**Representation Form**

Please return by 5pm on Thursday 28 June 2018 to: Rushcliffe Borough Council
Rushcliffe Arena, Rugby Road
Nottingham
NG2 7YG

This form has two parts:

**Part A** – Personal details

**Part B** – Your representation(s). Please fill in a separate part B for each issue/representation you wish to make.

Please read the Representation Guidance Notes (available separately) and the Data Protection Notice (see below) before completing the form.

**Part A** (Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

<table>
<thead>
<tr>
<th>1. Personal Details</th>
<th>2. Agent’s Details (if applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title</td>
<td>Mr</td>
</tr>
<tr>
<td>First Name</td>
<td>John</td>
</tr>
<tr>
<td>Last Name</td>
<td>Freeston</td>
</tr>
<tr>
<td>Organisation (where relevant)</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Job title (where relevant)</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Address – line 1</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Address – line 2</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Address – line 3</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Address – line 4</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Address – line 5</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Postcode</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>E-mail Address</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Telephone Number</td>
<td>Click here to enter text.</td>
</tr>
</tbody>
</table>

Representations must be received by 5pm Thursday 28 June 2018. Representations received after this time will not be considered duly made.
Part B (please use a separate Part B form for each representation)

Name/Organisation: Mr John Freeston

3a. To which document does your response relate? (please tick one)

- Local Plan Part 2
- Local Plan Part 2 Policies Map ✓
- Other supporting document please state which: Click here to enter text.

3b. To which part of the document does this representation relate? (complete all that apply)

Page no. Click here to enter text.
Paragraph no. Click here to enter text.
Policy ref. Choose an item.
Site ref. Choose an item.
Policies Map Radcliffe on Trent

4. Do you consider the Local Plan Part 2:

4(1) Legally compliant Yes ✓ No
4(2) Sound Yes No ✓
4(3) Complies with the Duty to Co-operate Yes ✓ No

→ If you have selected No to Question 4(2), please continue to Question 5.
→ In all other circumstances, please go to Question 6.

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.

Representations must be received by 5pm Thursday 28 June 2018. Representations received after this time will not be considered duly made.
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).

5. If you consider the Development Plan is UNSOUND, do you consider this to be because it is NOT: (please tick all that apply)

<table>
<thead>
<tr>
<th>Positively Prepared</th>
<th>Justified</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Effective</th>
<th>Consistent with national policy</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>√</td>
</tr>
</tbody>
</table>

6. Please give reasons for you answer to Questions 4(1), 4(2), 4(3) and 5, where applicable.

My family owns land to the east and west of Island Lane, identified under Strategic Housing Land Availability Assessment reference 833 and allocated reference RAD11 in the Housing Site Selection Report, April 2018. This land lies adjacent to proposed site allocations 5.1 and 5.5 and my family supports the proposed allocation of those sites for development. My family considers that the embankment of the former mineral railway line should form the new boundary to the Green Belt, with all land south of the former mineral railway line, from Nottingham Road to Wharf Lane, removed from the Green Belt. This would include the removal of RAD11 from the Green Belt as well as the sports and recreation land to the east of RAD11 and other pockets of land around the edge of the urban area.

RAD11 was assessed under reference RAD/K in the Rushcliffe Green Belt Review Part 2(b). RAD/K achieved a score of 13 in relation to its contribution to Green Belt purposes. This score reflected the prominence of the settlement edge east of Island Lane and the contribution of physical features which contain the site and reduce the importance of the land’s Green Belt designation. The land was therefore concluded in the assessment to be of low-medium Green Belt importance.

Site 5.1 was assessed under reference RAD/J in the Rushcliffe Green Belt Review Part 2 (b). It was also concluded in the assessment to be of low-medium Green Belt importance. RAD/K is therefore of similar value to the Green Belt as the land proposed to be removed from the Green Belt under allocation RAD01. Broadly, due to the prominence of the settlement edge between Nottingham Road and Wharf Lane and the presence of the former mineral railway line embankment, which prevents settlements from merging, assists in safeguarding the countryside from encroachment and checks the unrestricted sprawl of settlements, the Green Belt south of the former mineral railway line makes a limited contribution to Green Belt purposes. Therefore we consider that the removal of this land from the Green Belt would not be harmful to the objectives for including land in the Green Belt. Furthermore, the Landscape and Visual Analysis of Potential Development Sites (July 2017) indicates that RAD11 (reference RBC/RAD/010) is generally of low landscape value and of low sensitivity to change.

The National Planning Policy Framework states that, when reviewing Green Belt boundaries, local authorities should not include land in the Green Belt which it is unnecessary to keep permanently open. In view of the low-medium value of the land to the Green Belt, there is no compelling case for the land to be...
Policy 4 of the Core Strategy provides the framework for Green Belt Review, stating that Green Belt inset boundaries will be reviewed through the Local Plan Part 2 in order to accommodate development requirements until 2028. Policy 4 outlines criteria for reviewing green belt boundaries, including:

a) the statutory purposes of the Green Belt, in particular the need to maintain the openness and prevent coalescence between settlements;

b) establishing a permanent boundary which allows for development in line with the settlement hierarchy and / or to meet local needs;

c) the appropriateness of defining safeguarded land to allow for longer term development needs; and

d) retaining or creating defensible boundaries.

