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Rushcliffe Local Plan Part 2 (Further Options) and Draft Green Belt Review Part 2 (b)

Representations on behalf of Samworth Farms Ltd

INTRODUCTION

These representations, made by Fisher German on behalf of Samworth Farms Ltd, relate to land to the north Grantham Road (RAD5), Radcliffe on Trent and St James Business Park, Radcliffe on Trent. They support the allocation of RAD 5 for development.

The representations incorporate comments on both the Local Plan Part 2: Land and Planning Policies (Further Options) and also the Green Belt Review Part 2(b); and should be read alongside each other.

In terms of the Green Belt Review, it is noted that site references provided for the Green Belt Review are reversed in the Local Plan Part 2 consultation document. In particular, land north of Holme Lane is RAD11 in the Local Plan Part 2 consultation document and RAD 12 in the Green Belt review. Land to the North of Sheford Road is identified as RAD 12 in the Local Plan Part 2 consultation but RAD 11 in the Green Belt Review. The Council's own reference numbers have been retained in commenting on both consultation documents.

RUSHCLIFFE LOCAL PLAN PART 2: LAND AND PLANNING POLICIES – ISSUES AND OPTIONS

Comments have not been made to all questions posed in the Issues and Options paper, with the representations below focusing on those questions of most relevance to the land to the north of Grantham Road, Radcliffe on Trent and St James Business Park, Radcliffe on Trent.

Question 1 – Council's Assessment of the present housing supply position

As detailed in our representations to the Local Plan Part 2 consultation in Spring 2016, Rushcliffe Borough Council has very challenging housing targets to deliver with a core reliance on urban extensions to the south of Clifton, at Melton Road, Edwalton, and at east Gamston/north of Tollerton, to deliver the majority of growth over the Plan period.

The Council's recognition that delays in the delivery of the urban extensions will result in the sites delivering fewer homes than previously anticipated, both by the end of the Plan period, and within the next five years, is supported. The Council's response to this, through the publication of the current consultation document is also supported. It is agreed that additional land is required to accommodate more homes over the Plan period.

Radcliffe on Trent is identified as a Key Settlement for growth to accommodate a minimum of 400 homes. In light of the need to identify more land for development, it is clear that the 400 homes identified for Radcliffe on Trent must be seen as a minimum, and not maximum; with sufficient land identified to meet the Borough's housing targets.

The Council poses the question: *"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 homes?"* Samworth Farms Ltd agree with the Council's position that more land will need to be identified in the Plan to accommodate additional homes to meet the anticipated shortfall. However, the number of dwellings for which land needs to be allocated is considered to be overly conservative.

Whilst the Council has recognised that the urban extension sites are not delivering the numbers anticipated, the completion rates expressed in the Housing Trajectory, detailed in Appendix A of the Local Plan Part 2, remain over ambitious; requiring a huge step change in delivery. It is considered that the figure of 2,000 homes, proposed by the Council will not deliver the necessary housing requirement over the Plan period. More land, over and above that which will deliver 2,000 homes, will be required to ensure delivery.

The 2,000 dwellings which the Council believes Part 2 should plan for should therefore be seen as an **absolute minimum** figure for delivery. As too should the 400-dwelling figure identified for Radcliffe on Trent. Without an increase in the number of dwellings the Plan is not sufficiently flexible to the Borough's housing need.

Question 2 – Expansion of the three strategic allocations

For the reasoning provided above, Samworth Farms Ltd agree with Council's decision not to expand any of the three existing allocations (Melton Road, Edwalton; South of Clifton; and East of Gamston/North of Tollerton) to resolve the shortfall in the amount of land that is available for housing development.

Radcliffe on Trent

Question 12 – Total Number of dwellings which should be built on greenfield sites at Radcliffe on Trent up to 2028

As referred to above, Radcliffe on Trent is identified as a Key Settlement for growth to accommodate a minimum of 400 homes. In light of the need to identify more land for development, it is clear that the 400 homes identified for Radcliffe on Trent must be seen as absolute minimum, and not maximum figure; with sufficient land identified to meet the Borough's housing targets.

