



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

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)
Newton Nottingham LLP	Name	Q+A Planning Ltd
Click here to enter text.	Address	One Mortimer Street London W1T 3JA
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 checked="" type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

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

See attached sheet

(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.

Click here to enter text.

(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.

Click here to enter text.

(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	<input 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)

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	<input 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 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?

Yes	<input 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)

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?

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 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 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 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 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)

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.

Click here to enter text.

(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.

See attached sheet

(please continue on a separate sheet if necessary)

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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.

RAF Newton – Representations to Preferred Options Consultation

Introduction

Q+A Planning Ltd act on behalf of Newton Nottingham LLP. Our client owns the former RAF Newton site, which is a strategic allocation as identified under Policy 22 of the Local Plan Part 1: Core Strategy (LPP1) - adopted in December 2014. The allocation allows for *'additional housing for around 550 dwellings, protection of existing B8 employment located within the former aircraft hangars, and the provision of additional employment land for B1, B2 and B8 purposes. In addition, a primary school, community centre, public open space and other facilities as appropriate.'*

The Council will be aware that planning permission was granted in January 2014 (reference 10/02105/OUT) for *'500 dwellings; up to 50 live/work units; up to 5.22ha new employment land; up to 1,000 sq. m of A1, A3, A4 and community uses; retention of existing hangars for employment purposes; perimeter cycle track; provision of land for new primary school; and associated public open space, recreation and landscaping.'*

The above permission was varied by an application (reference 15/00583/VAR) submitted under Section 73 of the Town and Country Planning Act, 1990, as amended, and this was granted in July 2015 and varied/removed some of the conditions attached to the original outline permission. A further application to vary the permission (reference 16/02864/VAR) was submitted in November 2016 to allow the replacement of 50 live work units with 50 residential units, removal of the "commercial only" internal road and reduction in level of affordable housing. The Council resolved to grant this second variation in January 2017 subject to a Section 106 agreement, which is due to be signed imminently.

Once the section 106 agreement on the second variation is signed, and the permission is released, pre-commencement conditions will be submitted in late 2017/early 2018. We can confirm that there is significant market interest in the development for both individual phases completed by separate house builders, or the complete development delivered by one house builder. Given this market interest, we are confident that the rate of delivery is capable of being accelerated to up to 150 a year from 2019 should permission be granted for more housing, meaning that the site could deliver between 150 and 200 extra dwellings (beyond the 550 permitted) prior to 2024.

On behalf of our client, we lodged duly made representations in March 2017 to the consultation on the Rushcliffe Local Plan Part 2: Land and Planning Policies – Further Options and the Rushcliffe Green Belt Review Part 2 (b) – Additional Sites (Draft for consultation). This explained that having considered the outline permission that has been granted, the indicative masterplan and the existing Green Belt boundary, there is potential to accommodate up to 160 additional dwellings at the site. The proposed additional land is within the existing Green Belt boundary, but would require parts of the green infrastructure in the form of planned allotments and public open space to be accommodated outside the Green Belt boundary (i.e. in the Green Belt).

It is appreciated that a new planning application would be required for this additional phase beyond the permission granted and to ensure that any new permission aligned with the principles agreed as part of the outline permission. However, in our view, retaining the built development within the existing Green Belt boundary and including open space and allotments (and any necessary buildings associated with these uses) outside the Green Belt boundary should not conflict with Green Belt policy. Indeed, such uses would be consistent with the exception uses as specified in paragraph 89 of the NPPF.

In response to our client's proposition, the Council in its report to Cabinet on 12th September 2017 stated that:

'It has been suggested by the landowner that the former RAF Newton strategic allocation should be expanded to provide for additional housing delivery. As with the Bingham strategic allocation this would not result in greater housing delivery in the short term and therefore, aside from any other relevant suitability factors, for this reason it is considered inappropriate to increase the size of the allocation at the present time.'

