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EAST LEAKE PARISH COUNCIL

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RUSHCLIFFE BOROUGH COUNCIL BUSINESS SUPPORT UNIT RECEIVED 24 NOV 2017 Copies sent to

Dear Richard

Please find attached East Leake Parish Council's response to your Local Plan (Local Plan Part 2) Consultation.

If you require any further information please do not hesitate to contact me.

Yours sincerely

Neil Lambert
Clerk to East Leake Parish Council

East Leake Parish Council (ELPC) response to Rushcliffe Borough Council (RBC) Consultation, Local Plan Part 2: Preferred Housing Sites

1. Overall Response

In East Leake we are bearing the brunt of RBC's failure to maintain a 5 year housing land supply, and your delay in bringing forward sites in the key settlements by releasing them from the green belt. We do not wish to see any further delay, and make it quite clear that we **SUPPORT** the proposals. In particular:

(a) We strongly support that no further sites be allocated in East Leake, over and above those that have already been given planning permission. See section 2 below.

(b) We support inclusion of **ALL** the proposed sites elsewhere

We do have some observations on the plan, and although we would not wish these in any way to delay the release of land from the green belt, we feel it worth making them in case extensive revisions are made to the proposals. See sections 3 to 12 below.

2. Our support for allocating no further sites at East Leake (aside from those that already have planning permission)

The East Leake Neighbourhood Plan process incorporated extensive consultation with residents and running through it is the desire to maintain a compact village, where homes are within walking distance of the village centre and its facilities, and the desire to maintain the rural feel by keeping the green rim of ridges visible all around the village. This is a strong vision, completely in accord with national policies (NPPF) and the Local Plan, and enacted via several policies of the Neighbourhood Plan, in particular:

H6 (a) Most homes built on the site shall be within 1.25km walking distance of East Leake Village Centre, defined here as the T-junction between Gotham Road and Main Street

E1 (a) The ridges within the Parish boundary marked on the map at Fig 5.1/1 will remain undeveloped, in order to maintain the rural character of the village and to provide a visual link between the settlement and the countryside. The heights of any buildings within the Parish boundary on the slopes up to the ridges will be limited so as to leave a green rim clearly visible from the village and to screen sight of the village from outside.

East Leake had around 2700 homes at the start of the plan period (2013) and since then has already provided sites for 1064 new homes, expanding the village by 40%. Rushcliffe's Core Strategy specifies a minimum of 400 new homes for the entire plan period to 2028 – over 2½ times this number have now been approved. Such massive over allocation at East Leake distorts the provision of homes across the Borough and thus conflicts with the spatial strategy of the Core Strategy. Providing a further large number of homes at the far south of the county at East Leake would conflict with the requirement in the Core Strategy for Rushcliffe to provide sites on the urban edge of Nottingham.

The NPPF is about achieving sustainable development. Further development in East Leake would fail to meet the economic, social, and environmental criteria for sustainable development set out in paragraph 7 of the NPPF. It is the Parish Council's view that East Leake can no longer be considered a sustainable location for development due to lack of school places, Health Centre capacity, sewerage capacity and the limitations of the local road network. Housing development is spreading the size of the village so that it is no longer easy to walk from the outskirts to the central village facilities. Developer led housing is providing the wrong mix of housing to support a balanced community. No employment opportunities are being

created alongside the housing. Couple this with a mediocre bus service linking only to Nottingham and Loughborough and not other local centres of employment, and it is clear that the housing is generating additional car journeys.

For further information on issues to do with infrastructure at East Leake, we refer you to the following:

- East Leake Neighbourhood Plan¹ section 2.1 and policy H1
- ELPC response to 17/02292/OUT² (195 houses at Lantern Lane)
- Supplementary information to above³
- ELPC submission to Planning Inspectorate re 16/01881/OUT (235 Dwellings North of Rempstone Road)⁴
- RBC statement to above appeal⁵, particularly Sections 5 and 7, and Appendix 7

3. Accounting for East Leake Housing Numbers

We find it curious that five of the eight sites that had planning permission before the Rempstone Road appeal⁶ have been included as allocations for East Leake. Why not all of them? Why any? We can see that there may be some merit in actually citing sites, as a possible defence against further “ministerial statements”. Also we are reassured in part by the statement that “all of these homes count towards the minimum 400 home target”. But we are nevertheless concerned that this treatment may obscure in future the amount of housing that East Leake has provided during the plan period relative to the other settlements, if the total of the five sites (658) is taken rather than the overall total of 829 on the eight sites (or 1064 on nine sites as it now stands on 22 Nov 2017 after the appeal).

You will no doubt update the figures to include the Rempstone Road site. Note also that it is significantly 829 rather than 800 homes that had planning permission before that. This counts the extra 13 houses which were sneaked in to the Kirk Ley Phase 3 reserved matters, which do not in fact have outline planning permission at this time. It does not count the outline approval for 3 homes on the Johnson’s Garage site, nor the 2 houses being built on Rempstone Road. Presumably these are counted elsewhere?

