RUSHCLIFFE LOCAL PLAN PART 2: LAND & PLANNING POLICIES: PUBLIC CONSULTATION:

RADCLIFFE-ON-TRENT NEIGHBOURHOOD PLAN STEERING COMMITTEE RESPONSE:

1. EXECUTIVE SUMMARY

- 1.1. The Radcliffe on Trent Neighbourhood Plan Steering Committee (RNPSC) is broadly in support of the proposed Land & Planning Policies for Part 2 of the Rushcliffe Local Development Plan as they impact on the Parish of Radcliffe on Trent, (Radcliffe) which includes the settlement of Upper Saxondale.
- 1.2. Its comments are restricted to the proposals for the Parish of Radcliffe and to avoid duplication, only a single comment has been made where it is relevant to both the proposed Land & Planning Policies and the Rushcliffe Green Belt Review.
- 1.3. The RNPSC accepts that Radcliffe has been identified as a "key settlement for growth" in the Local Development Plan, and that there is the requirement to identify greenfield sites to meet a minimum of 400 new homes adjacent to the village by 2028. It also supports the allocation of employment sites and the development of a new sports/leisure facility to provide more local employment opportunities as part of the A52 strategic growth corridor.
- 1.4. The RNPSC agrees that Radcliffe shall remain "inset" from the green belt and that to accommodate the new housing, the existing green belt boundary (which is drawn tightly around Radcliffe), will need to be significantly changed. It also agrees with the proposed new "inset" boundary for Upper Saxondale to allow for suitable infill development.
- 1.5. The RNPSC has considered in its responses the need for alignment of the proposed Land & Planning Policies with the draft Radcliffe Neighbourhood Plan Policies, if the future proposed development is to be managed effectively. It has also borne in mind the requirements of the National Planning Policy Framework (NPPF) in respect of the purposes of the green belt and its guidance on how green belt boundaries should be defined.
- 1.6. The RNPSC notes that the Rushcliffe Development Plan states that there will be a minimum of 13,150 new homes in the Borough between 2011 and 2028, which will increase Rushcliffe's housing stock from 47,350 in 2011 to 60,500 in 2028 (28% increase). Against this background, the RNPSC is supportive of 400 new homes up to 2028 for Radcliffe, but no more. This point is made because if all the proposed development sites around Radcliffe were to be developed, this target would be significantly exceeded and this is not supported by the local community. Also, any development above 400 new homes would require a major review of the infrastructure provision.

- 1.7. The RNPSC recommends that the new housing development should be spread around the village as stated in Neighbourhood Plan Policy 10 Residential Development Strategy –and not concentrated in one or two specific sites.
- 1.8. The draft Radcliffe Neighbourhood Plan endorses the Local Development Plan that 30% of new houses should be "affordable" on schemes of 5 or more units. It also recommends that there is a particular focus on providing homes for young people and first time buyers and also appropriate housing, bungalows and sheltered accommodation for people who wish to downsize.
- 1.9. The Radcliffe Community and Neighbourhood Plans both reflect the wishes of the local community that Radcliffe is a "village" and wishes to retain its "village character" and this is an important consideration in accommodating the proposed new housing and associated infrastructure. It is important that a strong separation of development is maintained between Radcliffe and its adjacent settlements to prevent any coalescence between them.
- 1.10. The RNPSC believes that the village centre is the heart of the village and its economic viability and vitality and it makes some important recommendations on the proposed boundaries to the retail centre. It suggests the inclusion of a regeneration area and the rejuvenation of the village centre to make it more pedestrian friendly and more focused on sustainable public transport.
- 1.11. The RNPSC has real concerns about the capacity of the A52 (T) and certain other roads in Radcliffe, particularly Shelford Road, to cope with future traffic volumes. New housing development in the village and at the nearby settlements of Newton and Bingham and other developments beyond, will increase the amount of traffic travelling through Radcliffe, particularly to and from Nottingham. It is therefore vitally important that major road improvements are carried out to reduce the through-traffic volume and its impact on the village and especially with regard to cycle and pedestrian safety.
- 1.12. The RNPSC is aware of the NPPF and the Local Plan requirements that development is steered towards locations that are at less risk of flooding, or if this is not possible, that the "exception test" is passed. Some of the proposed development land in Radcliffe is located on flood zones 2 & 3 of the flood plain of the River Trent, and given the recent national flooding incidents, the draft Neighbourhood Plan recommends that housing development should not be located within any areas at risk of river flooding or known ground water level problems.
- 1.13. Finally, although not part of this public consultation, the RNPSC is aware that there is the potential for a development of up to 100 additional new homes on a non-green belt site known as The Paddocks, which is land south of Nottingham Road and north of the A52 in the west of the Parish.

