| **Comment** |
|-----------------|-----------------|
| **Agent**       | Mr Peter Keenan (1167310) |
| **Consultee**   | (1167323)       |
| **Company / Organisation** | Newton Nottingham LLP |
| **Event Name**  | Local Plan Part 2 (Publication Draft) |
| **Comment by**  | Newton Nottingham LLP ( - 1167323) |
| **Comment ID**  | 68               |
| **Response Date**| 28/06/18 10:48 |
| **Status**      | Submitted       |
| **Submission Type** | Web |
| **Version**     | 0.1             |
| **Files**       | RAF Newton Representations |
|                  | RAF Newton Representations (1) |

**To which document does your response relate?**

- Local Plan Part 2 Publication Version

**Page number**

- 18-20

**Paragraph number**

- 3.1-3.11

**Policy reference**

- Please select an option

**Site reference**

- Please select an option

**Policies Map**
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).

See attached document

Please add any supporting files (if applicable)  
RAF Newton Representations
RAF Newton Representations

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.

See attached document

Please add any supporting files (if applicable)  
RAF Newton Representations (1)
RAF Newton Representations

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.
RAF Newton (Phase 2) is a strategic housing allocation in the Part 1 Local Plan. Therefore, our involvement would assist the examination in respect of matters such as housing delivery, housing land supply and the hierarchy of settlements.

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
Comment

Agent Mr Peter Keenan (1167310)
Company / Organisation Q+A Planning Ltd
Consultee (1167323)
Company / Organisation Newton Nottingham LLP
Event Name Local Plan Part 2 (Publication Draft)
Comment by Newton Nottingham LLP ( - 1167323)
Comment ID 69
Response Date 28/06/18 10:49
Status Submitted
Submission Type Web
Version 0.1
Files Representations (1)

To which document does your response relate? Local Plan Part 2 Publication Version
Policy reference Policy 25: Development within District Centres and Local Centres
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”? 

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**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).

See attached document

Please add any supporting files (if applicable)

Representations

Representations

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

Yes

Please add any supporting files (if applicable)

Representations (1)

Representations

**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.**

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. The Local Plan Part 2 has been adopted
Comment

Agent: Mr Peter Keenan (1167310)
Company / Organisation: Q+A Planning Ltd
Consultee: Newton Nottingham LLP
Event Name: Local Plan Part 2 (Publication Draft)
Comment by: Newton Nottingham LLP ( - 1167323)
Comment ID: 70
Response Date: 28/06/18 10:49
Status: Submitted
Submission Type: Web
Version: 0.1
Files: Representations (3), Representations (2)

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

Policy reference:
Policy 27: Main Town Centre Uses Outside District Centres or Local Centres.

Site reference: Please select an option

Policies Map

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

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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
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See attached document

Please add any supporting files (if applicable)  
Representations (2)  
Representations

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

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See attached document

Please add any supporting files (if applicable)  
Representations (3)  
Representations

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.

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. The Local Plan Part 2 has been adopted
**Comment**

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| Files | Representations (4)  
Representations (5) |

**To which document does your response relate?**  Local Plan Part 2 Policies Map

**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”?”**

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Do you consider the Local Plan Part 2 to be sound?  No

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- Justified
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See attached document

Please add any supporting files (if applicable)  Representations (4)

Representations

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See attached document

Please add any supporting files (if applicable)  Representations (5)

Representations

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The Local Plan Part 2 has been adopted.
RAF Newton – Representations to Rushcliffe Local Plan Part 2: Land and Planning Policies
Publication Draft

Introduction

1. Q+A Planning Ltd act on behalf of Newton Nottingham LLP. Our client owns the former RAF Newton site, which is a strategic allocation as identified under Policy 22 of the Local Plan Part 1: Core Strategy (LPP1) - adopted in December 2014. The allocation allows for ‘additional housing for around 550 dwellings, protection of existing B8 employment located within the former aircraft hangars, and the provision of additional employment land for B1, B2 and B8 purposes. In addition, a primary school, community centre, public open space and other facilities as appropriate.’

2. The Council will be aware that planning permission was granted in January 2014 (reference 10/02105/OUT) for ‘500 dwellings; up to 50 live/work units; up to 5.22ha new employment land; up to 1,000 sq. m of A1, A3, A4 and community uses; retention of existing hangers for employment purposes; perimeter cycle track; provision of land for new primary school; and associated public open space, recreation and landscaping.’

