

## Rushcliffe Local Plan Part 2: Land and Planning Policies – Preferred Housing Sites

### Response Form

Please return by **5pm on Monday 27 November 2017** to:  
 Planning Policy, Rushcliffe Borough Council  
 Rushcliffe Arena, Rugby Road  
 Nottingham. NG2 7YG  
 Or to: [localdevelopment@rushcliffe.gov.uk](mailto: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)
John A Wells Ltd	Name	Ben Holmes
C/O Agent	Address	Oxalis Planning Ltd Unit 7 Wheatcroft Business Park, Landmere Lane, Edwalton, Nottingham, NG12 4DG
Click here to enter text.	E-mail	

### Housing Development

#### Housing Land Supply

**Question 1:** Do you agree with the Council's proposal that Local Plan Part 2 should identify enough land for around 2,550 new homes?

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

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

Please see attached Statement.

(please continue on a separate sheet if necessary)

## Housing Sites within the Main Urban Area

**Question 2:** Do you agree with the Council's proposed allocation of the Abbey Road Depot (site WB01) for the development of around 50 new homes?

**Yes** .....

**No** .....

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

You may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

In part, but it is unclear how the site could be brought forward because the Council have not identified a suitable site for the relocation of it's depot service.

(please continue on a separate sheet if necessary)

## Housing Sites adjacent to the Main Urban Area

**Question 3:** Do you agree with the Council's proposal that no sites adjacent to the main urban area of Nottingham (within Rushcliffe) should be allocated for housing development through Local Plan Part 2?

**Yes** .....

**No** .....

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

Please see attached Statement.

(please continue on a separate sheet if necessary)

## Housing Development at the 'Key Settlements'

### Bingham

**Question 4:** Do you agree with the Council's proposal that no sites adjacent to Bingham should be allocated for housing development through Local Plan Part 2?

**Yes** .....



**No** .....

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

Click here to enter text.

(please continue on a separate sheet if necessary)

### Cotgrave

**Question 5:** Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Cotgrave for around 350 homes in total?

**Yes** .....



**No** .....

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

Click here to enter text.

(please continue on a separate sheet if necessary)

**Question 6:** Do you support the proposed allocation for housing development of the following sites at Cotgrave:

	Yes	No
Site COT01 – Land rear of Mill Lane/The Old Park (estimated capacity around 170 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Sites COT09 – Land south of Hollygate Lane (1); COT10 – Land south of Hollygate Lane (2); and COT11a – Land south of Hollygate Lane (3a) (estimated capacity around 180 homes)	<input type="checkbox"/>	<input type="checkbox"/>

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

For each of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

## East Leake

**Question 7:** Do you agree with our proposal that only sites EL01, EL02, EL04, EL05 and EL08 (as shown at Figure 4) should be allocated for housing development at East Leake?

<b>Yes</b> .....	<input type="checkbox"/>
<b>No</b> .....	<input type="checkbox"/>

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

This question is now out of date given recent appeal decision.

(please continue on a separate sheet if necessary)

## Keyworth

**Question 8:** Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Keyworth for around 580 homes in total?

<b>Yes</b> .....	<input checked="" type="checkbox"/>
<b>No</b> .....	<input type="checkbox"/>

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

[Click here to enter text.](#)

(please continue on a separate sheet if necessary)

**Question 9:** Do you support the proposed allocation for housing development of the following sites at Keyworth.

	Yes	No
Site KEY4a – Land off Nicker Hill (1) (estimated capacity around 150 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site KEY8 – Land between Platt Lane and Station Road (estimated capacity around 190 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site KEY10 – Land south of Debdale Lane (1) (estimated capacity around 190 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site KEY13 – Hillside Farm (estimated capacity around 50 homes)	<input type="checkbox"/>	<input type="checkbox"/>

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

For each of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

[Click here to enter text.](#)

(please continue on a separate sheet if necessary)

## Radcliffe on Trent

**Question 10:** Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Radcliffe on Trent for around 820 homes in total?

**Yes** .....



**No** .....

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

Click here to enter text.

(please continue on a separate sheet if necessary)

**Question 11:** Do you support the proposed allocation for housing development of the following sites at Radcliffe on Trent.

