Rushcliffe Local Plan Part 2: Land and Planning Policies
Publication Version

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).

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Representations must be received by 5pm Thursday 28 June 2018. Representations received after this time will not be considered duly made.
27th June 2018

Dear Planning Policy Team

Consultation on the Rushcliffe Local Plan Part 2

Thank you for consulting Nottinghamshire Wildlife Trust on the draft Local Plan Part 2.

We have completed and attach Part A of the response form template but given the necessary scale of our response, which considers multiple parts of the documents, it is not possible for us to fill out Part B for each of the policies, sites or text we wish to comment on.

However, we have clearly marked which policy, site or section of text we are referring to and our position (support or ‘not support’) and any suggested changes/amendments.

Local Plan Part 2 Publication Version

Chapter 2. Sustainable Development Policy 1 Development Requirements (page 16-18)

We **support** the general approach to sustainability in this policy in relation to sub-sections 6-8:

*Planning permission for new development, changes of use, conversions or extensions will be granted provided that, where relevant, the following criteria are met:*

6. **There is no significant adverse effects on important wildlife interests;**
7. **There is no significant adverse effects on landscape character;**
8. **The amenity of occupiers or users of the proposed development would not be detrimentally affected by existing nearby uses;**

**Proposed amendment** At condition 6 add **there is no significant adverse effects on important wildlife interests and, where possible, the application demonstrates net gains in biodiversity**.

Such principles are entrenched in the Rushcliffe Core Strategy. Core Strategy Policy 17 mentions restoring, expanding and enhancing biodiversity interest at sub-section a. Sub-section c. describes provision of new and improvement of existing biodiversity features.
3. Housing Development (page 18)

Housing Land Supply General comments on paragraphs 3.1 to 3.11

We understand the need for Rushcliffe to identify land for housing, to ensure Rushcliffe meets it targets and, given delays to the 6 sites identified in the Core Strategy, there is a now a focus on looking elsewhere, including village and town locations.

Our concerns on this, as expressed in the two recent 'additional housing' consultations are as follows:

- If locations are secured through LPP2 to compensate for some of the 6 Core Strategy sites not coming forward on time, surely if these 6 sites then came forward this will lead to over development?
- If this was to happen, we would be concerned about the consequential wider environmental impacts, including adverse effects on wildlife. For this reason we consider it is not sensible to have such a ‘buffer’ (paragraph 3.4).
- This also goes against the principles already set in the adopted Core Strategy (it is contrary to the Core Strategy's focus to locate development within or adjacent to the main urban area of Nottingham).
- In general, we consider the village and small town locations to be less sustainable and lacking facilities and services to sustain proposed levels of growth. This would also lead to greater reliance on the use of private cars for shopping, leisure and commuting (with related environmental impacts), whereas sites identified in the original Spatial Strategy provide more opportunities for new residents to use existing public transport systems.
- The town and villages locations currently being considered in the local plan does not seem to give any consideration to potential large developments that are more progressed nearby. For example, large development at Clifton is proposed but Ruddington is being considered, similarly Newton is underway/ nearing completion but sites are considered at nearby East Bridgford.
- We would expect to see a mechanism be put in place to ensure that, should both the 6 sites identified in the core strategy and additional town and the village and town sites (currently being considered in the LPP2) reach development stage, high levels of unsustainable growth would be stopped.

We therefore **object** to this approach. Proposed amendment: we would expect to see some form of mechanism put in place to stopped unsustainable growth in Rushcliffe in the event of town/ village and
sites identified in the Spatial Strategy all coming forward, to avoid damaging cumulative environmental impacts.

Housing Allocations
General Comment Policies 2.1 to 10 (pages 20 to 57)

Keeping in mind our separate comments on housing land supply in general and we are not supportive of town and village allocations, we welcome that, whenever the allocations are near to Local Wildlife Sties or important Green Corridors, this is generally noted in the policy wording or supporting text. In many cases, buffering of sites (to help ensure wildlife sites are safeguarded) or creation of additional GI links is discussed, which is again most strongly welcomed.

However, we do have serious concerns about how well this would eventually be translated ‘on the ground’. Naturally, there is a pressure for as many dwellings to be built as possible on allocations. For those that require buffering to biodiversity features (such as LWSs) or new links to GI, we would strongly recommend the policies should specify how much land would be required (e.g. 25% of the site for habitat corridor, which must link to the (for example) Grantham Canal, LWS meadow, the local woodland or adjacent disused railway etc).

Proposed amendment: Inclusion of further details on the extent of GI and habitat buffers required throughout all of the policies in relation to allocations.

