

East Leake Neighbourhood Plan Statement of Consultation, Appendix 8

Pre submission consultation responses, November 2014

No	Stakeholder Organisation	Page
1	East Leake Evangelical Church	2
2	Sport England	2
3	Rushcliffe Nature Conservation Implementation Group	3
4	Cemex	3
5	Rushcliffe Clinical Commissioning Group	4
6	Natural England	5
7	Nottinghamshire County Council	6
8	Nottinghamshire Wildlife Trust	10
9	NHS England	12
10	Environment Agency	13
11	East Midlands Airport	14
12	British Gypsum	15
13	Ramblers	15
14	A landowner	15
15	East Leake Pre-School Playgroup	15
16	BS Stanford Ltd	16
17	iPlan solutions on behalf of a landowner	18
18	Town Lands Trust	22
19	A landowner	22
20	Neighbourhood Watch	23
21	East Leake Community Plan Group	24
22	Borough Councillor	25
23	Rushcliffe Borough Council	26
24	Highways Agency	36

1. The Pastor, East Leake Evangelical Church

Thank you for forwarding on this information. I am impressed by the vision and commitment of the Parish Council and other parties to the sustainable development of the village. I'm a relative newcomer to East Leake (4 years), but having settled here with my family it feels like a community with a bright future. (Perhaps I can also take this opportunity to thank the Parish Council for the new cycle path & footpath through Meadow Park. My children use that route to cycle to school. I am also very grateful that the trees overhanging the footpath on the west side of Gotham Road were cut back recently. I'm 6'3", and had to duck or walk in the road in many places.)

On behalf of the church I represent (the Evangelical Church) can I also thank you for the Neighbourhood Plan and consultation. The church will mark its 30th anniversary next year. For most of that time we have met in the Village Hall, but we do have a desire to acquire or build our own premises when the right opportunity arises - and hope that this would increase our ability to offer a variety of community activities. Of course space in the village centre (where we prefer to be) is very limited, so potential redevelopments in the village centre are of particular interest to us.

I will circulate all the information you have provided to the other church leaders and to our building committee, and I hope that we will be able to contribute positively to the consultation.

2. Sport England

Thank you for consulting Sport England on the above Neighbourhood Plan.

Planning Policy in the National Planning Policy Framework identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.

It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Parts 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, 'A Sporting Future for the Playing Fields of England – Planning Policy Statement'.

<http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/>

Sport England provides guidance on developing policy for sport and further information can be found following the link below:

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations.

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/>

If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

If you need any further advice please do not hesitate to contact Sport England using the contact details below

3. Chair of Rushcliffe Nature Conservation Implementation Strategy Group (RNCSIG)

On behalf of the Rushcliffe Nature Conservation Implementation Strategy Group (RNCSIG) I would like to offer a few observations on Sect 5.2

- Meadow Park - I feel the plan could be more ambitious for making this site much more wildlife friendly, particularly in the context of promoting a more diverse flora, which in turn promotes insects which in turn supports a larger mammal and bird population.
- Townland Trust fields - this area is noted as having a reasonably diverse flora. Perhaps the parish council should be more ambitious and look at investigating whether this diversity can be improved.
- Tree planting - the plan suggests tree planting and I would just like to observe that other wildlife friendly options are available, for example suitable wildflower mixes will attract bees and butterflies (as well as other insects) and in turn provide a food supply for birds and bats. Variety is helpful and maybe worth investigating. Also if tree planting is followed native species (with good local provenance) are much more useful to local wildlife, most exotic species are not.
- Lings Farm - the gravel extraction operation south of East Leake is now winding down and the focus of operation (if it is given permission to continue) is likely to shift towards Rempstone. As part of the restoration plan for the large lake and surrounding land the site is in the process of being restored as wetland and wet grassland and will form a substantial nature reserve (possibly handed over to Notts Wildlife Trust). The timetable for this transition is still unclear, but we understand that the lake is no longer being used and the pipes have been withdrawn. This will within the time frame of the plan become a significant Rushcliffe nature reserve potentially around 30 hectares on the edge of East Leake.
- St Mary¹ Churchyard - this is a small triangle of disregarded land the other side of Sheepwash Brook, it appears to be an abandoned grave yard and was years ago home to unusual flora such as harebell (very rare in Rushcliffe). Although now in the grip of rank grasses, there is no reason why with appropriate long term management the underlying seed bank couldn't be tempted back into life.

4. Eastern Area Development Planner , Cemex

Many thanks for the opportunity to comment on East Leake Neighbourhood plan,

I would like to commend the promotion of industrial operations in around East Leake which would include Cemex East Leake Quarry.

With regards to 3.7.9 I would like to add the restoration includes wetland and conservation and all rights of way would be retained through the life of the site.

¹ The respondent probable refers to the site of the church St Peter in the Rushes, between East Leake and Rempstone

5. Chief Officer, Rushcliffe Clinical Commissioning Group

Dear Sir/Madam

East Leake Neighbourhood Plan – response to the consultation

Contracting for primary care services is not a function of CCGs under the Health and Social Care Act 2012 – the Government's most recent reform of the NHS. As such NHS Rushcliffe CCG is not the authorising body to approve proposals to improve or rebuild the health centre building in the village.

However, improving the quality of primary care services, ensuring that the local population receives safe, high quality services is a key function for CCGs. Improved patient experience and overall satisfaction with the care and treatment they receive from GP services, and opportunities to develop more services in the community are also key objectives for the CCG.

In line with the above priorities, NHS Rushcliffe CCG would support proposals which:

- Increase the number, range or efficiency of clinical rooms and meeting rooms which will enable the CCG to develop services in the community, avoiding unnecessary visits to hospitals
- Provide a wider range of services by providing opportunities for co-locating or merging practices
- Provide the environment to develop new models of care with extended surgery hours and access to a wider clinical staff
- Increase the opportunities to train more GPs and other clinical staff which will contribute to better access to appointments for patients and succession planning for future workforce needs
- Provide capacity for future population growth
- Provide clinical rooms which are fit for purpose and compliant with all statutory requirements such as health and safety, infection control, DDA and will comply with Care Quality Commission (CQC) standards
- Improve overall access for patients and, in particular, to provide equitable access to all patients including those with mobility problems, sensory impairment or other disabilities
- Improve privacy, dignity and confidentiality for patients using the facilities

NHS Rushcliffe CCG recognises that the Neighbourhood Plan identifies that adequate infrastructure is required for the village which is consistent with the CCG's priorities and will assist the CCG in achieving its quality agenda.

The CCG would suggest also that the NHS England Derbyshire/Nottinghamshire Area Team also be consulted as the body responsible for contracting for primary care services, together with the East Leake Medical Group who provide medical services to the village of East Leake and the surrounding areas.

Planning consultation: East Leake Neighbourhood Plan – Draft Consultation

Thank you for your consultation on the above document which was received by Natural England on 17 September 2014

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England generally welcomes the Neighbourhood Plan and considers that it provides a useful framework for the future sustainable development of East Leake.

In particular we are supportive of Policy T1: New developments and connectivity and Policy T2: Strategic network of footpaths and cycle paths, which both aim to connect new footpaths with the existing Public Right of Way network. These policies will help to improve access to the countryside providing further recreational opportunities for local residents.

We broadly support Section 5, Maintaining the Environment, and its accompanying vision which aims to conserve and enhance the rural character of the village and the surrounding landscape. We advise however that the Rushcliffe Golf Course Site of Special Scientific Interest (SSSI) should be mentioned within this section. Whilst this site is just outside the parish boundary it should be ensured that any proposal or activity that would be likely to damage or destroy the interest features of this nationally designated site is avoided. Further information will need to be provided with the next iteration of the Plan to outline that potential impacts on the Rushcliffe Golf Course SSSI have been fully considered and impacts avoided.

Policy E2 Wildlife and Rural Heritage Features is welcome particularly the objective of preserving, and enhancing continuous green corridors for the movement of wildlife. We would suggest however that the term Green Infrastructure should be used within the policy to reflect the wording set out in Policy 15 of Rushcliffe's emerging Core Strategy. Green infrastructure is a network of greenspaces which includes established green spaces and new sites. Its value comes from threading through and being part of the built environment, connecting the urban area with the rural environment. This will contribute to resilient and coherent ecological networks.

We also suggest that point (c) of this policy should clarify that that the planned additional mixed woodlands should use native tree species of local provenance. We are also pleased to note the inclusion of point (d) roosting opportunities for bats and birds which will assist in the enhancement of the area's biodiversity.

We advise that in figure 5.2 Sites of Biological Importance that Rushcliffe Golf Course should be shown as a Site of Special Scientific Interest (SSSI). The other sites shown on this map are also known as Local Wildlife Sites (LWS) and further information on these is available from the Nottinghamshire Wildlife Trust.