	Yes	No
Site RAD01 – Land north of Nottingham Road (estimated capacity around 150 homes), with employment development to the west of the powerlines that separate the site.	<input type="checkbox"/>	<input type="checkbox"/>
Site RAD02 – Land adjacent Grooms Cottage (estimated capacity around 50 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RAD03 – Land off Shelford Road (estimated capacity around 400 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RAD05a – Land north of Grantham Road to south of railway line (1a) (estimated capacity around 140 homes)	<input type="checkbox"/>	<input type="checkbox"/>

	Yes	No
Site RAD06 – 72 Main Road (estimated capacity around 5 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RAD13 – The Paddock, Nottingham Road (estimated capacity around 75 homes)	<input type="checkbox"/>	<input type="checkbox"/>

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

For each of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

## Ruddington

**Question 12:** Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Ruddington for around 410 homes in total?

Yes .....



No .....

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

Click here to enter text.

(please continue on a separate sheet if necessary)

**Question 13:** Do you support the proposed allocation for housing development of the following sites at Ruddington.

	Yes	No
Site RUD01 – Land to the west of Wilford Road (south) (estimated capacity around 180 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RUD05 – Land south of Flawforth Lane (estimated capacity around 50 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RUD11 – Old Loughborough Road (estimated capacity around 10 self and custom-build homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RUD13 – Land opposite Mere Way (estimated capacity around 170 homes)	<input type="checkbox"/>	<input type="checkbox"/>

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

For each of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

## Housing Development at the 'Other Villages'

### Cropwell Bishop

**Question 14:** Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Cropwell Bishop for around 160 homes in total?

**Yes** .....



**No** .....

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

Click here to enter text.



(please continue on a separate sheet if necessary)

**Question 15:** Do you support the proposed allocation for housing development of the following sites at Cropwell Bishop.

	Yes	No
Site CBI02 – Land north of Memorial Hall(1) (estimated capacity around 90 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site CBI05 – Land east of Church Street (estimated capacity around 70 homes)	<input type="checkbox"/>	<input type="checkbox"/>

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

For both of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

[Click here to enter text.](#)

(please continue on a separate sheet if necessary)

## East Bridgford

**Question 16:** Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at East Bridgford for around 100 homes in total?

Yes .....	<input checked="" type="checkbox"/>
No .....	<input type="checkbox"/>

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

[Click here to enter text.](#)

(please continue on a separate sheet if necessary)

**Question 17:** Do you support the proposed allocation for housing development of the following sites at East Bridgford

	Yes	No
Site EBR06 – Closes Side Lane (west) (estimated capacity around 20 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site EBR07 – Closes Side Lane (east) (estimated capacity around 20 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site EBR8 – Land to the north of Butt Lane (estimated capacity around 15 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site EBR10 – Land south of Butt Lane (estimated capacity around 45 homes)	<input type="checkbox"/>	<input type="checkbox"/>

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

For each of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

## Gotham

**Question 18:** Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Gotham for around 100 homes in total?

Yes .....	<input checked="" type="checkbox"/>
No .....	<input type="checkbox"/>

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

Click here to enter text.

(please continue on a separate sheet if necessary)

**Question 19:** Do you support the proposed allocation for housing development of the following site at Gotham:

	Yes	No
Site GOT5a – Land east of Gypsum Way/The Orchards (1) (estimated capacity around 100 homes)	<input type="checkbox"/>	<input type="checkbox"/>

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

You may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

### Bunny Brickworks

**Question 20:** Do you support the proposed allocation of the former Bunny Brickworks (site BUN01) for a mixed development of around 100 new homes and employment development?

Yes .....	<input type="checkbox"/>
No .....	<input checked="" type="checkbox"/>

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

You may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

It is unclear how development at Bunny Brickworks could be made to be sustainable given the sites remoteness from the village and services and facilities.

There are a wide range of more suitable and sustainable sites located on the

immediate edge of other villages (some lie outside the Green Belt). Development of these site would result in a more sustainable form of development. The nature of the Bunny Brickworks site does not provide sufficient justification to depart from core sustainable development principles.

(please continue on a separate sheet if necessary)

## Flintham – Former Islamic Institute

**Question 21:** Do you support the proposed allocation of the former Islamic Institute at Flintham for the development of up to 95 new homes?

**Yes** .....

**No** .....

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

It is a committed site and should not be allocated. It is relevant to note that it is wholly inconsistent of the Council to conclude that development is acceptable and sustainable at Flintham for 95 dwellings, whilst concluding that other equally or more sustainable locations are not considered suitable for development.