Policy 2.1 Housing Allocation – Land rear of Mill Lane/The Old Park, Cotgrave (page 23)

Keeping in mind our separate comments on housing land supply in general and we are not supportive of town and village allocations, we welcome policy sub-section d green infrastructure should achieve net-gains in biodiversity through tree planting/woodland creation; and Paragraph 3.17 The site is within a local green infrastructure corridor and ecological corridor. It is also close to the Grantham Canal, a strategically important pedestrian and cycle route. These corridors seek to protect and enhance pedestrian and cycle connectivity between Cotgrave, the Country Park, Hollygate Park, and, in the case of the Canal, the main urban area of Nottingham and settlements to the south and east. The ecological corridor seeks to improve woodland cover and connectivity. It is important that the development of this allocation contributes to these objectives.

We would wish to see these principles secured (e.g. it shouldn’t ‘seek to improve’; ‘it will improve’ by X amount). In line with our comments on housing allocations in general, we do however object to this allocation in principle. Proposed amendment: Inclusion of further details on the extent of GI and habitat buffers required.
Policy 2.2 Housing Allocation – Land south of Hollygate Lane, Cotgrave (page 24)

Keeping in mind our separate comments on housing land supply in general and we are not supportive of town and village allocations, we welcome policy sub-section f) Green Infrastructure should provide linkages to the Grantham Canal and Hollygate Park and achieve net-gains in biodiversity through tree planting and woodland creation; and paragraph 3.23 The site is within a local green infrastructure corridor and ecological corridor. It is also close to the Grantham Canal, a strategically important pedestrian and cycle route. These corridors seek to protect and enhance pedestrian and cycle connectivity between Cotgrave, the Country Park, Hollygate Park, and, in the case of the Canal, the main urban area of Nottingham and settlements to the south and east. The ecological corridor seeks to improve woodland cover and connectivity. It is important that the development of this allocation contributes to these objectives.

As with our comments on Policy 2.1, rather than ‘seek’, we would expect it to be stated how much the ecological corridor would improve woodland cover and connectivity. In line with our comments on housing allocations in general, we do however object to this allocation in principle. Proposed amendment: Inclusion of further details on the extent of GI and habitat buffers required.

Policy 3 Housing Allocation – Land north of Rempstone Road, East Leake (page 28)

We agree with paragraph 3.25 that the village cannot sustain any further development. Given its separation from the main village, we are surprised site 3.1 (Rempston Ln) is a sustainable location, as pointed out at paragraph 3.25. We therefore object to the allocation.

Policy 4.1 Housing Allocation – Land off Nicker Hill, Keyworth (page 31)

 Keeping in mind our separate comments on housing land supply in general and we are not supportive of town and village allocations, we note policy subsections a) the neighbouring Local Wildlife Site should not be adversely affected; b) Green Infrastructure should improve connections to the right of way network and deliver net-gains in biodiversity and paragraph 3.35 The site is within a local green infrastructure corridor. This corridor seeks to protect and enhance pedestrian connectivity east of Keyworth, towards Normanton on the Wolds and beyond to Cotgrave.

Although protection of the LWS is referred to prominently in the policy, there is no further thought as to how the site will be protected and net gains in wildlife would be achieved. Would there be a buffer? How big? Would it comprise meadow, to complement the grassland
LWS? In line with our comments on housing allocations in general, we do however object to this allocation. Proposed amendment: Inclusion of further details on the extent of GI and habitat buffers required.

**Policy 4.2 Housing Allocation – Land between Platt Lane and 32 Station Road, Keyworth**

Keeping in mind our separate comments on housing land supply in general and we are not supportive of town and village allocations, we note policy subsections d) **Green infrastructure should deliver net-gains in biodiversity through tree planting which complements other green infrastructure objectives**; e) **subject to access requirements, the hedgerow on Platt Lane and tree belt on Station Road must be retained** and paragraph 3.38 The site is within a local green infrastructure corridor. This corridor seeks to protect and enhance pedestrian connectivity east of Keyworth, towards Normanton on the Wolds and beyond to Cotgrave. It also encourages netgains in biodiversity through increases in tree cover and the ecological connectivity of woodland sites.

Again, we welcome GI and hedgerow protected but consider further information (or mechanism to secure this) is required to ensure net biodiversity gain and that the benefits are seen on the ground (e.g. area of tree planting expected etc?). In line with our comments on housing allocations in general, we do however object to this allocation. Proposed amendment: Inclusion of further details on the extent of GI and habitat buffers required.

