

Background Paper One - Submissions on behalf of Gotham Parish Council on the Further Options Document for Part Two of the Rushcliffe Local Plan

1. Context

1.1 These notes form part of the response of Gotham Parish Council to the Further Option Report on Part two of the Rushcliffe Local Plan, the Green Belt Review and the Community Infrastructure Levy consultation. Where appropriate the response forms submitted are cross referenced to this report. It is important that the three documents are read together.

1.2. An Issues and Options Report was published in January 2016 and that document proposed a tight village envelope around Gotham that left no room for Greenfield development on the edge of the village. The Parish Council supported that approach.

1.3 A Further Option Report is said to be justified on the grounds that housing development has not taken place at the rate set out in the Core Strategy and the prospects for development on some of the major sites such as Clifton South are less positive than they were twelve months ago.

1.4 Rushcliffe BC seems to see this as giving it the task of securing land to allow 7058 dwellings to be built in the period 2019 to 2024, a rate of just over 1400 per annum. The BC says this requires additional land capable of being developed in five years with a capacity of 900 dwellings to be identified.

2. General points

2.1 The relationship of the Core Strategy and the Part Two Local Plan.

Our view is that any solution Rushcliffe BC come up with must be within the spatial framework set out in the Core Strategy and the settlement hierarchy; particularly the restriction of development in other villages such as Gotham to local needs. Any other approach would necessitate the full or partial review of the Core Strategy.

2.2 Causes of under performance

There are some key areas of work that ought to have been carried out before the report was published. Perhaps the most important of these is some study of the causes of the underperformance in house construction and an assessment of whether allocating extra land will of itself bring completions back on track. What is proposed is an average completion rate of 1400 for the period 2019 to 2024 compared with 400 for the period 2011 to 2019. This seems highly unlikely. All of this may seem a bit academic in the light of the case I will set out later in this report that housing in Gotham is to be for local needs only whatever the land supply position; but a failure to identify the real causes of housing underperformance will mean that we arrive at the same "land supply crisis" next year and the year after and at some point developers and landowners may present a freeing up of policy in "third tier" villages like Gotham as an appropriate response. Past appeal decisions in villages such as Aslockton suggest this could become a real danger.

2.3 Duty to co operate

This is simply mentioned. There is no evidence that Rushcliffe has asked neighbouring authorities, particularly Nottingham City, if they can provide more land. It may also be appropriate to jointly commission research into the causes of poor performance. A review of job creation in Greater Nottingham over the last five years might well shed some light on the issue.

2.4 Settlement Hierarchy and Thresholds

If we accept for the moment the need to find land for a further 900 dwellings then there needs to be a sequential search based on the Spatial Policy of the Core Strategy which remains the statutory framework into which any Part 2 Local Plan must fit. The hierarchy is:

2.5 The Main Urban Area of West Bridgford

The Further Options document assumes there are no sites additional to those already identified in the January 2016 document. It is not clear how closely the issue was assessed.

2.6 Key Settlements

These are listed below:

Bingham (no further sites are identified).

Cotgrave (sites are included in the plan with a capacity of more than 900 dwellings but infrastructure thresholds have not been examined. It is arguable that a capacity exercise for this and other key settlements should have been carried out before the further options document was published).

East Leake (already set to take twice the number in the Core Strategy albeit that is a minimum figure. The document takes the view that the limit has been reached).

Keyworth (the document accepts the principle of development over the level in the 2016 document but subject to infrastructure constraints. Sites with a capacity of over 1200 dwellings are identified).

Radcliffe on Trent (the approach is similar to Keyworth but the sites identified have a capacity of 295 dwellings).

Ruddington (the approach is similar to Keyworth but the sites identified have a capacity of 300 dwellings).

2.6.1 Sites are identified in the key settlements for over 2500 dwellings. The Core Strategy says that after West Bridgford the key settlements are the first port of call. If only 30% of the identified sites were included in the Local Plan that would meet the 900 requirement. Until further work is carried out on the key settlements it would be premature as well as inappropriate for the BC to lay down a housing figure for Gotham on land supply rather than local need grounds.

2.7 The local need villages

Bradmore, Bunny, Cropwell Butler, Gotham, Newton, Plumtree, Shelford, Upper Saxondale. It is for those Parish Councils to assess what local needs are but the likelihood is that these settlements, in aggregate, will accommodate some housing and in aggregate it could amount to several hundred. In due course this will add to supply but for the reasons explained below it should be seen as any part of a five year land supply solution.

The presentation of material on settlements at all levels of the hierarchy in the same format is misleading and inappropriate.

