

**East Leake Parish Council Representation**  
**Rushcliffe Local Plan Part 2 Publication Version**  
**June 2018**

**1. NOT SOUND**

East Leake Parish Council considers Rushcliffe Local Plan Part 2 to be NOT SOUND. It is:  
NOT JUSTIFIED and  
NOT EFFECTIVELY PREPARED

**1.1 NOT JUSTIFIED**

*(i.e. The plan is not the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.)*

**1.1 .1 Housing density**

We do not believe that Local Plan Part 2 contains accurate or useful estimates as to the number of homes that can be accommodated on each of the sites allocated, and it is likely that these are underestimated in most cases and overall. More green field (and green belt) land than is required will therefore have been taken. This is not efficient use of land (and thus not sustainable development as required in para 8c of the draft revised NPPF).

We recommend that Local Plan Part 2 should contain a policy on net housing density **or** that each of the site specific policies should specify the minimum net density for that site. We also recommend that the net and gross densities achieved in sites with reserved matters applications should be monitored in the annual monitoring report.

In CS policies 20 (Edwalton), 21 (Bingham), 22 (Newton) 23 (Cotgrave), 24 (South of Clifton), 25 (Gamston), the following statement appears for each of the strategic allocations.

*“New residential development should seek to achieve an average net density of at least 30 dwellings to the hectare.”*

This is a rigorous (if conservative) approach but sadly at odds with the policies for each of the allocations in Local Plan Part 2 which do not appear to contain any statement about density; nor can we see a blanket policy in the document. Most of the sites have had their capacity assessed at a (gross) density of 20 or less dph.

The Housing Site Selection Report (April 2018) contains the following:

*3.4 The number of dwellings it has been estimated the sites assessed could accommodate if allocated has been calculated on a site by site basis. As a starting point, for sites up to a hectare in size their capacity has been calculated on the basis of a gross density of 25 dwellings per hectare; for sites between 1 and 3 hectares a 23 dwellings per hectare gross density has been used and for sites in excess of 3 hectares a 20 dwellings per hectare gross density has been used. These density figures are considered appropriate based on previous experience.*

We cannot find any analysis of this “previous experience”.

It would be helpful when assessing sites to look at net rather than gross density, as in our experience there is great variation between sites as to the areas that can be used for housing.

The Core Strategy (P155) and Local Plan Part 2 (P141) contain the following explanation of density:

*Density - The intensity of development in a given area. Usually measured as net dwelling density, calculated by including only those site areas which will be developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children's play areas, where these are provided.*

However the SHLAA (p8) contains the following statement:

*Density: Factual information or a judgment on the number of dwellings per hectare (gross) that a site could accommodate.*

It should also be noted that in our experience sites sometimes obtain outline approval at one density but at the reserved matters stage the number of homes (and so density) is increased.

Compare Rushcliffe's approach with this from Broxtowe<sup>1</sup>, which is providing housing sites for the same housing market area:

*The net density of new residential development shall be not less than that indicated in the categories below, for development falling within the following walking distances from existing or proposed frequent public transport services:*

*(a) Within 400 metres: 40 dwellings per hectare or 45 dwellings per hectare where there is a choice of public transport modes within this distance;*

*(b) Beyond 400 metres: 35 dwellings per hectare.*

*In all the above cases, if the Council is satisfied that the specified densities would have a detrimental impact on the character or appearance of the locality, the net density may be reduced, but it shall be not less than 30 dwellings per hectare.*

### **1.1.2 Failure to allocate further sites next to urban edge**

The possibility of allocating further sites on the urban edge is briefly considered and then summarily dismissed in para 3.6 of Local Plan Part 2:

*In preparing Local Plan Part 2 it has been assessed whether it would be appropriate to extend any of these strategic sites, but it has been decided that it would not. It has also been assessed whether it would be appropriate to allocate any new sites for development within or on the edge of main urban area of Nottingham. However, none have been identified as suitable for allocation for development during the plan period.*

Given the importance of finding sites adjoining the main built up area of Nottingham (7650/out of 13150 homes in Core Strategy Policy 3) Rushcliffe should have tried harder to identify sites or provided better justification for their decision. Given the generous interpretations of guidelines and

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<sup>1</sup> Policy H6 (page 66) of the Broxtowe Local Plan 2004  
(<https://www.broxtowe.gov.uk/media/2877/local-plan-main-document-2004.pdf>);

policy that have been allowed to accommodate sites at East Leake, we suggest that a similar approach be adopted to making sites at the urban edge deliverable.

In para 3.6 the land adjacent to the three strategic allocations next to Nottingham have each been given this same treatment despite the fact that development of these sites is proceeding at very different rates.

Discussions with landowners should be under way to identify further suitable sites next to the urban edge.

A significant number of the following sites should be allocated in Local Plan Part 2 with the remainder brought out of the green belt and safeguarded for development early in the next plan period and not subject to another long delay to release further greenbelt land after 2028. Referring to site numbers in the SHLAA 2017:

- Remaining land South of Clifton 352
- Holme Pierrepont and Gamston 46, 70, 71, 354, 425, 426, 696, 755
- West of Sharphill 356
- Adjacent to Nottingham Knight Roundabout 842

### 1.1.3 Distribution of Additional Housing between the Key Settlements

In considering additional housing sites away from the urban edge to correct the trajectory, we would like to see sites allocated at the other key settlements (and brought out of the green belt where required) to bring the potential housing growth there to the level already experienced at East Leake.

