Comment

Consultee: Miss Claire Dorans (1134198)
Company / Organisation: Ruddington Parish Council
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Comment by: Ruddington Parish Council (Miss Claire Dorans - 1134198)
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To which document does your response relate?
Local Plan Part 2 Publication Version

Policy reference: Please select an option
Site reference: Please select an option

Policies Map

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).

This has been left blank as we do not feel we have the knowledge to answer this.

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)
   - Justified
   - 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).

We consider the Development Plan is unsound for the following reasons:

We do not believe the Plan has been prepared in a way that is consistent with National Policy nor is it justified as the evidence base is flawed or ignored.

The NPPF, paragraph 28 requires planning policies to support a prosperous rural economy by promoting the retention and development of local services and community facilities, such as local shops.

As the amount of housing proposed in Ruddington when including the planning application recently approved at Asher Lane (175 houses) will be 100% + growth than the Core Strategy, which proposed 250 houses, there is a negative impact due to the increased transport and on either the Flooding, Heritage or Landscape objectives within the plan, this is also highlighted in The Local Plan 2 Sustainability Appraisal Main Report – Paragraphs 6.64 & 6.65 ‘there is a negative impact on the environmental objectives, and more pronounced due to the greater greenfield land take required. As with the 50% additional growth scenario, this would increase the probability of having to identify sites that either have a negative impact on the Flooding, Heritage or Landscape objectives. 125% + growth than Core Strategy 6.65 This higher growth scenario would potentially involve having to identify as many as four or five sites and would require having to identify a greater number of sites that have a negative impact on either the Flooding, Heritage or Landscape objectives.’

The NPPF paragraph 32 states that ‘all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment’, we do not believe that the Assessments conducted take into account the effect on the local and strategic road network within Ruddington of development on sites outside of Ruddington or the additional development of 175 houses recently granted planning permission, this is supported by the comment made by Highway England in the Infrastructure Delivery Plan paragraph 4.10. ‘Highways England has indicated in its response to the Local Plan Part 2: Preferred Housing Options consultation that, in respect of the non-strategic allocations, some have the potential to impact upon the operation of the Strategic Road Network, including options for development at West Bridgford, Keyworth, Radcliffe-on-Trent and Ruddington.

The sustainability of a level of housing is not supported in Part 2 of the Plan itself which, at paragraph 3.69 (pg 42), states ‘The Core Strategy sets a target of a minimum of 250 new homes that need to be built on greenfield sites at Ruddington up to 2028. It is considered that Ruddington has scope to sustain around 350 dwellings in total adjacent to the village, based on the capacity of local services and the availability of suitable sites for development.’

The NPPF paragraph 155 states that ‘Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.’ The Parish Council does not feel that it has been possible for a collective vision to be reflected as the process of consultation was flawed. In January 2016 consultation on the Issues & Options Document was undertaken by the Borough Council which asked for views on 10 sites within the Parish of Ruddington in regards to allocation of land for development, the Parish Council held a public meeting to ascertain the views of the residents and accordingly responded to the consultation. In February 2017 the Borough Council held a consultation on the Further Options Document which asked for views on 4 extra sites within the Parish of Ruddington in regards to allocation of land for development. All fourteen sites should have been consulted upon at the same time as soon as it was apparent that further sites had come forward and further sites needed to be added to the Local Plan for development due to the shortfall in the 5 year housing supply and the
shortfall in number of houses being delivered within the main site allocations of Rushcliffe. This is true for all Parishes outside of Ruddington where additional sites were identified in the Further Options Document.

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).

This has been left blank as we do not feel we have the knowledge to answer this.

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.

. The Parish Council believes that in order to make the Local Plan Part 2 sound that consultation on all sites identified within the Issues & Options Document & the Further Option Document needs to be undertaken at the same time.

The Asher Lane development needs to be included within the 350 allocation of houses for Ruddington as planning permission has been granted for that site and the Local Plan Part 2 and supporting documents state that Ruddington cannot sustain a 100%+ increase in houses over the amount allocated in Local Plan Part 1.

A Traffic Assessment needs to be carried out which incorporates the additional vehicles for the Asher Lane site and the impacts on Ruddington of the developments that are taking place outside of the Parish boundaries which will have an impact due to travelling through the village centre to reach the A453, the A52, the A46 and the A6.

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.

The Parish Council are the representatives of the local community and have a vested interest in its future development and the impacts the Local Plan and its supporting documents will have on the Parish, its inhabitants and its vitality & economic prosperity.

Please indicate if you wish to be notified that:
(please tick all that apply)