(please continue on a separate sheet if necessary)

## Other Issues

**Question 22:** Please identify any matters related to housing development which are not covered here or elsewhere and which you wish to raise.

Click here to enter text.

(please continue on a separate sheet if necessary)

Please return by **5pm on Monday 27 November 2017** to:

Planning Policy,  
Rushcliffe Borough Council  
Rushcliffe Arena  
Rugby Road  
Nottingham. NG2 7YG

Or to: [localdevelopment@rushcliffe.gov.uk](mailto: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 plan making process and may be in use for the lifetime of the Local Plan and associated processes in accordance with the Data Protection Act 1998. 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. By sending the Council your details you will automatically be informed of future consultations on planning policy documents unless you indicate otherwise.

# **Rushcliffe Local Plan Part 2: Preferred Housing Sites Consultation**

## **Representation by Oxalis Planning on behalf of John A Wells Ltd**

### **Question 3: Sites adjacent to the Main Urban Area**

#### **Land at Edwalton – west of the existing SUE. Proposed Retirement Village**

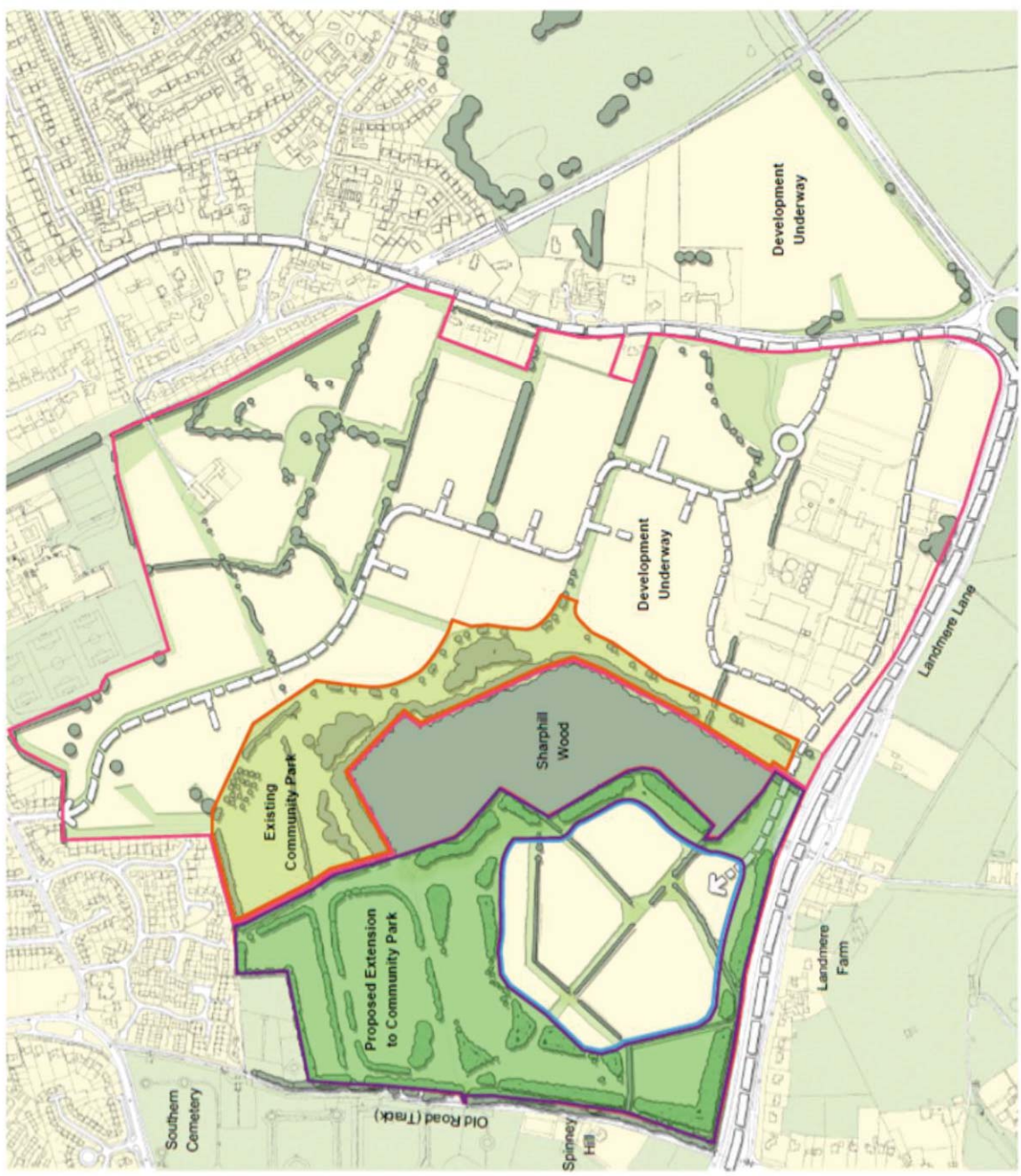
- 1.0 The Council's justification for not identifying additional land for development at Edwalton, as set out in the Housing Site Selection Interim Report, is flawed.
- 2.0 The Interim Report concludes that there would be no merit in including additional land because it would not lead to more homes being built over the next five years to help address the Borough's 5 year land supply shortfall. This assumption is wholly inaccurate because its fail to consider the specific circumstances of land west of the Edwalton SUE and the form of development that is proposed.
- 3.0 The proposal for retirement housing on the land west of Edwalton SUE can be delivered in the early part of the Local Plan Part 2 plan period.
- 4.0 The Interim Report also refers to Green Belt considerations, but the conclusions at the time of the Core Strategy did not take account of the significant additional housing that is now needed to be planned for in the Borough. Circumstances have changed greatly and justify a different conclusion, including the allocation of land to the west of the existing SUE.
- 5.0 Land at Edwalton is the most advanced of the three SUEs. Permissions are granted and development has commenced on site. The site is also the smallest of the three SUE's and is therefore expected to now progress well and be completed within the Plan period. Land to the west of the existing SUE, west of Sharphill Wood, but immediately north of the A52, would form a natural, sensible and sustainable extension to the Edwalton site.
- 6.0 Please see attached concept masterplan.
- 7.0 This area was previously considered by the Council at the Core Strategy but not pursued at the time principally because it was considered not to be required to meet development needs. Circumstances have now changed and the Council should now allocate the site for development and remove the land from the Green Belt.
- 8.0 This area of land had a very low score in the Council's Strategic Green Belt Assessment, acknowledging that the area does not perform a strong Green Belt function. Indeed, given that land to the east has been removed from the Green Belt, the area appears as an anomaly of land north of the A52, retained as Green Belt.
- 9.0 An area of about 30 acres of land is considered appropriate for development. This land sits low in the landscape and would relate well to existing development. The remaining land in this area, much of which is prominent higher ground, could be given over as community open space, adding significantly to the existing space to be provided by the Edwalton scheme and providing a comprehensive approach to the land in this area around Sharphill Wood.