2. <u>DETAILED COMMENTS ON THE PROPOSED LAND & PLANNING POLICIES AND THE GREEN</u> <u>BELT REVIEW IN RESPECT OF RADCLIFFE ON TRENT:</u>

LAPP: = Land and Planning Policies. GBR = Green Belt Review. CS Policy = Core Strategy Policy.

a) Employment Development Land:

The draft Neighbourhood Plan (NP) policy 7 – Business & Enterprise – states "the NP supports planning applications which encourage economic development and enterprisethe development of new small and medium scale employment uses." The RNPSC believes that there is merit in allocating x hectares of new employment sites in Radcliffe, possibly parts of sites RAD 1 and RAD 4, for small scale offices and light industrial uses. (LAPP: pages 36, CS Policy 5)

b) Accessibility & Wheelchair Housing Standards:

The RNPSC understands that NPPF sets out that a local planning authority may adopt a policy to provide enhanced accessibility or adaptability for new residential housing, but that they can only do so by reference to the M4(2) (accessible and adaptable dwellings) and/or the M4(3) (wheelchair user dwellings) "optional" requirements in the Building Regulations; and that in order to adopt one or both of these "optional" standards, the Government is clear that the Borough Council will have to demonstrate a clear need for a proportion of new homes to meet the relevant standard. The RNPSC believes that there should be such a policy.

(LAPP: p28. CS Policy 8)

c) <u>Gypsies, Travellers & Travelling Showpeople:</u>

Radcliffe already has a site for travellers which is located off the A52 (T) on the western edge of the village and no additional sites within the parish are supported. (LAPP: p29, CS Policy 9)

d) Green Belt Inset Boundaries:

The NPSC supports the alterations recommended to the green belt inset boundaries for Radcliffe on Trent, namely (a) Garden at 12 Nottingham Road, Fig A11; (b) 72 Nottingham Road & 12-22 The Chestnuts, Fig A12 (c) Gardens at rear of 9-17 Lamcote Gardens & 3 Greenway Close, Fig A13; and (d) The Green & 1 Holme Lane, Fig A14. (LAPP: pages 33, 85 & 86. GBR pages 31–34 inclusive, CS Policy 4).

e) <u>New Inset Boundaries for Upper Saxondale:</u>

The recommended new inset boundary for Upper Saxondale is supported. (LAPP: p34. GBR p17. CS Policy 4)

f) <u>Radcliffe Local Centre:</u>

The RNPSC believes that the village centre is the heart of the village and its economic viability and vitality. The proposed boundary for the Radcliffe on Trent Local Centre needs increasing to that shown in the draft NP. It should include all of the land bounded by Shelford Road and New Road and include the Railway Station. The secondary frontage on Shelford Road should be extended to its junction with New Road., (LAPP: p50, CS Policy 6)

g) Local Retail Centre Expansion:

The NPPF states that Local Plans should provide within a local retail centre sufficient space for future expansion of retail, commercial and community uses, etc, and the Radcliffe Neighbourhood Plan recommends the allocation of a regeneration zone to the south of Main Road within the proposed Local Village Centre. This could possibly accommodate the expansion of the Health Centre, and provide future retail floorspace capacity to cope with an expanding population.

(LAPP: p52, CS Policy 6)

h) <u>Retail Development Edge of Centre & Out of Town:</u>

The recommendation of the retail study for Greater Nottingham of a 500m2 gross floorspace threshold across Rushcliffe for assessing applications for retail, leisure and office development outside of established retail centres *is considered to be an acceptable threshold for leisure and office developments, but too high a threshold for retail developments in Radcliffe, as any such retail development would adversely affect the retail offer in the village centre.*

(LAPP: p54)

i) <u>Residential Design:</u>

Policy 10 of the Core Strategy and the 2009 Rushcliffe Residential Design Guide Supplementary Planning Document which set out detailed objectives and criteria against which the design of new residential developments should be judged needs enhancing. The "Building for Life" guidance should also be used for the evaluation of residential designs as recommended in Policy 10 – Residential Development Strategy – in the draft Neighbourhood Plan.

