

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)
Rosamund Worrall	Name	Click here to enter text.
Historic England 2 nd Floor, Windsor House Cliftonville Northampton NN1 5BE	Address	Click here to enter text.
E	E-mail	Click here to enter text.

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

Don't know

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

This is outwith Historic England's remit for the historic environment.

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

No

Don't know

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

Any expansion to the three strategic allocations will need to take any impact on the historic environment into account as part of considerations. It is recommended that site assessments for additional sites are undertaken in line with the methodology and advice set out in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

This would add to the limited historic environment information included in the SHLAA and current Green Belt Review for additional sites and assist with moving forward, including informing SA work which we expect will be undertaken.

Question 3: Do you support housing development at:

	Yes – all of site	Yes – but only	No
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	part of site		
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.

There are designated and non-designated heritage assets adjacent to the site which may be adversely impacted by development at this site. It is recommended that site assessments for additional sites are undertaken in line with the methodology and advice set out in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

This would add to the currently limited historic environment information included in the SHLAA and current Green Belt Review for additional sites and assist with moving forward, including informing SA work which we expect will be undertaken, and to ensure that the final site allocation plan is sound.

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

No

Don't know

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

The question is outwith Historic England’s remit for the historic environment. However, it is recommended that site assessments for additional sites are undertaken in line with the methodology and advice set out in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

This would add to the limited historic environment information included in the SHLAA and current Green Belt Review for additional sites and assist with moving forward, including informing SA work which we expect will be undertaken.

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

No

Don’t know

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

This question is outwith Historic England’s remit for the historic environment. However, it is recommended that site assessments for additional sites are undertaken in line with the methodology and advice set out in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

This would add to the limited historic environment information included in the SHLAA and current Green Belt Review for additional sites and assist with moving forward, including informing SA work which we expect will be undertaken.

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.

This is outwith Historic England’s remit for the historic environment.

Question 7: Do you support housing development at:

	Yes – all of site	Yes – but only part of site	No
Site COT1 – Land rear of Mill Lane/The Old Park (potential capacity around 240 homes)			
Site COT2 – Land at Main Road (potential capacity around 50 homes)			
Site COT3 – Land rear of and to the west of Main Road (potential capacity around 125 homes)			
Site COT4 Land off Woodgate Lane (potential capacity around 80 homes)			
Site COT5 – Bakers Hollow (potential capacity around 60 homes)			
Site COT6 – The Brickyard, Owthorpe Road (potential capacity around 100 homes)			
Site COT7– Land behind Firdale (2) (potential capacity around 65 homes)			
Site COT8 – Land behind Firdale (potential capacity around 95 homes)			
Site COT9 – Land south of Hollygate Lane (1) (potential capacity around 140 homes)			

	Yes – all of site	Yes – but only part of site	No
Site COT10 – Land south of Hollygate Lane (2) (potential capacity around 40 homes)			
Site COT11 – Land south of Hollygate Lane (3) (potential capacity around 250 homes)			
Site COT12– Land south of Plumtree Lane (potential capacity around 250 homes)			
Any other location (please specify which)			

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.

The cluster of Listed Buildings, including the Grade I Church of All Saints, and their setting, along with other heritage assets and their setting will need to be taken into account as part of any site assessment work. The setting of Scheduled Monuments to the south of Cotgrave, e.g. the bombing decoys, may also need to be taken into account. It is recommended that site assessments for additional sites are undertaken in line with the methodology and advice set out in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

This would add to the limited historic environment information included in the SHLAA and current Green Belt Review for additional sites and assist with moving forward, including informing SA work which we expect will be undertaken.

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.

The question is outwith Historic England's remit for the historic environment.

Question 9: Do you support housing development at:

	Yes – all of site	Yes – but only part of site	No
Site EL9 – Land south of West Leake Road (potential capacity around 50 homes)			
Site EL10 – Land north of West Leake Road (potential capacity around 75 homes)			
Site EL11 – Brook Furlong Farm (potential capacity around 70 homes)			
Site EL12 – Land off Rempstone Road (north) (potential capacity around 235 homes)			
Site EL13 – Land off Rempstone Road (south) (potential capacity around 120 homes)			
Site EL14 – Land north of Lantern Lane (2) (potential capacity around 360 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.

Additional greenfield sites at East Leake will need to be considered in relation to the historic environment, heritage assets and their setting. The Grade II* Manor House may be impacted upon by proposed development sites, and there is the potential for archaeology at sites indicated. In addition, EL12 indicates a high survival of field patterns.

It is recommended that site assessments for additional sites are undertaken in line with the methodology and advice set out in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

This would add to the limited historic environment information included in the SHLAA and assist with moving forward, including informing SA work which we expect will be undertaken.

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.

This question is outwith Historic England's remit for the historic environment.

