1. Introduction

1.1. This Position Statement has been prepared by Fisher German on behalf of Terra Strategic in respect of its land interests at land east of Church Street, Cropwell Bishop (Policy 7: Housing Allocation – Land East of Church Street).

1.2. An application for Outline Planning Permission is currently being prepared and will be submitted this month (November 2018). The outline application, with all matters reserved except for access, will seek planning permission for 89 dwellings. The following documents have been prepared to support the application and are included as appendices to show the deliverability of the site:

   A. Pre-Application Response
   B. Illustrative Masterplan
   C. Landscape and Visual Assessment
   D. Design and Access Statement
   E. Ecological Appraisal
   F. Transport Statement
   G. Travel Plan
   H. Heritage Impact Assessment
   I. Geophysical Survey
   J. Topographical Survey
   K. Tree Report
   L. Flood Risk Assessment
   M. Planning Statement

1.3. Pre-application advice was received from the Borough Council on the 18 October 2018. A copy of the response is included as Appendix A. The feedback received has informed the survey work which has been undertaken.

1.4. A public consultation event was held on 22\textsuperscript{nd} October, for residents to view the proposals. Feedback on the scheme was generally positive. Support was expressed for more affordable housing in the village and new market homes with a number of requests made for bungalows. This feedback has informed an amended masterplan (Appendix B) which will be submitted with the planning application. The proposed school car park and drop off were also supported. Some residents raised concerns in respect of the site access and the drainage of the site. Both matters have been addressed in full in the Highways Statement and Flood Risk and Drainage Assessment which will be submitted with the planning application.

1.5. Terra Strategic is committed to the delivery of the land to the east of Church Street, Cropwell Bishop. Terra Strategic are a midlands-based land development company targeting the delivery of housing in sustainable locations. The Company has over 30 years of experience promoting and developing sites for residential development. Alongside Terra sits their housebuilding arm, Hayfield Homes, which can be utilised to deliver consented schemes to the market as quickly as possible. There has been strong interest from the housebuilding market for this location which would see either Hayfield or another developer come on board to ensure an early delivery of housing to meet the local demand.
2. Does the distribution of non-strategic sites allocations accord with the spatial strategy in the Part 1 Plan?

2.1 It is considered that the proposed housing distribution supports the policy of urban concentration with regeneration for Greater Nottingham, whilst making sensible and appropriate allocations in the more rural areas. The increase in allocations to the Key Settlements and sustainable ‘Other Villages’ from the Part 1 Local Plan, is in recognition of the difficulty in delivering strategic sites and is entirely justified to ensure continuity in housing supply and, importantly, housing delivery. As the Council consider at 3.6 of the Submission Local Plan, extending the capacity of the strategic sites which have already proved difficult to deliver would be entirely ineffective. It is clear that to ensure any shortfall is delivered quickly, that smaller sites which are easier and quicker to deliver are progressed. The Council should be commended for its pragmatic approach to ensuring the delivery of vital housing.

2.2 Policy 1 of the Part 1 Rushcliffe Local Plan: Core Strategy sets the housing requirement for the Borough at 13,150 dwellings over the plan period (773 dwellings per annum). To deliver this, the distribution of development is dictated by a policy of Urban Concentration. This means that the majority of development, 7,650 dwellings is directed to the main urban area of Nottingham (sites adjoining Clifton or West Bridgford). This equates to 60% of the housing requirement. 5,500 dwellings, or 40% of the housing requirement, is distributed to identified ‘Key Settlements’ or to two redevelopment opportunities at Clifton Colliery and former RAF Newton.

2.3 Of the 7,650 dwellings directed towards the main urban area, some 7,000 dwellings were to be delivered over three Strategic Urban Extensions during the plan period. The composition of which is 2,500 dwellings to east of Gamston/north of Tollerton, 3,000 dwellings to Clifton South and 1,500 dwellings at Edwalton. However, only the latter has commenced delivery. The Clifton South development now benefits from outline approval and close to signing a S106 but is still some time from commencing delivery due to the infrastructure required. The progress of the Gamston/Tollerton strategic site is currently unknown, although it is understood that there are complex land ownership issues which are currently impeding development.

2.4 In the Key Settlements, particular focus is placed on a sustainable urban extension of Bingham (1,050 dwellings), the redevelopment former Cotgrave Colliery (470 dwellings). The final key strategic site is the regeneration of former RAF Newton (550 dwellings) and the redevelopment of Cotgrave Colliery. Development of the latter is close to conclusion, whilst development at Bingham is now also underway. Recent Council Committee papers suggest that RAF Newton’s Section 106 agreement has now been signed.