Given the sustainable nature of Radcliffe, it is considered that, along with some housing provision in the 'other' villages, Radcliffe could deliver significantly more housing than is currently proposed.

In allocating land however, consideration must be given to the emerging Neighbourhood Plan which identifies a proposed direction of growth in Radcliffe on Trent which is supported by the community.

The Plan below is taken from the Neighbourhood Plan. It illustrates a clear direction of growth to the east of the settlement, encompassing RAD 2 and 3, as well as land to the south of the railway line incorporating RAD 5. Some land to the west, incorporating RAD 1, but not RAD 11 is also proposed.



Figure 1: Radcliffe on Trent Neighbourhood Plan, Indicative Map

In delivering more homes, above and beyond the 400 dwellings currently proposed, consideration also needs to be given to emerging Policy 10 of Neighbourhood Plan which seeks the delivery of sites which accommodate no more than 200 dwellings. The Policy also

seeks the inclusion of an element of commercial office space alongside residential development where this is appropriate.

RAD 5 can deliver a mixed-use development in line with the Neighbourhood Plan's aspirations. The site could deliver up to 200 dwellings, along with some small and medium scale employment uses, building on the success of the nearby St James Business Park.

In considering the total number of new homes that should be built on greenfield sites in Radcliffe on Trent, alongside the aspirations of the emerging Neighbourhood Plan, it is worth noting that the strategy detailed within the Neighbourhood Plan has been tested on the delivery of up to 600 dwellings. There is therefore some flexibility in the Neighbourhood Plan for the delivery of increased numbers.

Question 13 – Location of housing development

Housing development at **RAD 5 is supported**, as detailed in the Sustainability Appraisal scoring below, the site represents a sustainable location for development in Radcliffe on Trent. In addition, the site scores 'Low' in the Green Belt Review revised scoring.

RAD 5 – Sustainability Appraisal Scoring

SA Objectives	Response	Scoring
<p>1. Housing To ensure that the housing stock meets the housing needs of Rushcliffe</p>	<p>The site is not currently allocated for development, but is a site which could be brought forward as a residential or mixed use development through the Local Plan Part 2.</p> <p>The site is bounded by existing residential development to the south and west of the site. The railway line to the north of the site provides a strong defensible boundary, as too does the existing built infrastructure and signage associated with St James Business Park which bounds the site to the east.</p> <p>Housing provision within the site would be delivered in accordance with the most up to date objectively assessed needs set out in the SHMA. The site will therefore increase the range and affordability of housing for all social groups.</p> <p>The Neighbourhood Plan is an emerging document and, owing to the need to release Green Belt in order to accommodate any future development in Radcliffe, has been put on hold until the Green Belt review has progressed. The Neighbourhood Plan Group is aware that the site is available and could deliver a residential, or mixed use development.</p>	
<p>2. Health To improve health and reduce health inequalities</p>	<p>The site is a 7 minute walk to Bingham Road Playing Fields and a 26 minute walk to Wharf Lane Recreation Ground creating opportunities for recreational physical activity. The development of the site could facilitate additional onsite open space</p>	

	<p>provision in the form of children's play and ancillary open space; offsite contributions could be made to enhance existing provision in accordance with the emerging Neighbourhood Plan.</p> <p>The development of the site would not result in the loss of existing recreational open space.</p>	
<p>3. Heritage To provide better opportunities for people to value and enjoy Rushcliffe's heritage</p>	<p>The development of the site will not result in the loss of a historic site, or damage to the setting of a listed building or Conservation Area.</p>	
<p>4. Crime To improve community safety, reduce crime and the fear of crime in Rushcliffe</p>	<p>The internal layout of the site would be designed to design out crime with natural surveillance provided over public spaces within the development. The site is bounded by existing development to the south and west, with access to St James Business Park to the east; all of which provide surveillance of the site throughout the day and night.</p>	
<p>5. Social To promote and support the development and growth of social capital across Rushcliffe</p>	<p>The development of the site will not result in the loss of a community facility. Opportunities exist within the site for the creation of a new community facility if sought by the local community.</p>	
<p>6. Biodiversity and Green Infrastructure To increase biodiversity levels and protect and enhance Green Infrastructure across Rushcliffe</p>	<p>The development of the site will not result in the loss of all or part of a designated site of nature conservation interest. The site is not adjacent to a designated site of nature conservation.</p> <p>The proposed development would not involve the loss of existing habitat or trees or hedgerow. Trees and Hedgerow surrounding the site will be enhanced and strengthened as part of the development proposals.</p> <p>The development of the site provides the opportunity to deliver biodiversity enhancements through the provision of SUDs and onsite open space.</p> <p>As indicated above, onsite open space will be provided (and contributions provided to offsite provision if sought, in accordance with the emerging Neighbourhood Plan).</p>	
<p>7. Landscape To protect and enhance the rich diversity of the natural, cultural and built environmental and archaeological/geological assets, and landscape character of Rushcliffe,</p>	<p>The overall landscape strategy is to enhance the area. The development of the site would provide the opportunity to create a landscaped edge to the settlement creating a new, soft gateway to Radcliffe on Trent.</p>	