Most of the settlements are in the green belt because of their proximity to Nottingham, the very factor that makes them suitable for development to support Nottingham’s housing requirements. This contrasts with East Leake, which is outside the green belt because it is further away and less well connected with the Nottingham built up area. None have been allocated the level of growth than East Leake has experienced, neither in terms of the size of the settlement nor in terms of the over allocation relative to the targets in the Core Strategy.

Settlement	Pop'n (2011)	Allocation in CS	New homes in LP2+approvals *	% over CS target	New homes / pop'n
Bingham	9313	1000	1000	0%	0.11
Radcliffe on Trent	8205	400	920	230%	0.11
Ruddington	7216	250	525	210%	0.07
Cotgrave	7203	470	840	179%	0.12
Keyworth	6733	450	600	133%	0.09
East Leake	6337	400	1062	265%	0.17
EL if appeal for 17/02292/OUT allowed	6337	400	1257	314%	0.20

\* Number of homes allocated by Local Plan Part 2, in the case of East Leake and Ruddington increased by approvals and appeal outcomes.

Most of the figures in the CS are minima, whereas Bingham and Cotgrave are “around”, but even so the table above clearly demonstrates that the plan is not allocating housing evenly across the settlements, nor in the relative proportions laid out in the CS, and they are not providing any justification for not doing so.

There are sites aplenty in the SHLAA for Keyworth, Cotgrave, and Radcliffe. Keyworth is a settlement very similar to East Leake in many ways, yet it is being allocated half the housing . There appears to be further potential in Bingham north of the railway line and to the East. It is recognised that Ruddington needs to remain separated from Clifton and West Bridgford, but the other directions of growth would not cause coalescence

## **1.2 NOT EFFECTIVELY PREPARED**

*i.e. The plan is not deliverable over its period.*

Rushcliffe appears to be staggeringly inept at producing a housing trajectory that predicts the housing deliveries. It is this that has led to the housing supply reducing from 5 years at the examination of the Cores Strategy to 3.1 years now. The only way of estimating delivery that appears to be employed is “two years from now”. The projections for 2020 to 2024 in particular are wildly optimistic. If Local Plan Part 2 should be passed at examination on the basis of this work of unsubstantiated fiction, the housing land supply will drop below 5 years at the next monitoring and East Leake’s residents will continue to be the only people in Rushcliffe to be punished.

Without going through it in detail we point out the following:

- In the Core Strategy (2013) the Land South of Clifton was projected to start delivering housing in 2015. (How was that ever going to happen?) In the trajectory for the 2014 monitoring report this was slipped to 2016. In 2015 it slipped again to 2017; in 2016 to 2018; in 2017 to 2019. In Local Plan Part 2 (2018) it astonishingly remains projected to start delivering homes in 2019-20, despite the fact that the employment land is expected to be developed first and outline planning permission has not yet been granted.
- All the non strategic sites allocated in Local Plan Part 2 are scheduled to start in 2020 (apart from 3 which Rushcliffe believes will start in 2019). Is there no difference between all these sites? Will some of them not take longer than others? Will any of them get through the required sequence of planning processes in time to start delivering homes in 2 years?
- 483 out of 2089 completions in Rushcliffe to March 2017 (monitoring report) were in East Leake, which was scheduled in the core strategy to deliver 400 homes at the rate of just 50 each year, and starting in 2018.
- Of the completions to date across Rushcliffe the greater proportion has been on “windfall” rather than planned sites.

## **2. CHANGES REQUIRED (Question 7 of the response form)**

- Correct the housing trajectory so that realistic estimates are provided for start dates to build on the various sites allocated
- State the policy on net housing density for each of the sites allocated, and reassess the number of dwellings that each can support (see 1.1.1 above.)

- Add monitoring targets and indicators to track net and gross density achieved on sites with full or reserved matters planning permission.
- Bring forward into the plan period the building on Edwalton Golf Course, previously released from the green belt as land safeguarded for development.
- Add into the allocations sites adjacent to the urban edge (see 1.1.2 above)
- Increase the sites allocated at the “key settlements” of Keyworth, Ruddington, Cotgrave, Bingham, Radcliffe on Trent to levels commensurate to those experienced at East Leake (see 1.1.3 above)
- Add safeguarded sites at the urban edge, key settlements, and selected third tier settlements, removing them from the green belt now, so that the delivery in the next plan period can start promptly.

### **3. Other Comments**

East Leake completely supports the policy that allocates no further sites in East Leake, apart from the Rempstone Road site, which was allowed at appeal.

We are aware that other parishes are opposing their allocations, but we support inclusion of **ALL** the sites allocated in Local Plan Part 2. To remove any of them would jeopardise the likelihood of Rushcliffe ever achieving a 5 year housing land supply and achieving a situation where its housing development is plan-led rather than developer-led.