3 Local Need and timing

3.1 The restriction of housing in settlements such as Gotham is dealt with in the Core Strategy in three places, of which the most important is section 1 of the Spatial Policy:

1. *The sustainable development of Rushcliffe will be achieved through a strategy that supports a policy of urban concentration with regeneration for the whole of Greater Nottingham to 2028. The settlement hierarchy for Rushcliffe to accommodate this sustainable development is defined on the Key Diagram and consists of:*

a) the main built up area of Nottingham; and

b) Key Settlements identified for growth of Bingham, Cotgrave, East Leake, Keyworth, Radcliffe on Trent and Ruddington.

In other settlements (not shown on the Key Diagram), with the exception of Newton and the redevelopment of the former RAF Newton, development will be for local needs only.

The Core Strategy does not provide a definition of local needs but the Further Explanation provided by the supporting text as set out below provides the context for such a definition:

3.3.5 In line with the strategy, outside of those Key Settlements listed in part1(b) of the policy and with the exception of the former RAF Newton, development will be of a scale appropriate to meet local needs. Former RAF Newton is identified for development in order to regenerate a major brownfield site and to support the existing Newton community.

3.3.17 In other settlements, development will meet local needs only. Local needs will be delivered through small scale infill development or on exception sites (see Policy 8). Beyond this, where small scale allocations are appropriate to provide further for local needs, these will be included in the Local Plan Part 2: Land and Planning Policies Development Plan Document, including Neighbourhood Plans.

3.2 Based on this material our conclusions are

- Neighbourhood Plans have a key role
- The first port of call will be infill sites or rural exception sites
- Any allocations will be small scale.

We have looked at the practice in a number of other areas and it is clear that whilst local needs is broader in scope than affordable housing on rural exception sites, because it includes market housing and takes a longer term view, nevertheless the two concepts are alike in that the starting point is the need for housing of residents in Gotham both now and over the Plan period.

3.3 Gotham Parish Council has commenced work on a Neighbourhood Plan. We submit that the assessment of local needs and the identification of the number, type, timing and location of housing to meet it is for the Neighbourhood Plan in the first instance. We will ensure that progress is made on the Neighbourhood Plan at a rate that will allow any implications for greenbelt review and site allocations to inform the Preferred Option Stage of the Part Two Local Plan.

4. Green belt

4.1 The Green Belt Review is at a higher level of detail than has previously been undertaken. It also seems to be very much related to SHLAA sites and for the reasons set out above we do not think that is an appropriate starting point. We have a number of technical reservations; namely:

- The analysis assumes all five purposes are of equal value
- The scoring system is relatively rough and ready

- The purposes of protecting the open countryside and checking unrestricted sprawl should be seen in the context of the settlement concerned. An area of housing that would not be “sprawl” in a large urban area would be perceived as that in a small settlement such as Gotham
- The category 'Preserve setting and special character of historic settlement' seems to have been interpreted very narrowly as the immediate setting of heritage assets. In settlements such as Gotham settlement size, shape and in particular relation to the landscape and the historic value of landscapes are all relevant issues.

4.2 This stage of a greenbelt review is clearly a matter of subjective opinion. In the spirit of localism residents need to have a major input. The Neighbourhood Plan will allow them to do that in an informed way with adequate time for reflection and discussion. We see no need for firm decisions on the value of parts of the greenbelt in Gotham at this stage and we propose that the examination of the greenbelt around Gotham should be one of the tasks undertaken by the Neighbourhood Plan although we recognize that the Neighbourhood Plan cannot of itself amend greenbelt boundaries.

4.3 Notwithstanding our objections to the methodology we set out at Appendix One and summarise below our own assessment of the value of the various greenbelt areas dealt with in the review against greenbelt purposes as well as other material planning considerations such as the value of agricultural land and bio diversity.

5. Recommendations

1. That further work is required on the causes of the underperformance in house construction and an assessment of whether allocating extra land will of itself bring completions back on track.
2. That the spatial policy of the Core Strategy remains in place and in particular that development in Gotham should be for local needs only
3. That work on the Neighbourhood Plan will identify the correct number, type and location for housing to meet local needs in Gotham to meet local needs over the plan period to 2028
4. Local need is likely to be spread over the full plan period and so it would not be appropriate in any event to look to allocations in Gotham to meet a five year land supply shortfall
5. It is noted that consultation on the preferred option will take place in June 2017. By that time sufficient progress will have been made to enable local needs to be identified.
6. As the Neighbourhood Plan is developed further inputs can be made to the Part Two local plan up to November 2017 when the draft plan is published

In the meantime we would suggest that the BC carry out further work on the capacity of the main urban area, on capacity thresholds and ways to remove them in key settlements and on the causes of under performance in the housing market in Rushcliffe.