3. The above permission was varied by an application (reference 15/00583/VAR) submitted under Section 73 of the Town and Country Planning Act, 1990, as amended, and this was granted in July 2015 and varied/removed some of the conditions attached to the original outline permission. A further application to vary the permission (reference 16/02864/VAR) was submitted in November 2016 to allow the replacement of 50 live work units with 50 residential units, removal of the "commercial only" internal road and reduction in level of affordable housing. The Council resolved to grant this second variation in January 2017 subject to a Section 106 agreement.

4. We can confirm that there is significant market interest in the development for both individual phases completed by separate house builders, or the complete development delivered by one house builder. Given this market interest, we are confident that the rate of delivery is capable of being accelerated to up to 150 a year should permission be granted for more housing, meaning that the site could deliver between 150 and 200 extra dwellings (beyond the 550 permitted) prior to 2024.

5. On behalf of our client, we lodged duly made representations in March 2017 to the consultation on the Rushcliffe Local Plan Part 2: Land and Planning Policies – Further Options and the Rushcliffe Green Belt Review Part 2 (b) – Additional Sites (Draft for consultation). This explained that having considered the outline permission that has been granted, the indicative masterplan and the existing Green Belt boundary, there is potential to accommodate up to 160 additional dwellings at the site. The proposed additional land is not within the existing Green Belt boundary but would require parts of the green infrastructure in the form of planned allotments and public open space to be accommodated outside the Green Belt boundary (i.e. in the Green Belt).
6. In response to our client’s proposition, the Council in its report to Cabinet on 12th September 2017 stated that:

‘It has been suggested by the landowner that the former RAF Newton strategic allocation should be expanded to provide for additional housing delivery. As with the Bingham strategic allocation this would not result in greater housing delivery in the short term and therefore, aside from any other relevant suitability factors, for this reason it is considered inappropriate to increase the size of the allocation at the present time.’

7. It appears that the Council’s primary concern at that time surrounded the rate of delivery of housing. There was no appreciation of the policy context where the potential for RAF Newton should be considered prior to any other villages (see our previously duly made representations). We believe any suitability concerns could be adequately addressed through a planning application since any built development would only be focused within the development boundary. Furthermore, as we have explained, we consider that there is a realistic prospect that the rate of delivery could be increased to be increased in the short term given the progress the developer has made.

8. Due to those concerns, on behalf of our client, we made further comments on the consultation on the Preferred Housing Sites in November 2017 which set out again the potential for additional housing development at RAF Newton. In the Council’s report to Full Council in April 2018, the reason for not making this allocation was as follows:

‘Phase 2 within the Former RAF Newton SUE has not yet commenced and increasing the number of new homes within this allocation (and effectively enlarging it through the relocating of Green Infrastructure beyond its boundary) would not contribute to meeting the housing needs within the plan period. An addition of 150 new units is not therefore necessary or appropriate at present.’

9. It is appreciated that the Council’s reason does not preclude the additional housing and the concern appears to relate to the rate delivery and the extent to which that would assist in meeting housing needs in the plan period. Whilst we have sought to reassure the Council over the potential rate of delivery, our main concern is that Council have not addressed the spatial inconsistency with the Part 1 Local Plan to allocate sites smaller centres in the hierarchy before Newton. Consequently, we wish to lodge an objection on the approach to housing land supply within the Plan. In addition, having reviewed the full plan, we also have concerns over the soundness of the retail policies and the approach taken to define the new Green Belt boundary surrounding Newton.
Housing Land Supply
(pages 18-20, paragraphs 3.1 to 3.11)

Reason for objection

10. We consider that the Council’s approach to search for additional housing sites is unsound due to an inconsistency with the Part 1 Local Plan and specifically Policy 3. Therefore, we wish to re-iterate the point made in our previous duly made representations from March 2017 and November 2017 concerning the policy approach to search for additional housing sites. As far as we are aware, this matter has not been addressed by the Council at any stage and we note that Newton as a settlement does not feature in paragraphs 3.1 to 3.11 of the Publication Draft Local Plan. The heart of our concern relates to paragraph 3.5, which states:

‘In terms of deciding where further land should be allocated for new housing development, Policy 3 of the Local Plan Part 1: Core Strategy sets the broad framework for how new homes should be spread around Rushcliffe. The Core Strategy sets a hierarchy for where new development should be located, which is based on a strategy of ‘urban concentration with regeneration’. This means that development should, where possible, be directed to locations within or adjacent to the main urban area of Nottingham (within and around West Bridgford and to the south of Clifton), followed by locations at the six towns and villages which are classified by the Core Strategy as ‘key settlements’ for growth. Finally, growth at ‘other villages’ will be provided to meet local needs only.’