including Rushcliffe's heritage and its setting		
<p>8. Natural resources and flooding To prudently manage the natural resources of the area including water, air quality, soils and minerals whilst also minimising the risk of flooding</p>	<p>The site will not cause any harm to the water environment or to any AQMA. The site is not at risk of flooding as defined by the Environment Agency's online maps.</p> <p>Part of the site is currently used for agricultural purposes, albeit the land is not high quality agricultural land. The western part of the site comprises scrub land.</p> <p>The development of the site will not conflict with the emerging Neighbourhood Plan in respect of Natural Resources and Flooding.</p>	
<p>9. Waste To minimise waste and increase the re-use and recycling of waste materials</p>	<p>Recycling and Waste collection will be provided in accordance with the County's requirements.</p> <p>A Construction Management Plan would be submitted on discharge of the planning permission conditions detailing a waste management plan for the construction period.</p>	
<p>10. Energy To minimise waste and increase the re-use and do develop the area's renewable energy resource, reducing dependency on non-renewable sources</p>	<p>The proposed development will deliver energy technology as required by building regulations at the time of the determination of the planning application.</p> <p>The Construction Management plan will detail how sustainable construction techniques and reuse of materials will be undertaken in accordance with the emerging Neighbourhood Plan.</p>	
<p>11. Transport To make efficient use of the existing transport infrastructure, help reduce the need to travel by car, improve accessibility to jobs and services for all and to ensure that all journeys are undertaken by the most sustainable mode available</p>	<p>The site is accessible by public transport with two existing bus stops to the north of Grantham Road and two existing bus stops to the south of Grantham Road, along the site frontage. Up to 7 services an hour use these bus stops. Furthermore, the site is approximately a 20 minute walk from Radcliffe on Trent Train Station, which provides regular services to Nottingham, Bingham and Grantham. Development of the site will therefore use exiting transport infrastructure and reduce journeys undertaken by the car.</p> <p>The site is located on the edge of the settlement within walking distance of a number of services and facilities including community facilities, schools, retail centres and employment areas.</p> <p>The development of the site is in accordance with the emerging Neighbourhood Plan in this respect which seeks to prioritise sustainable modes of transport and promote good access for all to public services and facilities.</p>	

<p>12. Employment To create high quality employment opportunities</p>	<p>The site could support a mixed use development with the provision of residential development as well as some small scale employment uses in accordance with the types of employment uses being sought in the emerging Neighbourhood Plan. The site could therefore improve access to employment and rural productivity.</p> <p>The development of the site will not result in the loss of existing employment land.</p>	
<p>13. Innovation To develop a strong culture of enterprise and innovation</p>	<p>As detailed above, the site could deliver, as part of a mixed use scheme with residential development, employment uses in accordance with the emerging Neighbourhood Plan. However, whilst in accordance with the Neighbourhood Plan these uses may not be 'centres of excellence' but might facilitate the development of a future 'centre'.</p>	
<p>14. Economic structure To provide the physical conditions for a modern economic structure including infrastructure to support the use of new technologies</p>	<p>The site could be delivered as a residential scheme, or as a mixed use residential and employment scheme thereby improving access to jobs.</p> <p>There is no conflict with the emerging Neighbourhood Plan in this respect.</p>	

