheet if necessary)

Transport

General transport policy

Question 71: Do you agree that no further local transport policy is required in the LAPP?

Yes—additional local policy is not needed.....

No – further local policy is needed (please identify what policy).....

Please provide any comments you wish to make to support your response. If you answered NO, please provide information about what policy is needed.

(please continue on a separate sheet if necessary)

Highway design and parking standards

Question 72: *Should we (please tick one):*

Continue to use the guidance in the 6Cs Highway Design Guide?

Set out and adopt an approach through the LAPP?.....

Adopt another approach (please set out what)?.....

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

The 6Cs Design Guide can be used and should be applied and considered alongside other planning considerations including the overarching ambitions set out in the NPPF. It should be used as a 'Guide' and not as inflexible and rigid standards.

(please continue on a separate sheet if necessary)

Other issues

Question 73: *Please identify any matters related to transport which are not covered here or elsewhere.*

(please continue on a separate sheet if necessary)

Telecommunication Infrastructure

Question 74: *Should we include more detailed policy in the LAPP in relation to telecommunications:*

Yes – further detailed policy is required

No – there is sufficient policy already (e.g. within the NPPF).....

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

(please continue on a separate sheet if necessary)

Other issues

Question 75: *Please identify any matters related to telecommunications which are not covered here or elsewhere.*

(please continue on a separate sheet if necessary)

Question 76: Please identify any topics or issues which you consider need to be covered by the LAPP which are not addressed elsewhere in this document.

(please continue on a separate sheet if necessary)

Signed:



Date:

22 March, 2016

Please return by **5pm on Thursday 24 March 2016** to:

Planning Policy
Rushcliffe Borough Council
Civic Centre, Pavilion Road
West Bridgford
Nottingham. NG2 5FE

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>

Data protection: The details you submit to the Borough Council will be used in the Local Plan preparation and associated processes. 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.

openness of the Green Belt, long term permanence and the presence of recognisable defensible boundaries.

(please continue on a separate sheet if necessary)

5. Green Belt Review Part 2 (b): Key Settlement Review

Do you consider the methodology for assessing land around Rushcliffe's Key Settlements against the purposes for including land within the Green Belt is appropriate (pages 39 to 44 of the review)? If you do not, please state how the methodology could be improved.

It is considered that the approach to the Green Belt Review should clearly place into context the use of a scoring system. Such a system can often be blunt and ignore specific circumstances on individual sites. The process should clearly recognise the shortcomings of the approach adopted so that the results can be considered within this context and given appropriate weight.

(please continue on a separate sheet if necessary)

6. Green Belt Review Part 2 (b): Key Settlement Review

Do you agree or disagree with the assessment of Green Belt land around Rushcliffe's Key Settlements against the purposes for including land within the Green Belt (pages 44 to 148 of the review)? If you disagree, state why the assessment is incorrect and provide your Green Belt score and conclusions on Green Belt importance. Your comment should focus on the land's performance against Green Belt purposes.

KEYWORD

The approach to the assessment of Green Belt around Keyworth appear to be inconsistent with the assessment work undertaken as part of the evidence base for the preparation of the Keyworth Neighbourhood Plan. This is an illustration of the subjective nature of the judgements made and the weakness of a scoring system. Specific consideration should be given to the Neighbourhood Plan Green Belt work in finalising the Green Belt Review.

Specific comments on the assessment are:

1. Paragraph 4.130 should refer to land north of Bunny Lane (not south of Bunny Lane) as on the same ridge as Keyworth and containing strong defensible hedgerows. This would then be consistent with the text in the Strategic Review table.
2. Paragraph 4.131 should make it clear that land at Debdale Lane would not encourage prominent urban sprawl. Built development north of the ridge line (some distance north of Debdale Lane) would be prominent, and not the development of land promoted for development by Bloor Homes.
3. In the assessment of KEY11 and KEY12 it is suggested that parts of the site are prominent in views from the north. This is inaccurate. The ridgeline that runs along the northern edge of Keyworth screens long distance views towards this part of the village. It is also difficult to understand why the assessment of this area differs so significantly to the assessment of land around Radcliffe – in particular RAD3. RAD3 gets a score of 2 for safeguarding the countryside from encroachment because it contains a farmhouse and residential dwelling. However KEY11 and 12 also contain a farmhouse and residential dwelling but have a score of 3.
4. KEY12. The assessment refers to KEY10 whereas it should refer to site KEY11. Indeed The assessment should be of KEY11 and 12 jointly, as proposed in the Keyworth Neighbourhood Plan, with an overall scoring likely to be of 11 or less.
5. KEY14 has been given a different score in relation to safeguarding the countryside from encroachment than other sites, such as KEY11 and KEY10, which has the same relationship and effect from the existing settlement edge. Its scoring should be the same in this regard, which would reduce its overall score.

RUDDINGTON

The general approach to the assessment of land around Ruddington is supported.

7. Please provide any others comments you wish to make

(please continue on a separate sheet if necessary)

Signed:



Date:

22 March, 2016

Please return by **5pm on Thursday 24 March 2016** to: Planning Policy
Rushcliffe Borough Council
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Nottingham. NG2 5FE
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