

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

Response Form

Please return by **5pm on Friday 31 March 2017** to:
 Planning Policy, Rushcliffe Borough Council
 Rushcliffe Arena, Rugby Road
 Nottingham. NG2 7YG
 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>

Your Details		Agent details (where applicable)
Mr Sam Burt	Name	Mark Bassett
c/o agent	Address	Freeths LLP Cumberland Court 80 Mount Street Nottingham NG1 6HH
Click here to enter text.	E-mail	x

Housing Development

Housing Land Supply

Question 1: Do you agree with the Council's assessment of the present housing supply situation and that enough land will need to be identified by Local Plan Part 2 to accommodate around 2,000 new homes?

Yes

No

X

Don't know

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

Please see supporting letter

Housing Sites adjacent to the Main Urban Area

Question 2: Do you agree with the Council's view that none of the three strategic allocations (Melton Road, Edwalton; South of Clifton; and East of Gamston/North of Tollerton) should be expanded as part of resolving the current shortfall in the amount of land that is available for housing development over the next few years?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

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

[Click here to enter text.](#)

Question 3: Do you support housing development at:

	Yes – all of site	Yes – but only part of site	No
Site HOL1 – Simkins Farm, Adbolton Lane, West Bridgford (potential capacity around 40 homes)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Any other location (please specify which)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

could include comments on the services and facilities required to support development and the design, mix and layout of development.

Click here to enter text.

Housing Development at the 'Key Settlements'

Bingham

Question 4: Do you agree that Local Plan Part 2 should not allocate further greenfield land for housing development at Bingham in the plan period (up to 2028)?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

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

Click here to enter text.

Cotgrave

Question 5: Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Cotgrave in the plan period (up to 2028)?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

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

Click here to enter text.

Question 6: Do you have a view on the total number of new homes that should be accommodated on greenfield sites at Cotgrave up to 2028? If possible, please give reasons for your answer.

Click here to enter text.

Question 7: Do you support housing development at:

	Yes – all of site	Yes – but only part of site	No
<i>Site COT1 – Land rear of Mill Lane/The Old Park (potential capacity around 240 homes)</i>			
<i>Site COT2 – Land at Main Road (potential capacity around 50 homes)</i>			
<i>Site COT3 – Land rear of and to the west of Main Road (potential capacity around 125 homes)</i>			
<i>Site COT4 Land off Woodgate Lane (potential capacity around 80 homes)</i>			
<i>Site COT5 – Bakers Hollow (potential capacity around 60 homes)</i>			
<i>Site COT6 – The Brickyard, Owthorpe Road (potential capacity around 100 homes)</i>			
<i>Site COT7– Land behind Firdale (2) (potential capacity around 65 homes)</i>			
<i>Site COT8 – Land behind Firdale (potential capacity around 95 homes)</i>			

	Yes – all of site	Yes – but only part of site	No
<i>Site COT9 – Land south of Hollygate Lane (1) (potential capacity around 140 homes)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Site COT10 – Land south of Hollygate Lane (2) (potential capacity around 40 homes)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Site COT11 – Land south of Hollygate Lane (3) (potential capacity around 250 homes)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Site COT12 – Land south of Plumtree Lane (potential capacity around 250 homes)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Any other location (please specify which)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Click here to enter text.

East Leake

Question 8: *Do you agree that, apart from those eight sites that already have planning permission for housing development (sites EL1 to EL8 as shown at Figure 5), further greenfield land should not be allocated for housing development at East Leake?*

Yes

No

Don't know

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

Click here to enter text.

Question 9: Do you support housing development at:

	Yes – all of site	Yes – but only part of site	No
<i>Site EL9 – Land south of West Leake Road (potential capacity around 50 homes)</i>			
<i>Site EL10 – Land north of West Leake Road (potential capacity around 75 homes)</i>			
<i>Site EL11 – Brook Furlong Farm (potential capacity around 70 homes)</i>			
<i>Site EL12 – Land off Rempstone Road (north) (potential capacity around 235 homes)</i>			
<i>Site EL13 – Land off Rempstone Road (south) (potential capacity around 120 homes)</i>			
<i>Site EL14 – Land north of Lantern Lane (2) (potential capacity around 360 homes)</i>			
<i>Any other location (please specify which)</i>			

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.

Click here to enter text.

Keyworth

Question 10: Do you have a view on the total number of new homes that should be built on greenfield sites at Keyworth up to 2028? If possible, please give reasons for your answer.