Question 11: Do you support housing development at:

	Yes – all of site	Yes – but only part of site	No
Site KEY1 – Land east of Willow Brook (potential capacity around 40 homes)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site KEY2 – Land off Selby Lane and Willowbrook (potential capacity around 15 homes)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site KEY3 – Land south of Selby Lane (potential capacity around 60 homes)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Yes – all of site	Yes – but only part of site	No
<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>			
<i>Site KEY13 – Hillside Farm (potential capacity around 60 homes)</i>			
<i>Site KEY14 – Land south of Bunny Lane (potential capacity around 410 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.

KEY14 has the potential to impact on the Conservation Area and setting of Listed Buildings while other sites have the potential to impact on unknown archaeology.

It is recommended that site assessments for additional sites are undertaken in line with the methodology and advice set out in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

This would add to the limited historic environment information included in the SHLAA and assist with moving forward, including informing SA work which we expect will be undertaken.

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.*

This question goes beyond Historic England's remit for the historic environment.

Question 13: *Do you support housing development at:*

	Yes – all of site	Yes – but only part of site	No
<i>Site RAD11 – North of Holme Lane (potential capacity around 115 homes)</i>			
<i>Site RAD12 – Land to the north of Shelford Road (potential capacity around 180 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.

RAD11 has the potential to impact on heritage assets and RAD12 has the potential to impact on Gallows Hill which is a heritage asset. There may be other unknown archaeological elements too.

The SHLAA and Green Belt Review information do not assess the sites adequately. It is recommended that site assessments for additional sites are undertaken in line with the methodology and advice set out in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

This would add to the limited historic environment information included in the SHLAA and current Green Belt Review for additional sites and assist with moving forward, including informing SA work which we expect will be undertaken.

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.*

This question is outwith Historic England’s remit for the historic environment.

Question 15: *Do you support housing development at:*

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

	Yes – all of site	Yes – but only part of site	No
Site RUD13 – Land opposite Mere Way (potential capacity around 170 homes)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site RUD14 – Croft House (potential capacity around 25 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.

The sites have the potential to impact on the Conservation Area and Listed Buildings and their setting (Easthorpe House GII and GII stables and animal pen). It is recommended that site assessments for additional sites are undertaken in line with the methodology and advice set out in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

This would add to the limited historic environment information included in the SHLAA and current Green Belt Review for additional sites and assist with moving forward, including informing SA work which we expect will be undertaken.

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.

This question goes beyond Historic England's remit for the historic environment. Should additional sites be considered for allocation they should fully consider the impact on the historic environment as part of the sustainability considerations.

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
Cropwell Bishop	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
East Bridgford	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gotham	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sutton Bonington	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tollerton	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Any other settlement (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 questions goes beyond Historic England's remit for the historic environment.

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.*

This question goes beyond the remit of Historic England.

Question 19: *Do you support housing development at:*

	Yes – all of site	Yes – but only part of site	No
<i>Site CBI1 – Land to the south of Nottingham Road and east of Kinoulton Road (potential capacity around 30 homes)</i>			
<i>Site CBI2 – Land north of Memorial Hall (1) (potential capacity around 75 homes)</i>			
<i>Site CBI3– Land north of Memorial Hall (2) (potential capacity around 60 homes)</i>			
<i>Site CBI4 – Land north of Fern Road (2) (potential capacity around 30 homes)</i>			
<i>Site CBI5 – Land north of Fern Road (1) (potential capacity around 250 homes)</i>			
<i>Site CBI6 – Land to the north of Fern Road (3) (potential capacity around 70 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.

The setting of heritage assets should be taken into account, and our comments on the Green Belt Review should be read in conjunction with this response. The greenfield sites have the potential for unknown archaeology. It is recommended that site assessments for additional sites are undertaken in line with the methodology and advice set out in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

This would add to the limited historic environment information included in the SHLAA and current Green Belt Review for additional sites and assist with moving forward, including informing SA work which we expect will be undertaken.

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.*

This question goes beyond the remit of Historic England.

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>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Site EBR2 – Land behind Kirk Hill (west) (potential capacity around 70 homes)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Site EBR3 – Land north of Kneeton Road (1) (potential capacity around 95 homes)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Site EBR4 – Land north of Kneeton Road (2) (potential capacity around 150 homes)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Site EBR5 – Land at Lammas Lane (potential capacity around 40 homes)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Yes – all of site	Yes – but only part of site	No
<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.

The additional sites all have the potential to impact on the significance of heritage assets and their setting and should be appropriately assessed in relation to the historic environment. It is recommended that site assessments for additional sites are undertaken in line with the methodology and advice set out in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

This would add to the limited historic environment information included in the SHLAA and current Green Belt Review for additional sites and assist with moving forward, including informing SA work which we expect will be undertaken.