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- 10.0 The site is promoted specifically for a large retirement village. This form of development is much needed in the area, it would add to the existing mix of housing on the Edwalton site and fit well into the character and landscape of this part of the site. This form of development would also provide the opportunity to establish a bespoke transport and access solution.
  - 11.0 Because it would be a different form of housing it would serve a different market to that being delivered on the existing Edwalton site. It could therefore be delivered as a discrete phase of, but at the same time as, other parts of the Edwalton SUE. It could therefore be brought forward quickly and has the potential to make a significant contribution to the Borough's 5 year housing land supply.
  - 12.0 Inspired Villages Group, a specific retirement village provider, is now working with the landowner to promote the site. Inspired Villages have a wealth of experience in delivering high quality retirement villages and are keen to develop a retirement village to serve the south Nottingham Area.
  - 13.0 There is currently no retirement village in Rushcliffe and unless a specific allocation is made for this purpose, it is unlikely that such a form of retirement living will be delivered. This would be a failure of the local Plan to respond appropriately to the needs of the area's ageing population and would fail to meet Government's policy aspirations.
  - 14.0 The failure to allocate the land west of the Edwalton SUE would also be a significant missed opportunity for the Borough, both to deliver a new and high quality form of retirement living, but also to establish an expanded community park to the benefit of the existing community.
  - 15.0 Inspired villages are putting together a brochure to explain the basis of their retirement village concept and how this could be applied at Edwalton. This document will be submitted to the Council to inform their Plan making process in due course.