We are unclear, also, how the East Leake housing is included in housing trajectory, which is at Appendix 1, page 38, of the Housing Site Selection Interim Report and elsewhere. The row is blank for East Leake, so where are the 829 (or 658, or 1064, or 893) houses included in this calculation?

¹<http://www.rushcliffe.gov.uk/media/rushcliffe/media/documents/pdf/planningandbuilding/neighbourhoodplans/ELNP-Final%20version.pdf>

² https://planningon-line.rushcliffe.gov.uk/online-applications/files/44DC1B4FE126AFD2CD6D306EB25960C1/pdf/17_02292_OUT-MRS_EAST_LEAKE_PARISH_COUNCIL-1086906.pdf

³ https://planningon-line.rushcliffe.gov.uk/online-applications/files/413583D2536529C04C5A85C9FF89931E/pdf/17_02292_OUT-MRS_EAST_LEAKE_PARISH_COUNCIL-1087389.pdf

⁴ https://planningon-line.rushcliffe.gov.uk/online-applications/files/10101380F26B58ED9EFB4B6EC23FABDD/pdf/16_01881_OUT-EAST_LEAKE_PARISH_COUNCIL_SUBMISSIONS_TO_PLANNING_INSPECTORATE-1085565.pdf

⁵ https://planningon-line.rushcliffe.gov.uk/online-applications/files/986E2CA16BCCE945293FDE526DE1C6A8/pdf/16_01881_OUT--1087438.pdf

⁶ Rushcliffe Planning Application 16/01881/OUT
Inspectorate Reference: APP/P3040/W/17/3178343

4. East Leake Site Assessments

Sites EL09 and EL10 on West Leake Road are covered by policy E1(b) of the Neighbourhood Plan, and this needs to be added to the assessments on pages 116-119 of the Housing Site Selection interim Report.

“Development to the west of the railway line, other than on West Leake Road, will be permitted only where strong justification is provided. On West Leake Road, any development should have regard to the more linear and sporadic residential character of the area.”

5. Replacement of Green Belt

We request that alongside removal of green belt land there should be new green belt land allocated to ensure continued separation of settlements. We have raised this point before in previous consultations, and note RBC's response⁷, but we have been asked at a public meeting to raise it again.

6. Land Adjacent to the Main Urban Area

We note in para 6.6 of the Housing Site Selection Interim Report that further sites have been identified and offered by landowners next to the strategic allocations, but that these possibilities have been dismissed by RBC due to the fact that delivery of any homes here would be at the end of the plan period or beyond. Given the land supply situation, and the likelihood that the strategic allocations will all proceed at different rates, we suggest that this decision could be revisited with a view to possibly bringing the land out of the green belt to be used under certain conditions, or perhaps bringing it out as safeguarded land.

On the subject of safeguarded land we return again to the Edwalton Golf Course which was released from green belt as safeguarded land in the Core Strategy. The Core Strategy states:

3.4.8 Consideration has and will be given as to the appropriateness of excluding other land from the Green Belt as part of a boundary review to allow for longer term development needs, as advised by Government policy. This can aid the 'permanence' of the Green Belt, and prevent the need for further early review of its boundaries. This Local Plan Part 1 (Core Strategy) removes Edwalton Golf Course from the Green Belt and safeguards it for development in the future. This is an approach that is supported by the Rushcliffe Green Belt Review 2013. While the land is not required for development at the present time, should this situation change it may be brought forward through a future review of the Local Plan.

Should this not have been considered as part of the Local Plan Part 2 review? Surely the land is required for development at the current time given the woeful lack of progress in delivering the homes next to the urban area?

⁷ P108, Rushcliffe Draft Green Belt Review. Report of consultation
<http://www.rushcliffe.gov.uk/media/rushcliffe/media/documents/pdf/planningandbuilding/planningpolicy/lapp/preferredsites/Green%20Belt%20Review%20Part%20b%20Consultation%20Report.pdf>

7. Key Settlements

We point out again that East Leake has already had massively more development relative to its size than is proposed for other key settlements, and we would prefer to see a more equal spread of the growth.

The other general point is that there seems to be very little contingency in terms of sites brought out of the green belt and our concern is that non-delivery of the sites at other key settlements for whatever reason could jeopardise the 5 year land supply in the future and put further and disproportionate pressure on East Leake, which does not have green belt protection.

Cotgrave

The allocation of an extra 350 homes at Cotgrave is conservative compared to the growth already experienced at East Leake, and we would prefer to see more of the 14 available sites released from green belt and allocated here or at least brought out of the greenbelt as safeguarded land. The settlement is benefitting from regeneration funding and a new Health Centre. The report states that it is constrained by primary school places. The schools are currently at around 79% full.⁸ No analysis is provided as to the options for expanding the schools.