The Green Belt review documents do not define what may be considered a ‘defensible boundary’, but the National Planning Policy Framework says that such boundaries should be clearly defined, using physical features that are readily recognisable and likely to be permanent. Holme Lane would form a weak boundary to the Green Belt as it is a low-key country lane. Site 5.1 and RAD11 have a strong visual relationship, with Holme Lane as a subordinate feature. The sense of enclosure from wider land comes from the significant landscape feature of the former mineral railway line. The minor ditch/field boundary to the north of site 5.5 would also form a weak boundary, with little to distinguish the Green Belt boundary on the ground. The former mineral railway line embankment would form a strong and permanent Green Belt boundary, clearly distinguishing the Green Belt from urban fringe land associated with the settlement. We consider that the use of the former mineral railway line embankment as the new Green Belt boundary would best serve the purpose of Core Strategy Policy 4 (7) (d) in creating a defensible boundary.

The release of land from the Green Belt could also remove Green Belt constraints from sports and recreation development at Wharf Lane Recreation Ground. Green Belt policy in the National Planning Policy Framework states that provision of appropriate facilities for outdoor sport and recreation is appropriate in the Green Belt as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it. This requirement to preserve openness is a significant constraint on the provision of new facilities for sports and recreation. The Wharf Lane Recreation Ground and surrounding land is identified as a ‘Zone of Recreation’ in the recently adopted Neighbourhood Plan, where the Neighbourhood Plan identifies a priority for the improvement of the village’s formal sports facilities to be delivered through enhancement of facilities within the recreational zone, creating a sports and recreation hub for use by the wider community. Therefore we consider that the removal of Green Belt designation from this land would best support the objectives of the Neighbourhood Plan.

The assessment of site RAD11 in the Housing Site Selection Interim Report concludes the following:

‘There are a number of positives in relation to the site. Firstly the site is one of the closest sites to the village centre that is being promoted. Secondly, it does not score highly when assessed against the purposes for including land within the Green Belt. Thirdly, the landscape and visual sensitivity assessment indicates that it is generally of low value and of low sensitivity. Whilst the site is identified as at risk of flooding in a 1 in 1000 event on the Environment Agency's flood maps, the SFRA indicates that the site is not at risk of flooding. The major barrier in relation to the possibility of development on the land is that an appropriate access could not be achieved to the site in order to enable development as The Green is too narrow. As with all sites around Radcliffe on Trent, a solution needs to be found in order to improve health and education provision’.

This conclusion indicates that the only barrier to development of the land is vehicular access via The Green. There are potential options for access that need not necessarily utilise The Green and so RAD11 could potentially come forward in the longer term, through co-operation with adjoining landowners.
Policy 4 of the Core Strategy says that consideration will be given to safeguarding land in Local Plan Part 2 to meet development needs beyond the plan period. The National Planning Policy Framework says that Local Plans should, where necessary, identify areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. The Local Plan should make clear that the safeguarded land is not allocated for development at the present time and planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development. Furthermore, local authorities should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the Local Plan period.

We would suggest that RAD11 should be considered for allocation as safeguarded land in order to allow the Green Belt boundary to be redrawn to a robust, defensible boundary which does not need to be reviewed at the end of the plan period and which could allow for development to meet longer-term needs, should a suitable access solution be put forward.

---

7. Please set out what change(s) you consider necessary to make the Local Plan Part 2 legally compliant or sound, having regard to your responses to Questions 5 and 6. 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.

(If you are suggesting that the Local Plan Part 2 is legally compliant or sound please write “Not applicable”).

The new Green Belt boundary should follow the line of the former mineral railway line at Radcliffe on Trent, with all land south of the railway line from Nottingham Road to Wharf Lane removed from the Green Belt. Aside from the proposed allocations 5.1 and 5.5, land removed from the Green Belt should be safeguarded. This will create a defensible Green Belt boundary in line with local and national policy.

---

8. If your representation is seeking a change, do you consider it necessary to participate at the hearing sessions of the Public Examination? (please tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected No, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

---

9. If you wish to participate at the hearing sessions of Public Examination, please outline why you consider this to be necessary:

To contribute to the discussion from a landowner's perspective.
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.

10. 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

Date form completed 11/06/2018

Please return the completed form by no later than 5pm on Thursday 28 June 2018 to:

localdevelopment@rushcliffe.gov.uk; or

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

(Electronic copies of this form are available to download at www.rushcliffe.gov.uk/planningpolicy).

If you have any questions, please contact the Planning Policy team by telephone on 0115 981 9911, or email at localdevelopment@rushcliffe.gov.uk

Data Protection Notice

The personal information you provide will only be used by Rushcliffe Borough Council, the Data Controller, in accordance with General Data Protection Regulation 2016/Data Protection Act 2018 to undertake a statutory function (also known as a ‘public task’).
Your personal information will be shared with the Planning Inspectorate in connection with the above purpose.

Your personal data will be kept in accordance with the Council’s retention policy and schedule. Details of which can be found on the Council’s website at http://www.rushcliffe.gov.uk/retention_schedule/

Your data protection rights are not absolute and in most cases are subject to the Council demonstrating compliance with other statutory legislation, for further information see http://www.rushcliffe.gov.uk/privacy/

Representations will be available to view on the Borough Council’s website, but any signatures, addresses, email addresses or telephone numbers will not be included. However, as copies of representations must be made available for public inspection, comments cannot be treated as confidential and will be available for inspection in full.