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-  "Inspired" Retirement Village (Approx 11.6Ha)
-  Extent of Existing Permissions and Allocations (Approx 62.8Ha)
-  Extent Of Existing Committed Community Park (Approx 11.2Ha)
-  Proposed Extension to Community Park (Approx 19.8Ha)
-  Existing Sharpshill Wood (Approx 9.7Ha)
-  Proposed Main Access



20230376LANDPERS2194-01F DEVELOPMENT FRAMEWORK.MXD

Oxalis Planning Ltd  
 Land West of Sharpshill Wood  
 Edwalton

**DEVELOPMENT FRAMEWORK**

INT/010  
 22nd November 2017 OMB/BJ  
**73184-01 - F**  


Author	MB
Checked	MB
Approved	MB
Date	22/11/17
Scale	1:1000
Sheet	01 of 01





## **Rushcliffe Local Plan Part 2: Preferred Housing Sites Consultation**

### **Housing Land Supply: Question One**

**Representation by Oxalis Planning  
on behalf of its clients.**

**November 2017**

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## **1.0 Background**

- 1.1 Oxalis planning have consistently raised concerns about the approach to housing land supply adopted by the Borough Council. Whilst the Borough's acknowledgement of its housing supply issues is welcomed, Oxalis Planning remain concerned that the approach to the Local Plan Part 2 is fundamentally flawed because the Council continue to overstate supply and underestimate the challenges of housing delivery.
- 1.2 Oxalis Planning has set out its position in detail previously. This is updated and repeated here. Oxalis Planning act on behalf of a range of clients active in Rushcliffe. That includes in relation to the 3 sustainable urban extensions at Edwalton, Clifton and Gamston. Because of this we have a detailed understanding of the complexities of bringing large sites forward, and what are likely to be reasonable assumption on when sites are likely to begin to deliver housing and reasonable assumptions on the rate at which delivery is likely to occur.

## **2.0 Introduction**

- 2.1 The Borough has a very serious housing land supply issue. It has failed to bring forward enough land in the right place, at the right time. This is due in part to the lack of delivery on almost all of the Borough's Strategic sites but also due to the significant delays in the preparation and adoption of the Local Plan Part 2.
- 2.2 Part of the reason for the delay in the Local Plan Part 2 has been a reluctance on the part of the Borough Council to accept it has a housing supply shortfall. The Council's first Issues and Options Consultation on the Local Plan Part 2, (published in March 2016) denied there was a housing supply issue at all.
- 2.3 The Council's desire to down play the issues has led to delay and a lack of action to deal with the problem. This process is now due to continue because this current round of consultation, whilst it acknowledges that there is a housing supply shortfall, seriously underestimates the shortfall.
- 2.4 We strongly disagree with the Council's assessment of the present housing supply situation and we do not consider that enough land will be identified unless a more realistic and positive approach to housing delivery is adopted.
- 2.5 The issue relates not only to the Borough's five year land supply but also to delivery over the whole plan period.

## **3.0 Government Requirements**

- 3.1 The Government's position is unequivocal. It requires local authorities to 'boost significantly' the supply of new houses.
- 3.2 It requires local authorities to deliver, in full, their objectively assessed needs. In the case of Rushcliffe this means preparing a Local Plan Part 2 that will ensure, with a high degree of certainty that the Borough's minimum housing requirement of 13,150, is delivered by 2028.

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3.3 The Government recognises that more needs to be done to ensure that the right numbers of houses are built. It's White Paper – Fixing Our Broken Housing Market (February 2017) is aimed at just that. The White Paper draws on and makes reference to the work undertaken by the Local Plan Experts Group (LPEG). As well as proposing a new approach to calculating housing needs, the LPEG made recommendations as to how Local Plans should be approached not only to demonstrate a five year land supply but to ensure plans deliver over the whole plan period.

3.4 In their Report to Government (March 2016) they state that:

*'there needs to be a clearer and more effective mechanism for maintaining a five year land supply, at the same time as ensuring plans consider delivery over the whole plan period and incorporate sufficient flexibility to respond to rapid change' (Paragraph 11.3).*

And they recommend that plans:

*'focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement' (Paragraph 11.4).*

3.5 Because of its existing delivery problems, the scale of its shortfall and the uncertainties regarding delivery in the future, it is important that this 'sufficient Flexibility' is adopted by Rushcliffe in its Local Plan Part 2. The Local Plan must be flexible enough to guarantee the delivery of the minimum number of new homes in the Plan period.