Whilst we support the aim of Policy E3: Green Spaces within the Built Environment, we suggest that the term Green Infrastructure should be used as discussed above.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Roslyn Deeming on 0300 060 1524. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

7. Principal Planning Officer, Nottinghamshire County Council

Dear Sir/Madam

East Leake Neighbourhood Plan 2013-2028 Draft Version 6 Consultation September 2014

Introduction

Nottinghamshire County Council (NCC) has been asked for strategic planning observations on the above consultation document and this letter compiles responses from Departments involved in providing comments and observations on such matters. The following comments were agreed with the Chairman of Environment and Sustainability Committee.

Description of the Document

A set of about 20 planning policies specific to East Leake that will be used to make decisions when future planning applications within East Leake Parish are submitted to Rushcliffe Borough Council. The policies will shape development of East Leake in the future and will have the weight of law.

The parish of East Leake, including the built up area of the village and surrounding countryside. It extends beyond Bunny Lane in the North, to Melton Road in the South, past the burial ground on West Leake Road, North East to Bunny Hill Top and past Costock Road playing fields. There is a map in the Plan.

A team of parish councillors and residents set up by the Parish Council and supported by Rushcliffe Borough Council, Nottinghamshire County Council, Rural Community Action Nottingham, CABA (Design Council), and Planning Aid England, using government grants and direct support.

It is based on the views residents expressed about planning in the Community Plan's drop-in days and questionnaire. The project team then developed a draft vision, in a leaflet distributed to residents in March 2013 for further comment.

The Neighbourhood Plan must help to meet defined housing needs for the Nottingham area. It therefore supports Rushcliffe Borough Council's proposal for a minimum of 400 new homes in East Leake in the period 2013 to 2028. It cannot oppose this, nor set a maximum number. It will give the village more say about the location of any new homes, provision of infrastructure to support them, phasing of building, the types of homes built, provision of affordable homes, and building standards and design.

The recently approved large developments are classed as part of Rushcliffe's "minimum 400" homes, but this minimum target has already been hugely exceeded. The Neighbourhood Plan will not affect these sites but once the Plan is adopted it will affect any more planning applications, giving the village more control over any further building.

There are sections on:

- Business and Employment
- Transport, Communications and Traffic
- Environment
- Leisure and Play
- Conservation, History and Heritage
- The Village Centre

National Planning Policy Context

Neighbourhood Plans (paragraphs 183-185 of the NPPF)

Neighbourhood plans are promoted within the NPPF with it stating that they will be able to shape and direct sustainable development in their area. Once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan and is brought into force, the policies it contains take precedence over existing non-strategic policies in the Local Plan for that neighbourhood, where they are in conflict.

Strategic Planning Issues

Highways

Having read the East Leake Neighbourhood Plan the County Council can advise that they have no strategic transport planning observations to make. The neighbourhood plan is centred around transport improvements with limited reference to wider transport issues which are acknowledged and will be considered by the County Council as part of the statutory planning processes.

Travel and Transport

Section 4 of the Draft document deals with Transport, Communications and Traffic.

It is noted that the minimum number of new homes to be built in East Leake in the period 2013 to 2028 will be 400 as laid down in Rushcliffe Borough Council's Core Strategy.

The County Council supports Section 2.6.2 of the document which states *"In order to preserve the sense of community and village feel, East Leake should be developed to maximize the number of journeys that can be undertaken walking, cycling and by public transport."*

The County Council supports the references in Section 2.6.11 which refers to the need for housing developments to be located near to public transport

The County Council supports Objective 4.1.5 – "Well located bus stops with a shelter to promote the use of public transport"

However the statement should be amended to read as follows:

"Well located bus stops with a shelter, raised kerb, clearway enforcement where required and real time information at suitable stops to promote the use of public transport"

Section 4.2 Support for Public Transport

4.2.3 and 4.2.4 cover the potential for improvements to public transport and Policy T3: - Public Transport states:

"Developments in the plan area will be required to contribute, where appropriate, through Section 106 Agreements, section 278 Agreements, Community Infrastructure Levy and direct investment or works, to secure improvements to public transport services, which provide new travel opportunities to access work, health and other public services, shopping and leisure facilities."

The County Council will wish to liaise with developers to secure appropriate funding for both infrastructure and to secure and develop the local bus service provision. It is important to note that the County Council's budget for supporting local bus services is being reviewed, and bus services supported by the Council, including Service 863 (Gamston Morrisons - Keyworth - East Leake), will be subject review as part of the Council's Strategic Passenger Transport Framework. Developer funding will therefore be important to secure the sustainability of the local bus provision to the village.

Section 4.2.8 of the report on East Leake Community Survey (2012) [ELCP] states “66% rate the frequency of evening bus services as poor and Section 4.2.3 Sets out a Key Point of Improvements to evening public transport services for access to social and cultural activities outside the village in Nottingham and Loughborough.”

The County Council is prioritising the available local bus budget to support predominately weekday peak and off-peak journeys providing access to employment, training, health, retail and recreation. Therefore funding for an enhancement of evening services will need to be sought from alternative sources including developer contributions.

Community Transport

Section 4 makes a brief reference to Community Transport. Community Transport plays an important role in delivering transport provision, especially in rural areas. A number of community transport providers are based in East Leake and the surrounding area including the East Leake Community Care Association Voluntary Car Scheme, Keyworth & District Community Concern Minibus and the Soar Valley Community Bus. It is suggested that reference to these schemes, and the potential for Community Transport and related services i.e. taxi buses to complement the local bus network is explored.

Taxis

There is no reference in the document to the role of taxis, which are licensed by the Borough Council and play an import role in the local economy.

Landscape and Visual Impact

The Country Council have no comments to make in respect Landscape Planning or Landscaper Character. The Plan already references the Greater Nottingham 2009 Landscape Character Assessment. The plan has developed the recommended policy actions that relate to containment of built development very effectively through its Policy E1 – Containment of Built Environment.

Rights of Way

The Neighbourhood plan mentions improvement of Sheep Plank Lane which is a byway. This is something which the County Council are happy to see in the plan. However the improvement of it has to be in keeping with its rural nature. Currently it is a stone surface path. Use on foot and cycle is not the only use as horse riders and motorised vehicles are also allowed on a byway. Horse riders and vehicles have to use the ford half way along. There is a footbridge to one side for walkers and cyclists. Consideration has already been given to some improvement of the route and sources of funding are being investigated but there is no guarantee that funds will be found.

The plan does also mention other routes linking the new residential areas to the village centre. Much mention is made of these new footpaths/cycle paths, and while they are very important for the nonmotorised access around the village, it is important to note their legal status. As these paths are likely to be tarmacked and possibly lit, it is more appropriate for them to be adopted as highway and maintained by Highways Management, rather than recorded on the Definitive map held within the Countryside Access team. It is also important that they link to the wider network to allow easy access to the countryside. It is possible that the Countryside Access Team would record routes that linked to and added to the rights of way network.

Education

The East Leake Neighbourhood Plan includes comments that the County Council education team provided about place availability and future demand from the outset.

The County Council are happy with the content of the plan which says that Lantern Lane is being expanded to accommodate the new houses across the road from the school and Brookside could accommodate the additional pupils from the known proposals if expanded to 315 places, however a new school would be needed if any of the developments were to increase in size or if new proposals came along, as the Brookside site could not be expanded any further than a 315 place.

Overall Conclusions

Having read the East Leake Neighbourhood Plan the County Council can advise that they have no strategic transport planning observations to make.

The County Council have no comments to make in respect Landscape Planning or Landscaper Character. The Plan already references the Greater Nottingham 2009 Landscape Character Assessment. The plan has developed the recommended policy actions that relate to containment of built development very effectively through its Policy E1 – Containment of Built Environment.

In terms of Rights of Way the County Councils supports the proposed plan, however, draws your attention to the need to ensure that legal status of new footpaths/cycle ways, as these paths are likely to be tarmacked and possibly lit, it is more appropriate for them to be adopted as highway and maintained by Highways Management, rather than recorded on the Definitive map held within the Countryside Access team. It is also important that they link to the wider network to allow easy access to the countryside. It is possible that the Countryside Access Team would record routes that linked to and added to the rights of way network.

From a Travel and Transport perspective the County Council supports the plan, however, raise a number of concerns, as set out above.

The County Council are happy with the content of the plan which says that Lantern Lane is being expanded to accommodate the new houses across the road from the school and Brookside could accommodate the additional pupils from the known proposals if expanded to 315 places, however a new school would be needed if any of the developments were to increase in size or if new proposals came along, as the Brookside site could not be expanded any further than a 315 place.