2.5 The remainder of development in Key Settlements is distributed as follows; East Leake (400 dwellings), Keyworth (450 dwellings), Radcliffe on Trent (400 dwellings) and Ruddington (250 dwellings).
Rushcliffe Borough Council recognise and accept that only one of the six strategic sites identified in Policy 1 of the Part 1 Local Plan has delivered as intended. The Trajectory supporting the Part 1 Local Plan indicated that all strategic sites would be delivering by 2015/16, save Gamston/Tollerton which was due to commence in 2016/17.

To reconcile this position, the Council have concluded correctly that additional sites are required to come forward quickly to meet the shortfall and to provide additional time for the strategic sites to fully come onstream. To facilitate this, the housing requirement of Key Settlements, defined in the Part 1 Local Plan, have been increased. This includes larger requirements in Cotgrave (370 additional dwellings), Keyworth (150 additional dwellings), Radcliffe on Trent (420 additional dwellings) and Ruddington (100 additional dwellings). No additional allocations have made in East Leake, due to nearly 1,000 dwellings being approved in recent years.

Additional allocations are also proposed in Cropwell Bishop (70 dwellings), East Bridgeford (25 dwellings), Gotham (70 dwellings) and Sutton Bonington (80 dwellings). It is notable that in all cases these numbers are described as a minimum of, so they should not be seen as a maximum target. These locations, whilst not benefiting from the full range of services and facilities in other locations, still benefit from a good range of services and facilities to enable them to support housing growth. Growth here will likely help maintain such services and ensure vibrancy within the respected communities, whilst delivering much needed affordable housing.

Finally, 190 dwellings are proposed as part of mixed-use regeneration schemes at Bunny Brickworks and the former Islamic Institute Flintham.

In total, the above additions equate to nearly 2,500 additional dwellings to be delivered above that proposed in the Part 1 Local Plan.

The proposed development is now more evenly dispersed between the Nottingham urban area and the rest of the Borough than the 60/40 split promoted in the Part 1 Local Plan. However, when compared to the relative populations of the Borough, the Nottingham Urban Area accounts for only circa 35% of the population of the borough. Furthermore, it is not apparent if there are any urban sites readily available for development, particularly with regard to the damage that additional development on the Nottingham urban fringe would have on the Green Belt.

It should also be noted that the strategic sites on the Nottingham Fringe will likely continue to deliver beyond the plan period, contributing long term to the adopted Strategy and likely reducing future rural requirements.

It is considered therefore, for the reasons set out above, that the distribution of housing proposed in the Part 2 Local Plan remains consistent with the policy of urban concentration as set out within the Part 1 Rushcliffe Local Plan Policy 3, as far as practical, whilst still ensuring the delivery of much need housing.
2.7 Is the distribution of the proposed housing allocations consistent with the distribution of housing as set out in Part 1 Plan Policy 3? If so, what is the evidence to support this?

2.14 With regards to the delivery of individual sites, the Plan remains highly consistent with the strategy proposed at Policy 3 of the Part 1 Local Plan. The limited differences between the strategy proposed in the Part 1 Local Plan and this emerging Local Plan Part 2 are all clearly justified. The Part 1 Local Plan indicates a strategy of development directed towards the Nottingham Urban Area and a number of Key Villages.

2.15 The graph below outlines the number of dwellings allocated to each settlement. It clearly illustrates a distribution pattern directed towards the Nottingham Urban Area first, then the Key Villages (including strategic redevelopment sites at Cotgrave and RAF Newton). This is clearly aligned to the overall spatial strategy as outlined within the Part 1 Plan.

![Figure 1: Housing Allocations Totals by Settlement](image)

2.16 It is accepted that with regards to quantum of development, the Part 2 Local Plan delivers a greater number of dwellings to the Key Villages than the Part 1 Local Plan. However, the rationale for this is clearly explained within the Local Plan Part 2 (page 18), that in order to deliver a rolling five-year housing land supply throughout the Plan period, some additional 2,000 dwellings are required. Importantly, these dwellings need to deliver early within the Plan period, allowing time for the strategic sites to come on stream. Having regard to this it is therefore considered that additional dwellings in the Key Settlements is justified, and as can be seen from the graph above, does not dislodge the Nottingham Urban Area as the primary location for growth.