3.6 In simple terms this means planning for more houses so that there is sufficient flexibility now, to take account of inevitably delays to delivery on some sites and lapsed permission or non-implementation on others.

3.7 The LPEG also advise on a standardised approach to calculating five year land supply. They recommend:

- the buffer (5% or 20%) is applied to the requirement and the backlog;
- lapse rates should be applied to both small and large sites. In the absence of evidence a 10% proxy should be applied;
- Assumptions on lead in time and build rates for large sites is not always realistic and should be drawn from experience on comparable sites.

#### **4.0 Increasing the Flexibility in the Plan to secure Delivery**

4.1 The Core Strategy set out a minimum housing requirement of 13,150 (2011-2028). It allocated sites and set out minimum requirements for other parts of the Borough, which it considered at the time would deliver 13,450 houses.

4.2 This level of flexibility, at just over 2% (300 as a percentage of 13,150) is now unacceptably small, particularly given the supply issues being experience in the Borough, and the uncertainty regarding future delivery. It would not pass the test of 'sufficient flexibility to respond to rapid change' recommended by the LPEG, let alone have any

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regard to the need for reserve sites equal to 20% of a Council's requirement, (also recommended by the LPEG).

- 4.3 A 20% flexibility allowance would respond positively to the Borough's supply difficulties and uncertainties. It would respond to the LPEG and the Government's continued emphasis on improving delivery. If a 20% flexibility allowance were applied to (only) the remaining requirement over the Plan period and assuming delivery at April 2017 will be around 2,100 dwellings, 20% would equate to around 2,200 additional dwellings ( $13,150 - 2,100 = 11,050(x20\%) = 2,210$ ).
- 4.4 It is our view therefore that the Borough should Plan for the delivery of 15,350 dwellings over the Plan period to provide the necessary flexibility and certainty that the minimum housing requirement will be met in full.

## **5.0 The Council's Delivery Assumptions (as set out in its Housing Trajectory).**

- 5.1 The Council's previous delivery assumptions as set out in the Core Strategy have proved to be unrealistic on almost all the strategic sites. The majority of large sites have experienced significant complications and delays. Oxalis Planning has direct experience of (and indeed continued involvement in) the 3 largest SUE's at Edwalton, Clifton and Gamston.
- 5.2 Edwalton, following extensive delays (it first gained consent in 2009) is now being implemented and housing completions have started.
- 5.3 Clifton and Gamston however continue to experience delays and the Council's assumptions on first delivery are unrealistic. Furthermore, and equally importantly, the assumptions on 'average' delivery rates are considered to be unrealistic. Previous information was submitted to the Council which indicated that the sites could, on good years, deliver 250 houses a year. This assumption remains reasonable. However it is considered that average delivery is unlikely to be maintained at this rate. A rate of 250 houses a year would require at least 4 house builders consistently building and selling at high levels. The likelihood is that there will be years when some builders are gearing up or finishing off, which will reduce overall delivery in those years. Over the Plan period it is also reasonable to assume that there will be some years when, for whatever reason, delivery is much lower. The 'average' over the Plan period should reflect this.
- 5.4 In relation to land at Clifton, work has been undertaken to inform a Viability Appraisal for the Scheme. This has included independent market evidence. This evidence has advised that higher build out rates will affect sales values, and that a reasonable assumption is for average completion rates to be 200 dwellings a year across the life of the project, with a build up to this figure in the first few years. This has been accepted and agreed as an appropriate assumption by the Council and their independent advisors.
- 5.5 Having regard to this evidence and the other matters mentioned above, it is our view that a reasonable and realistic assumption is that both the Clifton and Gamston schemes, once up and running, will deliver 'on average' 200 dwellings per year over the Plan period.
- 5.6 The Borough Council's Housing Trajectory as at April 2016 should be amended accordingly. Details of the required changes are shown at Appendix one. With these more realistic assumptions the Trajectory suggests a delivery of just 11,676 homes within the Plan period. It is important to note that even these assumptions may prove to be optimistic

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and may require further revision in due course. The Gamston SUE in particular remains uncertain given the level of commitment required from a wide range of both public and private sector bodies to ensure the site can be brought forward.