Further email correspondence with Nottinghamshire County Council about minerals, dated 18 Dec 2014:

In terms of the text on Gypsum this is in-line with the adopted and emerging Minerals Local Plan. I have spotted a slight amendment (that I must have missed previously) that could be made to the text relating to the Cemex quarry. It's not a major change but helps clarify the future of the quarry. I have amended the previous text slightly and added a paragraph on to the end (see below)

The CEMEX sand and gravel quarry between East Leake and Rempstone is at present operating outside Use Class B1, but the expectation is that operations here are temporary (~~10-12 years~~) and that the land will be restored to agricultural use and/or green space once the extraction is complete, according to its planning permission conditions. Restoration includes wetland and conservation, with all rights of way to be retained through the life of the site. ***The Minerals Local Plan Preferred Approach consultation document; published in October 2013 included potential site specific allocations, and identified two extensions to East Leake quarry. If the allocations were permitted this would extend the life of the site to approximately 2033. The proposed restoration schemes would tie into the existing permitted scheme.***

Is this something that can be added at this stage / are you happy with this? If so I can send a separate email with written confirmation that the Neighbourhood plan is compatible with the MLP.

If you have any questions just let me know.

Information of the development of the new Minerals Local Plan can be found at: Nottinghamshire.gov.uk/minerals

8. Southern Conservation Officer, Conservation Policy and Planning, Nottinghamshire Wildlife Trust

Thank you for the opportunity to comment on the consultation version of the East Leake Neighbourhood plan. Our comments are as follows:

Policy E2 (a)

We recommend replacing any reference to 'Biological Site of Importance' in section 5.2 (including Fig 5.2/1) with 'Local Wildlife Sites'. The Nottinghamshire Local Wildlife Sites Handbook defines these sites as follows:

'A site of local importance for the conservation of biodiversity. LWSs receive no legal protection, but are given some degree of protection through the planning system. They are of substantive value for the conservation of biodiversity, and are home to rare and scarce species, or represent the best surviving examples of habitats that were once widespread. Previously known as Sites of Importance for Nature Conservation (SINCs)'.

At Policy E2(a) we recommend removing the word 'designated', perhaps replacing it with 'identified'. This will serve to avoid any potential confusion that these sites are a statutory designated.

The Nottinghamshire Biological and Geological Records Centre (NBGRC) administer the LWS system in the county, on behalf of the Local Sites Panel, which is made up of local wildlife recorders and groups.

Policy E2(d) and 5.2.4

It seems potentially restrictive to just refer to creation of bird nest and bat roosting opportunities within new housing developments. There is clearly potential in new builds but also for existing residents, community buildings, local businesses etc to put up boxes and install bat bricks/ tiles/ voids in buildings etc.

This could be widened further. The local community could be encouraged to carry out 'wildlife friendly' practices in gardens. Creation of habitats, such as wildflower meadows, could be promoted in new and existing gardens and green spaces identified in 5.3.

Policy E3 and 5.3

We are pleased to see reference to native tree planting at paragraph 5.3.5 and consideration of future maintenance of green spaces when incorporated into new developments at E3(b).

In relation to new green space, (also referred to as Green Infrastructure):

- GI should be planned and managed to deliver the widest range of linked environmental and social benefits, including conserving and enhancing biodiversity. It is expected to be multi-functional, delivering amongst other things: improved water and flood risk management; and a positive contribution to climate change through adaptation to, and the mitigation of, associated impacts. Biodiversity is to be protected and enhanced, mitigating for the impacts of new development. Local authorities are specifically required to integrate a green infrastructure network into spatial development plans. There is now a significant body of evidence which makes the case for investment in green infrastructure. From a well planned and connected network of parks and open spaces to the planting of street trees and the greening of roofs, green infrastructure can contribute significantly to both economic development and to efforts to encourage healthier and more sustainable lifestyles.
- It is essential that new GI are created through new development that link coherently with existing open space and to the countryside beyond. The GI provision should aim to buffer existing ecological features and improve habitat connectivity and avoid fragmentation of ecological features.
- The creation and enhancement of GI through development must contribute to Biodiversity Action Plans (see Nottinghamshire Biodiversity Action Group website) to halt and reverse the decline in priority habitats and species.

- Natural England recommends that local communities should have access to an appropriate mix of green spaces with at least 2 ha of accessible natural green space per 1000 population with the following accessibility criteria: No person should live more than 300m from their nearest area of natural green space; At least one hectare of Local Nature Reserve should be provided per 1000 population; There should be at least one accessible 20 ha site with 2 km; There should be one accessible 500 ha site within 10 km.
- In relation to any new developments, ask that Planning Conditions are used to protect and enhance wildlife are included. This means developer will have to agree to make provision for nature within the development before they are granted full planning permission. Even small scale developments could contribute significantly to creating and enhancing local wildlife habitat.

Biodiversity Opportunity Mapping

The Nottinghamshire Biodiversity Action Group is currently carrying out a Biodiversity Opportunity Mapping exercise for West Rushcliffe. This is essentially a data collection and mapping exercise which identifies opportunities for landscape scale conservation gain. In particular, it looks to implement the conclusions of the Lawton Review (Making Space for Nature: A review of England's Wildlife Sites and Ecological Network), which identifies we need 'more, bigger, better and joined' wildlife sites.

For the East Leake area this exercise has identified opportunities for grassland (meadow) management and wetland restoration potential at Lings Farm. It also identifies opportunities for increased woodland and grassland habitat connectivity throughout the parish. We recommend contacting Chris Jackson, Notts BAG Officer for more information in relation to this work in the first instance.

I hope you find our response useful. If you have any further questions please do not hesitate to contact me on 0115 9588542 or email me bdriver@nottswt.co.uk.

9. Head of Primary Care and Deputy Director of Commissioning, Derbyshire and Nottinghamshire Area Team, NHS England

Thank you for your email dated 15th October 2014 regarding the consultation currently being undertaken on the East Leake Neighbourhood Plan.

The developments of healthcare premises will be a key component to enable new and innovative models of care and this will be considered as part of CCG led joint work described above.

Clearly in an environment of constrained financial resources there will need for strict prioritisation of investment in new premises developments to those that demonstrate the most compelling need. CCGs and the Area Team are currently undertaking a piece of work to re-assess the condition of all GP premises and to confirm other local factors (e.g. expected housing growth) to support a robust and fair prioritisation process.

Ultimately though it is the responsibility of GP practices themselves to develop and submit business cases for investment in premises. These need to demonstrate that the practice has considered every avenue to maximise the use of the current premise and/or utilise other available public sector estate before consideration will be given to investment in new premises. Any investment in new premises would have to clearly demonstrate how it is supportive of the wider CCG commissioning strategy.

NHS England must then consider each of these against a number of set criteria to help determine relative priority. We would expect to be able to support a forward programme of investment in the highest priority developments, although I should emphasise that this will be limited by the availability of financial resources. The current financial constraints mean that in the short term investments are only likely in premises that present an immediate risk to statutory compliance.

Your plan includes comments made by the patients and the public in 2012 in relation to the East Leake Medical Centre. Since then there has been further NHS investment in the current premise which may have addressed some of the concerns raised.

The longer term CCG commissioning strategy for more integrated and patient centred health services in East Leake and the surrounding area could potentially necessitate a further premise improvement or even a new development. If we receive a business case from the GP practice we will be happy to work with the CCG to consider it within the process and financial context described above.

Finally, from a purely financial perspective, where new housing is proposed it is vitally important that a developer contribution to community infrastructure is secured to support improved health services and infrastructure. If we can do anything to further this then do please let me know.

I hope this provides a useful update of our position and if I can be of further assistance please do feel free to contact me. I have copied the CCG in to this letter as they may wish to add further to the issues highlighted,

10. Planning Specialist - Sustainable Places – Nottinghamshire, Environment Agency

Thank you for the opportunity to comment on the Draft East Leake Neighbourhood Plan, received 15 September 2014.

The Environment Agency's principal aim is to protect and improve the environment and to promote sustainable development by:

- Acting to reduce climate change and its consequences
- Protecting and improve water, land and air
- Working with people and communities to create better places
- Working with businesses and other organisations to use resources wisely

We have reviewed the draft plan which sets out many good policies which promote sustainable development within the plan area. We are supportive of the policy aspirations of the plan, in particular:

- We welcome that flood risk is a key consideration within policy H7 for new housing
- We agree that there should be adequate sewerage capacity on the sewage system to accommodate new homes as detailed in policy H1

New Developments - Surface Water Management

With regard to new developments, surface water drainage schemes must be designed to prevent an increase in flood risk on to the site and elsewhere.

The local planning authority should determine whether a proposed surface water drainage strategy will ensure that the surface water will be managed sustainably.

