Representations must be received by 5pm Thursday 28 June 2018. Representations received after this time will not be considered duly made.
Part B (please use a separate Part B form for each representation)

Name/Organisation: Saxondale Parish Meeting

3a. To which document does your response relate? (please tick one)

- [ ] Local Plan Part 2 Publication Version
- [ ] Local Plan Part 2 Policies Map
- [ ] Other supporting document please state which:

3b. To which part of the document does this representation relate? (complete all that apply)

- [ ] Page no. Various
- [ ] Paragraph no. Various
- [ ] Policy ref. Choose an item.
- [ ] Site ref. Choose an item.
- [ ] Policies Map Click here to enter text.

4. Do you consider the Local Plan Part 2:

<table>
<thead>
<tr>
<th>4(1) Legally compliant</th>
<th>Yes ☑️</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>4(2) Sound</td>
<td>Yes</td>
<td>No ☑️</td>
</tr>
<tr>
<td>4(3) Complies with the Duty to Co-operate</td>
<td>Yes ☑️</td>
<td>No</td>
</tr>
</tbody>
</table>

→ If you have selected No to Question 4(2), please continue to Question 5.
→ In all other circumstances, please go to Question 6.

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).

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5. **If you consider the Development Plan is UNSOUND, do you consider this to be because it is NOT:** (please tick all that apply)

- Positively Prepared
- Justified
- Effective
- Consistent with national policy

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6. **Please give reasons for you answer to Questions 4(1), 4(2), 4(3) and 5, 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). You can attach additional information but please make sure it is securely attached and clearly referenced.

**4(1) Legal Compliance.**

Aspects of the Plan have failed in their application, in particular the duty to consult in line with paragraph 155 of the National Planning Policy Framework, its sustainability appraisals and its future equalities impact (and consultation). In respect of the equalities issues I would draw your attention to the needs of the travelling community which are not taken into account or detailed within your proposals. The plan does not take account of religious or race collectivism within its proposals. Whilst the plan is cognisant of some relevant data and facts, it fails to apply a methodology which takes these factors into account. As a result the nature of land and housing discussed within the Plan actively discriminates against disabled community living and racial or religious group identity.

**4(2) Sound**

The Plan cannot be considered as Sound as the concept of land allocation is fundamentally flawed. To consistently allocate land because developers have failed to engage (at a time of economic restraint) leads to issues of increasingly blighted land, diminution in arable farming and a reduction in green belt provision, all of which are unsustainable in the longer term.

Where development is proposed villages face a widening of their communities with minimal or limited infrastructure improvement or development support. The nature of such development leads to two levels of community:

a) Existing village communities
b) External growth communities (good examples here would be Cropwell Bishop and Radcliffe on Trent where proposed new developments will surround the existing community).

Whilst the public consultation is actively promoted on social media, in local libraries and at other locations, business consultation appears minimal and fractured.

Paragraph 155 states “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and business is essential” I have seen little consultation across business parameters sufficient to be reflective of the needs of local businesses which is a paramount consideration across Rushcliffe in order to ensure the effectiveness of the local business economy. I have not seen any consultation with respect to the rural agricultural economy which is becoming increasingly blighted by the proposals in the

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Plan. Accordingly, it appears that the Plan fails in part in respect of the consultation methods which will serve to distort the final results of the consultation.

Whilst the application methods themselves are broadly acceptable, there does appear to be a large element of discretion and this may result in a lack of balanced consultation between statutory statutory bodies - who appear to be quite well consulted – and businesses, charities and voluntary organisations (as well as harder to reach groups) who appear to be less well informed. As such the Plan has not had proper consideration and cannot be considered as sound in this respect.

The constant designation of land for building purposes is primarily due to allocated land not being selected by developers and this appears to be an ineffective and inappropriate process which has led, and will continue to lead, to great swarthes of land being blighted by the threat of future development. Surely it would be better to concentrate on policies which encourage development on land already allocated and urban redesign around and within existing town areas rather than to continually threaten the Green Belt, future sustainability, community cohesion and access to infrastructure.

The increasing allocation of land also has major future environmental and sustainability consequences, particularly with regards to building in current known flood areas (for example at Radcliffe on Trent) and the reliance on existing, already overburdened arterial routes (in particular the A52, A60 and A46) to carry road infrastructure.

Many of the proposed sites in Radcliffe on Trent, Cotgrave and the Cropwells rely on the use of these arterial routes which is both impractical and unsustainable, as is the minimal approach to infrastructure within the developments. Whilst some have proposals for various schools and health centres, these proposals seem only serve existing or immediate growth factors rather than looking to the future. Due to the minimalist approach to infrastructure I do not believe that the Plan can be considered as Sound in this respect.

7. Please set out what change(s) you consider necessary to make the Local Plan Part 2 legally compliant or sound, having regard to your responses to Questions 5 and 6. 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.

(If you are suggesting that the Local Plan Part 2 is legally compliant or sound please write “Not applicable”).

In respect of equalities and access issues I would suggest a redrafting of the equalities Impact Statement to take the areas I mention into account.

In respect of the fractured approach to business consultation, this is an area where a more defined approach needs to be undertaken. Thus area is a serious flaw in the consultation process.

Unfortunately, the Plan's inability to recognise and understand the aspects of community cohesion make it a completely untenable document.
8. If your representation is seeking a change, do you consider it necessary to participate at the hearing sessions of the Public Examination? (please tick one box only)

- **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

- **Yes**, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

9. If you wish to participate at the hearing sessions of Public Examination, please outline why you consider this to be necessary:

   - **Not Applicable**

   **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.

10. 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

   Date form completed: 12/06/2018

Please return the completed form by **no later than 5pm on Thursday 28 June 2018** to:

localdevelopment@rushcliffe.gov.uk; or

Planning Policy
Rushcliffe Borough Council
Rushcliffe Arena
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Data Protection Notice

The personal information you provide will only be used by Rushcliffe Borough Council, the Data Controller, in accordance with General Data Protection Regulation 2016/Data Protection Act 2018 to undertake a statutory function (also known as a ‘public task’).

Your personal information will be shared with the Planning Inspectorate in connection with the above purpose.

Your personal data will be kept in accordance with the Council’s retention policy and schedule. Details of which can be found on the Council’s website at http://www.rushcliffe.gov.uk/retention_schedule/

Your data protection rights are not absolute and in most cases are subject to the Council demonstrating compliance with other statutory legislation, for further information see http://www.rushcliffe.gov.uk/privacy/

Representations will be available to view on the Borough Council’s website, but any signatures, addresses, email addresses or telephone numbers will not be included. However, as copies of representations must be made available for public inspection, comments cannot be treated as confidential and will be available for inspection in full.