Keyworth

It is most disappointing that only 130 homes over and above the original allocation of 450 have been included at Keyworth, particularly given the number of sites identified. The settlement has 3 primary schools (not 2 as stated in the site assessments) currently at around 77% full and on paper able to take children from around 670 homes without the need for expansion. There is no assessment provided of the options to expand the Keyworth schools and the school sites certainly appear to be much less constrained than the two East Leake primary schools. Keyworth has a large, modern Health Centre. We believe that more housing sites should be brought out of the greenbelt and allocated at Keyworth or at least brought out of the greenbelt as safeguarded land.

8. Other Villages

Sutton Bonington

SUT01 is not in the green belt and so has the potential to deliver homes quickly. The only reason given for not including it in the site allocations is that "Sutton Bonington Primary School currently has no capacity or potential for expansion in order to accommodate housing growth". This is at odds with the paragraph in the site assessment which states "There may be some flexibility for additional dwellings but without a feasibility study this is difficult to confirm." Has the feasibility study been undertaken? Normanton school appears to have some spare capacity at present, and is about the same distance from the site as Sutton Bonington school, although across a busy road (requiring perhaps a footbridge or traffic lights) and in a separate settlement. We suggest that school places for this site be reconsidered.

Tollerton

For some of the Tollerton sites the main constraint identified is once again primary school places. The school does not appear to be at capacity at present and there is no detail of the reason for stating that there is no option for expansion.

⁸ Source: NCC Primary Admissions to Schools 2017-18,
<http://www.nottinghamshire.gov.uk/media/125546/rushcliffeprimaryschools2018-2019.pdf>

9. Education Provision

Throughout the Local Plan Part 2 documentation the decision to allocate or not allocate sites is heavily predicated by the ability to provide primary school places at the location. As far as we can see the relevant detailed information has not been made available in the supporting documentation. Some information on numbers is available in the documentation that NCC provides to parents⁹ but in order to justify the assessments more detailed information needs to be publicly available, giving current numbers on roll, future projections and an assessment of the potential of each school site/building to be expanded.

While we agree wholeheartedly with the aspiration to provide school places within communities, we do draw your attention to the contrast between the consideration given to primary school places in the site assessments, and the situation that is currently being endured at East Leake. The primary schools here were full or close to capacity in many year groups even before the start of the building rush here. Lantern Lane school never had the capacity it needed, even from new, and portacabins were in use at the school very soon after it was built. Additional capacity for this school has now been provided by building an annexe across the road as part as one of the housing developments, an arrangement that is far from ideal. There is no evidence that this type of solution has been considered when putting together the site assessments, in terms of identifying locations for annexe buildings (or indeed new schools) within development sites.

The S106 agreement for the Rempstone Road site even includes the appalling solution of developer contributions being used to transport East Leake children to schools outside the village. If this can be considered at East Leake, why would it not be considered elsewhere? The site assessments need to be reconsidered in the light of the appeal decision.

In the situation where so many of the schools are full, RBC needs to be working closely with NCC to formulate a holistic plan for provision of primary school places within all communities.

10. Housing Density

As far as this exercise of allocating sites to satisfy the five year land supply is concerned it is important that density is dealt with accurately and carefully, and linked with housing mix.

Para 3.4 of the Housing Site Selection Interim Report uses a density of 20-25 dwellings per hectare in determining how many homes each site can accommodate, stating that “these density figures are considered appropriate based on previous experience”. We would like to see evidence that this figure is tied to current national standards, densities achieved elsewhere in the Greater Nottingham Housing Area, and current government policy. It could be the case that the sites allocated could produce higher densities, and thus significantly boost the 5 year land supply, whilst delivering the starter homes, smaller family homes, and schemes for older people that are required rather than endless 4 bedroom detached houses. Our experience in East Leake is that sites are initially presented for public consultation at a modest density and density is subsequently increased, without necessarily including more of the smaller and more affordable dwellings needed. Policy H3 of the East Leake Neighbourhood Plan deals with housing mix and has been largely ignored by the developments here to date.

⁹ See <http://www.nottinghamshire.gov.uk/media/125546/rushcliffprimaryschools2018-2019.pdf>

11. Ratcliffe-on-Soar Power Station

We are wondering why the Local Plan appears silent about Ratcliffe-on-Soar Power Station, which is projected to close during the plan period or soon afterwards, releasing a huge brownfield site with excellent road and rail links.

12. “Cut and Paste” errors etc

In “Housing Site Selection Interim Report”:

- Para 6.28 *“A total of 14 alternative site options have been assessed at Cotgrave.”* Should be Keyworth
- Para 6.45 *“A total of 16 alternative site options have been assessed at Radcliffe on Trent.”* Should be Ruddington.
- p48, *“New residents of Bunny are likely to register at the Keyworth Medical Centre which is a purpose built primary care centre that opened in 2007. It is within a 20 minute walk of all residents and accessible by bus.”* Bunny is not a 20 minute walk from Keyworth Medical Centre, and we question anyway the assertion that Bunny residents use Keyworth. Is there evidence for this?
- Pages 146 to 178. Keyworth has three primary schools, not two.

23 November 2017