5.7 This suggests a shortfall of 1,774 dwellings from the Core Strategy figure of 13,450. But a shortfall of 3,674 from a planned provision of 15,350 dwellings (the housing requirement with a 20% flexibility allowance – see paragraph 4.4 above)

## 6.0 The Plan Period Requirement

6.1 We have set out above, in section 4 and 5, the need to incorporate additional flexibility in the Local Plan and the need to amend the assumptions made in the Housing Trajectory.

6.2 It is our view therefore that:

1. The Housing trajectory should be amended as set out at Appendix One;
2. A flexibility allowance (in addition to the Trajectory changes) of 20% of the remaining Plan Period requirement (which is approximately 11,050 dwellings) should be planned for – this would equate to planning for 2,200 additional homes over the remaining Plan Period. In effect to Plan for 15,350 dwellings.

6.3 The trajectory at Appendix One shows that delivery is anticipated to be only 11,676 homes in the Plan period. This includes an assumption of Local Plan Part 2 allocations of 1,100 dwellings at Keyworth, Ruddington and Radcliffe. This would leave a shortfall of 3,674 dwellings compared to the need to plan for 15,350 as set out in point 2. above. This approach would therefore require the Local Plan Part 2 to allocate specific sites to accommodate 4,774 new homes, rather than the 2,550 suggested in the Preferred Housing Sites Consultation.

## 7.0 Five Year Housing Land Supply

7.1 The Preferred Housing Sites document recognises the need for the Local Plan Part 2 to ensure that, on adoption, the Borough can demonstrate a five year land supply. However, the approach to the calculation of the likely supply shortfall at 1<sup>st</sup> April 2019 is flawed. There are two main reasons for this, (which draw on the advice of the LPEG):

1. Assumption on lead in time and delivery rates in relation to Clifton and Gamston are unrealistic (as set out in Section 4 above)
2. Lapse rates of 10% should be applied to both small and large sites (assuming the calculation is based on the requirement of 13,150 rather than that requirement plus a contingency).

7.2 The Borough Council produced a calculation of five year supply set out in Appendix A of the Further Option Consultation document. This is relied upon in the Preferred Housing Sites Consultations. This should be amended to take account of the factors above. It should be as follows:

Annual target 2019 – 2028	1000
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Projected total houses built 2011 – 2019	3230
Projected shortfall in houses built 2011 – 2019 (4150 target minus 3,218 houses built)	932
Housing required 2019 – 2024 (1000 per year over 5 years plus 932 home shortfall, with a 20% buffer applied)	7118
Total number of houses expected to be built on deliverable sites between 2019 – 2024 (based on the trajectory at Appendix One, with the inclusion of 10% lapse rate) (5,259 less 10%-526=4,733)	4,733
Potential shortfall in houses built between 2019 and 2024 (housing requirement minus anticipated supply)	2,385

7.3 Based on this calculation the Local Plan Part 2 should allocate specific sites to accommodate 3,485 dwellings (the shortfall of 2266 plus the 1100 to be allocated in Keyworth, Radcliffe and Ruddington); the vast majority of which must be capable of delivery by 2024.

## 8.0 Can the Borough meet its housing requirements and address its shortfall?

8.1 Whilst there have been, and continue to be, major delays to the delivery of most of the Borough's strategic sites, experience at Cotgrave and East Leake demonstrates that delivery on sites can be consistently high if suitable sites are brought forward. Experience at East Leake in particular has shown how new houses can be brought forward quickly, when there are significant permissions granted on different sites. In East Leake delivery rates have been consistently high over the last few years where there is consent for over 1000 dwellings on at least 9 sites around the village.

8.2 There is no reason to believe that this experience could not be replicated in other villages across the Borough, provided sufficient sites are made available. Rushcliffe is a very strong housing market area and demand is unlikely to constrain delivery rates.