Additional information

For your information we have attached a copy of our publication '*Building a better environment*' that provides further details of our role in the planning process, including:

- Initial advice on how to manage the environmental impact and opportunities of development
- Signposting to further information to assist you with development

EAST LEAKE NEIGHBOURHOOD PLAN – 2013 TO 2028

Thank you for the opportunity to comment on the consultation version of the East Leake Neighbourhood Plan. It is a valuable document that reflects the needs and the priorities of the local community and it informs the sustainable development of the area.

East Midlands Airport is a significant UK airport. In 2013 the Airport handled 4,332,000 passengers and it is the UK's 11th busiest passenger airport. East Midlands is also a nationally significant cargo airport handling 300,000 tonnes in 2013.

The Airport site and its immediate area is an important economic asset and employment area for the local area including the district of Rushcliffe. In 2013 there were 6,700 people working on the Airport site and some 400 were Rushcliffe residents.

In 2014 the Airport published its draft Sustainable Development Plan that sets out the ambition of the Airport, the potential for traffic growth and the economic and employment opportunities. The Plan also includes the surface access strategy, how the Airport will work with its local community and the approach to be taken to minimising and mitigating the environmental impact of its future growth.

The Sustainable Development Plan identifies the long-term opportunities for the development of the Airport and it is also intended to inform plans and strategies in the local area and to also enable a constructive dialogue with our neighbours and business partners.

We welcome the inclusion of a number of airport-related topics within the Neighbourhood Plan, including the provision of sound insulation for new residential and other noise-sensitive development, the requirement to safeguard safe aircraft operations, the management and control of aircraft noise and the development of public transport links. It is helpful that the Neighbourhood Plan provides references to the Airport's community material including the Sustainable Development Plan and the Noise Action Plan.

The Neighbourhood Plan makes reference to employment sites and the opportunities to provide employment opportunities for local people. This section could helpfully be extended to also include major employment sites in the local area but outside East Leake that provide employment. This can then be linked to the section on public transport that identifies the need and the opportunities for the development of new or improved public transport services.

Thank you again for consulting us on the Neighbourhood Plan, and we welcome the opportunity to continue to work with Parish Council and the community of East Leake.

12 Sustainability Leader, British Gypsum

The only comment I have is are you familiar with the MAGIC website? I only ask as a few of the maps in the document seemed to have missed some of the key features of the green space in East Leake, <http://www.magic.gov.uk/>

13 Rushcliffe coordinator, Ramblers

Having read the consultation documents relating to this subject I must congratulate you on them. There are commitments to stop the spreading out of East Leake which has expanded a great deal over the years and to enhance the local path and cycle network. My only concern is that when talking about business premises especially rural ones, whilst using the word amenity I would prefer a direct commitment to protect rights of way as well as stop there enjoyment being eroded by buildings, alterations or increased traffic.

14 A landowner

I have received an e mail asking for my comments on the neighbourhood plan as a landowner.

We have land on the outskirts of the village. This land has therefore been included in the area designated as the village separation area on Costock Road which is the part of the plan and therefore this may well be the part of the plan that could affect us the most. We are farmers and love the countryside but we are classed as a small farm and like many other business's particularly small ones have had to diversify in order to survive. We all have to change and adapt to survive and grow and I hope that the decision to include some of our land will not have an adverse affect on any future decisions we make to enable us to do this. Any changes would be because of local or customer demand and would have to go through all the appropriate planning stages.

We would obviously like to see less of our land in the separation area in case it affects future developments of our business. However we agree that a separation area would benefit the village allowing it to stay independent of neighbouring villages. We already provide stepping stones for people to relocate their business when they have outgrown their homes and garages. We have done this in such a way that it does not have a detrimental impact on the village and would like to think we can expand if this trend continues. This is very positive because it shows that East Leake has many new and growing business's that are surviving the recent recession and continuing to expand.

I personally feel the map Fig 5 1/2 provided to consult on regarding this issue is not very clear. The map fig 5 1/1 and Fig 5 3/1 shows all the field boundaries, buildings and houses. The map used for the separation areas is not ideal to be used for consultation purposes as all houses, buildings, field boundaries and permitted development areas are not shown clearly and accurately. It will be very difficult for people to make informed comments when the information shown is inaccurate. I appreciate it is not easy to prepare these maps especially if not familiar with the process.

15 Chair, East Leake Pre-School Playgroup

Business and Employment

Playgroup would support additional support for small businesses/organisations/charities. For example, access to meeting room facilities, use of office space (and equipment) and storage/archive facilities would be of interest to the charity.

Transport, Communications and Traffic

Safe footpaths and additional safe crossing facilities around the village would be desirable for the playgroup as staff often take the children around the village on short trips.

The construction of safe footpaths and cycle routes to Brookside school would be supported by the playgroup. A safe approach to the playgroup for families with young children/babies is very important to us.

Environment

Maintaining easily accessible green spaces, such as the Brook, park, the Pinfold and the Green are important to the playgroup. The staff and children often take little walks and trips around the village.

Leisure and Play

New and more varied playground facilities at the Gotham Road play area designed particularly for under 5s would be regularly used by the playgroup.

Access to financial support from developers to help the charity meet the growing demand for its services in the village as a result of increasing numbers of families moving to East Leake would be desirable.

If you require clarification or would like to discuss our comments further, please do not hesitate to contact me.

16 Senior Planner, BS Stanford Ltd

We write on behalf of BS Stanford Ltd, the applicant for the development of the Defence and National Rehabilitation Centre (DNRC) on the Stanford Hall Estate. Please find enclosed our comments on the proposed East Leake Neighbourhood Plan.

Stanford Hall Estate is situated approximately 2km south of East Leake village, immediately south of the East Leake Parish boundary and the 'Neighbourhood Area'. The site has full planning consent for the development of a Defence rehabilitation establishment for injured Service personnel, and outline planning consent for a national clinical rehabilitation facility for civilian use (applications 12/02070/HYBRID and 12/020701/LBC). As the DNRC will largely be a self-contained site, we do not consider that the proposed East Leake Neighbourhood Plan would have any significant impact on the Estate. Our comments on the relevant aspects of the Plan are set out below.

1. We agree that consideration should be given to improving the capacity of essential services (including drainage) to serve any new developments within East Leake and surrounding smaller villages (*Section 2 – Housing*). This will be of benefit to the DNRC development and will ensure that local services do not become overloaded.
2. We agree that it should be ensured that developments are well designed and contribute to the character of East Leake, and to the wider aims of sustainability (*Section 2.5 – Issues of Building Standards and Design and Policy H6*). This objective is in line with the design objectives of the DNRC, which seeks to provide the highest quality design and to restore and preserve the unique character of Stanford Hall Estate.
3. We support the objective to ensure that all new large scale development applications are to create permanent employment opportunities (*Objective 3.2.2*). The DNRC will contribute to sustainable economic development by generating opportunities for employment, both during construction and operation¹. It will also support the local economy through procurement of a range of materials and services.

¹ Details of the way in which the Defence establishment will operate will be confirmed nearer the time of occupation.

4. We support the objectives within *Section 5.1 – Containment of the Built Environment* in the interest of preserving the unique rural character of East Leake and the surrounding area.
5. We support the objectives within *Section 5.2 – Preservation of Wildlife and Rural Heritage*. As set out in the Environmental Statement and Heritage Statement submitted as part of the approved DNRC planning application, we are seeking to preserve an important heritage asset for the local area, and ensure that any potential impacts on wildlife are appropriately mitigated.
6. We support *Policy E3 – Green Spaces within the Built Environment*, in particular the provision of 'suitable green spaces for the benefit of wildlife and the recreation of residents' in new developments. This is of particular importance to the DNRC, where a range of outdoor recreation spaces will be provided for the benefit of patients, including courtyards, gardens, trim trails and outdoor sports facilities. Provision has also been made for protected species including bats and newts.

We are happy to discuss any of the information contained in this letter.

General

- 1.1 Thank you for the opportunity to respond to the contents of the draft neighbourhood plan for East Leake. These representations are submitted on behalf of Mr T Kirk.
- 1.2 It is noted that the consultation response form lacks validity due to the absence of a section containing the personal details, e.g. name and address of the respondent. This anonymity that is inherent within the response form therefore devalues the validity of the responses that may be received and therefore reduces the rigour that can consequently be attributed to the aggregation of response findings. Furthermore, this situation also introduces the theoretical potential for individuals to submit multiple representations and in doing so distort the true representative nature of the responses received. This shortcoming should be rectified in a further consultation exercise.
- 1.3 It is pleasing to note that the draft plan acknowledges that it must conform to the NPPF and be prepared in response to the Rushcliffe Core Strategy. Although at an advanced stage, the latter has yet to be formally adopted by the local planning authority.