**Policy 4.3 Housing Allocation – Land south of Debdale Lane, Keyworth (page 33)**

Keeping in mind our separate comments on housing land supply in general and we are not supportive of town and village allocations, we note policy subsections b) **Green Infrastructure will include a landscape buffer along the site’s western boundary**; c) **the two northern fields (adjacent to Debdale Lane) remain in the Green Belt and should comprise a landscape buffer and multifunctional open space**; and paragraph 3.41 The two northern fields which slope steeply down towards Debdale Lane, a small stream and a right of way remain in the Green Belt. Inappropriate built development within these fields will be restricted and the land utilised as publicly accessible open space. Where appropriate these fields should provide play space, a landscape buffer, improved wildlife habitats, and deliver pedestrian and cycle connectivity to Debdale Lane and the rights of way network which connect the site to the wider countryside.

Again, we welcome GI references and wish to point out that the northern fields and ‘ridge and furrow’, so protection of this historic feature is another reason for them to remain undeveloped. We don’t
think it is appropriate for these fields to provide formal ‘play space’ and should comprise wildlife habitat and landscape buffer, should the allocation progress. We therefore **object** to including the reference to ‘play space’. In line with our comments on housing allocations in general, we do however **object** to this allocation. **Proposed amendment:** Inclusion of further details on the extent of GI and habitat buffers required.

Policy 5.1 Housing Allocation – Land north of Nottingham Road, Radcliffe on Trent (page 36)

Keeping in mind our separate comments on housing land supply in general and we are not supportive of town and village allocations, we note policy subsections **Green Infrastructure should improve connections to the rights of way network, including the neighbouring former Cotgrave Colliery Mineral Line (a pedestrian and cycle route), deliver net-gains in biodiversity and where necessary contribute to flood risk avoidance measures** and 3.56 **As identified in Appendix D, the allocation is located within the River Trent Green Infrastructure Corridor, Urban Fringe area and is adjacent to the former Cotgrave Colliery Mineral Line, which is now a pedestrian and cycle route between Cotgrave and Radcliffe on Trent. It is also located within the River Trent Ecological Network, which comprises wetlands, grasslands and woodland. In accordance with Policies 35 and 38 the development of this allocation should incorporate green infrastructure which connects to the former minerals line and the local rights of way network (including the Trent Valley Way along Holme Lane). It should also achieve net-gains in biodiversity through the preservation and creation of connected habitats, including where appropriate wetlands, woodland and grassland.**

Once again, we are pleased to see inclusion and recognition of GI links in delivering net gains in biodiversity and flood risk management, we think more information is required on scale of what is required, if it were to take forward. We are not convinced there is enough space for 150 homes with proposed B1, B2 and B8, alongside GI. We consider this low laying land near to the River Trent, which is in floodplain (flood zone 2) is important farmland habitat which supports biodiversity and is linked to similar (grassland dominated habitats) which are considered important (and have restoration potential in the short term) in the Rushcliffe Biodiversity Opportunity Map (Map 2). In relation to the sequential test and flood risk (3.54), surely some other (more suitable sites) have already been identified in the spatial strategy and, in principle, agreed in the adopted Core Strategy? For the reasons above, we **Object** to this allocation. **Proposed amendment:** Inclusion of further details on the extent of GI and habitat buffers required.
### Policy 5.3 Housing Allocation – Land off Shelford Road, Radcliffe on Trent (page 39)

We are concerned about the scale of development proposed for this site (400 homes) on the basis of indirect impacts on wildlife (lighting, noise, traffic) and cumulative impact on wildlife, wildlife and infrastructure arising from other developments planned, committed and underway in the area (most notably Newton and Bingham North). We therefore **Object** to this allocation.

### Policy 5.4 Housing Allocation – Land north of Grantham Road, Radcliffe on Trent (page 40)

We are concerned about the scale of development proposed for this site (240 homes) on the basis of indirect impacts on wildlife (lighting, noise, traffic) and cumulative impact on wildlife, wildlife and infrastructure arising from other developments planned, committed and underway in the area (most notably Newton and Bingham North). We therefore **Object** to this allocation.

If this allocation were to be taken forward, we would wish to see substantial GI provision parallel to the railway line (such transport corridors are important for wildlife), around the east of the allocation and stretching across to land south of the A52/ east of Radcliffe, to provide a GI corridor linking to Dewberry Hill. **Proposed amendment:** Inclusion of further details on the extent of GI and habitat buffers required.

### Policy 6.1 Housing Allocation – Land west of Wilford Road, Ruddington (page 44)

Keeping in mind our separate comments on housing land supply in general and we are not supportive of town and village allocations, we note policy subsections **d. on-site green infrastructure should deliver recreational open spaces, landscape buffers (including a buffer around Sellers Field Recreation Ground), net-gains in biodiversity and where necessary surface water flood mitigation. This should include a 10 metre buffer either side of the Packman Dyke;**

**Proposed amendments:** The 10m buffer is welcomed but we feel that it should be ‘a minimum of’ 10 metres. As with previous, some more information on scale of GI proposed and net gain is required, as well as more details of what is proposed in terms of flood risk proposals – a reference to SUDS principles would be welcomed in this section.