Comments on the other sites proposed have been provided to the Council previously. However, in respect of RAD 11 and RAD 12, the following comments are made:

RAD 11

Not Supported - The site scores poorly in the Green Belt Review, being of medium-high Green Belt importance. As detailed above land to the west of the settlement plays a key role in preventing the coalescence of Radcliffe on Trent with the urban edge of Nottingham, with only the River Trent and the railway line separating the settlements. The site extends over Gibbet Hill and down towards the River Trent. The Green Belt in this location prevents significant and prominent urban sprawl. It is essential, under the purposes of the Green Belt, set out in the Framework, that the limited Greenfield land in this location is retained to maintain this separation. The delivery of access to the site, without the need for third party land is questioned. The Green linking to Holme Lane is a private road in part. Even if access can be achieved Holme Lane is narrow and may not support a further increase in dwellings off it.

RAD 12

Not Supported - Development of the site would extend the built development of Radcliffe on Trent into the open countryside. The site is bounded by existing residential development to its south-western boundary only. The site boundaries to the north, east and south are weak, with no defensible boundaries, not even in the form of hedgerow planting provided to the south and the east as illustrated in Figure 2 below. The development of the site would be incongruous

in its location further exacerbate the traffic issues within the centre of the settlement and existing junctions on the A52.



Figure 2: RAD 12 looking south west into Radcliffe on Trent; no defensible boundaries to the site.

Other

It is noted that this current consultation seeks comments in respect of housing numbers and the allocation of additional land to deliver homes. However, as set out in previous representations to the emerging Local Plan Part 2, sites such as St James Business Park also need to be considered in the preparation of the Local Plan Part 2. It is requested that St James Business Park is removed from the Green Belt to enable a less restrictive policy context in order to allow the existing businesses to develop. Furthermore, additional land should be released and if necessary safeguarded to enable established Business Parks, such as St James Business Park, to expand and, importantly, enable the businesses that occupy the site to grow without having to relocate from their established address.

Building a strong, competitive economy and supporting a prosperous rural economy are central to the NPPF. The release of the land from the Green Belt will support the aims of the Framework, supporting economic growth and enabling businesses and enterprises to grow and expand.

RUSHCLIFFE GREEN BELT REVIEW – ASSESSMENT OF ADDITIONAL SITES IN KEY SETTLEMENTS AND OTHER VILLAGES

Question 1 – Do you agree or disagree with the review of the additional Green Belt sites around Rushcliffe’s Key Settlements and Other Villages?

In previous representations, the Council's Assessment Criteria and Assessment Matrix have been used to re-score the sites surrounding Radcliffe on Trent on an equal basis. This is reproduced below for ease, with a re-assessment of RAD 11 and RAD 12 also provided. The Council's original scoring and justification is set out in black text, the revised text and scoring is shown in red.

It should be noted that the site references provided for the Green Belt are reversed in the Local Plan Part 2 consultation document. So, and North of Holme Lane is RAD11 in the Local Plan Part 2 consultation document and RAD 12 in the Green Belt review. Land to the North of Sheford Road is RAD 12 in the Local Plan Part 2 consultation and RAD 11 in the Green Belt Review. The Council's own reference numbers have been retained in commenting on both consultation documents.

RAD 2

Green Belt Purpose	Score	Justification
To check unrestricted sprawl of large built-up areas	1 3.	This site shares two boundaries with Radcliffe on Trent. It is well contained by Shelford Road and residential dwellings on Clumber Drive. Development would contribute to a rounding off of Radcliffe on Trent's north eastern boundary and not intrude into open countryside. The site has two or more boundaries adjoining the settlement, however the site's boundaries are weak and not very substantial.
To prevent neighbouring towns merging into one another	1 1.	As the site does not extend beyond existing developments along Shelford Road or the railway line, the development of this site would not reduce the distance between Radcliffe on Trent and its neighbouring settlements. Agree.
To assist in safeguarding the countryside from encroachment	3 3	The site contains one residential property and stables. Due to the prominence of Radcliffe on Trent and its urban edge, the land is urban fringe in character. Agree.
To preserve the setting and special character of historic towns	1 1.	There are no statutory or non-statutory historical features within or adjacent to the site. Agree.
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	3 3	There are no specific urban regeneration projects within regeneration Radcliffe on Trent. Agree.
	9. 11.	Low Low – Medium