Representations

Section 2 – Housing

- 2.1 It is noted that the vision expresses concern and perception that new housing developments have been mainly targeted at “well-off families” This is a subjective categorisation and if the plan is to use such a judgemental statement, the plan should provide a definition of what it considers to constitute a “well off”.
- 2.2 It is, however pleasing to note that the plan wishes to encourage “smaller scale housing developments” in preference to large-scale estates, however the reality is that the Borough Council has already previously knowledge that there is insufficient availability of infill sites within the existing built-up area and therefore there should be an acceptance within the plan that there will inevitably be a need for the release of greenfield land for housing provision.
- 2.3 The section also acknowledges a number of infrastructure deficiencies and recognises that new development should provide measures to contribute towards the rectification of such shortfalls. It is unreasonable, however, that paragraph 2.1.8 – 2.1.10 only distinguishes greenfield sites as being subjected to the suggested embargo put forward in policy H1. The respondent considers that such a policy should not be adopted, but if such a policy is to be pursued such a policy stance is illogical since all new residential development, de facto, will place a demand on the existing infrastructure of the village. Modifications are required accordingly.

Draft Policy H1(b) The Number of New Homes

2.4 Objection is made to the wording of this policy criteria

- 2.5 The idealised aspiration of this criteria cannot always be reflected by the economic reality of development and the interrelationship of the developer with the activities of third parties that may be charged with the provision of additional infrastructure, particularly where contributions from a number of developments may be necessary to provide the critical mass of funding necessary to initiate such an improvement. The reality is that the onus is therefore frequently upon the 3rd party agencies, whether it be the education authority or health authority, for example, to forward fund such enhanced facilities and subsequently recoup the contributions from developers as their proposals are brought forward.
- 2.6 It is therefore suggested that it is unreasonable and unrealistic for the policy criteria to be drafted in such a prescriptive and inflexible manner. It is requested that a greater degree of flexibility be introduced into the wording of the criteria reflecting that the art of the possible is frequently the reality of life and occasions may arise where a temporary minor interim worsening of the infrastructure provision situation is frequently a necessary prerequisite prior to a step-change improvement becoming a reality. This is particularly the case where the provision of new or upgraded replacement infrastructure is dependent upon cumulative development-led funding.
- 2.7 The key importance is to ensure that all developments make an appropriate and justified contribution towards the rectification of infrastructure shortfalls caused by the development itself..

Paragraph 2.1.17

- 2.8 It is requested that paragraph 2.1.17 be amended to clarify that planning application 02/01403/OUT related to an application for a replacement health centre in Keyworth and not East Leake. As currently worded, the paragraph lacks this clarity and can be misconstrued to suggest that there was a previous planning application for a replacement health centre in East Leake.

Paragraph 2.2.3

- 2.9 It is pleasing to note that the neighbourhood plan acknowledges that a continuous supply of new housing should be available.

Draft Policy H2 – Phasing

- 2.10 The policy is imprecise in referring to “the larger sites”. Clarity should be introduced.
- 2.11 A housing trajectory is at best an estimate, since a significant variety of factors influence the rate at which completions and subsequent occupations will be achieved.

Draft Policy H3 Types of Market Housing and Paragraph 2.3.6

- 2.12 The suggestion that all housing development should follow a prescriptive mix is too simplistic, and moreover the provision of housing should be considered across all tenures and not solely restricted to that of market housing. Each site should be considered on its individual merits together with prevailing market reality in conjunction with any assessment of need.

Draft Policy H4 and Paragraph 2.4.9– Satisfying Local Housing Need

- 2.13 The principle of such a prioritised cascade mechanism in terms access to affordable housing has been operated by many local planning authorities, however it should be noted that the funding arrangements for registered social landlords will require the scope from which potential occupiers are drawn to ultimately cascade down to an unfettered residency or local connection. Therefore paragraph 2.4.9 should be amended to introduce a 6th criteria to this effect.

Paragraph 2.5.8

- 2.14 It is pleasing to note that the neighbourhood plan acknowledges provisions of the NPPF in not seeking to dictate a particular architectural design for new developments.

Draft Policy H7 Sites where housing development will be permitted and paragraphs 2.6.2 and 2.6.12

- 2.15 East Leake was identified as a sustainable settlement by Rushcliffe Borough through a comparison with other settlements within Rushcliffe Borough itself. The use of an arbitrary figure of 1.25 km as a prescriptive acceptable walking distance is unreasonably restrictive, and a greater degree of flexibility should be introduced into the policy through the introduction of the word “approximately” prefacing “within 1.25 km walking distance of East Leake village centre” at criteria (a).
- 2.16 By way of comparison, the Chartered Institute of Highways and Transportation’s (CIHT) document ‘Planning for Public Transport in Developments’ states that ‘new developments should be located so that public transport trips involve a walking

distance of less than 400m from the nearest bus stop'. The CIHT guidelines do however state that the recommended 400m is to be 'treated as guidance' and that it is 'more important to provide services that are easy for passengers to understand and attractive to use than to achieve slavish adherence to some arbitrary criteria for walking distance'. This therefore underlines that flexibility in aspired distances should be a policy feature.

Draft Policy E1 Containment of Built Environment and paragraphs 5.14, 5.15 and figure 5.1/2 Areas important for Separation

- 2.17 Objection is raised to draft Policy E1, specifically criteria (b) and (c).
- 2.18 There is no supporting assessment to demonstrate the alleged importance of the identified area of land on West Leake Road shown within Fig 5.1/2 to justify the need for the specific identification of this as an Area of Separation in addition to the application of normal open countryside planning policies that already prevail.
- 2.19 Furthermore, the comment at paragraph 5.1.5 that "it is not the intention of policy E1 (b) to place restriction on development of site 362 over and above the other policies and the normal planning process, however it is noted that it does currently contribute to separation" is most curious. This site was identified in the 2013 Rushcliffe SHLAA 2013 as a potential housing site that "may be suitable if policy changes in 5+ years". A similar designation was also made within the SHLAA to the existing allotments at site 98 situated opposite to the south of West Leake Road. In respect of this site, it is also noted that the implication of draft Neighbourhood Plan Policy L2 is such that it would in principle support the residential redevelopment of that allotment site providing that alternative replacement allotment provision is made.
- 2.20 Objection is made to the eastern boundary identified on the southern side of West Leake Road for the proposed area important for separation. The appropriate planning practice, when defining policy areas, is to utilise physical features on the ground as a basis for clear unambiguous policy delineation. The proposed eastern boundary for policy E1(b) within Fig 5.1/2 runs through the middle of an agricultural field with no logic or sound basis for doing so. It does not relate to a physical feature on the ground.
- 2.21 Consequently, it is requested that if the area Important for Separation is to persist, notwithstanding the fundamental objection raised above, that this boundary is re-drawn further to the west such that it is contiguous with the readily identified physical feature of the western boundary of the agricultural field, such that it is therefore also contiguous with the eastern and southern most boundary of the existing allotments.
- 2.22 Objection is raised to the statement made at paragraph 5.1.7 and also to criteria (c) of draft policy E1. It is a matter of fact that the railway line is not a boundary to the built-up area of East Leake. Furthermore, there is no underlying rationale to support criteria (c), nor why such an alleged exception should be necessary as to require "strong justification" for any future development in this locality. It is requested that the criteria be deleted in its entirety.

18 Chairman, Town Lands Trust

The Trustees have looked at the two sections of the Consultation Document which are relevant to the Trust's land holdings, namely

- (1) Areas Important for Separation
- (2) Local Green Spaces.

They follow the rationale behind these designations and are content with the proposals. ✓

The Trustees wish to congratulate the Project Team on the exhaustive evaluation of the issues under review and on the detailed presentation of their conclusions.

19 A landowner

To Neighbourhood Plan Project Team

Thankyou for your letter informing me that land that I own on Costock Rd may be directly affected by the neighbourhood plan.

Although I agree that green space around the village is of great importance, I would not agree to my land being in the separation zone due to the fact it would affect the value of the land.

I believe that it would not work and be unfair to include my small pony paddock in a separation zone, when land on Costock side of my land that actually forms the gateway to village has not been included in the zone.

I am a great lover of the countryside, and have no intention of using my land for development just as a pony paddock. It is purely so my family and I can enjoy the green space and wildlife, and by having always maintained the land and hedges I hope others benefit from the wildlife it attracts.

East Leake Neighbourhood Plan Consultation Response

COORDINATOR'S: 10.11.14

Please return by 31 October 2014 to the Parish Office, 45 Main Street, East Leake, LE12 6PF
or email to plan@eastleake.net
(This form can be downloaded from the website.)

How would you support the Neighbourhood Plan in a referendum, as it stands?