In line with our comments on housing allocations in general, we do however **object** to this allocation.

### Policy 6.2 Housing Allocation – Land south of Flawforth Lane,
Ruddington (page 45)

Keeping in mind our separate comments on housing land supply in general and we are not supportive of town and village allocations, we note policy subsection **a) the trees and hedgerows which form the boundary of the site should be retained** and retention of trees (3.77).

Such habitats are a valuable wildlife habitat and sensitive retention of which (i.e. provision of appropriate buffer, securing future management etc) is welcomed.

In line with our comments on housing allocations in general, we do however **object** to this allocation.

Policy 6.3 Housing Allocation – Land opposite Mere Way, Ruddington (page 46)

There is no reference/ consideration of possible GI/ net biodiversity gain. Wist the County Park is nearby, additional recreational and habitat should be provided to link to and to complement the habitats on the CP and to reduce on pressures on the park’s infrastructure. A development of 180 homes should have its own open space provision.

In line with our comments on housing allocations in general, we do **object** to this allocation.

Policy 7 Housing Allocation – Land east of Church Street, Cropwell Bishop (page 47)

Keeping in mind our separate comments on housing land supply in general and we are not supportive of town and village allocations, we note policy subsection **b) on-site multi-functional green infrastructure should provide a buffer between the new homes and sewage treatment works**; and paragraph 3.85 **The site is bounded by public footpaths to the south and east, and by the sewage treatment works to the north. The delivery of multi-functional green infrastructure along these boundaries, which retain and improve rights of way and publicly accessible open space, deliver net-gains in biodiversity, manage surface water run-off and create a visually attractive settlement edge, should be incorporated into the design and layout of the proposal.**

Again, securing GI delivery, which delivers wildlife habitat and net biodiversity gain is crucial and more information on scale / type of habitat envisage should be provided, to aid securing these benefit and avoid a situation where as many houses as possible are built. We also have multiple concerns about the sustainability of any such development in this location and indirect impacts on wildlife from
increased traffic, noise lighting, such as those we’ve identified in our response to the Radcliffe on Trent allocations. In line with our comments on housing allocations in general, we object to this allocation. Proposed amendment: Inclusion of further details on the extent of GI and habitat buffers required.

Policy 8.1 Housing Allocation – Land between Butt Lane and Closes Side Lane, East Bridgford (page 51)

In line with our comments on housing allocations in general (where we refer to East Bridgford), we object to this allocation.

Policy 8.2: Housing Allocation – Land south of Butt Lane, East Bridgford (page 52)

Keeping in mind our separate comments on housing land supply in general and we are not supportive of town and village allocations, we note policy subsections d) development which borders the open countryside to the east should be screened by a substantial tree belt which connects Butt Lane and the neighbouring Millennium Wood; e) the right of way which connects Butt Lane and Millennium Wood should be retained; and paragraph 3.96 A substantial tree buffer along the site’s eastern boundary would reduce the landscape and visual impacts of the development when viewed from the east and provide an extension of Millennium Wood, an area of deciduous woodland, which is a priority habitat.

Whist we welcome inclusion about a statement buffering Springdale (or Millennium) Wood there is no information on what constitutes ‘substantial’ in terms of a tree belt. This is open to interpretation and we think it is important that this is clarified. However, In line with our comments on housing allocations in general in which we do refer to East Bridgford, we object to this allocation. Policy 38 of the LPP2 applies (protection of non-designated sites) applies to this proposed allocation site. Proposed amendment: Inclusion of further details on the extent of GI and habitat (tree) buffers required.

Policy 9 Housing Allocation – Land east of Gypsum Way/ The Orchards, Gotham (page 53)

Keeping in mind our separate comments on housing land supply in general and we are not supportive of town and village allocations, we note policy subsections b) the neighbouring Local Wildlife Site should not be adversely affected; c) Green Infrastructure should deliver net-gains in biodiversity, including grassland and woodland habitats; and paragraph 3.101 The allocation is located within the Gotham Hills Ecological Network of woodland and grassland habitats. Therefore, this proposal should, where
appropriate incorporate these habitats into on-site Green Infrastructure, including any buffer zones between the development, neighbouring properties, wildlife site and bus depot

Whist again we welcome the proposals for safeguarding the adjacent LWS, GI provision and net biodiversity gain, contribution to the ecological network et, we would wish to see it demonstrated how these would/could be secured. We think that the allocated site and neighbouring fields are of significant value currently and they are closely linked to a number of grasslands, we are not supportive on development. In particular, there will be an inevitable pressure to further develop this western edge of Gotham once one of these sites are allocated. Also, in line with our comments on housing allocations in general, we object to this policy. Proposed amendment: Inclusion of further details on the extent of GI and habitat buffers required.

