28th June 2018

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

By email only

Dear Sir or Madam,

RESPONSE TO CONSULTATION ON THE LOCAL PLAN PART 2 SUBMISSION DRAFT: LAND AT HOLLYGATE LANE, COTGRAVE.

We welcome the opportunity to submit representations on the Rushcliffe Local Plan Part 2: Submission Draft (RLP2) on behalf of Barwood Homes, who are promoting the above site on behalf of the landowner.

The Site

Our representations are made in relation to Land at Hollygate Lane, Cotgrave (‘the site’). The land is 4.7 hectares in area, as identified on the plan at attachment 1, and could accommodate around 90 dwellings. It is a level site, with vehicular access available along its frontage to Hollygate Lane. It is bounded by:

- Hollygate Lane and a large new development known as Hollgate Park (some 470 dwellings with 4.5 hectares of employment space) on the former Cotgrave Colliery site immediately to the west;
- the Grantham Canal to the south; and
- a Memorial Woodland with access road and car park which wraps around its north and east boundaries, as shown on Figure 1 of the RLP2, see attachment 2.

Summary of Representations

In summary, we consider the RLP2 fails all four tests of soundness as it does not provide sufficient certainty or flexibility to ensure that it adequately provides for the housing needs of the borough to be met. It is therefore in conflict with national planning guidance in the NPPF and for the same reason it is not positively prepared, justified or effective. In particular, our objections are that:

- the number and extent of housing sites allocated are insufficient. They do not allow for non-deliverability of some sites, including those already allocated in the Core Strategy, particularly within the years between 2019 and 2024;
- we therefore object to the omission of the Hollygate Lane, Cotgrave site from the list of housing allocations in section 3 of the RLP2; and
we submit that the Hollygate Lane, Cotgrave site is appropriate for housing development and the Plan should be revised to provide for its removal from the Green Belt and allocation for housing in the Plan. This would result in around 90 dwellings being delivered on the site, at a gross density of around 19 dwellings per hectare, within the period 2019 – 2024, as described more fully below.

Housing Land Supply

The RLP2 explains at paragraph 3.1 that the housing target for Rushcliffe is for a minimum of 13,150 dwellings to be provided between 2011 and 2028.

We note that Rushcliffe only has, at best, only 3.1 years housing land supply and paragraph 3.1 of RLP2 confirms that five of the six strategic housing allocations are not going to deliver at the rate or quantum of development previously envisaged. Consequently, residential allocations to support an approximate additional 2,700 dwellings are proposed.

We support the Council’s efforts to respond to changing circumstances by seeking to allocate additional land for residential development. However, we consider it is essential that the RLP2 builds in sufficient flexibility to respond to future changes to ensure the longevity of the plan, given that this recent additional requirement has only been generated within the last 2-3 years.

Indeed, paragraph 14 of the National Planning Policy Framework (NPPF) makes it very clear that for plan-making:

‘Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

– any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
– specific policies in this Framework indicate development should be restricted.’

We emphasise therefore that the site is capable of accommodating around 90 dwellings to help satisfy this additional need in a sustainable, well connected location backed by a credible developer and a willing landowner. It should be noted that this level of development can be accommodated on the site even taking into account that the net developable area is likely to be less than the total site area, to accommodate a green, ecological buffer and flood risk mitigation works in the part of the site adjoining the Grantham Canal.

Relationship with Existing Allocations and the Key Settlement

Cotgrave is defined in the RLP2 as a Key Settlement which is second only to West Bridgford as a sustainable urban centre and therefore suitable in principle for further development to help meet identified housing needs in the borough. This is due to the size of Cotgrave, which already has some 3,000 dwellings, and its wide range of existing employment, shopping, educational and community facilities.

As noted above, the site lies immediately east of the existing Core Strategy Strategic Allocation of some 470 dwellings and at the former Cotgrave Colliery site. The RLP2 also proposes to allocate 370 dwellings on sites lying between the site and Cotgrave town centre. These sites currently lie within the Green Belt but the Council has accepted that exceptional circumstances exist to justify their allocation for housing development and that Cotgrave can sustain this number of additional dwellings.
Immediately north and east of the site is a Memorial Woodland with an access road and car park, which wraps around and tightly encloses two sides of the site. This woodland is already planted and will mature significantly over the next 5 years and beyond. The north, east and west boundaries of the site are characterised by mature hedgerow planting and to the south is the Grantham Canal. Given the site is immediately adjacent to Hollygate Park and enclosed on all other sides allocation and development of this site is a logical and sustainable rounding off to this area of Cotgrave on land that does not form a useful Green Belt function.

**Strategic Housing Land Availability Assessment (SHLAA) 2017 and Site Selection Report April 2018**

The above documents (the relevant extract from which is at attachment 3) demonstrate that the site has low landscape and visual sensitivity due to its proximity to adjoining development.