☒ Yes, I support it ☐ No, I oppose it ☐ I probably wouldn't vote

Please give your reasons:

65

Ello

10/11/14

Do you agree with the individual policies?

You can use the space on the right to give your reasons or any other comments.

Policy	Agree	Disagree	Comments
H1 The number of new homes in relation to infrastructure	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Infrastructure at time of total build - no phasing.
H2 Phasing the building of new homes over the Plan period	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Phasing causes you not to notice. All cards on table with sewerage/schools built.
H3 Sizes and types of homes to be built	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Mix of townhouse, small family and large homes.
H4 Helping people with an East Leake connection to obtain affordable homes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Not practical. Would like to see young people given opportunity to afford a home.
H5 Measures against aircraft noise	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
H6 Good design and quality in new homes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
H7 Suitability of sites for housing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Homes should be within accessible townships - bus restriction sale of farmland.
B1 Clustering a range of shops and services in village centre	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
B2 Measures to support small businesses	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Regional granting.
B3 Support for larger industry on British Gypsum Site	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Discourage heavy traffic through the village

Policy	Agree	Disagree	Comments
T1 Connectivity of new developments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Safe cycling routes. Road network improved.
T2 Developing the network of foot and cycle paths	<input type="checkbox"/>	<input type="checkbox"/>	
T3 Improving public transport	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
E1 Protecting green ridges and preventing coalescence	<input checked="" type="checkbox"/>	<input type="checkbox"/>	check building at top of Woodgate - green ridge - what? Flooding
E2 Preserving wildlife and rural heritage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
E3 Green spaces in housing developments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
E4 Designating "local green spaces"	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Potters Lane - boundary - check designation of green
L1 Enhancing play facilities and playing fields	<input checked="" type="checkbox"/>	<input type="checkbox"/>	co-ordinated policy required. Tennis.
L2 Support for allotments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Promote.
V1 Priorities for land use in village centre	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Drive economy local shops. Shop locally.
V2 Improvements to Gotham Road T-junction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Speeding signs. Traffic management required. Speed signs showing speed on both sides.

What have we missed?

Bearing in mind that the Neighbourhood Plan only deals with planning matters, use the space below for any comments on the Plan, including anything you think we should have included.

Want a village, not a town.
Allocation of developer funding should be a decision of local community. More involvement of community and engagement. Transparency.
30mph Woodgate Road at entry bend to village - housing there. Castle Hill at entry bend 30mph. ie. 30mph. Sewerage water treatment plant. (Give name and contact details if you would like a reply, or if we may get in touch to discuss your comments.)

Many thanks for taking the time to read this and comment.

EAST LEAKE East Leake Neighbourhood Plan Consultation Response ACTION PLAN GROUP Please return by 31 October 2014 to the Parish Office, 45 Main Street, East Leake, LE12 6PF or email to plan@eastleake.net (This form can be downloaded from the website.)

Overall, would you support the Neighbourhood Plan in a referendum, as it stands?
☒ Yes, I support it ☐ No, I oppose it ☐ I probably wouldn't vote

Please give your reasons:

RESERVE
15/16

Do you agree with the individual policies?

You can use the space on the right to give your reasons or any other comments.

Policy	Agree	Disagree	Comments
H1 The number of new homes in relation to infrastructure	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SEWAGE, SCHOOLS, PROBABLY HEALTH FACILITIES
H2 Phasing the building of new homes over the Plan period	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
H3 Sizes and types of homes to be built	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Support more affordable homes mid - 3 beds required
H4 Helping people with an East Leake connection to obtain affordable homes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Particularly young and older
H5 Measures against aircraft noise	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Soundproofing
H6 Good design and quality in new homes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Building standards
H7 Suitability of sites for housing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Flooding Plain
I1 Clustering a range of shops and services in village centre	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
I2 Measures to support small businesses	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Forums / 12
I3 Support for larger industry on British Gypsum site	<input checked="" type="checkbox"/>	<input type="checkbox"/>	within visual & attract standard

Policy	Agree	Disagree	Comments
T1 Connectivity of new developments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Footpaths
T2 Developing the network of foot and cycle paths	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
T3 Improving public transport	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Has to be viable. Need encourage use.
E1 Protecting green ridges and preventing coalescence	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
E2 Preserving wildlife and rural heritage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	V. Important / Needs Control & Rate
E3 Green spaces in housing developments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Essential
E4 Designating "local green spaces"	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Protect / Community knowledge / involve
L1 Enhancing play facilities and playing fields	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Coast Road - pool facilities
L2 Support for allotments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
V1 Priorities for land use in village centre	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
V2 Improvements to Gotham Road T-junction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Speed signs / Policing

What have we missed?

Bearing in mind that the Neighbourhood Plan only deals with planning matters, use the space below for any comments on the Plan, including anything you think we should have included.

Speed signs Cotham Road and other entry roads. Policing poor.

(Give name and contact details if you would like a reply, or if we may get in touch to discuss your comments.)

Many thanks for taking the time to read this and comment.

MR Mapletoft There are my comments regarding the East heake Neighbourhood Plan

H2 Do I understand that the ELNP will have more say than the R.B.C. Planning Committee?

H3 We already have a good mix of housing and will have with the new developments catering for all needs.

H5 The R.B.C planning officers already have means of reducing the aircraft noise in new build with the existing condition.

H7 British Gypsum does not mine under buildings

B3 There is an existing weight limit in East heake.

T.1 Footpaths or 'cut throughs' are not popular, particular with the Police

T.2 Ransom strips, are these a private matter between developers and land owners?

V.1.V2 Village Centre. The County Council created the central reservations on Goltam Road some years ago, I don't think that they would be happy with what the E.L.N.P. proposes. and neither would the residents of East heake.

23 Rushcliffe Borough Council

East Leake Neighbourhood Plan. Comments of Rushcliffe Borough Council

Policy/Paragraph	Basic condition test	Comments	Suggested amendment
2.1.3	N/A	It would be useful to source the concerns relating to infrastructure. Assume that this was from the community plan questionnaire results	Add source of concerns.
2.1.5	N/A	Latest version of Infrastructure Delivery Plan dated Feb 2014, document EX35 http://corestrategy.rushcliffe.gov.uk/media/CoreStrategy/Documents/Examinationdocuments/EX35%20Infrastructure%20Delivery%20Plan.pdf For confirmation, the assessment is the basis of a minimum of 400 dwellings.	Update reference.
2.1.8	National policy (CIL regulations and NPPF) General conformity	<p>It is considered 'step change' does not comply with the legal framework for the use of planning obligations. Planning obligations or a unilateral undertaking would be required where there are financial contributions required for The legal tests are:</p> <ul style="list-style-type: none"> (a) necessary to make the development acceptable in planning terms (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development. <p>Also, it is considered that the neighbourhood plan should not rule out the requirement for infrastructure from developments on previously developed land. For example, should an area of brownfield land the size of Lantern Lane school come forward in the future this as an example. Also CIL, if sought in the future has a 1 dwelling threshold.</p> <p>Where financial contributions are sought towards improvements to facilities that are the responsibility of third parties (such as education, health etc), it may be reasonable to restrict occupation until payment is received towards infrastructure improvements through the use of conditions and planning obligations, however the overall level of the financial contribution and the phasing of such payments depends upon several factors in when having regard to legislation and the National Planning Policy Framework. These factors include whether meets the three tests for seeking planning obligations and the CIL regulations, the comments of the infrastructure provider following consultation, and whether such contributions do not place an unreasonable</p>	<p>Rewording of paragraph 2.1.8 as follows:</p> <p>Policy H1 therefore adopts the minimum number of homes in the Rushcliffe Core Strategy, but includes mechanisms within it which allows for occupation of development to be conditioned, development phased, and/or planning obligations sought where improvements to infrastructure are required.</p>

