1. This short report sets our representation on behalf of the owners of site RUD3 (Land adjacent St Peter’s Junior School. It follows representations made at all previous consultation stages of the draft Local Plan Part 2 in relation to proposals for housing. The report considers the following issues in turn:

   - Rushcliffe Borough Council’s [RBC] overall housing land supply position
   - Consistency of assessment of potential housing sites in Ruddington
   - The merits of RUD3

2. Please note that it would be our intention to appear at any relevant session of the EiP relating to housing land supply and Ruddington site release, and to augment this summary representation with more detailed comment and analysis at the appropriate time.

RBC housing land supply

3. RBC continues to fall short of a five-year housing supply: as of April 2018 it is now just 3.1 years (Report to Council 26 April 2018 para 4.10). The shortfall arises from slow delivery on major strategic sites identified in the Core Strategy.

4. RBC is seeking to address this by allocating 21 additional sites across the Borough, delivering some 2,700 new homes and increasing the five-year housing land supply to 5.5 years by the end of 2018 (para 4.11). This assumes, however, that delivery of the main strategic sites continues but there is a real danger that these additional sites will provide an insufficient buffer to address the slow delivery on the large sites.

5. Ruddington’s share of this additional capacity was suggested as being 410 homes in the last proposed housing sites consultation in October 2017. Our clients supported that figure. The site allocation now proposed amounts to just 350 new dwellings. While the overall total is balanced by increases in other parts of the Borough, there is in our view additional capacity in Ruddington that could meet the housing land shortfall

Ruddington site assessment

6. We have set out in previous representations our concerns regarding a lack of consistency in the way that potential housing sites in Ruddington have been assessed. Indeed, it seems that one site (RUD11) that was previously earmarked for release from the Green Belt, specifically for self-build housing, has now been dropped from the draft Local Plan on the basis of our (and others’) comments.
7. These comments do not appear to have been addressed in the latest consideration of potential sites. The following comments repeat those previously made and are based on the Cabinet report of 12 September 2017 and on Part 2(b) of the Rushcliffe Green Belt Review – Detailed Review of the Nottingham-Derby Green Belt within Rushcliffe – Rural Towns and Villages.

8. It should be noted that RUD3 has a Green Belt Score [GBS] of 16 and sits within the Ruddington North area which has a Strategic Green Belt Score [SGBS] of 13.

9. RUD1 (Policy 6.1) sits within the Ruddington North area which has SGBS of 13 and GBS of 11. The latter is based in part on a score of 2 for the checking unrestricted sprawl purpose: the commentary suggests the site borders the built-up area of Ruddington on two sides, which is something of an exaggeration, and the ditch and trees hardly form a strong defensible boundary in the open landscape (as indicated in the illustrating photograph in the Green Belt Review). The score of 3 for preventing merging of settlements also does not seem to reflect either the commentary or the SGBS of 5 on this issue.

10. RUD13 (Policy 6.3) has a SGBS of 17 (Ruddington SE) and a GBS of 14. The latter score reflects the separation of Ruddington from other settlements in that direction and serves to underplay the significance of the site for the setting of the Ruddington Conservation Area, it being “open countryside” and the fact that “Its removal would constitute a significant intrusion beyond the A60, which is a robust and strategic boundary.” Furthermore, the site would not result in a strong and robust Green Belt boundary and would put extreme pressure on other sites in the conservation area that are not proposed to be allocated for housing (RUD6 and RUD14) to be released. It would effectively be an island in the GB, with a tangential boundary with RUD5.

11. Our client supports the release of RUD5 (Policy 6.2) from the Green Belt – even though it has a higher SGBS that RUD3 (17 against 13).

The merits of RUD3

12. We would reiterate the following positive attributes of RUD3 in considering additional housing sites:

- it adjoins the settlement by virtue of St Peter’s Junior School
- immediately deliverable
- capable of being accessed from A60
- capacity of approximately 70 dwellings
- it is of sufficient size to enable part of the site to be dedicated to self-build houses while also allowing for appropriate provision of conventional housing (including affordable housing)
- any such scheme would also contribute to other services in Ruddington

13. Access: the Housing Site Selection Report (April 2018) suggests that NCC policy precludes access for new developments onto major A roads except in special circumstances. It is
important to note in this context that the refusal of an outline application in 2009 on this site was only on Green Belt grounds, not highways. It is noted also that RUD13 is served by a roundabout on the A60 and there is no highways reason why RUD3 could not be adequately and appropriately accessed similarly, particularly given the proximity within 500m to the north, of the junction with the A52. A new access for the school may also amount to the “special circumstances” that NCC policy refers to.

14. Education capacity: the Housing Site Selection Report (April 2018) assesses the merits of various sites located close to existing built up areas which are potentially suitable for residential development (including those referred to above). The following comment is made in relation to school capacity locally:

There is limited capacity to accommodate additional development within Ruddington with current primary-aged school provision. It has been indicated that there is a potential solution to accommodate additional development on the St Peters Junior School site.

15. The release of RUD3 may provide the opportunity for increasing the capacity of the St Peters Junior School site: a new vehicular access might be provided from the A60 (the existing access from Ashworth Avenue is not fit-for purpose), new playing fields provided to the north of the school and land released for housing alongside new school accommodation to the south, adjoining existing housing in Devon Drive.

MI/tpb