Policy 11 Housing Development on Unallocated Sites within Settlements (page 58)

Protected species (bats and birds, especially house sparrow, swallow, swift and house martin and including Schedule 1 bird species such as barn owl) have potential to be harmed by conversions/change of use, particularly in rural village locations.

Proposed amendment Under Policy sub-section 2 Planning permission will be granted for the conversion and change of use of existing buildings to residential use within the existing built up area of settlements provided: a) all homes are self-contained with suitable access arrangements; b) the proposal would not cause a significant adverse impact on the amenity of nearby residents and occupiers; and c) appropriate provision for parking and access is made, we would recommend stating that planning permission would only be granted if existing populations of bats and birds are not impacted.

Policy 12 Housing Standards (page 61)

The BREEAM /ecohomes criteria (2006 onwards) contain a long-standing section relating to Biodiversity and we would expect measures to benefit biodiversity being automatically included in house building standards within the Borough.

In particular, swift, house sparrow and bat boxes could be incorporated into new buildings, where appropriate. This has in fact been achieved in the Barratts DWH development at Cotgrave, for instance, so this demonstrates it can be achieved elsewhere.
Provisions for Hedgehog (gaps in fencing etc) and use of water from roofs etc should also be built into new schemes (the latter will of course help achieve the water saving targets mentioned in the policy/supporting text). Please refer to BREEAM (2006) and Designing for Biodiversity, RIBA (2013).

Proposed amendment Include biodiversity elements to the housing standard.

**Policy 15 Employment Development (page 69)**

In policy 15 and its supporting paragraph there is nothing about protection of ecological features in general. We trust this is an oversight because, when comparing this to the housing allocations, the impact on biodiversity and ecological features is considered in detail, along with consideration of opportunities for enhancement and creation of new GI. We would like to **object** to this policy and recommend that this oversight is addressed.

In terms of identification of particular sites, the Bingham allocation would impact on areas of mature scrub and woodland, which is of concern, especially as much development is proposed to the north and retention of existing GI features is important for wildlife and amenity.

We have major concerns about the Hollygate Lane allocation as this is very close to the Grantham Canal and could have impacts on this important Green Infrastructure asset and wildlife corridor. Substantial buffering is required to protect these features (as noted under policy 2.2) but sadly not recognised here. The allocation of employment in this site would, in our view, remove all possibility of providing a corridor, as per paragraph 3.23 in relation to the housing allocation *(The site is within a local green infrastructure corridor and ecological corridor. It is also close to the Grantham Canal, a strategically important pedestrian and cycle route. These corridors seek to protect and enhance pedestrian and cycle connectivity between Cotgrave, the Country Park, Hollygate Park, and, in the case of the Canal, the main urban area of Nottingham and settlements to the south and east. The ecological corridor seeks to improve woodland cover and connectivity. It is important that the development of this allocation contributes to these objectives)*, meaning that the aspirations at Policy 2.2 cannot be delivered. We therefore **Object** to policy 15 1C.

In relation to 1D and 1E (Platt Lane and Nottingham Road Radcliffe), GI requirements as per Policy 4.2 and 5.1 should be applied to the business use proposals, or cross referenced within this policy.

The Bunny allocation supports important regenerating habitats, which could be of county importance for wildlife and need to be retained. It
is also part of a local network of sites, which includes Bunny Wood and habitats associated with British Gypsum’s land. As such, we object to Policy 1F.

**Proposed amendment:** Update Policy 15 so that it considers biodiversity and GI.

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**Policy 16 Renewable Energy (page 74)**

We welcome that renewable energy schemes will only be granted permission if there are no impacts on ecology and biodiversity (subsection c). We also welcome the requirement for ecological assessment stated under para 5.9, which aligns with best practice.

Perhaps noted indirectly at paragraph 5.15, as well as risk to ecology (in particular, bird strike and impacts on bats for turbines) renewable energy proposal can provide opportunities for habitat creation and enhancement, such as grasslands within solar farms. Such opportunities need to be secured through the planning systems and a clear reference to this in this policy would, in our view, help.

**Proposed amendment:** Include a reference to potential biodiversity gain

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**Policy 17 Managing Flood Risk (page 78)**

There is a strong subsection on managing biodiversity and flood risk (5.24 and 5.25), which we strongly support especially in relation to the creation of new areas for habitats and species and to reconnect sites to their floodplain. Unfortunately, there is no reference to this in the main policy wording, which undermines its impact.