Against this background, we consider that development of the site for around 90 dwellings (the estimated capacity indicated in the above documents) would constitute a logical rounding off of the settlement form, be well related to facilities and services in Cotgrave and would not harm the landscape character of the adjoining land. Nor would it encroach on the wider countryside given the site’s degree of enclosure and defensible boundaries on all sides, meaning there would be no resulting pressure for further development beyond the site in any direction.

For all the above reasons the site no longer performs a clear Green Belt function, as defined in paragraph 80 of the NPPF, and its development would be sustainable and help to meet local housing needs in the short term. It would also create environmental, social and economic benefits by enhancing the biodiversity, landscape, recreational and heritage qualities of the Grantham Canal strategic green corridor.

Previous analysis in the Council’s SHLAA and Site Selection Report has also shown development of the site to be deliverable, with there being no overriding access or other technical or environmental constraints (and noting that part of the southern half is within Flood Zones 2/3 adjoining the canal). We have also prepared a Technical Note (see attachment 4) which also demonstrates no overriding technical constraints to development of the site in principle.

**Conclusions**

We consider that the site should be taken forward as an allocation in RLP2 as it is capable of helping to meet the required additional housing requirements including appropriate additional flexibility. We reiterate that:

- This site is deliverable in the short term and is not reliant on the provision of major new infrastructure;
- The site is now tightly enclosed by existing new housing development and a Memorial Woodland and its development would not therefore encroach upon the wider countryside;
- The Council’s evidence base shows that the site has no overriding technical or environmental constraints and an appropriate ecological buffer can be provided alongside the Grantham Canal;
- Development of the site would constitute sustainable development in one of the Council’s identified key settlements and thereby help to meet housing needs in a borough which has struggled to do so over a lengthy period; and
In the light of all the above factors, the Council’s justification for the allocation of other Green Belt sites in Cotgrave is equally applicable to this site.

Consequently, the Plan is currently unsound and it should be revised such that the site is removed from the Green Belt and allocated for housing development.

I would be grateful if you could confirm receipt of these representations. Should you wish to discuss any aspect of our representations further, please do not hesitate to get in touch.

Yours faithfully,

Tim Coleby
Senior Associate Planner
For and on behalf of
PETER BRETT ASSOCIATES LLP

Enc
Comment

Agent
Tim Coleby (1092960)
Consultee
(1167223)
Company / Organisation
Barwood Homes Ltd
Event Name
Local Plan Part 2 (Publication Draft)
Comment by
Barwood Homes Ltd ( - 1167223)
Comment ID
66
Response Date
28/06/18 05:32
Status
Submitted
Submission Type
Web
Version
0.1
Files
RLP2 letter Cotgrave and 4 attachments
RLP2 letter Cotgrave

To which document does your response relate?
Local Plan Part 2 Publication Version

Page number
18 - 22
Paragraph number
3.1 - 3.14
Policy reference
Please select an option
Site reference
Please select an option
Policies Map
Yes

Do you consider the Local Plan Part 2 to be legally compliant?
Yes
What makes a Local Plan “sound”?

- **Positively prepared** - the plan should be prepared in a way that meets the need for housing and other development, including infrastructure and business development.
- **Justified** – the plan should be based on evidence, and be the most appropriate strategy for the district when considered against other reasonable alternatives.
- **Effective** – the plan should be deliverable; the housing and other development should be capable of being carried out.
- **Consistent with national policy** – the plan should enable sustainable development and be consistent with the policies in the National Planning Policy Framework (NPPF).

Do you consider the Local Plan Part 2 to be sound?  

No

Do you consider this to be because it is NOT:  

(please tick all that apply)

- Positively Prepared
- Justified
- Effective
- Consistent with national policy

Please give reasons for your answer, where applicable. You may also use this box if you wish to make representations on one of the Local Plan Part 2’s supporting documents (e.g. Sustainability Appraisal, Habitat Regulations Assessment or Equalities Impact Assessment).

Please see attached letter and its four associated attachments

Please add any supporting files (if applicable)  

RLP2 letter Cotgrave and 4 attachments

Do you consider that the Local Plan Part 2 complies with the Duty to Co-operate?  

Yes

Please set out what change(s) you consider necessary to make the Local Plan Part 2 legally compliant or sound, having regard to your previous responses. You will need to say why this change will make the Local Plan Part 2 legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached letter and associated attachments

Please add any supporting files (if applicable)  

RLP2 letter Cotgrave

If your representation is seeking a change, do you consider it necessary to participate at the hearing sessions of the Public Examination? Please note: if you select NO, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

Yes, I wish to appear at the examination

Please outline why you consider this to be necessary. Please note: the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

In order to describe in more detail how the Plan is unsound in failing to make adequate provision for housing sites to meet local housing needs.
Please indicate if you wish to be notified that:
(please tick all that apply)

. The Local Plan Part 2 has been submitted for independent examination.
. The recommendations of the Planning Inspector appointed to carry out the independent examination have been published.
. The Local Plan Part 2 has been adopted.
1. Introduction

This Technical Note has been prepared by Peter Brett Associates LLP (PBA) to provide initial technical advice on highways, access, flood risk and surface water drainage in relation to Land at Hollygate Lane, Cotgrave.