Click here to enter text.

Question 11: Do you support housing development at:

	Yes – all of site	Yes – but only part of site	No
<i>Site KEY1 – Land east of Willow Brook (potential capacity around 40 homes)</i>			
<i>Site KEY2 – Land off Selby Lane and Willowbrook (potential capacity around 15 homes)</i>			
<i>Site KEY3 – Land south of Selby Lane (potential capacity around 60 homes)</i>			
<i>Site KEY4 – Land off Nicker Hill (potential capacity around 450 homes)</i>			
<i>Site KEY5 – Hill Top Farm, Platt Lane (1) (potential capacity around 50 homes)</i>			
<i>Site KEY6 – Hill Top Farm, Platt Lane (2) (potential capacity around 80 homes)</i>			
<i>Site KEY7 – Shelton Farm, Platt Lane (potential capacity around 160 homes)</i>			
<i>Site KEY8 – Land between Platt Lane and Station Road (potential capacity around 180 homes)</i>			
<i>Site KEY9 – Land north of Debdale Lane (1) (potential capacity around 110 homes)</i>			
<i>Site KEY10 – Land south of Debdale Lane (1) (potential capacity around 230 homes)</i>			
<i>Site KEY11 – Land south of Debdale Lane (2) (potential capacity around 200 homes)</i>			
<i>Site KEY12 – Land north of Debdale Lane (2) (potential capacity around 160 homes)</i>			

	Yes – all of site	Yes – but only part of site	No
Site KEY13 – Hillside Farm (potential capacity around 60 homes)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site KEY14 – Land south of Bunny Lane (potential capacity around 410 homes)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Any other location (please specify which)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

[Click here to enter text.](#)

Radcliffe on Trent

Question 12: Do you have a view on the total number of new homes that should be built on greenfield sites at Radcliffe on Trent up to 2028? If possible, please give reasons for your answer.

[Click here to enter text.](#)

Question 13: Do you support housing development at:

	Yes – all of site	Yes – but only part of site	No
Site RAD11 – North of Holme Lane (potential capacity around 115 homes)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Yes – all of site	Yes – but only part of site	No
Site RAD12 – Land to the north of Shelford Road (potential capacity around 180 homes)			
Any other location (please specify which)			

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.

Click here to enter text.

Ruddington

Question 14: Do you have a view on the total number of new homes that should be accommodated on greenfield sites at Ruddington up to 2028? If possible, please give reasons for your answer.

Click here to enter text.

Question 15: Do you support housing development at:

	Yes – all of site	Yes – but only part of site	No
Site RUD11 – Old Loughborough Road (potential capacity around 40 homes)			X
Site RUD12 – Land to the east side of Loughborough Road (potential capacity around 60 homes)	X		

	Yes – all of site	Yes – but only part of site	No
Site RUD13 – Land opposite Mere Way (potential capacity around 170 homes)			X
Site RUD14 – Croft House (potential capacity around 25 homes)			
Any other location (please specify which)			

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.

See supporting letter

Housing development at ‘other villages’

Question 16: *Do you agree that, apart from the site to the south of Abbey Road, Aslockton with planning permission for up to 75 new homes, Local Plan Part 2 should not allocate greenfield land for housing development at Aslockton and Whatton in the plan period (up to 2028)?*

Yes

No

Don't know

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

Click here to enter text.

Question 17: Should Local Plan Part 2 identify the following ‘other’ villages as suitable for a limited level of housing growth on greenfield sites?

	Yes	No	Don't know
<i>Cropwell Bishop</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>East Bridgford</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Gotham</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Sutton Bonington</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Tollerton</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Any other settlement (please specify which)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Click here to enter text.

Cropwell Bishop

Question 18: If greenfield land is allocated for housing development at Cropwell Bishop, do you have a view on the total number of new homes that should be built up to 2028? If possible, please give reasons for your answer.

Click here to enter text.

Question 19: Do you support housing development at:

	Yes – all of site	Yes – but only part of site	No
Site CBI1 – Land to the south of Nottingham Road and east of Kinoulton Road (potential capacity around 30 homes)			
Site CBI2 – Land north of Memorial Hall (1) (potential capacity around 75 homes)			
Site CBI3– Land north of Memorial Hall (2) (potential capacity around 60 homes)			
Site CBI4 – Land north of Fern Road (2) (potential capacity around 30 homes)			
Site CBI5 – Land north of Fern Road (1) (potential capacity around 250 homes)			
Site CBI6 – Land to the north of Fern Road (3) (potential capacity around 70 homes)			
Any other location (please specify which)			

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.

