



Rushcliffe Local Plan Part 2: Land and Planning Policies – Preferred Housing Sites

CEG 988577 agent
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Response Form

Please return by **5pm on Monday 27 November 2017** to:
 Planning Policy, Rushcliffe Borough Council
 Rushcliffe Arena, Rugby Road
 Nottingham. NG2 7YG
 Or to: localdevelopment@rushcliffe.gov.uk

Please note that your comments can be directly entered through the Borough Council's online consultation system: <http://rushcliffe-consult.objective.co.uk/portal>

Your Details		Agent details (where applicable)
CEG c/o Nexus Planning	Name	Amy Stone
Click here to enter text.	Address	Nexus Planning, Suite A, 3 Weybridge Business park, Addlestone Road, Weybridge, Surrey, KT15 2BW
Click here to enter text.	E-mail	

Housing Development

Housing Land Supply

Question 1: Do you agree with the Council's proposal that Local Plan Part 2 should identify enough land for around 2,550 new homes?

Yes



No

Don't know

Please provide any comments you wish to make to support your response.

Please see attached response.

(please continue on a separate sheet if necessary)

Housing Sites within the Main Urban Area

Question 2: Do you agree with the Council's proposed allocation of the Abbey Road Depot (site WB01) for the development of around 50 new homes?

Yes

No

Please provide any comments you wish to make to support your answers.

You may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

Housing Sites adjacent to the Main Urban Area

Question 3: Do you agree with the Council's proposal that no sites adjacent to the main urban area of Nottingham (within Rushcliffe) should be allocated for housing development through Local Plan Part 2?

Yes

No

Please provide any comments you wish to make to support your response.

Please see attached response.

(please continue on a separate sheet if necessary)

Housing Development at the 'Key Settlements'

Bingham

Question 4: Do you agree with the Council's proposal that no sites adjacent to Bingham should be allocated for housing development through Local Plan Part 2?

Yes

No

Please provide any comments you wish to make to support your response.

Click here to enter text.

(please continue on a separate sheet if necessary)

Cotgrave

Question 5: Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Cotgrave for around 350 homes in total?

Yes

No

Please provide any comments you wish to make to support your response.

Click here to enter text.

(please continue on a separate sheet if necessary)

Question 6: Do you support the proposed allocation for housing development of the following sites at Cotgrave:

	Yes	No
Site COT01 – Land rear of Mill Lane/The Old Park (estimated capacity around 170 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Sites COT09 – Land south of Hollygate Lane (1); COT10 – Land south of Hollygate Lane (2); and COT11a – Land south of Hollygate Lane (3a) (estimated capacity around 180 homes)	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you wish to make to support your answers.

For each of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

East Leake

Question 7: Do you agree with our proposal that only sites EL01, EL02, EL04, EL05 and EL08 (as shown at Figure 4) should be allocated for housing development at East Leake?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please provide any comments you wish to make to support your response.

Click here to enter text.

(please continue on a separate sheet if necessary)

Keyworth

Question 8: Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Keyworth for around 580 homes in total?

Yes



No

Please provide any comments you wish to make to support your response.

Please see attached response.

(please continue on a separate sheet if necessary)

Question 9: Do you support the proposed allocation for housing development of the following sites at Keyworth.

	Yes	No
Site KEY4a – Land off Nicker Hill (1) (estimated capacity around 150 homes)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Site KEY8 – Land between Platt Lane and Station Road (estimated capacity around 190 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site KEY10 – Land south of Debdale Lane (1) (estimated capacity around 190 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site KEY13 – Hillside Farm (estimated capacity around 50 homes)	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you wish to make to support your answers.

For each of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Please see attached response.

(please continue on a separate sheet if necessary)

Radcliffe on Trent

Question 10: Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Radcliffe on Trent for around 820 homes in total?

Yes

No

Please provide any comments you wish to make to support your response.

Click here to enter text.

(please continue on a separate sheet if necessary)

Question 11: Do you support the proposed allocation for housing development of the following sites at Radcliffe on Trent.

	Yes	No
Site RAD01 – Land north of Nottingham Road (estimated capacity around 150 homes), with employment development to the west of the powerlines that separate the site.	<input type="checkbox"/>	<input type="checkbox"/>
Site RAD02 – Land adjacent Grooms Cottage (estimated capacity around 50 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RAD03 – Land off Shelford Road (estimated capacity around 400 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RAD05a – Land north of Grantham Road to south of railway line (1a) (estimated capacity around 140 homes)	<input type="checkbox"/>	<input type="checkbox"/>

	Yes	No
Site RAD06 – 72 Main Road (estimated capacity around 5 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RAD13 – The Paddock, Nottingham Road (estimated capacity around 75 homes)	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you wish to make to support your answers.