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- 8.3 Having regard to the growth of East Leake, more houses could be accommodated in the larger villages of Keyworth and Cotgrave than is suggested in the Preferred Housing Sites document.
- 8.4 The Plan now acknowledges that housing will be required in other villages and proposes sites at East Bridgford, Cropwell Bishop and Gotham. This is supported. However there are other sustainable locations where growth can be accommodated and the shortfall in housing supply addressed. The Councils basis for excluding allocations as set out in the Housing Site Selection Interim Report is not sound. In particular, there are sustainable locations for growth at Aslockton, Sutton Bonington and Costock and some additional development could be accommodated at Edwalton. Aslockton and Sutton Bonington have a wide range of services and facilities, and Costock has good access to services and facilities as a result of close proximity to and direct relationship with East Leake. All three villages have the benefit of being located outside the Green Belt and have suitable sites available for development.
- 8.5 Development in smaller villages is not inherently unsustainable. The Council have now acknowledged that smaller settlement can make a meaningful contribution to delivery, but the approach is currently inconsistent and does not go far enough. It is inconsistent to conclude that development on land at Bunny Brickworks, Bunny and the former Islamic Institute at Flintham (for 100 and 95 houses respectively) is sustainable, whilst development in villages with a better range of services and facilities on sites better related to those villages and those services and facilities, is not sustainable. Both sites are remote from the village centres, in settlements with limited access to services and facilities. The fact that these isolated sites have been previously used does not in itself justify the allocation of these sites before, or instead of, better located, more sustainable, green field sites.
- 8.6 Whilst it will continue to be appropriate, in terms of meeting sustainable development principles, to direct the majority of development to larger centres, (and indeed some of these can accommodate more growth) given the housing shortfall in Rushcliffe, development should now also be accommodated in smaller settlements to ensure that housing requirements are met in full. The basic principle of this has been accepted but it simply does not go far enough.

## **9.0 Supporting Alternative Forms of Housing Provision**

- 9.1 The Government is committed to boosting housing supply, its White Paper, 'Fixing Our Broken Housing Market' presents a range of measures to increase delivery and ensure housing requirements are met. A Key emphasis of the White Paper is to encourage development in villages and to support the development of small and medium sized sites. Under the Heading 'Supporting small and medium sized sites, and thriving rural communities' it states that changes are proposed to the NPPF to:

*'Expect local planning authorities to identify opportunities for villages to thrive, especially where this would support services...'*

- 9.2 As well as recognising the importance of development within villages to support local communities and contribute to housing delivery, the White Paper seeks to encourage greater variety in the form of housing local planning authorities plan for. In particular it emphasises the need to plan for more self and custom build housing and for specific sites to meet the needs of an ageing population.

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- 9.3 The Local Plan Part 2 should respond positively to these requirements, both in terms of allocations within smaller villages, but also specific allocations for custom build schemes and retirement housing. Suitable sites are being promoted specifically for this purpose. The Borough Council should adopt a positive and innovative policy approach (as sought by Government) rather than ignoring these issues.
- 9.4 As the White Paper recognises, an increase in the choice of sites, both in terms of size and locationally, together with policies and allocations which encourage different forms of housing, will greatly assist with improving the rate of delivery of new homes. These are important measures, made essential in Rushcliffe as a result of its supply issues.

## Appendix One: Revised Housing Trajectory

	Future years												Total 2020-2021 (beyond plan period)								
	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 on north allocated sites and identified SHLAA capacity	263	209	189	373	376	365	298	293	281	87	190	91	1	0	100	90	50	13	0	3,247	63
Land at Mellon Road, Edleston (1,600) (Policy 20)						50	100	150	150	150	150	100	150	150						1,400	0
Land at Gomer Congreve Colliery (460) (Policy 21)					112	100	100	100	44											468	0
Land at Former RAF Newcote Phase 2 (650) (Policy 22)								50	195	150	150	90								550	0
Land north of Bingham (1,050) (policy 23)								50	150	150	150	150	150	100						1,050	0
Land south of Cillon (3,000) (Policy 24)								50	50	100	200	200	200	200	200	200	200	200	200	1,550	600
East of Garesfield North of Tolleran (2,500-4,000) (Policy 25)								50	50	50	50	50	50	50	50	50	50	50	50	2,550	300
fill and change of use in broad locations																				1,550	600
Outstanding East Leaks to be allocated (400) Policy 3																				400	0
Outstanding Keyworth to be allocated (450) Policy 3																				450	0
Outstanding Ruddalls on Trent to be allocated (400) Policy 3																				400	0
Outstanding Rodington to be allocated (250) Policy 3																				250	0
2011/12-2021/22	263	209	189	373	376	365	298	293	281	87	190	91	1	0	100	90	50	13	0	3,247	63
2022/23-2031																					
Completions	263	502	701	1,074	1,591	2,078	2,375	3,068	4,548	6,798	7,429	8,223	9,425	10,431	11,010	11,436	11,861	12,286	12,711	13,136	13,561

11,676