Policy/Paragraph	Basic condition test	Comments	Suggested amendment
		financial burden on development.	
Policy H1	National Policy (CIL regulations) General Conformity	<p>The policy as drafted is too restrictive as drafted as the Borough Council is guided by the requirements of comments from infrastructure providers on planning applications in relation to what contributions are required, and whether there should be phased provision throughout the development. To go over and above this would not meet the legal tests set out in the CIL regulations and the requirements (paras 203-206 of the NPPF).</p> <p>The policy should therefore have a degree of flexibility depending on what infrastructure providers are requesting, and at what point they are requesting payments or improvements. To go over and above what the infrastructure providers request will be contrary to Para 204 of the NPPF and the CIL regulations. It would not be considered to be 'necessary to make the development acceptable in planning terms', and may not be 'fairly and reasonably related in scale and kind to the development' should a block on development occur as a result of waiting for a new health centre, for example.</p> <p>Health, education and sewerage provision are only are only three areas where planning contributions are sought. Whilst the three areas are of most concern, it is considered to be beneficial for the policy to be sufficiently flexible to seek other contributions, as necessary.</p>	<p>Suggested rewording of H1:</p> <p>b) Conditions will be used, or planning obligations be sought to enable the provision of the necessary infrastructure to support new development.</p>
2.1.24	N/A	Need confirmation that hd means heads per day	
H3 and other policies	N/A	Understand that this policy may be tailored further to East Leake based upon additional work being undertaken by Housing Vision. Policies within the plan cover up to 15 years, and policy H3 is based upon the statistics available at the time may become outdated. (this comment would be equally applicable for other policies of the plan)	It would be beneficial for a paragraph within the plan to explain that it covers the period 2011-2028, but the need to update or amend part or all of the plan during this period will be monitored should policies become outdated.
2.4.6	Factual	Policy HOU7 of the Non Statutory Replacement Local Plan seeks up to 30% affordable housing on sites of 15 dwellings or more or over 0.5 hectares and is subject to negotiation.	Update text to reflect comment
H4 and	National Policy	Comments from Head of Strategic Housing:	

Policy/Paragraph	Basic condition test	Comments	Suggested amendment
2.4.9-2.4.10	General Conformity.	<p>East Leake Neighbourhood Plan -Policy H4 – Satisfying Local Housing Need</p> <p>ELPC are requesting that people on the Rushcliffe housing register who have a connection with East Leake are given priority for occupation of affordable housing (rented and intermediate) on all new developments in the Parish.</p> <p>Rushcliffe Housing Allocations Policy</p> <p>All local authorities are free to set their own housing allocation policy as long as they agree to certain rules, including giving priority (reasonable preference) to certain groups of people i.e. those who are homeless or who live in unsatisfactory housing. RBC operates a needs-based system which prioritises applicants by:</p> <ol style="list-style-type: none"> 1. Local connection to Rushcliffe 2. Housing need band, from Band 1 (highest need) to Band 3 3. Waiting time in that band (which we call Effective Date) 4. Waiting time since first registered (which we call Registration Date) <p>Three months additional waiting time</p> <p>The ELPC proposal is that East Leake residents should receive three months additional waiting time (i.e. their Effective Date should be modified) when they bid on a property in East Leake. We do not believe this is technically feasible within the current Choice Based Lettings software. An applicant's Effective Date (and thus their waiting time) is tied to their application – it is not calculated for each separate property they apply for, so it couldn't be automatically applied to an East Leake property and not any other.</p> <p><u>Alternative options</u></p> <p>We have considered some alternative means of giving East Leake residents priority:</p> <ol style="list-style-type: none"> a) Don't change the software, but get housing associations to check for any bidders from East Leake and "manually" calculate an extra 3 months when letting the property – as well as the considerable time impact when letting any East Leake property, this would not be reflected in the automatically generated Choice Based Lettings (see https://www.gov.uk/council-housing 	

Policy/Paragraph	Basic condition test	Comments	Suggested amendment
		<p>for explanation of Choice Based Lettings) outcomes, so may appear unfair to the public. CBL was intended to improve transparency in the allocations process. The more levels of complexity added to CBL, the less the public can understand it, and the greater potential for errors to occur in lettings, especially as staff leave and are replaced over time. Some housing association staff lettings will be working with 20 or 30 different CBL systems around the country, so errors should be expected in applying a very localised policy like this – this is why we get the system to prioritise applicants automatically.</p> <p>b) Use a new criterion of connection to the parish to prioritise applicants, i.e.:</p> <ol style="list-style-type: none"> 1. Local connection to Rushcliffe 2. Housing need band, from Band 1 (highest need) to Band 3 3. Connection to parish property is located in 4. Waiting time in that band (which we call Effective Date) 5. Waiting time since first registered (which we call Registration Date) <p>This should be technically feasible within the current system, but it would not be straightforward and would have a significant cost (000's). It would also raise other problems. It could be set up just for East Leake initially, but then any time another parish wanted it setting up for them there would be another cost to amend the system. It would mean that waiting time was completely overruled if one applicant who bid had a parish connection. E.g. an East Leake resident who joined the register last week would be prioritised over a Keyworth resident in the same band who had ten years waiting time.</p> <p>General comments</p> <ul style="list-style-type: none"> • RBC operates a borough-wide Choice Based Lettings system (CBL) to enable people to move to where they wish to live. Mobility in social housing is strongly encouraged by the government to make it easier for tenants to take up offers of work, schooling, childcare etc. There is a tension between the aim of providing choice and mobility and the “local homes for local people” approach. • The change would be so fundamental it is likely we would be required to re- 	

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		<p>consult on the allocations policy to ensure additional preference groups (i.e. armed forces personnel) received additional priority over residents with two additional preference categories i.e. connection and employment.</p> <ul style="list-style-type: none"> The issues of social sustainability raised by ELPC to support the policy change are applicable to all areas within the borough due to the very high demand for affordable housing. RBC has no role in allocating intermediate housing properties (i.e. shared ownership) and therefore has limited means to restrict occupation, except for “rural exception” development which is covered by specific legislation. Giving “first refusal” to people with local connection to the village can make mortgage lenders more reluctant to lend, or only willing to lend at lower Loan to Value ratios or higher rates, because the restrictions on sale make the property less valuable to them as security. Gotham Road East Leake precedent (07/00524/OUT) - It is not considered a precedent for the request was set in application 07/00524/OUT. Paragraph 190 of the appeal decision clearly states that East Leake is a main priority for the provision of affordable housing within the Borough. At the time of the appeal there were over 100 people on the waiting list for affordable housing in the East Leake area, but no information as to where these people originate from or if they had a connection to the Borough. In addition, people could be included on the housing waiting list at the time that could have no demonstrable need. S106 Planning Agreements - Most of the s.106 agreements for the developments in East Leake have already been signed, and in any case, it would need to be our allocations policy that was modified, not the s106s <p>Based on the above, we would not support Policy H4 as set out in the draft ELNP.</p>	
H4 and 2.4.9-2.4.10	National Policy General Conformity.	<p>In addition to the comments made by the Head of Strategic Housing. it is believed that the statement in paragraph 2.4.10 and in the statement of basic conditions incorrect is in relation to rural exception development.</p> <p>From a planning perspective, only those parishes which are listed under Section 17 of the Housing Act 1996) by SI 1997/620-25 inclusive and 1999/1307, are eligible for rural exception development (such as the example given of the policy contained within the Woodcote neighbourhood Plan). The intention of rural exception development is to develop affordable housing for a village where such units would not</p>	Amend policy in line with Winsford, see http://www.winsford.gov.uk/images/Winsford%20Neighbourhood%20Plan.pdf

Policy/Paragraph	Basic condition test	Comments	Suggested amendment
		<p>normally be developed due to the size of the village, where there is robust evidence of housing need.</p> <p>Aylesbury Vale District Council, where Winslow is located (the second example of affordable housing) have produced the following guidance note in relation to affordable housing and neighbourhood plans: http://www.aylesburyvaledc.gov.uk/GetAsset.aspx?id=fAAxADUAMwAyADAAfAB8AFQAcgB1AGUAFAB8ADAAfAA1</p> <p>The important paragraph in this document is: “The Allocations Policy does not otherwise distinguish between different towns in the district when making nominations to properties on the social housing register, Bucks Home Choice. AVDC would not agree to enter into a Section 106 agreement that included the provision to restrict new affordable housing to a Neighbourhood Area, other than in the case of a Rural Exception Scheme. The overall impact of including this requirement in a Neighbourhood Plan may slow the development and delivery of affordable homes.”</p> <p>The Borough Council would have similar concerns in relation the development and delivery of affordable homes due to the need to address Borough-wide affordable housing need.</p> <p>As can be seen from the guidance note, Aylesbury Vale does have a local lettings policy in place, from which the Neighbourhood Plan policy has been developed. (see http://www.buckshomechoice.gov.uk/choice/uploads/AVDCLocalLettingsPolicy-subgroups.pdf). Looking at the local lettings policy, it can be seen that the District is split into 4 areas, and that Winsford is grouped in with a number of towns and villages within the north area). The development of a Local Lettings policy falls outside of planning legislation and such policies would only be developed if the Borough Council, in undertaking its Strategic Housing Function, considered it to be appropriate in meeting housing need, or where there were other issues in relation to housing stock. There is no such local lettings policy in place for East Leake, and there is no intention at present to produce a local lettings policy for East Leake given the issues raised by the Head of Strategic Housing.</p> <p>The Winsford neighbourhood plan, which is not within an enfranchised area or subject to a local lettings policy, has just passed its referendum. Its policy states:</p>	