Click here to enter text.

East Bridgford

Question 20: If greenfield land is allocated for housing development at East Bridgford, do you have a view on the total number of new homes that should be built up to 2028? If possible, please give reasons for your answer.

Click here to enter text.

Question 21: Do you support housing development at:

	Yes – all of site	Yes – but only part of site	No
<i>Site EBR1 – Land behind Kirk Hill (east) (potential capacity around 15 homes)</i>			
<i>Site EBR2 – Land behind Kirk Hill (west) (potential capacity around 70 homes)</i>			
<i>Site EBR3 – Land north of Kneeton Road (1) (potential capacity around 95 homes)</i>			
<i>Site EBR4 – Land north of Kneeton Road (2) (potential capacity around 150 homes)</i>			
<i>Site EBR5 – Land at Lammas Lane (potential capacity around 40 homes)</i>			
<i>Site EBR6 – Closes Side Lane (west) (potential capacity around 20 homes)</i>			
<i>Site EBR7 – Closes Side Lane (east) (potential capacity around 20 homes)</i>			
<i>Site EBR8 – Land to the north of Butt Lane (potential capacity around 20 homes)</i>			
<i>Site EBR9 – Land to the south of Springdale Lane (potential capacity around 30 homes)</i>			
<i>Any other location (please specify which)</i>			

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.

Click here to enter text.

Gotham

Question 22: *If greenfield land is allocated for housing development at Gotham, do you have a view on the total number of new homes that should be built up to 2028? If possible, please give reasons for your answer.*

Click here to enter text.

Question 23: *Do you support housing development at:*

	Yes – all of site	Yes – but only part of site	No
<i>Site GOT1 – Land to the rear of former British Legion (potential capacity around 25 homes)</i>			
<i>Site GOT2 – Land north of Kegworth Road/Home Farm (west) (potential capacity around 50 homes)</i>			
<i>Site GOT3 – Land north of Kegworth Road/Home Farm (east) (potential capacity around 20 homes)</i>			
<i>Site GOT4 – The Orchards, Leake Road (potential capacity around 50 homes)</i>			
<i>Site GOT5 – Land east of Gypsum Way/The Orchards (potential capacity around 200 homes)</i>			
<i>Site GOT6 – East of Leake Road (potential capacity around 45 homes)</i>			
<i>Site GOT7 – Land east of Hill Road (potential capacity around 160 homes)</i>			
<i>Site GOT8 – Land south of Moor Lane (potential capacity around 15 homes)</i>			
<i>Any other location (please specify which)</i>			

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.

Click here to enter text.

Sutton Bonington

Question 24: If greenfield land is allocated for housing development at Sutton Bonington, do you have a view on the total number of new homes that should be built up to 2028? If possible, please give reasons for your answer.

Click here to enter text.

Question 25: Do you support housing development at:

	Yes – all of site	Yes – but only part of site	No
Site SUT1 – Land north of Park Lane (potential capacity around 140 homes)			
Any other location (please specify which)			

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.

Click here to enter text.

Tollerton

Question 26: *If greenfield land is allocated for housing development at Tollerton, do you have a view on the total number of new homes that should be built up to 2028? If possible, please give reasons for your answer.*

Click here to enter text.

Question 27: *Do you support housing development at:*

	Yes – all of site	Yes – but only part of site	No
<i>Site TOL1 – Land at Burnside Grove (potential capacity around 180 homes)</i>			
<i>Site TOL2 – West of Tollerton Lane and North of Medina Drive (potential capacity around 360 homes)</i>			
<i>Site TOL3 – Land east of Tollerton Lane (potential capacity around 50 homes)</i>			
<i>Any other location (please specify which)</i>			

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.

Click here to enter text.

Other issues

Question 28: *Please identify any matters related to housing development which are not covered here or elsewhere.*

See supporting letter.

Please return by **5pm on Friday 31 March 2017** to:

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Rugby Road
Nottingham. NG2 7YG

Or to: localdevelopment@rushcliffe.gov.uk

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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.