**Proposed amendment:** We therefore strongly recommend inclusion of these references to biodiversity in the main policy wording. We do however appreciate that biodiversity is strongly referenced in subsequent policy 18.

**Proposed amendment:** In relation to sustainable drainage, we would wish to point out their potential biodiversity value (see Chapter 6 of the 2015 version of Ciria Suds Manual) and would expect to see reference to the existence of this guidance and the potential biodiversity value of suds in the supporting text. Such references could be appropriate at 5.24 / 5.25 or under Policy 18.

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**Policy 18 Surface Water Management (page 81)**

The reference to biodiversity at subsection e is strongly supported (permission will be granted for developments which *accommodates and enhances biodiversity by making connections to existing*
Policy 19 Development affecting Watercourses (page 83)

We strongly support the references to biodiversity (sub-sections a to f).

Proposed amendment: Policy 19 (subsection c) should refer to the minimum of 10m buffer zone, in line with paragraphs 5.32 and 5.33. If just 10 meters (not a minimum of) is cited in the main policy, opportunities for creation of wider buffers could be missed.

At 5.33 we strongly support that it is specified buffers should be a natural or semi-natural habitat free from built development, parking areas, private gardens and formal landscaping. and that a buffer should be provided on both sides of a watercourse that runs through a development.

In relation to 10m buffer, at 5.33 we object to the current wording on of the sentence Development proposed on previously developed land within 10 metres of a watercourse are exempt from the requirements of part (e) of the policy as it could lead to missed opportunities for enhancement.

Proposed amendment: We propose it is more positively worded to encourage establishment of a 10m buffer irrespective of the fact that it is previously developed. We propose something along the lines of “Although development proposed on previously developed land within 10 metres of a water course is exempt from the requirements of part (e) of the policy, proposals which incorporate a minimum of a 10m buffer will be encouraged as any such proposals will have significant potential benefits to the watercourse and its biodiversity value”.

Policy 20 Managing Water Quality (page 85)

We strongly support this policy and principles of securing WFD aims, objectives and targets within the local plan.

Policy 22 Development within the Countryside (page 88)

We object to the wording of sub section 2e

Within the countryside development for the following uses will be permitted subject to the requirements set out in (3) below:
e) expansion of all types of business and enterprise in rural areas,
both through conversion of existing buildings and well-designed new buildings;

Stating ‘all types of businesses and rural enterprises is potentially
open to misuse and this should be more specific. Activities should be appropriate to the particular rural area and the likely effects in the local environment, including biodiversity and ecology need to be assessed, which is covered at sub section 3a (developments will be permitted where the appearance and character of the landscape, including its historic character and features such as biodiversity, views, settlement pattern, rivers, watercourses, field patterns, industrial heritage and local distinctiveness is safeguarded and enhanced). However, stating “all businesses” could cause a policy conflict between 2e and 3a.

Proposed amendment: Remove all types and make it clear in policy that this is the general approach but each application needs to be assessed individually.

**Policy 23 Redevelopment of Bunny Brickworks (page 93)**

We note subsection C: development will require the loss of any priority habitats, including woodland and hedgerow, should be avoided, mitigated, or, as a last resort off-set

We **object** to this policy. It is important to define if and how this could be achieved given the pressure for development, if this site is allocated.

**Policy 28 Conserving and Enhancing Heritage Assets (page 103)**

We **support** the reference to protecting regulated and non regulated parks (para 9.12) as such site clearly can have wildlife value.

Proposed amendment: We do feel it would be of benefit to refer to their potential value in the main policy wording.

**Policy 31 Sustainable Tourism and Leisure (page 111)**

Landscape Character is mentioned as being as value to tourism but biodiversity also has a role which needs to be picked up in this section. For instance, Rushcliffe contains a large wetland nature reserve at Skylarks, a bluebell woodland at Bunny and many other important nature reserves and which do attract visitors to the local area.

Proposed amendment: Acknowledge the role of (sustainable use / visits to) wildlife sites in relation to sustainable tourism and leisure.

**Policy 32 Open Space and Recreational Facilities (page 114)**

We **welcome** that the policy identifies GI within its definition of open space (para 11.12) and seeks funding for GI through planning system (main policy text).

**Policy 33 Local Green Space (para 117)**
We welcome that uptake of LGSs is supported through the local plan.

Chapter 12. Green Infrastructure and the Natural Environment (page 119)

At paragraph 12.2, whilst we welcome the GI protection we are concerned that the ‘escape clause’ might be used too readily “Developments which harm green infrastructure assets or the wider network will only be permitted where the benefits of the proposal outweighs this harm”. We therefore object to the policy.