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.*

This question is beyond the remit of Historic England.

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.

The additional sites have the potential to impact on the significance of heritage assets, and the comments provided as part of the Green Belt Review consultation should be read in conjunction with this response. It is not clear how heritage assets (designated and non-designated) have been assessed, and some of the additional sites have a high survival of field patterns which need to be considered appropriately as part of the plan. It is recommended that site assessments for additional sites are

undertaken in line with the methodology and advice set out in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

This would add to the limited historic environment information included in the SHLAA and current Green Belt Review for additional sites and assist with moving forward, including informing SA work which we expect will be undertaken.

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.

This question is outwith Historic England's remit for the historic environment.

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)	<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.

It is recommended that site assessments for additional sites are undertaken in line with the methodology and advice set out in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

This would add to the limited historic environment information included in the SHLAA

and assist with moving forward, including informing SA work which we expect will be undertaken.

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.

This question goes beyond the remit of Historic England.

Question 27: Do you support housing development at:

	Yes – all of site	Yes – but only part of site	No
Site TOL1 – Land at Burnside Grove (potential capacity around 180 homes)			
Site TOL2 – West of Tollerton Lane and North of Medina Drive (potential capacity around 360 homes)			
Site TOL3 – Land east of Tollerton Lane (potential capacity around 50 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.

It is recommended that site assessments for additional sites are undertaken in line with the methodology and advice set out in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

This would add to the limited historic environment information included in the SHLAA and current Green Belt Review for additional sites and assist with moving forward, including informing SA work which we expect will be undertaken.

Other issues

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

The SHLAA includes limited assessment on the historic environment – essentially relating to Conservation Area status and landscape information. For areas considered as part of the current Green Belt Review consultation, further heritage asset information is available but the Review’s methodology scoring criteria is limited to high value heritage assets, although some text within the review also refers to non-designated assets as ‘heritage assets’. As such, it is unclear what has been considered in relation to the historic environment, heritage assets and their setting, and how significance and harm to significance has been assessed.

In the absence of any assessment of the degree of harm which the potential site allocations might cause to the historic environment, or what measures the Plan might need to put in place in order to ensure any harm is minimised, at present it cannot be demonstrated that the sites are compatible with the Council’s own policies for the protection of the historic environment. In addition, in terms of national guidance and legislation, the Part 2 additional sites Plan also fails to demonstrate that:

- *The sites that it is putting forward for development will deliver a “positive strategy for the historic environment” as is required by NPPF Paragraph 126;*
- *The sites that are allocated will be likely to “contribute to protecting or enhancing the historic environment”. Therefore, it has not shown that it is likely to deliver sustainable development in terms of the historic environment (NPPF Paragraph 7);*
- *The sites which it has allocated are likely to “conserve heritage assets in a manner appropriate to their significance”. Therefore it has not shown that it will be likely to deliver the Government’s objectives for the historic environment (NPPF Paragraph 17); or,*

- *It has complied with the statutory duty under S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas.*

On that basis, it is recommended that site assessments for additional sites are undertaken in line with the methodology and advice set out in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

This would add to the limited historic environment information included in the SHLAA, and also the Green Belt Review for relevant settlements, and assist with the Plan moving forward, including informing SA work which we expect will be undertaken as the Plan progresses.

We hope that this information is of use to you at this time and would be pleased to discuss any queries you may have.

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>

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.

Response Form

Your Details		Agent details (where applicable)
Rosamund Worrall	Name	
Historic England 2 nd Floor, Windsor House Cliftonville Northampton NN1 5BE	Address	
EMk	E-mail	

1. Green Belt Review Part 2 (b): Additional sites review

Do you agree or disagree with the review of the additional Green Belt sites around Rushcliffe's Key Settlements and other villages against the purposes for including land within the Green Belt? 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.

Thank you for the opportunity to comment on the Green Belt Review Part 2(b). Historic England would wish to make the following comments.

Firstly, on a general point, it be helpful if the 'Other Villages' section could include village maps and sites as with the 'Key Settlements' section, or have the same reference numbers as the LP Part 2 Land and Planning Policies Further Options, since it has been quite awkward having to cross reference the SHLAA document information, the Part 2 Further Options document and the Green Belt Review during the consultation process when some reference numbers match and others do not.

Secondly, in terms of the Methodology which has been applied to the 2014 and current review the parameters of the review for the historic environment relate to highly valued assets only so does not account for the requirements of NPPF para.139 in relation to non-designated assets, particularly archaeology. We feel that this limit to high value assets misses valuable historic landscape setting information, such as areas where there is high survival of field patterns, including ridge and furrow, which can have links to the historic core of the settlement. It is recommended that the Council considers if/how this could be addressed in the Green Belt Review. If it is concluded that the Council has considered the historic environment appropriately in respect of the Green Belt Review, but that more detailed assessment information elsewhere in the process would inform site selection overall, then it would be worth making that clear in the Additional Sites report.