The initial advice in this Technical Note is based on freely available online information and no site visit or formal consultation with relevant stakeholders has been undertaken at this preliminary stage.

The highways, access, flood risk and surface water drainage advice in this Technical Note is preliminary and should only be used to evaluate the feasibility of development at the site. It should be noted that there has been no consideration of ecological constraints, nor existing utilities constraints within the site. Further, more detailed assessment of highways, access, flood risk and surface water drainage should be undertaken if the site is taken forward to planning.

It is understood that the land is 4.7 hectares in area and could accommodate around 90 dwellings.
## Highway and Access Review

The findings of the highway and access options appraisal set out by this Technical Note are based on available OS mapping and satellite images only. The access options have been considered in light of DMRB and Manual for Streets Guidance, but no engineering assessment of the options has been undertaken.

The appraisal considers potential constraints on the existing highway network in the vicinity of the site, options for vehicular accesses points into the sites and pedestrian, cycle and public transport links to the area.

### Existing Highway

Hollygate Lane is an existing single carriageway road bounding the western boundary of the site. Hollygate Lane provides access between Cotgrave to the south and Stragglethorpe Road to the north, which in turn connects to both the A46 and A52.

The speed limit of the Hollygate Lane, is understood to be 30mph. A roundabout has been recently constructed to the north west the site to serve the adjacent Hollygate Park development. In addition to the roundabout, there is priority junction serving Hollygate Park, a visitor car park access and private drive/show house access opposite the western boundary of the site. There is an access to the cemetery immediately to the north west corner of the site.

The Grantham Canal bounds the site to the south. Hollygate Lane crosses over the canal via a bridge located to the southwest corner of the site. The bridge deck is not elevated above adjacent road level and the bridge parapets are set back from the edge of carriageway.

There is a pedestrian footway located on the west side of Hollygate Lane which provides access between Cotgrave and Hollygate Park. The canal towpath is accessible from this footway.

There is a bus stop located on the opposite side of Hollygate Lane. No review of bus routes served by this bus stop has been completed.

There is streetlighting along Hollygate Lane and observation indicate there are likely to be utilities in the eastern verge, including a telecommunication or electric supply kiosk at one location.

### Access Points

Due to the size and expected development quantum, it is expected that a single point of access will be required to serve the site. Given the expected development quantum and the presence of a simple priority junction serving the Hollygate Park development, it is currently anticipated that a simple priority access will be appropriate for the development.

Due to the nature of the existing road, current speed limit and proliferation of access points in the vicinity of the site, a review of potential access locations has been undertaken based on Manual for Streets, which is considered appropriate in this location. Furthermore, it is expected that the designs for the adjacent site will have been completed under Manual for Streets, and that application of DMRB standards is not considered appropriate or feasible.
<table>
<thead>
<tr>
<th>Item</th>
<th>Subject</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The forward visibility from Manual for Streets 1, Table 7.1 ‘Derived Stopping Sight Distance (SSD)’ recommends for a street with a speed limit of 30mph a SSD of 40m. Hollygate Lane has very few obstructions and a preliminary review indicates a SSD of 40m can be achieved along any section of the site frontage with the public highway.</td>
</tr>
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<td></td>
<td>The vertical visibility from Manual for Streets 1 details in section 7.6.3 that drivers need to be able to see obstructions 2m high down to a point 600mm above the carriageway. Preliminary assessments indicate the road is fairly level road and, subject to a survey and production of a long-section, vertical visibility does not appear to be a material issue that should affect delivery of an access.</td>
</tr>
<tr>
<td></td>
<td>Manual for Streets recommends junctions are staggered to avoid potential conflicts, but does not stipulate a minimum spacing. As such, there is scope to provide an access into the site at a location which accounts for the existing adjacent accesses and driveways and any potential utility constraints.</td>
</tr>
<tr>
<td></td>
<td>Based on the above review and interpretation of design guidance as it is expected to apply at this location it is considered that a new site access can be provided within the area shown on the Figure 1 below.</td>
</tr>
</tbody>
</table>

Figure 1 – Site Access Options

This access is expected to be a simple priority junction and should include suitable pedestrian crossings to facilitate access to the footway and bus stop on the west side of Hollygate Lane.