Proposed amendment: We think the policy could be strengthened by making it clear that (approval of proposals that harm GI) would be only considered under very exceptional circumstances.

Proposed amendment: In relation to paragraph 12.3, we wish to highlight that transport corridors such as live railways and A43, A52 and A453 provide significant GI functions in terms of significant areas of connected wildlife habitat (trees, scrub and grasslands).

We object to paragraph 12.4 “The primary purpose is to provide opportunities for walking, cycling and horse riding (whether for leisure purposes or travel) and opportunities for biodiversity enhancement and wildlife migration. They also offer opportunities for flood alleviation and adaptation to the effects of climate change” as is not worded positively enough in terms of protecting biodiversity. The sentence seems to suggest a hierarchical approach, with wildlife bolted on at the end.

Proposed amendment: we would like to see biodiversity mentioned first, or it made clear there is no hierarchical approach.

We support the reference to climate change and flood alleviation. Proposed amendment: we also suggest worth mentioning ecosystem services approach in general, which will also include air and soil etc.

We support the references to Rushcliffe Nature Conservation Strategy and Biodiversity Opportunity Mapping at paragraph 12.5.

We support the reference to ‘opportunities to improve’ the GI network at paragraph 12.6

Objection to paragraph 12.7: “Green infrastructure is multifunctional, delivering a variety of benefits for local communities, businesses, visitors and tourists and wildlife” because, as will paragraph 12.4, it seems to suggest a hierarchy, with wildlife and biodiversity mentioned last. Proposed amendment: We recommend the sentence is modified to address this observation.

The GI map (Appendix D) appears not to include the Great Central Railway, which is a significant corridor and is of importance for grassland habitats and the Grizzled Skipper, a BAP species.
Policy 34 Green Infrastructure and Open Space Assets (page 120)

We support Policy 34, part 1. Proposed amendment: list ‘traditional orchards’ under the ‘assets’ listed.

We do find the wording of part 2 confusing in relation to ‘adversely affect their primary functions’. Development that protects, enhances, or widens their Green Infrastructure importance will be supported, provided it does not adversely affect their primary functions

If a development were to protect, enhance or widen GI, we think there would be unlikely to be any consequences on the GIs primary function. Proposed amendment: Some further explanation (or examples) in the supporting paragraphs could help clarify this.

We strongly support paragraph 12.9, which highlights protection of all GI and open spaces, recognising that such assets can be found (or even created) beyond identified corridors.

Policy 34 part 3. Where a proposal would result in the loss of Green Infrastructure which is needed or will be needed in the future, this loss should be replaced by equivalent or better provision in terms of its usefulness, attractiveness, quantity and quality in a suitable location. Replacement Green Infrastructure should, where possible, improve the performance of the network and widen its function.

Objection to Policy 34 part c. We wish to highlight that it may be possible to easily and quickly provide replacement or even better GI when it comes to footpaths, sports pitches etc but this is certainly not the case for wildlife habitats. They often take many decades to mature and develop value that is equivalent to that of mature habitats lost. Certain habitats, such as ancient woodland and veteran trees are irreplaceable. Proposed amendment: This should be recognised in the policy wording and supporting text.

Policy 34 part 4. Planning permission will not be granted for development which would adversely affect access to open spaces and opportunities should be sought to protect or enhance the rights of way network and, where applicable, its open environment. We find this wording Confusing. We don’t think this section discusses value of ‘open environment’. Proposed amendment: We suggest this should say … opportunities should be sought to protect or enhance accessibility, which then links more clearly to paragraph 12.13.

In relation to paragraph 12.2 "Where development would result in
the loss of a Green Infrastructure asset or affect its function an assessment must be undertaken which clearly shows the open space, buildings or land is surplus to requirements and can no longer contribute (in its present form or as an alternative Green Infrastructure use) to meeting local or wider needs, we support the requirement for a GI assessment in these circumstances.

Policy 35 Green Infrastructure Network and Urban Fringe (page 122)

We support this policy. Proposed amendment: In relation to biodiversity and geodiversity supporting paragraphs, we note that Policy 17 states that “designated sites will be protected in line with the national hierarchy of sites and that [developments on] non-designated sites or wildlife corridors will only be permitted where there is overriding need. We suggest the above amendment is required to the text.

We very much support that paragraph 12.20 strongly protect non-designated sites, recognising that “only a small proportion of the Borough’s important habitats and species are located within nationally protected Sites of Special Scientific Interests (SSSIs) and that many important sites (Local Wildlife Sites or priority habitats) have no legal protection. Local Wildlife Sites and priority habitats are a material consideration when considering planning applications.