11. This approach misrepresents Policy 3 of the Local Plan Part 1: Core Strategy. Policy 3 states, inter alia, that:

‘The settlement hierarchy for Rushcliffe to accommodate this sustainable development is defined on the Key Diagram and consists of:

a) the main built up area of Nottingham; and
b) Key Settlements identified for growth of Bingham, Cotgrave, East Leake, Keyworth, Radcliffe on Trent and Ruddington. In other settlements (not shown on the Key Diagram), with the exception of Newton and the redevelopment of the former RAF Newton, development will be for local needs only.’ (our emphasis).

12. From a settlement hierarchy perspective, it is appreciated that the built-up area of Nottingham and the six key settlements represent the first area of search. However, after that the search should focus on Newton and the former RAF Newton (together) as the only other settlement that Policy 3 says is appropriate for a level of development that is more than local needs. Therefore, the search needs to consider Newton before all ‘other settlements’. This is not the approach that the Council have taken to date and not the approach as set out in paragraph 3.5 of the Publication Draft Plan.

13. There is a clear distinction in policy, where both Newton and the former RAF Newton together are given a separate status to other settlements in the borough. When judging the suitability of settlements to deliver additional housing, the Council should not distinguish between the two
(i.e. Newton and the former RAF Newton). This different status in policy means that there is a clear policy direction in the Local Plan Part 1 for the potential for Newton and the former RAF Newton to be examined for their potential to meet housing needs prior to other smaller settlements in the borough.

14. The Council have sought to allocate sites in the 'other villages' of Cropwell Bishop, East Bridgford, Gotham and Sutton Bonington for a combined total of 470 dwellings. Whilst we have not commented upon these specific allocations (irrespective of Policy 11 on unallocated sites within settlements), we repeat the entirely valid planning argument that Newton and the former RAF Newton should be considered first since there is an available and deliverable opportunity for additional housing to meet the Council's needs within the plan period. This is not the approach that the Council have taken to date and the possibility of additional residential development at Newton seems to have been entirely omitted. Relying on a blanket un-evidenced assertion that an additional allocation would not deliver additional housing is not effective and is not a sound approach.

15. An additional allocation at the former RAF Newton site would be broadly consistent with paragraph 52 of the NPPF where it is explained that 'the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities'. Newton is already an existing settlement, and once the permitted development is delivered, will have a range of services and infrastructure. An additional modest allocation would be appropriate and, as explained below, would not undermine the role of the Green Belt.

**Change sought:**

16. Considering the above, the Council ought to allocate additional land at the former RAF Newton to help meet the housing needs for at least 160 dwellings.
Policy 25 Development within district centres and local centres

Reason for objection

17. On behalf of our client, we wish to object to this policy because that is does not recognise the role of main town centre uses within strategic allocations and only refers to ‘District Centres and Local Centres, as defined within the policies map’. The practical outcome is a policy vacuum in respect of such areas, which means in effect they are given ‘out of centre’ status. This is inconsistent with Core Strategy Policy 6.

18. Policy 6 does include this recognition, as follows:

‘New retail development of an appropriate scale, as identified through masterplans, will be required in the following locations to serve new sustainable communities:

a) Land South of Clifton;
b) Former RAF Newton;
c) Land off Melton Road, Edwalton;
d) Land North of Bingham; and
e) Land East of Gamston/North of Tollerton

New retail development at these locations will be expected to consolidate and strengthen the network and hierarchy of centres and not harm the viability and vitality of existing centres. Other major residential-led development may require retail development of an appropriate scale and this will be addressed in the Local Plan Part 2 (Land and Planning Policies).’

19. In our view, the emboldened text above introduces the retail development at these locations into the hierarchy of centres. This means, subject to ensuring the viability and vitality of existing centres is not harmed, retail development is given a sequential priority to these locations within the hierarchy of centres. This benefit does not translate to policy 25, providing an inconsistency between the two plans, meaning the policy is not effective, justified or consistent with national policy.