RAD 3

Green Belt Purpose	Score	Justification
To check unrestricted sprawl of large built-up areas	2 2.	This site has three boundaries with Radcliffe on Trent's urban edge. Logically however it would not be removed from the Green Belt in isolation. Removal of this land from the Green Belt would round off Radcliffe's eastern urban edge. Whilst the site is within a gently sloping bowl and generally screened from the majority of views, development towards the north and east of the site would be more visible. Removal of this site would necessitate removal of RAD2. Agree.
To prevent neighbouring towns merging into one another	1 1	Provided development does not extend beyond the existing residential developments along Shelford Road and the A52, the distance between Radcliffe on Trent, Saxondale, Shelford and Newton would not be reduced. Agree.
To assist in safeguarding the countryside from encroachment	2 3	Land contains a farmhouse and residential dwelling on Shelford Road. The land contains two dwellings to the far north of the site. The urban edge is visible, but not an overriding feature.
To preserve the setting and special character of historic towns	1 1.	There are no statutory or non-statutory historical features within or adjacent to the site. Agree.
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	3 3.	There are no specific urban regeneration projects within Radcliffe on Trent. Agree.
	9 10	Low Low

RAD 4

Green Belt Purpose	Score	Justification
To check unrestricted sprawl of large built-up areas	5 5.	The development of this large site would establish a prominent intrusion into the open countryside. It would be seen as outlying development which would result in further Green Belt removal east of Radcliffe on Trent (RAD2 and RAD3). The site is bounded by the railway line to the south, Oatfield Lane to the east and hedgerows to the north and west. Spellow Hill is a notable topographical feature in the centre of the site upon which development would be visually intrusive. Agree.
To prevent neighbouring towns merging into one another	4 2.	If developed in its entirety, it would significantly reduce the distance between Radcliffe on Trent and Bingham. Development would result in a limited to moderate reduction in distance between settlements, with the topography of the surrounding land providing a clear break between the two.
To assist in safeguarding the countryside from encroachment	4 3.	Whilst the site contains business units at St James Business Park and masts (on Spellow Hill), due to the size of the site, the degree of encroachment is limited. The existing settlement edge is not a prominent feature across the site. It is open countryside in character. The land contains some development in the countryside. The existing settlement edge is visible but not an overriding feature.
To preserve the setting and special character of historic towns	1 1.	There are no statutory or non-statutory historical features within or adjacent to the site. Agree.
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	3 3.	There are no specific urban regeneration projects within Radcliffe on Trent. Agree.
	17 14	Medium – High Low – Medium

RAD5

Green Belt Purpose	Score	Justification
To check unrestricted sprawl of large built-up areas	3 2.	Whilst the site has strong defensive boundaries, this site, if developed in isolation would result in prominent urban intrusion into open countryside. The site has strong defensive boundaries and does not extend over topographical features. The site has two boundaries adjoining the settlement.
To prevent neighbouring towns merging into one another	4 2.	Further development east would reduce the distance between Radcliffe on Trent and Bingham. There would be a perception that development was reducing the distance to Upper Saxondale. Development would result in a limited to very moderate reduction in distances between settlements.
To assist in safeguarding the countryside from encroachment	4 2.	Inappropriate development has not encroached. The existing settlement edge is not a prominent feature within the majority of the site. The land's appearance is open countryside. The settlement edge is visible for the majority of the site, with built form infrastructure and signage associated with St James Business Park forming the western boundary of the site.
To preserve the setting and special character of historic towns	1 1.	There are no statutory or non-statutory historical features within or adjacent to the site. Agree.
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	3 3.	There are no specific urban regeneration projects within Radcliffe on Trent. Agree.
	15 10.	Low – Medium Low