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Email: mark.bassett@freeths.co.uk

31 March 2017

Our Ref: MB/2003/2098457/2

Dear Sir/Madam,

Re: Rushcliffe Local Plan Part 2 Further Options Consultation – Land and Planning Policies Document

I refer to the above consultation and set out below representations in response to the Land and Planning Policies (LAPP) Further Options document on behalf of our client Mr Sam Burt. Previous representations have been submitted on behalf of Mr Burt in respect of the issues and options consultation of March 2016. This letter amplifies and supports the attached response form concerning housing development within the Borough, notably questions 1, 15 and 28.

Background

Core Strategy Policy 3 (Spatial Strategy) details housing provision over the plan period and that sustainable development will be achieved through a strategy that supports a policy of urban concentration with regeneration. The settlement hierarchy to accommodate this consists of:

- The main built area of Nottingham (this includes three Sustainable Urban Extensions at land South of Clifton, land off Melton Road (Edwalton) and land East of Gamston / North of Tollerton);
- Key Settlements of Bingham, Cotgrave, East Leake, Keyworth, Radcliffe-on-Trent and Ruddington;
- RAF Newton; and,
- Other settlements solely to meet local housing needs to be allocated in the Local Plan Part 2.

Policy 3 also sets out the quantum of new homes to be provided as a **minimum** (my emphasis) of 13,150 between 2011 and 2028, with approximately 7,650 homes in or adjoining the main built up area of Nottingham (within Rushcliffe) and approximately 5,500 homes beyond the main built up areas of Nottingham (within Rushcliffe), including: North of Bingham (around 1,000 homes); Former RAF Newton (around 550 homes); Former Cotgrave Colliery (around 470 homes); in or adjoining East Leake (a minimum of 400 homes); in or adjoining Keyworth (a minimum of 450 homes); in or adjoining Radcliffe on Trent (a minimum of 400 homes); in or adjoining Ruddington (a

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minimum of 250 homes); and in other villages solely to meet local housing needs. Furthermore, the policy predicts the delivery pattern of new homes over the plan period and also indicates that the following strategic sites have the status of allocations, expecting housing delivery by 2015: Sustainable Urban Extension (SUE) on land off Melton Road, Edwalton; SUE to the South of Clifton; North of Bingham; Former RAF Newton; Former Cotgrave Colliery; and SUE to the East of Gamston/North of Tollerton.

In this context of housing provision, the Council's latest monitoring report (dated as of 31 March 2016 and covering the period of 2016-2021) acknowledges that a five year supply of housing land cannot be demonstrated, detailing this to be 3.43 years. This a further reduction from the earlier monitoring report covering the period of 2015-2020 which detailed a figure of 4.27 years. This decline has been an ongoing trend for the Authority over a number of years such that the Borough's Objectively Assessed Housing Needs (OAHN) is not being met as required by national policy.

The main reason for this undersupply, as is acknowledged in the Further Options consultation document which sets out that additional housing sites are required to meet the Borough's identified need, is that the Council relies heavily on a number of large scale development sites and SUEs which have failed to deliver as originally anticipated in the Core Strategy. Whilst this situation of significant reliance on SUEs was accepted by the Core Strategy's Examining Inspector (EI), her report acknowledged (paragraph 64) that this is likely to mean a comparatively slow build-up in delivery rates and concluded (paragraph 68) that '...there is inevitably uncertainty as to whether the expected rate of delivery over time will be achieved, but proposed modification MM1(d) confirms that performance will be closely monitored and a full review of the Local Plan undertaken if the numbers are not being achieved'.

The Council's ongoing position of failing to satisfy the Borough's OAHN has led to concerns that this requirement may not be met over the plan period contrary to NPPF requirements resulting in calls for a full local plan review. Appeal Inspector Baker (ref: APP/P3040/A/14/2227522) shared these concerns at paragraphs 34 and 49 of her report, stating the reliance on SUEs and other strategic allocations within the housing land supply and that the anticipated delivery of development on most of the Strategic Sites has slipped significantly from the position presented to the Local Plan Inspector and included within the Core Strategy. In this regard the Inspector concluded at paragraph 52 that '...some of the figures included within the supply by the Council are likely to be overly optimistic given the difficulties associated with bringing some of the Strategic Sites forward for development' and that the '...current supply is a best case scenario and may well be further reduced and require adjustment through the release of other sites identified in the SHLAA'.