(LAPP: p55, CS Policy 10)

j) Managing Flood Risk:

The NPPF and Policy 2 of the Core Strategy address flood risk. They require that new development is steered towards locations that are at less risk of flooding or, if this is not possible, that the exception test is passed. This policy needs to be strengthened and given the availability of other sites with no flood risk in Radcliffe, no residential development on flood zones 2 and 3 is considered appropriate for Radcliffe on Trent. Suggest that the flood risk to RAD 1 is mentioned in the conclusion.

(LAPP: p61 & GBR: p122 - RAD1, CS Policy 2)

k) Green Infrastructure Network:

Agreed that all eight types of land use listed should be incorporated into the Green Infrastructure Network.

(LAPP: p63, CS Policy 16)

I) Local Green Spaces:

The draft Radcliffe Neighbourhood Plan – Policy 4 – Local Green Spaces – designates 15 local green spaces that meet the NPPF criteria due to their special character, significance and recreational value, namely: - Malkin Hill and Cliff Walk (Trent Valley Way), Wharf Lane Recreational Ground, Dewberry Hill, The Grange Grounds, Rockley Memorial Park, The Lily Ponds, Grantham Road Allotments, Nottingham Road Allotments, Bowling Greens at Cropwell Road and Upper Saxondale, Cricket Club, Radcliffe Road, South Nottinghamshire Academy Bingham Road Playing Field, Radcliffe Junior School Playing Field, Copse on Bingham Road, Valley Road Play Area, and the amenity space and gardens at the former hospital at Upper Saxondale.

The NPSC considers that if these areas are designated as local green spaces, then the NPPF and Core Strategy 16 are sufficient to protect them.

(LAPP: p65, CS Policy 16)

m) Culture, Tourism and Sports Facilities:

The draft Radcliffe Neighbourhood Plan – Policy 5 – Local Leisure Provision – states "The Neighbourhood Plan identifies the priority for the improvement of the village's formal sports facilities for all ages. Where appropriate, contributions may be sought in lieu of onsite provision. These contributions should be targeted towards enhancement of existing, and provision of new, off site facilities within the recreational zone as marked on the proposals map to enhance and create the sports and recreation hub for the use by the wider community."

Policy 13 of the Core Strategy identifies that provision ofsporting facilities of an appropriate scale will be encouraged throughout Rushcliffe......and where appropriate, existingsporting facilities will be protected and their further development will be supported.

The NPPF also identifies that to promote a strong rural economy, Local Plans should support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors. In respect of existing facilities, the NPPF requires that Local Plans promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues....."

The Radcliffe NP promotes the development of the existing sports facility on Wharf Lane. (LAPP: p69. CS Policy 13).

n) <u>Transport:</u>

There is considerable concern at the capacity of the A52 (T) and other roads in Radcliffe, particularly Shelford Road, to cope with future traffic volumes generated by new housing developments in the village and at nearby settlements such as Newton and Bingham, especially through-traffic travelling through Radcliffe to and from Nottingham. It is therefore vitally important that major road improvements are carried out to reduce the through-traffic volume and its impact on the village. There is support for the provision of a new road bridge across the Nottingham to Grantham railway line in the North East Strategic Area, to form a new link from Shelford Road to the A52(T) to divert through-traffic out of the village centre. This should be considered as part of sites RAD 3 and RAD 5.

The draft Neighbourhood Plan – Policy 9 – Radcliffe on Trent Railway Station – supports the railway station. It supports the retention and enhancement of the services and associated parking facilities, to encourage the use of this sustainable form of transport within the A52 strategic growth corridor.

(LAPP: pages 75 & 76, CS Policy 14 & 15)

o) Local Centre Map:

The Radcliffe Local Centre Map area needs increasing to that shown in the draft NP. It should include all of the land bounded by Shelford Road and New Road and include the Railway Station. The secondary frontage on Shelford Road should be extended to its junction with New Road.