2.17 Directing additional development to the Urban Area is not considered to be an effective solution. Increasing the size of strategic sites will not expedite their delivery and may actually frustrate delivery while complex land assembly and master planning takes place. Delivering further Green Field sites on the Nottingham Fringe is also likely to prove more damaging to the Green Belt.

2.18 With regards to adding sustainable ‘Other Villages’ not previously identified within the Part 1 Local Plan Strategy, it is considered again that this decision is entirely justified. The evidence base document Identification of Additional Settlements Background Paper (February 2017) clearly
and convincingly states the rationale why those settlements allocated are able to absorb modest allocations sustainably. Given the necessity to increase delivery in the short-term, increasing the number of settlements is entirely justified and an effective way of remediating the land supply issue. It increases potential market outlets and assists in reducing the quantum of development within the Key Settlements, which may otherwise begin to have infrastructure capacity issues if further growth was located here. Finally, it allows opportunity to develop sites of low Green Belt value (such as land at Cropwell Bishop), which may be at a premium given the levels of development proposed on the Nottingham Fringe and within Key Settlements. Crucially, it should be noted that only 540 dwellings are proposed in locations not identified within Policy 3 of the Part 1 Local Plan. This equates to only 3.5% of the overall total to be delivered.

2.19 Having regard to the above the allocations made within the Part 2 local Plan are consistent with the strategy set out in Policy 3 of the adopted Local Plan Part 1: Core Strategy and any deviation is both limited and justified.

2.20 The proposed allocations made through the Rushcliffe Part 2 Local Plan deliver a range of sites of varying sizes in different locations. Appropriately, the allocations made reflect the nature of the settlement and context in which they are based. The largest strategic allocations are located on land adjoining the Nottingham conurbation, with two strategic extensions to West Bridgford and another at Clifton (Nottingham City). These allocations benefit not only from a good functional relationship with the settlements in which they adjoin, they also benefit from good access to the highway network and capability to be served by public transport (particularly the extension at Clifton which has the capacity to be served by the NET network). These locations are highly suitable for the levels of strategic development proposed. Moreover, with the quantum of development to be delivered at these locations, they allow for a critical mass of development to enable the provision of new services, facilities and infrastructure.

2.21 Outside of the Nottingham Urban Area, Bingham receives the next largest allocation. Again, this is appropriate, especially when one considers the sustainability credentials of the settlement. The Accessible Settlements Study for Greater Nottingham (February 2010) indicates that the it is the fourth most sustainable settlement within the study area (Ashfield, Broxtowe, Erewash, Gedling, Nottingham City and Rushcliffe) outside the Nottingham Primary Urban Area. It shows also that it is the most sustainable settlement in Rushcliffe, save for West Bridgford. The settlement benefits from a number of services and facilities, including a train station, which supports its designation of an area of significant growth. Rushcliffe also has two Strategic Redevelopment sites within the more Rural Area. Cotgrave Colliery and the redevelopment of RAF Newton. The suitability of these sites has already been examined through the Local Plan Part 1 and assessed as being sound and justified.

2.22 The remaining housing allocations delivered through the emerging Local Plan part 2 are generally smaller sites, ranging from 45 dwellings, to 240 dwellings (excluding the outlier sites at 72 Main Road, Radcliffe on Trent (5 dwellings) and Shelford Road, Radcliffe on Trent (400 dwellings)). The average allocation size is 133 dwellings. The allocations made reflect the size and sustainability of the settlement in which they are located, with the largest allocation of more than 100 dwellings exclusively within the Key Settlements.
2.23 The principle of the Key Settlements delivering large residential sites has already been assessed through the Local Plan Part 1. This range of sites are at sizes which are both attractive for developers but will also deliver quantum of development required and is not complicated by land ownership assembly, master planning or likely to result in the requirement for new additional infrastructure. This scale therefore is entirely geared to achieve what the Local Plan requires it to, early delivery.

2.24 The final allocations made within selected sustainable ‘Other Villages’ are all of a limited size of between 45 and 100 dwellings. This reflects the nature of these locations, whilst still delivering sites which will deliver substantial benefit to the Council’s housing land supply. Development of these sites also enables affordable housing needs to be met, without relying on rural exception sites. Moreover, the sites are of a size which remain attractive to the commercial market, to assist in enabling quick delivery.

2.25 Considering the above, the allocations made within this Plan are of an appropriate scale reflecting their location and relative sustainability of the settlement in which they are located.