Rushcliffe's Forecast Housing Supply and Shortfall

As noted, the Further Options consultation document acknowledges that additional housing sites are required to meet the Borough's OAHN as a consequence of all but one of the 6 large / Strategic Sites taking longer to commence than had previously been expected. In particular, the document references the need to deliver homes 'relatively quickly' in order to contribute to resolving the current shortfall in the amount of land that is available for housing development over

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the next few years (rather than increasing capacity at some of the Strategic Sites which will likely only result in additional completions at the tail end of those developments and therefore have no impact on the immediate housing land supply shortfall that exists). It is agreed that the deficit should be corrected as a matter of urgency with the Council's commitment to closely monitor performance and fully review the Local Plan if the numbers are not being achieved noted.

The LAPP's purpose is to set out non-strategic allocations and a number of detailed policies for managing new development, following on from the strategic framework set out in the Core Strategy. The Council anticipates adoption of the LAPP in June 2018 such that the non-strategic allocations at Keyworth, Radcliffe-on-Trent and Ruddington are then expected to come on-stream shortly thereafter and begin contributing to the Borough's supply of housing sites, projecting 150 homes to be delivered across the three settlements by April 2020. The Council envisages that the LAPP will now allocate additional sites for development across a wider range of towns and villages than originally anticipated to account for the likely shortfall they anticipate.

In this regard, the shortfall calculated by the Council is expected to be in the order of 899 homes for the period of 2019-2024 (i.e. the 5 years subsequent to adoption of the LAPP) and this has formed the basis of the Further Option consultation, but this is considered to be significantly underestimated. A more realistic yet inevitably much higher shortfall figure is considered to be some 2979 homes by the end of this period, amounting to in excess of 3 times the level of shortfall that the Council envisages. The rationale for this calculation is set out in the text and tables below.

Housing Trajectory

As the Council acknowledges, the primary issue relates to delivery of the Strategic Sites. Subsequent to the allowed appeal at Aslockton (ref: APP/P3040/A/14/2227522) where the appellant's concerns about the Council's ambitious housing trajectory were echoed by the Inspector (paragraph 52), the situation has not readily improved albeit that 15 months have since passed. Notwithstanding development at Cotgrave Colliery and Edwalton, which has taken between 4 to 7 years respectively from outline permission to begin delivering housing, there has been no reserved-matters/full planning application(s) submitted for the site at Bingham, the 2014 outline application at Clifton still remains undetermined, negotiations remain ongoing concerning infrastructure requirements at RAF Newton and there remains no application at the Gamston/Tollerton site. On this basis it is therefore unrealistic to consider that these dormant sites, particularly the largest strategic allocations at Bingham, Clifton and Gamston/Tollerton, would likely be in a position to begin delivering homes in the next 3 to 4 years as is envisaged in the Council's latest trajectory.

A synopsis of the 4 Strategic Sites yet to deliver any housing is detailed below and includes a measured but optimistic assessment as to when these could realistically begin contributing to the Borough's housing supply:

Bingham

Outline planning permission was granted in December 2013 for up to 1050 dwellings. There have been no subsequent planning applications and therefore no development has taken place to date on this site. It is understood that this site remains under the Crown Estate's ownership with little prospect of a reserved matters application in the near future. There is currently a considerable

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degree of uncertainty as to when this site will deliver but almost certainly this will not be before 2020/21 at the earliest. This delay would result in the loss of some 250 homes from the Council's trajectory for the period 2019-2024.

Clifton

An outline application proposing 5500 dwellings was withdrawn in 2011 and a revised outline application proposing 3000 dwellings submitted in July 2014. This latest application is still pending a decision and therefore no development has taken place to date on this site. Given there is no permission to date and the need for detailed reserved matters applications, coupled with the discharge of conditions pre-commencement of development, complex legal negotiations and infrastructure works, it is highly unlikely there will be any delivery on this site prior to 2022/23. This delay would result in the loss of some 950 homes from the Council's trajectory for the period 2019-2024.

Gamston/Tollerton

There have been no planning applications submitted for this site and therefore no development has taken place to date. Furthermore, the site requires major infrastructure works, along with the closing and possible relocation of the airport currently in situ. As per Clifton, given there is no permission to date and the need for detailed reserved matters applications, coupled with the discharge of conditions pre-commencement of development and complex legal negotiations, it is highly unlikely there will be any delivery on this site prior to 2022/23. This delay would result in the loss of some 750 homes from the Council's trajectory for the period 2019-2024.

