## Comment

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<th>Consultee</th>
<th>Mrs Christine Wells (1167348)</th>
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<td>Company / Organisation</td>
<td>Friends of Sharphill Wood</td>
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<td>Event Name</td>
<td>Local Plan Part 2 (Publication Draft)</td>
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<td>Comment by</td>
<td>Friends of Sharphill Wood (Mrs Christine Wells - 1167348)</td>
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**To which document does your response relate?**

Local Plan Part 2 Publication Version

**Page number**

16-138

**Paragraph number**

too many to list

**Policy reference**

Policy 1: Development Requirements

**Site reference**

Please select an option

**Policies Map**

No

**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
- Effective

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).

Whilst the Plan contains much that is excellent, the lack of soundness comes from the fact that we have found so many holes, coupled with our experience of divergence between planning and the results of implementation. Generally in the Plan encouragement and facilitation of an increase in diversity is not sufficiently emphasized.

*“Positive Preparation”* should include a sentence like “It should also take account of preservation or increase in Green Belt and Open Spaces, even those in urban areas and protection of valuable habitat.

*“Effectiveness”* should include that Developers (motivated principally by financial considerations) are held to Mitigation Plans and other promises which in our experience are frequently broken or watered down, we have to say in sneaky ways that are sometimes not challenged. They do not respect Local Wildlife Sites as they should, where they get in the way of what they have planned. This can include dismissal of for example the need for badgers to forage widely and have access to other setts and wildlife corridors. **It is essential that National Planning Guidance continues to include robust enforcement of wildlife considerations**. An additional sentence could read *“This should include monitoring and enforcement of the Policies in the Plan (especially those dealing with environmental issues) where necessary”*

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 file attached which sets out our thoughts as helpfully as possible

**Please add any supporting files (if applicable)**

Comments on Rushcliffe Local Plan Part 2 On behalf of Friends of Sharphill Wood
Comments on Rushcliffe Local Plan Part 2 On behalf of Friends of Sharphill Wood

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.

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

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
Comments on Rushcliffe Local Plan Part 2

On behalf of Friends of Sharphill Wood

Comments on Policies

Policy 1
Criteria 6 & 7 are not robust enough. Limitation of impact is not sufficient, considerations and decisions should always include enhancement where possible so that we are increasing diversity and reversing the adverse effects of previous decisions. This can be achieved with the involvement of wildlife organisations large and small, which has the advantage of informing and engaging local people meaningfully.

Alternative wording:
6) there is either no significant adverse effects on important wildlife interests, or enhancement of Biiodiversity/habitat
7). there are no significant adverse effects on landscape character including profile of established woodland

Policies 2-10
There is a common theme to some of these where sufficient consideration has not been given to preserving/enhancing habitat and diversity (examples being 3, 4.1, 4.3, 6.1 and 6.3. There are actions that can be put into place eg adequate buffer zones and bird and bat boxes in new housing however there is a general tendency to put expedience before intruding into precious and dwindling natural resources. As mentioned above it is critical to hold developers to promises made through proper monitoring and enforcement. Once the developments are complete it is too late.

Policy 12 Housing Standards
There seems to be nothing in this policy about increasing biodiversity. That is as important to the welfare of communities as proper build and environment. Using Sharphill Wood as an example, we are working with the Developers to issue packs to households linking them to Friends Group and involving them in caring for local wildlife. Badgers particularly are likely to use the gardens for foraging and latrines as no one asked their permission to build on the land and they are reluctant to relocate themselves! No applications have been made to Natural England for potential disturbance which is typical of what can happen without local vigilance and knowledge!

New standard
4) Biodiversity in new and existing buildings
All new dwellings will be designed with regard to the Royal Institution of British Architects “Designing for Biodiversity” Technical Guide.

This would be a requirement which would benefit new developments and their residents enormously as well as contribute to national biodiversity standards.

Policy 16 Renewable energy
Very good.

Policy 17 Managing flood risk
Also good but include a Provision 3

3) Accompanying flood risk mitigation proposals should include robust proposals for including biodiversity and habitat improvement.

Policy 19 Development accompanying watercourses
Similar to above

New point: g) accommodates and enhances biodiversity by making connections to existing Green Infrastructure assets and conserves or enlarges habitats and species that depend directly on water.

Policy 21 Green Belt
Sentence “The National Planning Policy Framework 88 Local Plan Part 2: Land and Planning Policies does not indicate that any changes of use of open land are ‘not inappropriate’ in the Green Belt.” is very confusing – not sure what it is trying to say.

The health benefits of wild spaces and participation in conservation activities is widely recognised – “Let’s live well in Rushcliffe” underlines this.