Policy/Paragraph	Basic condition test	Comments	Suggested amendment
		“Policy H3: In order to secure a sustainable and mixed community, each development site will be expected to provide a mix of different dwelling types and a range of tenures. Affordable housing should accord with CWACC Local Plan policy.”	
H7	National Policy	Conservation and Design Officer: Policy H7 requires a little more structure for legibility. There are no linking words between the various lettered points. I believe the intention is that all statements should be true rather than an ‘or’ approach being taken although the policy does not make this clear and the parish will risk the planning inspectorate interpreting the policy in a way other than they intend. For example part c) in isolation suggests that unsustainable development in open countryside will be supported and granted consent.	Consider inserting ‘and’ at the end of each criterion.
B1	N/A	There are numerous Central Government proposals to alter the use class order out to consultation at present in particular use classes A1 and A2 (where A2 will only apply to payday loan companies and Betting shops and other financial and professional services will move to A1). Also, things can now move from A class uses to other class uses without the need for planning permission.	For information. No suggestions
B2	National Policy General Conformity	B2(a) Unsure what this will achieve. As phrased it just requires an assessment of the number of long-term jobs created by the development in East Leake with no justification on why this is needed to assist in determining planning applications B2(b) Requires evidence of need and demand for live/work units to justify. Developers often cite no evidence of need or demand for such requests. The only site within Rushcliffe that contains live work units is the second phase of RAF Newton which remain undeveloped and were included as a measure to reduce the need to travel, rather than there was a need for them.	Remove B2A and B2B
Section 4.1	National Policy	Conservation and Design Officer: There is no indication as to materials, surfacing, signage or routes, and how these new pedestrian and cycle routes will avoid harm to the special historic character of the village core and conservation area. The policy appears to suggest rather extensive new public transport links which could easily result in a change to the established character of the place.	Consider adding criterion in relation to historic character of village within T1 and T2 or in the supporting text in relation to impact on consideration area.
E2	N/A	Suggestions from the Environmental Sustainability Officer re planting and species: In addition to mixed woodland; wetland habitats and species rich grasslands are rare	Consider amending or adding extra criteria in relation to suggestions, and

Policy/Paragraph	Basic condition test	Comments	Suggested amendment
		<p>in Rushcliffe and are represented in the East Leake area, therefore protecting existing sites, seeking opportunities to expand these habitats may be an appropriate criterion.</p> <p>Recommend that planting in new developments should be appropriate to the area and where possible of native provenance. The recommendations of http://www.rushcliffe.gov.uk/conservation/treeshedgesandlandscaping/landscapingandtreeplanting/fourcharacterareas/#d.en.3531 should be followed where appropriate and advice from Nottinghamshire Wildlife Trust.</p> <p>Consideration should also be given to rare / protected species. In the East Leake area, rare plants, bats and amphibians are recorded. Further information is available from Nottinghamshire Biological and Geological Record Centre (NBGRC)</p>	make reference in the justification text.
5.2.6	N/A	<p>Conservation and Design Officer:</p> <p>'Rural Heritage' appears to relate only to fossil ridge and furrow, and primarily for its biodiversity value rather than its historic interest. There is no attempt to identify the best examples of ridge and furrow patterns within the parish and although a laudable aim is to protect these features it is unclear whether the aim is to protect the biodiversity value, the heritage value, or both.</p>	Further consideration required as to scope of policy
L1	General conformity	<p>Would be of benefit to cross reference to RBCs formulas for developer contributions see http://www.rushcliffe.gov.uk/media/rushcliffe/media/documents/pdf/planningandbuilding/localplan/COMMUTED%20SUMS%20FOR%20OPEN%20SPACE%20AREAS%20201314.pdf and to leisure strategy standards (see http://www.rushcliffe.gov.uk/media/rushcliffe/media/documents/pdf/leisureandculture/Leisure%20facilities%20strategy%202006%202016%20web.pdf)</p>	
7.1.3	National Policy	<p>Conservation and Design Officer:</p> <p>The statement that development must 'enhance' the character of the conservation area is flawed in law, the requirement under the Planning (Listed Buildings and Conservation Areas) Act 1990 is that development should 'preserve or enhance', the baseline of 'preserve' simply means that if the proposal cannot be considered to cause harm then it must at least preserve and should be acceptable. If the parish wish to 'raise the bar' and require an active enhancement from every scheme then they will need to add a policy to this end.</p>	Change required to paragraph to reflect comment.

Policy/Paragraph	Basic condition test	Comments	Suggested amendment
V2	National policy	<p>No objection to the principle of the policy, however would be beneficial (as with footpaths) to have a list of potential improvements, however broad, that may be appropriate, as agreed with partners who own or maintain land within the village centre such as the highway authority.</p> <p>NB if financial contributions are sought through CIL, then money generally can only be held for 5 years by the Borough Council. Also from May 2015 only a maximum of 5 developments can contribute to a single piece of infrastructure.</p>	Bolster up supporting text with further information
9.2	National policy	Whilst the Use class order is useful information, it is constantly being amended at present and may already be out of date.	Ensure latest version is in the appendix. Include health warning in relation to the month and year that the use classes order was correct.

General observations from Officers at RBC

Respondent	Comment
Environmental Sustainability Officer	The draft plan is a positive step forward for ecological / biodiversity / sustainability issues.
Environmental Sustainability Officer	There appears to be no consideration given to provision of recycling facilities
Environmental Sustainability Officer	There appears to be no consideration given to energy efficiency or renewable energy provision.
Conservation and Design officer	<p>Built Heritage should run as a continuous thread throughout documents seeking to establish policy, advice is contained within the 'plan making' sections of chapter 12, indeed protection of built heritage and natural heritage are recognised as one of the 3 core principles of sustainable development in the NPPF.</p> <p>Heritage is only mentioned in 2 sections, and totally in isolation. There is no connection, for example, that the historic environment can inform locally distinctive future development as it is the historic environment which dictates the unique local identity of a place. This fundamental flaw within the plan means that it ignores the core principles of the NPPF, taking themes in an insular and isolated way without making relevant and important links between the different threads of sustainable development.</p> <p>For example development in such a way as to retain hedgerows and trees might result in a form of development layout which is not locally distinctive. In such cases which element of the plan takes precedence? Is it acceptable to endure some loss of ancient hedgerow to achieve a more locally distinctive layout which better relates to the existing settlement pattern, or must local distinctiveness be compromised in order to retain hedges within a housing development?</p>

I received your e-mail about the East Leake Neighbourhood Plan on 2 December 2014 and have the following comments -

The Highways Agency (the Agency) welcomes the opportunity to comment on the Neighbourhood Plan for the East Leake Parish Council area. The Agency notes that the Plan has been prepared by the Parish Council in order to ensure that the local population have a stronger influence over the way change and development takes place over the coming years. This is in line with the change in national policy towards local communities having a stronger influence in plan-making, as set out in the National Planning Policy Framework (NPPF 2012).

It is the role of the Agency to maintain and safeguard the efficient operation of the Strategic Road Network (SRN), whilst acting as a delivery partner to national economic growth, as set out in DfT Circular 02/2013. There is no SRN which routes directly through the Neighbourhood Plan area, however the A52 and A453 route to the north of the plan area whilst the M1 junctions 23A, 24 and 24A are located to the west.

As required by the Localism Act and set out in the Neighbourhood Planning (General) Regulations 2012, the Neighbourhood Plan must align with the policies of the overarching Local Plan for the area. In the case of East Leake, it is important that the Plan aligns with the Rushcliffe Local Plan and the Agency welcomes the Parish Council's recognition of the need for this to be achieved. This is evidenced by the level of housing growth being proposed in the Neighbourhood Plan, with 400 homes set to come forward in the period 2013 to 2028, as is set out in Rushcliffe Borough Council's Local Plan. At this stage, no specific sites have been identified for development and the Agency notes that, within the Rushcliffe Infrastructure Delivery Plan (2014), transport requirements are to be developed. The Agency does not expect that the SRN will be significantly impacted as a result of individual sites coming forward for development in East Leake, but considers that there is a risk that the overall level of growth could produce cumulative impacts on the A52, particularly at the Nottingham Knight roundabout. The Agency is currently in discussions with Rushcliffe Borough Council on the need for a developer contribution strategy with regard to A52 improvements required to support growth in Rushcliffe. However, it is not currently anticipated that this will affect future development proposals in East Leake.

The Agency notes and welcomes Section 4: Transport, Communications and Traffic of the Neighbourhood Plan, which is predicated on improving and enhancing pedestrian and cycling connections across the village which will help to reduce the number of development trips generated from the housing proposals.

The Agency trusts that the above comments are useful and is keen to maintain engagement with the Parish Council in its local planning activities.

Regards,

... Asset Manager

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