20. In addition, it is noted that policy 25 includes the text ‘any development that would harm the vitality and viability of a defined centre will not be permitted’. If a development falls within a designated centre under policy 25, there is no requirement to address retail impact under paragraph 26 of the NPPF. The reference to ‘scale’ is also inconsistent with the NPPF, given that there has been no such national policy test since 2009. Policy 27 addresses the impact of developments outside designated centres and provides all the necessary protection to the hierarchy of centres. Therefore, policy 25 requires rewording to ensure that it is sound.

Change sought

21. To address our concerns, we suggest the first part Policy 25 should be reworded as follows:
‘Main town centre uses (retail, office, entertainment, cultural and leisure) will be permitted within the District Centres and Local Centres and within new communities (including land South of Clifton, land East of Gamston/North of Tollerton, the former RAF Newton, land off Melton Road, Edwalton, and land north of Bingham, as defined within the policies map, provided they are designed to reflect the role, function and distinctive qualities of the centre.’
Policy 27 Main town centre uses outside district centres or local centres

Reason for objection

22. On behalf of our client, we wish to object to Part 2 of this Policy on the grounds that it is inconsistent with the NPPF, as well as being internally inconsistent. Part 2 reads as follows:

‘Development proposals within out-of-centre locations, which improve their quality of design and connectivity, will be encouraged only where there is no increase in floorspace and there is no impact on the vitality and viability of other centres.’

23. This policy would apply to all out of centre locations (irrespective if there is development present or not). However, providing encouragement only if there is no increase in floorspace and no impact on existing centres would be entirely inconsistent with the NPPF and with parts 1 and 3 of the policy, which require the sequential approach and assessment of impact respectively. If there is an increase in floorspace, the sequential approach is satisfied, and the level of impact is not significantly adverse (i.e. there could be some impact), then there is no reason to qualify any support in the manner as drafted.

Change sought

24. To address our concerns, we suggest the second part of Policy 27 is reworded as follows:

‘Development proposals within out-of-centre locations, which improve their quality of design and connectivity, will be encouraged only where the sequential test is met and there is no likelihood of a significant adverse impact on the vitality and viability of other centres.’
Policies Map – Newton

Reason for objection

25. It is proposed that the existing Newton Village is removed from the Green Belt, along within the existing RAF Newton strategic allocation (which was removed from the Green Belt as part of the Part 1 Local Plan). Whilst we support the removal of the existing Village from the Green Belt, the outcome is that there is a remaining triangular area of land between the strategic allocation (to the north east) and the existing village (to the north west), which will not serve any Green Belt purpose. Therefore, this area should also be removed from the Green Belt. The inset is below:

26. Reference paragraph 85 of the NPPF, the approach taken does not represent a clear boundary using physical features that are readily recognisable and likely to be permanent because it simply follows the garden line of existing properties rather than the effect of the strategic development on the RAF Newton site. This means, the permanent of the boundaries can be questioned.
27. In our view, it would be more sensible to draw the boundary along the established tree lined boundary to the south of Main Street (most of which is within the strategic allocation, albeit remains within the Green Belt). This land would not serve any of the five Green Belt purposes within paragraph 80 of the NPPF as follows:

- Check unrestricted sprawl of settlements - the land outside the existing Green Belt will have two boundaries adjoining the existing permitted area of development at RAF Newton and the existing village. It will, in effect, be a visually well-connected ‘rounding off’ that settlement. The northern boundary is the existing tree belt to the south of Main Street and therefore is a clear defendable boundary.

- Prevent merging of settlements - the proposed area will not extend the built area north beyond its existing most northerly point. It will not result in any meaningful reduction, or perception of reductions, in the distance between development in Newton and other settlements elsewhere in the vicinity.

- Assist in safeguarding the countryside from encroachment - given that area is located between the existing properties in Newton and the permitted development area, we do not believe that the area could be described as materially encroaching onto open countryside. The site is not ‘open’ in that it is surrounding on all sides by existing and proposed development.

- Preserve setting and special character of the historic environment- the land does not contain nor form the setting of a designated or non-designated heritage asset.

- Assist in urban regeneration – excluding this land from the Green Belt would not preclude any urban land coming forward for development

**Change sought**

28. In light of our concerns above, the area edged in red should also be removed from the Green Belt.