RAF Newton

Outline planning permission for 500 dwellings was granted in 2014. However, there have been no subsequent applications of note since this time and therefore no development has taken place to date on this site (subsequent to Phase 1). It is known that there are major infrastructure requirements for this site by way of a new school, a bridge over the A46 and community facilities for example, causing delivery and viability issues which are the subject of ongoing discussions with the Council. The site is yet to be sold to a housebuilder and therefore delivery is uncertain, but certainly this will not occur before 2019/20 at the earliest given the need for detailed reserved matters applications, coupled with the discharge of conditions pre-commencement of development. This delay in commencing on site would result in a gain of some 50 homes in the Council's trajectory for the period 2019-2024.

Table 1 below provides an overview of the above commentary for the Strategic Sites and sets out the likely additional shortfall that would result as a consequence of an amended / updated trajectory for the period 2019-2024. The table also accounts for the delays in commencing delivery from earlier in the trajectory period and this would result in an overall loss of some 2050 homes from deliverable sites for the period of 2011-2024 (the amended housing trajectory in support of these calculations is appended to the end of this letter).

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Site	Planning Application Status	Freeths' Forecast To Begin Delivery	RBC Delivery Forecast (2019-24)	Freeths' Delivery Forecast (2019-24)	Deficit
Edwalton	On-site	n/a	750	n/a	0
Cotgrave Colliery	On-site	n/a	44	n/a	0
RAF Newton	Outline only	2019/20	500	550	+50
Bingham	Outline only	2020/21	750	500	-250
Clifton	None (Outline pending)	2022/23	1200	250	-950
Gamston/Tollerton	None	2022/23	1000	250	-750
<i>Freeths projected 5 year deficit (2019-2024) against Council's April 2016 trajectory</i>					-1900
<i>Plus loss of homes from earlier in trajectory period due to delay in commencing delivery</i>					-150
Total Trajectory Deficit (2011-2024)					-2050

Table 1. Overview of Core Strategy's Strategic Sites with the Council's and Freeths' comparable forecasts for the 5 Year Period 2019-2024 (based on the Council's April 2016 trajectory).

With the above in mind, the key output to consider is the Council's likely housing supply position (with 20% buffer) to determine whether enough additional sites are proposed in the emerging LAPP to address any shortfall that may exist and ultimately result in a development plan able to meet the Borough's OAHN. Utilising Appendix A of the Further Options consultation document as a template, Table 2 below sets out and compares our assessment of the potential shortfall in homes to be built between 2019 and 2024 in contrast to that expected by the Council. Our assessment is that by 2024, there will be a shortfall of 2979 homes.

		Homes (RBC)	Homes (Freeths)
A	Housing target over Plan Period (2011 to 2028)	13150	13150
B	Housing target for period 2011 to 2019	4150	4150
C	Housing target for period 2019 and 2028 (annualised when LP Pt 2 adopted)	9000	9000
D	Annual target 2019 to 2028	1000	1000
E	Projected total number of homes built between 2011 to 2019	3268	3118
F	Projected shortfall in homes built between 2011 and 2019 (B – E)	882	1032
G	Housing requirement for 5 year period 2019-2024 with 20% buffer (D x 5 + F x 1.2)	7058	7238
H	Total number of homes expected to be built on deliverable sites between 2019-2024 (see Council / Freeths' trajectories)	6159	4259
I	Potential shortfall in homes built between 2019 and 2024 (G – H)	899	2979

Table 2. Potential shortfall in homes built between 2019 and 2024 (RBC and Freeths' comparable assessments).

FREETHS

Objectively Assessed Housing Need

It is clear that the Council's strategy is currently failing to meet the Borough's OAHN and there are serious concerns that this may not be satisfied even by the end of the plan period (2028) as a result of failing to 'catch up'. Irrespective of disquiet regarding expected delivery rates over a sustained period, market delivery and proximity of competing sites within a concentrated area, this position of failing to meet the OAHN would also be exacerbated by any further delays to adoption of the LAPP and/or the delivery of Strategic Sites, particularly Bingham, Clifton and Edwalton. This is further compounded by concerns about the envisaged delivery of the non-strategic sites at Keyworth, Radcliffe-on-Trent and Ruddington so soon after adoption of the LAPP, especially when considering that these settlements are bounded by tightly drawn green belt boundaries and that no planning permissions currently exist.

On this basis the Council must maximise sustainable housing supply and use robust, considered evidence to justify its projected housing trajectory. More deliverable sites are undoubtedly required within the Borough to ensure choice and competition in the market and that the plan is positively prepared such that the Council can seek to meet their OAHN as required by paragraphs 14, 17, 47 and 182 of the NPPF.