Under 6.6 an additional sentence could be added:- “The Council also recognises that health and wellbeing is not only encouraged by organised sport but by participation in activities that do not impact on habitat and diversity of species”

Policy 28 Protecting Heritage assets.
Justification includes in 9.1 a mention of Conservation Areas however this should unequivocally mention including Local Wildlife sites. This is because the next generations will question why so much habitat and biodiversity was lost by this generation and they deserve to inherit a countryside with a wildlife heritage that cares for endangered species.

9.1 should ensure clarity as regards Conservation Areas, that these contain wildlife habitat.

Policy 30 Protection of community facilities
Does not mention the many Local Wildlife Sites that exist, some under threat eg Sharphill Wood.

10.2 should tackle this even if it is not included in Local Plan Part 1. and therefore cannot be included in the bullet points even though highly relevant

Policy 31 Sustainable Tourism and Leisure
This does not mention the potential for facilities based on conservation or the attraction for people like bird watchers. Mentions landscapes which suggest developed landscapes not wild or natural.

Policy 32 Recreational Open Space
This policy is good however we find in practice at the Sharphill Wood Edwalton development there is little provision for young people and children. There is going to be increased pressure on the vulnerable biodiversity of the Local Wildlife Site because there are few alternatives in the Development of over 1500 homes. Current damage to the Wood from fires, litter broken glass, and broken and damaged mature and young trees in not sustainable. Policies are only good when practices are carried out. No amendment to the wording but how can we be sure planners will build in the recommendations in the future?

Policy 33 Local Green Space
This is comprehensive and good.
However conserving nature is essential for its own sake.

12.7 Would include a sentence such as:-
Whilst there are not obvious immediate benefits to humans, conservation of habitat and preservation of species is vital to the future of biodiversity and conservation of what wild spaces remain.

Policy 34 Green Infrastructure and Open Space
Broadly supported and approved. The following could be clearer and more specific:-
3) Replacement Green Infrastructure should, where possible, improve the performance of the network and widen its function as increasing biodiversity and protecting endangered and other species of flora and fauna.

**Policy 35 Green Infrastructure and Network and Urban Fringe**
There are few Local Wildlife sites protected by Local Nature Reserve law, and Sharphill Wood is one. However our experience in Sharphill Wood has been that Developers are determined to develop land to the West of the Wood as well as to the East. This would mean the end of it as a SINC and a Local Wildlife site by damaging wildlife corridors and surrounding the Wood with homes, domestic animals, and dog walkers. Whilst this sounds desirable to humans, the impact on fragile wildlife is inestimable. It is to be hoped that this is made crystal clear within the wording. Also the community park diversely planted area originally promised, was reduced by Planners and Developers to leave the way clear for future negotiations. This is unacceptable. Suggested reworking:-

12.18 The National Planning Policy Framework requires the minimisation of impacts on biodiversity and net gains in biodiversity in order to halt the overall decline in biodiversity. This will be achieved by protecting and enhancing existing ecological and geological assets and by establishing coherent ecological network of assets that are more resilient to current and future pressures. There should be facilitated consultation with Wildlife Groups and organisations to ensure that unforeseen impacts will not arise in the future.

**Policy 36 Designated Nature Conservation Sites**
4c does not go far enough in protecting, and enhancing biodiversity and habitat. Suggested improvement:-

4c The development would be expected to result in no overall loss of habitat and, as a last resort, any compensation could be expected to include off-setting habitats adjacent to or within the vicinity of any losses proposed. Developments will be expected at worst to maintain existing levels of habitat and at best to achieve some increase or improvement.

**Policy 37 Trees and Woodlands**
Policy generally approved and welcomed. However at Sharphill the Developers (and RBC?) profits have taken precedence over an adequate buffer zone between a substantial Development and the fragile Local Wildlife Site. The housing is too near to the boundary. Also planting and maintenance of wildlife corridors are as important as trees.

12.35 In accordance with national policy and Policy 37, developments should seek to achieve net-gains in biodiversity and the enhancement of the Borough's ecological network. The planting of trees and the creation or improvements to woodlands will, where appropriate, provide opportunities to accomplish this as well as the provision of adequate space for planted and fenced buffer zones.

Although wording can't be suggested, there is a need for this sort of provision to be maintained and monitored for the future, so that if buffer zones and boundaries are breached there are no arguments about how to repair. This remains a major concern as regards Sharphill Wood.

**Policy 38**
All very good as long as there is robust monitoring and awareness of any breaches. Natural England have not been able to offer any support with badger issues at Sharphill as no applications have been made. We are currently unable to find out how the badger setts have been affected by ongoing works. No other bodies appear to be interested in sorting out this issue.