It appears that the Council's primary concern surrounds the rate of delivery of housing. There is no appreciation of the policy context where the potential for RAF Newton should be considered prior to any other villages (see our previously duly made representations). We believe any suitability concerns could be adequately addressed through a planning application since any built development would only be focused within the development boundary. Furthermore, as we have explained, we consider that there is a realistic prospect that the rate of delivery could be increased to be increased in the short term given the progress the developer has made.

Due to our concerns, we wish to make further comments on the consultation on the Preferred Housing Sites. The completed consultation forms cross reference to this document in its answers.

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

Answers are provided to questions 1 and 22 only.

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?

In our questionnaire, we agree with this proposal but with the caveat that it should be 'a minimum of 2,550 new homes'.

The housing needs that the Council rely upon in Policy 3 of the Local Plan Part 1: Core Strategy - adopted in December 2014 - states that a 'A *minimum* of 13,150 (2011 to 2028) new homes will be provided for'. Therefore, simply for consistency with the development plan, the requirement should be to identify land to meet a minimum of 2,550 new homes rather than '*around*' as positioned in the question above. Indeed, given the persistent under-delivery and the requirement to allocate additional land beyond the 20% buffer, the Council should actively consider allocating a greater

amount of land to ensure choice and competition in the market, consistent with the requirements of Local Plan Part 1.

The Council state that *'it is our view that it would be of benefit to identify a further level of additional housing supply at this stage in order to provide some level of buffer should housing delivery on the existing strategic allocations be further delayed beyond what is currently expected. It would also help in guarding against any future housing delivery shortfall should any one of the housing allocations eventually included in Local Plan Part 2 not come forward as expected'*.

Whilst we agree with the proposition that a further level of housing supply should be considered, this should not preclude a consideration of strategic allocations such as RAF Newton. As explained, the developer and Council have worked hard to achieve a deliverable permission and the site is on the cusp of coming forward. We consider there is scope to increase the delivery of housing on this site to help meet the Council's needs, given the infrastructure that will be delivered and its sustainability benefits. There is also a clear policy preference for this site beyond 'other villages' as explained in our duly made representations from March 2017.

Paragraph 47 of the NPPF makes it clear that to boost significantly the supply of housing, local planning authorities should ensure their Local Plan meets the *'full, objectively assessed needs for market and affordable housing in the housing market area'*. It also requires local authorities to *'identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements'* and to *'identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.'*

Question 22:

Please identify any matters relating to housing development which are not covered here or elsewhere.

We wish to re-iterate the point made in our previous duly made representations from March 2017 concerning the policy approach to the allocation of housing. As far as we are aware, this matter has not been addressed by the Council. To reiterate, our concern surrounds the approach the Council from a planning policy perspective in respect of 'other villages'.

In summary, we consider that is a clear distinction in development plan policy, where both Newton and the former RAF Newton together are given a separate status to other settlements in the borough. When judging the suitability of settlements to deliver additional housing, the Council should not distinguish between the two (i.e. Newton and the former RAF Newton). This different status in policy means that there is a clear policy direction in the Local Plan Part 1 for the potential for Newton and the former RAF Newton to be examined for their potential to meet housing needs prior to other smaller settlements in the borough.

The Council have sought to allocate sites in the 'other villages' of Cropwell Bishop, East Bridgford and Gotham for a combined total of 360 dwellings, with a further 100 allocated at Bunny Brickworks. Whilst we have not commented upon these specific allocations, we repeat the entirely valid planning argument that Newton and the former RAF Newton should be considered first. This

is not the approach that the Council have taken to date and the possibility of additional residential development at Newton seems to have been entirely omitted. Relying on a blanket un-evidenced assertion that an additional allocation would not deliver additional housing in the short term is inappropriate and is not a sound approach.

As previously explained, an additional allocation at the former RAF Newton site would be broadly consistent with paragraph 52 of the NPPF where it is explained that *'the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities'*. Newton is already an existing settlement, and once the permitted development is delivered, will have a range of services and infrastructure. An additional modest allocation would be appropriate and, as explained below, would not undermine the role of the Green Belt.

Considering the above, the Council ought to allocate the additional land at the former RAF Newton to help meet additional needs.