(LAPP: p102 – Fig C6)

p) The Four Strategic Areas for the Green Belt Review:

The RNPSC supports the NPPF requirement that green belt inset boundaries should not include within them land that is required to be kept permanently open, and should follow defensible boundaries that are readily recognisable and likely to be permanent, such as railways, rivers, roads, woodland, field hedge lines, ridgelines, etc.

The RNPSC agrees with the four broad strategic areas of North East, South East, South West and West for the Green Belt Review around Radcliffe on Trent and comments on each of them as follows:-

<u>North East</u>: Agree that developments along the A52 could reduce the Green Belt between Radcliffe on Trent and Bingham, especially RAD 4, part of RAD 5 and RAD 7. Agree that development of RAD 2 and RAD 3 would "round off" the village boundary without coalescence to adjacent settlements of Shelford and Newton.

<u>South East</u>: Agree that this area prevents the merging of Radcliffe on Trent with Upper Saxondale and Cropwell Butler, and that Dewberry Hill Local Wildlife Site and Radcliffe on Trent Golf Club contain development to the south. The RNPSC does however, have a concern about the words "disconnected from Radcliffe's recognised urban edge" and suggests that another form of words are used such as "the area is currently washed over by the green belt and should remain so." That said, the RNPSC believes that a case can be made for RAD 9 to be considered as "infill development". (GBR: p116 – Rad 9 table)

<u>South West</u>: Agreed that this area is open in character, containing large open fields which do not provide robust defensible boundaries, and if this land was developed it would result in a perception of urban sprawl.

<u>West:</u> Agreed that development of land to the west of the former railway line to Cotgrave would significantly reduce the distance between the small green belt settlement of Holme Pierrepont and Radcliffe on Trent and is therefore not supported. However, land to the north of the Nottingham Road and east of the former railway line to Cotgrave is directly adjacent to the urban edge of Radcliffe, is enclosed by the railway embankment and already contains significant elements of development such as power lines, RSPCA animal shelter, and development is supported.

q) Comments on the 10 Potential Housing Development Sites:-

The RNPSC does not promote any specific development sites and recommends that the 400 new homes should be spread around the village. Policy 10 of the draft Neighbourhood Plan – The Residential Development Strategy – states that in all cases, development sites should directly adjoin the current settlement edge, with sites bounded on two or more sides by existing built form being considered the most appropriate. It further states that the 400 new houses should reflect a broad locational strategy of 60% (approximately 240 dwellings) to the North East strategic area, 30% (approximately 120 dwellings) to the West strategic area, and 10% (approximately 40 dwellings) to the South East strategic area.

As stated above, the RNPSC does not promote any specific development site and has therefore based its comments on the suitability for housing of the 10 potential development sites to those strategic comments as requested for the public consultation, namely:-

Yes – all of the site. Yes – part of the site. No. **RAD 1** – Land to the North of Nottingham Road (potential circa 300 homes). Yes – part of site.

RAD 2 – Land adjacent to Grooms Cottage, Shelford Road (potential circa 50 homes) Yes – all of site.

RAD 3 – Land off Shelford Road (potential circa 400 homes). Yes – part of site.

RAD 4 – Land north of Grantham Rd to north of railway line (potential circa 900 homes) No.

RAD 5 – Land north of Grantham Rd to south of railway line (1) (potential circa 200 homes) Yes – about half of the site, to opposite existing development on south side of the A52(T).

RAD 6 – 72 Main Road, (potential circa 7 homes). Yes – all of site.

RAD 7 – Land north of Grantham Rd to south of railway line (2) (potential circa 180 homes) No.

RAD 8 – Land south of Grantham Rd. (potential circa 20 homes) Yes – part of site, but keep the allotments.

RAD 9 – Land at Radcliffe on Trent Golf Course (west) (potential circa 10 homes) Yes – all of site in principle, but having due regard to the adjacent Dewberry Hill Nature Reserve.

RAD 10 – Land at Radcliffe on Trent Golf Club (east) (potential circa 10 homes). No.

Radcliffe on Trent Neighbourhood Plan Steering Committee. February 2016.

Version 2: FINAL 02/03/16. rgu/word/localplanpart2/consultationNP.v2.

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