Ruddington (Q15)

We have previously submitted representations supporting site RUD4. We remain of the view that this site would have a very limited impact on the Green Belt and the site is sustainably located for access to facilities and services. This site is supported.

In respect of the additional options, we would comment that RUD11 is detached from the main urban area and would result in an isolated development, detached from the village core. Furthermore it would represent a significant encroachment into the countryside, as recognised by the Green Belt study. For these reasons the site is not supported.

RUD12 appears a logical choice for development, well related to the village core. Similar to RUD4 the sites scores well in Green Belt terms, with the overall figure increased by its proximity to the listed building at Easthorpe House.

RUD13 would represent a significant incursion into the countryside and would necessitate the release of RUD6 and also, logically, RUD14 to ensure that the development was not detached from existing development albeit by a comparatively modest amount. For these reasons this site is not supported.

Conclusion

The Council acknowledges that additional deliverable housing sites are required to meet the existing and projected shortfall resulting from delays to the SUEs and Strategic Sites; this position is supported. However, the Council expect this shortfall figure (with 20% buffer) to be in the region of 899 homes by 2024 but this is considered to be significantly underestimated such that any additional provision in this regard would fall considerably short of resolving the Borough's longstanding predicament.

FREETHS

Our calculation is that by 2024, the shortfall (with 20% buffer) will be in the order of 2979 homes principally as a result of delayed delivery of the 4 referenced sites (Bingham, Clifton, Gamston/Tollerton and RAF Newton). Our amended trajectory (attached) merely provides a greater degree of realism, albeit optimistic, for these sites but caution is identified that the position could indeed be much worse as a result of delays to the LAPP, delivery rates or market capacity for example. It is considered that this figure should be used by the Council as starting point to understand the extent of the likely shortfall to be addressed in order to satisfy its OAHN.

I would be grateful if you could confirm receipt of these representations. Please do not hesitate to contact me should you require any further information or wish to discuss.

Yours faithfully

Mark Bassett
Principal Planning Manager
Please respond by e-mail where possible

Enc.

Freeths' trajectory (based on LP Part 2 April 2016 trajectory)

	Completions		LP Pt 1					LP Pt 2					5 Yr Period					Beyond Plan Period			2011 - 2028
	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
Completions and identified SHLAA capacity	293	209	199	373	375	365	299	293	281	87	190	91	1	1	0	100	90	50	13	0	3247
Land at Melton Road, Edwalton (1500)						50	100	150	150	150	150	150	150	150	150	150					1500
Land at Former Cotgrave Colliery (450)					112	100	100	100	44												456
Land at Former RAF Newton Phase 2 (550)									50	150	150	150	50								550
Land North of Bingham (1050)										50	150	150	150	150	150	150	100				1050
Land South of Clifton (3000)												50	200	250	250	250	250	250	250	250	1250
East of Gamston/North of Tollerton (2,500 - 4000)												50	200	250	250	250	250	250	250	250	1250
Infill and Changes of use in broad locations									103	103	103	103	103	103	103	76	76	76	76	76	873
Outstanding East Leake to be allocated (400) Policy 3																					0
Outstanding Keyworth allocations (450) Policy 3									50	50	50	50	50	50	50	50	50				450
Outstanding Radcliffe on Trent to be allocated (400) Policy 3									50	50	50	50	50	50	50	50	50				400
Outstanding Ruddington to be allocated (250) Policy 3									50	50	50	50	50	50	50	50	50				250
Projected Completions	293	209	199	373	487	515	499	543	778	690	893	894	1,004	1,004	1,003	1,076	816				11276
Cumulative Completions	293	502	701	1,074	1,561	2,076	2,575	3,118	3,896	4,586	5,479	6,373	7,377	8,381	9,384	10,460	11,276				
Housing Requirement as per CS	250	250	470	470	470	470	470	1300	1000	1000	1000	1000	1000	1000	1000	1000	1000				13150
Cumulative Requirements as per CS	250	500	970	1440	1910	2380	2850	4150	5150	6150	7150	8150	9150	10150	11150	12150	13150				
Projected Delivery against Need (+/-)	43	2	- 269	- 366	- 349	- 304	- 275	- 1,032	- 1,254	- 1,564	- 1,671	- 1,777	- 1,773	- 1,769	- 1,766	- 1,690	- 1,874				