A review of ground levels and the apparent highway and site boundaries indicate there should be adequate space to construct an appropriate access.
3. **Flood Risk and Drainage Review**

**Flood Risk**

The findings of the flood risk section of this Technical Note are based solely on a desktop assessment of the Online flood mapping from the Environment Agency (EA) only.

The EA flood map for planning shows that there is a flood risk associated with the Grantham Canal and the southern edge of the site is within the flood zone 3 as per Fig 2 below.

![Figure 2 – EA flood Map extract](image)

In accordance with NPPF development should be located outside of areas at risk of flooding. On this basis, no built development should be proposed for the southern edge of the site, nor should any strategic surface water attenuation be located in this area.

It is noted from a preliminary review of ground levels that the southern edge of the site is at a lower elevation, albeit the overall cross fall over the site is minimal. As such, it will be necessary to undertake an appropriate exercise to map and if necessary model the flood risk posed to the site from the Grantham Canal to accurately understand the extent of any floodplain and the actual constraint posed to development. It is not anticipated that the floodplain will be a major impediment to development.

**Surface Water Drainage**

The Building Regulations Requirement H3 stipulates that rainwater from roofs and paved areas is carried away from the surface to discharge to one of the following, listed in order of hierarchy:

i. Discharge to a soakaway or other infiltration system
ii. Discharge to a watercourse
iii. Discharge to a surface water sewer, highway drain or another drainage system
iv. Discharge to a combined sewer
The geology of the site from the British Geological Survey (BGS) website indicates the site is;

- superficial geology: Lacustrine Deposits - Clay, Silt and Sand
- Bedrock: Branscombe Mudstone Formation - Mudstone.

MAGIC website which details geographic information about the natural environment has been used to confirm the aquifer designation at site is Secondary B - defined as predominantly lower permeability layers which may store and yield limited amounts of groundwater.

On this basis drainage of the site by infiltration is currently not considered feasible. In the absence of any other known watercourses at the site, it appears that a discharge to the Grantham Canal will mimic the existing drainage regime.

In line with NPPF requirements and following DEFRA’s ‘Non-statutory technical standards for sustainable drainage systems’ as advised by the LLFA, surface water runoff from any proposed development should be accommodated on-site for all events up to and including the 1 in 100 annual probability event, with 20% allowance for climate change, and discharge from each site at existing greenfield runoff rates.

As such, and in lieu of any additional guidance from the Canal and River Trust, it is expected that surface water runoff generated from any proposed development on the site would be managed using attenuation features, discharging into either the Grantham Canal at existing greenfield rates.

A preliminary assessment of the greenfield runoff rate for the area has been undertaken using the ICP SuDS method in Micro Drainage software. The QBAR greenfield runoff value for the site is 3.96l/s.

It is assumed that any proposed development within the site would have an impermeable area of 65%; this may be able to be reduced once the masterplan is developed, which may reduce the volume of attenuation required.

The proposed discharge rate was derived by multiplying the assumed impermeable area by the QBAR greenfield runoff rate. Subsequently, Micro Drainage Quick Storage Estimates (QSEs) were completed using FSR rainfall data to give an indication of the likely attenuation storage volumes required in each catchment (for the 1 in 100 annual probability event, with 20% allowance for climate change).

Based on the QSEs, the indicative land-take and location for attenuation/SuDS features based on the use of a strategic attenuation basin has been estimated. This estimate is shown Figure 3. SuDS features in the site would require land-take of approximately 0.25ha, assuming a single basin with a total depth of 1.5m could be constructed and a gravity outfall to the canal achieved.

The final land-take of any solution will depend on, amongst other issues, the actual topography and preferred form of attenuation/SuDS features. This is a high-level assessment and should be refined for any planning applications for the site(s), based on topographic survey, masterplan arrangements, FEH data and the requirement to locate SuDS features outside of the floodplain extents of Blackbrook and the unnamed tributary.

It should be noted that no assessment of potential foul drainage infrastructure requirements for the site has been considered within this preliminary Technical Note.
4. **Conclusion**

The preliminary review of the existing highway conditions and anticipated design requirements indicates that a suitable access can be provided from Hollygate Lane to serve the proposed development. It is expected that a single point of access will be required and this will take the form of a simple priority access designed and constructed in accordance with Manual for Streets.

On the basis that the EA flood map is an accurate, or over representation of flood risk at the site, dry access into the site can be achieved and there is sufficient land available within Flood Zone 1 to enable the proposed development and associated surface water attenuation and other key infrastructure to be constructed.

A preliminary review of surface water drainage requirements based on National Standards suggest that a surface water drainage strategy based on a positive outfall to the canal will be a feasible option for the management of surface water runoff from the site. An indicative size and location of the infrastructure required has been presented which indicates the overall land take is comparable with the development aspirations for this site. It should be noted that further survey information and liaison with the Canal and River Trust will be required to confirm the application of this solution and final land take requirements.