RAD 7

Green Belt Purpose	Score	Justification
To check unrestricted sprawl of large built-up areas	5 4.	The extension of development along the A52 to Oatfield Land would constitute a prominent urban extension of Radcliffe on Trent into the open countryside. Topography slopes up along Grantham Road increasing the perception of urban sprawl. The site is bounded on its eastern boundary by the built infrastructure associated with St James Business Park and would be seen, at present, as an extension of Radcliffe on Trent into the open countryside. Topography slopes up along Grantham Road.
To prevent neighbouring towns merging into one another	4 3.	If developed, it would significantly reduce the distance between Radcliffe on Trent and Saxondale/Bingham. Development would result in a moderate reduction in distances between settlements, and would remain contained by existing topography.
To assist in safeguarding the countryside from encroachment	5 4	The site does not contain inappropriate development which has encroached or would lead to further encroachment. The site includes some development in the form of an 'oil head'. The settlement edge, incorporating the built infrastructure associated with St James Business Park bounds the site to the east however, the land is open countryside.
To preserve the setting and special character of historic towns	1 1.	There are no statutory or non-statutory historical features within or adjacent to the site. Agree.
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	3 3.	There are no specific urban regeneration projects within Radcliffe on Trent. Agree.
	18 15	Medium – High Low – Medium

RAD8

Green Belt Purpose	Score	Justification
To check unrestricted sprawl of large built-up areas	1 1.	This site is well contained between residential developments on Cropwell Road and Hillside Road. Woodland/scrub and Local Wildlife Site to the rear form a strong defensible barrier against sprawl. Agree.
To prevent neighbouring towns merging into one another	1 1.	Development would not reduce the distance between Radcliffe on Trent and Cropwell Butler. Agree.
To assist in safeguarding the countryside from encroachment	4 4.	This small site does not contain any inappropriate development. Its proximity to the A52 and School opposite give the site an urban fringe character. Agree.
To preserve the setting and special character of historic towns	1 1.	There are no statutory or non-statutory historical features within or adjacent to the site. Agree.
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	3 3.	There are no specific urban regeneration projects within Radcliffe on Trent. Agree.
	10 10.	Low Low

encouraging the recycling of derelict and other urban land	3.	Agree.
	16	Low – Medium
	15	Low – Medium

	16.	Medium – High
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RAD 11 – Land North of Shelford Road

Green Belt Purpose	Score	Justification
To check unrestricted sprawl of large built-up areas	4	<p>The site shares one boundary with Radcliffe.</p> <p>Land extends to the top of Gibbet Hill above the River Trent. This forms part of prominent ridge within an open arable landscape.</p> <p>The River Trent escarpment provides a strong western boundary. Shelford Road provides strong southern boundary. However there are weak hedgerows and a track boundary to the north and east.</p>
	4	Agree.
To prevent neighbouring towns merging into one another	2	<p>The removal of this site and its development would extend the urban edge further along Shelford Road.</p> <p>There would be reduction in the distance between Radcliffe and Shelford however this would not be significant.</p>
	2.	Agree.
To assist in safeguarding the countryside from encroachment	4	<p>The land does not contain inappropriate development.</p> <p>Large detached dwellings within Radcliffe are visible, they are not however a prominent feature.</p>
	4	Agree.
To preserve the setting and special character of historic towns	3	<p>Shelford Lodge contains buildings of local historical interest. Land surrounding these buildings is important to their setting.</p> <p>Area around Gibbet Hill is identified as an area of archaeological interest.</p>
	3	Agree.
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	3	There are no specific urban regeneration projects within Radcliffe on Trent.
	3	Agree.
	16	Medium – high

	2.	Agree.
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	3 3.	There are no specific urban regeneration projects within Radcliffe on Trent. Agree.
	11. 15	Low – Medium Low – Medium

It is requested that the revised scoring is taken into account by the Council. A summary table has been prepared to reflect the revised scoring:

Site Reference	Green Belt Site Score	Green Belt Value
RAD 1	13	Low – Medium
RAD 2	11	Low – Medium
RAD 3	10	Low
RAD 4	14	Low – Medium
RAD 5	10	Low
RAD 6	7	Low
RAD 7	13	Low – Medium
RAD 8	10	Low
RAD 9	13	Low- Medium
RAD 10	16	Medium - High
RAD 11 – Land North of Shelford Road	16	Medium – High
RAD 12 – Land north of Holme Lane	15	Low – Medium