In addition, Review text should be amended since historic settlement site comments relate to 'heritage assets' as a whole. Heritage assets include designated and non-designated heritage assets whereas the methodology only addresses designated at present. It is not clear how setting has been assessed either.

We would recommend that the Historic Environment Record is consulted and that advice from your conservation and archaeology experts is sought, if it has not been already. The latter is not clear since the Review indicates local knowledge from Planning Officers has been included, but does not specifically state whether other colleagues have been involved.

In order to address current concerns, we recommend that the methodology for site assessment contained in Historic England Advice Note (HEAN) 3: The Historic Environment and Site Allocations in Local Plans is used to consider sites in relation to the historic environment. Outcomes from any such site assessment work could be included in the Green Belt Review as well as the LP Part 2 Further Options document moving forward. This would assist with providing clarity as to how the historic environment has been assessed in order to differentiate between the scores of 3 and 5 – at present it is not clear how adverse impact and significant adverse impact has been determined and it is

not clear whether assessment has been consistent across all sites.

As well as adding to the evidence base in respect of heritage assets and setting information, such assessment work could identify sites which may have a higher score in relation to Green Belt Review assessment at present but where mitigation measures could apply and result in a situation where all, or part, of a site could actually be considered for bringing forward in the Local Plan Part 2 Additional Sites in relation to the historic environment:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

Thirdly, based on the above, Historic England would wish to comment on the following Green Belt Review conclusions for particular sites:

Cotgrave – COT12 – The historic settlement information does not account for any unknown archaeology at present so the score could potentially increase;

Cropwell Bishop – CRO5 – The historic settlement information is scored as 1 although it states that the Green Belt forms part of the setting for this part of the village. As such, the score could possibly be higher depending on any historic environment assessment outcome;

East Bridgford – EAS4 – The historic settlement information is scored as 3 although this could be a significant adverse impact to score 5 depending on any historic environment assessment outcome;

Gotham – GOT2 – This is scored as 1 for the historic settlement section and the text reads 'There are no heritage assets within the site or within locations that would be affected by the removal of this area of land from the Green Belt' but there is the potential for non-designated heritage assets at the site since there has been a find in the vicinity. Detailed site assessment in respect of the historic environment would assist in informing the Review;

Gotham – GOT3 – This is scored as 1 for the historic settlement section but it is not clear how the historic environment, heritage assets or setting have been assessed in order to reach that conclusion;

Gotham – GOT4 – This is scored as 2 which has no definition in the methodology scoring criteria. The explanatory historic settlement text sets out that the land forms part of the setting for the historic core of Gotham as viewed on the approach from Leake Road but there is no evidence to demonstrate how this has been assessment to confirm why the score is 2 and not higher, and if higher what mitigation measures might be appropriate in order to reduce the score;

Gotham – GOT5 and GOT6 – The historic environment information scores 1 for each of these sites. However, there is a high survival of field patterns which form part of the historic landscape character and setting for Gotham and the loss of these would have an adverse impact on the historic environment. It is not clear how these have been assessed as part of the Review or SHLAA to inform the process. Detailed site assessment in respect of the historic environment would assist in informing the Review; and,

Gotham – GOT7 – The historic settlement information scores 1 for this site, but the explanatory text states that 'apart from ridge and furrow, there are no heritage assets within the site'. This highlights again the inconsistency in approach to the historic environment and the Green Belt Review since the Review methodology does not provide for non-designated heritage assets, yet the text for this site acknowledges the non-designated ridge and furrow as a heritage asset. It is our view that the loss would have an adverse effect on the historic environment but there is no information within the Review to assess the significance of the potential loss. As such, it is not clear how these have been assessed as part of the Review or SHLAA to inform the process. Detailed site assessment in respect of the historic environment would assist in informing the Review.

Summary

In summary, there is a lack of clarity in respect of the approach to the historic environment within the Green Belt Review with regard to a) the methodology criteria parameters and b) how that has been applied to the consideration of individual sites. Historic England recommends that the methodology for site assessment contained in HEAN 3: The Historic Environment and Site Allocations in Local Plans is used to consider sites in relation to the historic environment and provide an evidence base for the Green Belt Review and the LP Part 2 Further Options document moving forward.

We hope that this information is of use to you at this time. Please do not hesitate to contact me should you have any queries.

(please continue on a separate sheet if necessary)

2. Please provide any others comments you wish to make

(please continue on a separate sheet if necessary)

Please return by **5pm 31 March 2017**

to: Planning Policy
Rushcliffe Borough Council
Rushcliffe Arena
Rugby Road
West Bridgford
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>

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.