We strongly support paragraphs 12.21 to 12.26. We especially welcome the reference to appropriate ecological surveys being carried out prior to determination.

Policy 36 Designated Nature Conservation Sites (page 125)

Policy objection We are concerned that the ‘get out’ (‘need’ for development outrights the safeguard the site) clauses will be readily used, which will undermined the protection of designated and non-designated sites.

Proposed amendment: Even though some criteria is set, it should be made clear that this only applies in a small number of ‘exceptional circumstances’. We would also recommend referring to the fact that permission may be refused if significant harm resulting from a proposal cannot be avoided) (NPPF Paragraph 118). Our remaining protected sites are vital for biodiversity functioning and recovery of nature and there a few such sites in Rushcliffe. Ideally, such sites should, in our view, be protected with no exceptions.

Policy objection Although highlighting, no ‘net loss’ of habitats (4c), the policy fails to take account of opportunities for ‘net gain, which is in The National Planning Policy Framework and referenced in the Core Strategy. Suggested amendment: add reference to ‘net gain’ in
policy or at least acknowledge this is covered in policy 38. Reason: there is a risk that policy 36 is read in isolation, meaning that such opportunities are missed.

**Objection** to the monitoring targets (page 126). They only apply to SSSIs, so do not cover the biodiversity impact on the wider environment. **Proposed modification:** A better measure would be loss/damage to and/or the management condition of Local Wildlife Sites or loss/gain in biodiversity (area of habitats, features for species – nest and roost boxes etc) through the planning system.

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**Policy 37 Trees and Woodlands (page 127)**

We **support** the policy and particularly welcome references to ‘right tree in right place’, high protection of veteran tree and ancient woodland and taking into account climate change resilience and diseases.

**Policy objection:** In relation to sub section 2 Planning permission will not be granted for development which would adversely affect an area of ancient, semi-natural woodland or an ancient or veteran tree, unless the need for, and public benefits of, the development in that location clearly outweigh the loss it should be made clear that this would only be allowable in very exceptional circumstances. The ‘get out’ clause undermines an otherwise strong policy. **Proposed amendment:** Clear guidance should be provided on how the benefits of the development would be assessed to see if they outweigh the value of ancient woodland, as otherwise this cannot act as a protective policy.

**Proposed amendment:** In relation to development resulting in the loss or deterioration of Ancient Woodland, we recommend including reference to Government Standing Advice https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences.

**Proposed amendment:** We also recommend reference to ‘traditional orchards’, a BAP Priority habitat.

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**Policy 38 Non-Designated Biodiversity Assets and the Wider Ecological Network (page 128)**

We **strongly support** this policy in principle and consider it gives the protection and opportunities for habitat / improvement that are so greatly required.

**Objection** We are concerned about the ‘get out’ clause at subsection 1 (where appropriate) and consider this undermines an otherwise excellent policy. Also ‘all developments will be expected to...” could be seen as a negative (it is something that must be done) and this
could be more positively worded, especially if the wider benefits of doing so could be communicated.

**Proposed amendment:** We suggest this is amended and propose “Preserving, restoring and re-creating priority habitats and protection and recovery of priority species will be a key principle inherent in new developments in the Borough, with the goal to achieve net gains in biodiversity and the creation of better environments for people to live and work in.

We **support** the references to Biodiversity Opportunity Mapping and Biodiversity Opportunity Area approach at policy sub section 3.

We **strongly support** paragraphs 12.38 and 39 in relation to protection of non designated sites and “that preservation and enhancement of biodiversity and the wider ecological network is considered as part of the design of proposed development schemes from the outset”.

**Policy 40 Pollution and Land Contamination (page 132)**

Paragraph 14.6 recognises impact of light pollution on wildlife, which is also welcome. **Proposed amendment:** Noise can also create impacts on wildlife and would welcome reference to this as well in the policy/ supporting paras.

**Policy 43 Planning Obligations Threshold 138**

We **support** Policy 43 in relation to biodiversity and mitigation and compensation (**Planning obligations may be sought from developments of more than 10 dwellings or 1,000 square metres or more gross floorspace for the provision, improvement or maintenance, where relevant**). This needs to be requested in the first place (whenever appropriate to do) and any measures required need to be monitored, to make sure funding is spent and plans are implemented.

It is important that funding mechanisms are in place for future management of GI and habitats created alongside new developments. This, we assume is relevant under this policy but we think funding needs referring to in the Green Infrastructure and Natural Environment Policies (Policy 34 to 38) as we don’t think this important issue is considered. We welcome management costs are considered in the contexts of Suds (para 5.29).
If you require further clarification in relation to any of the points raised above please do not hesitate to contact me.

Yours sincerely