For each of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

Ruddington

Question 12: Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Ruddington for around 410 homes in total?

Yes

No

Please provide any comments you wish to make to support your response.

Click here to enter text.

(please continue on a separate sheet if necessary)

Question 13: Do you support the proposed allocation for housing development of the following sites at Ruddington.

	Yes	No
Site RUD01 – Land to the west of Wilford Road (south) (estimated capacity around 180 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RUD05 – Land south of Flawforth Lane (estimated capacity around 50 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RUD11 – Old Loughborough Road (estimated capacity around 10 self and custom-build homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site RUD13 – Land opposite Mere Way (estimated capacity around 170 homes)	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you wish to make to support your answers.

For each of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

Housing Development at the 'Other Villages'

Cropwell Bishop

Question 14: *Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Cropwell Bishop for around 160 homes in total?*

Yes

No

Please provide any comments you wish to make to support your response.

Click here to enter text.

(please continue on a separate sheet if necessary)

Question 15: Do you support the proposed allocation for housing development of the following sites at Cropwell Bishop.

	Yes	No
Site CBI02 – Land north of Memorial Hall(1) (estimated capacity around 90 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site CBI05 – Land east of Church Street (estimated capacity around 70 homes)	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you wish to make to support your answers.

For both of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

East Bridgford

Question 16: Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at East Bridgford for around 100 homes in total?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please provide any comments you wish to make to support your response.

Click here to enter text.

(please continue on a separate sheet if necessary)

Question 17: Do you support the proposed allocation for housing development of the following sites at East Bridgford

	Yes	No
Site EBR06 – Closes Side Lane (west) (estimated capacity around 20 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site EBR07 – Closes Side Lane (east) (estimated capacity around 20 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site EBR8 – Land to the north of Butt Lane (estimated capacity around 15 homes)	<input type="checkbox"/>	<input type="checkbox"/>
Site EBR10 – Land south of Butt Lane (estimated capacity around 45 homes)	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you wish to make to support your answers.

For each of the proposed housing sites, you may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

Gotham

Question 18: Do you agree that Local Plan Part 2 should allocate greenfield land for housing development at Gotham for around 100 homes in total?

Yes

No

Please provide any comments you wish to make to support your response.

Click here to enter text.

(please continue on a separate sheet if necessary)

Question 19: Do you support the proposed allocation for housing development of the following site at Gotham:

	Yes	No
Site GOT5a – Land east of Gypsum Way/The Orchards (1) (estimated capacity around 100 homes)	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any comments you wish to make to support your answers.

You may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

Bunny Brickworks

Question 20: Do you support the proposed allocation of the former Bunny Brickworks (site BUN01) for a mixed development of around 100 new homes and employment development?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Please provide any comments you wish to make to support your answers.

You may like to give your views on what development should look like, in terms of the design, mix and layout of new housing and other uses (for example, open space) on site.

Click here to enter text.

(please continue on a separate sheet if necessary)

Flintham – Former Islamic Institute

Question 21: Do you support the proposed allocation of the former Islamic Institute at Flintham for the development of up to 95 new homes?

Yes

No

Please provide any comments you wish to make to support your answers.

Click here to enter text.

(please continue on a separate sheet if necessary)

Other Issues

Question 22: Please identify any matters related to housing development which are not covered here or elsewhere and which you wish to raise.

Click here to enter text.

(please continue on a separate sheet if necessary)

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Rushcliffe Arena
Rugby Road
Nottingham. NG2 7YG

Or to: localdevelopment@rushcliffe.gov.uk

Please note that your comments can be directly entered through the Borough Council's online consultation system: <http://rushcliffe-consult.objective.co.uk/portal>

Data protection: The details you submit to the Borough Council will be used in the plan making process and may be in use for the lifetime of the Local Plan and associated processes in accordance with the Data Protection Act 1998. Please note that comments and personal details cannot be treated as confidential and may be made available for public inspection both physically

and/or through the Borough Council's website. We may publish all names, addresses and comments received, including on our website. We will use our best endeavours to not publish signatures, personal telephone numbers or email addresses. By sending the Council your details you will automatically be informed of future consultations on planning policy documents unless you indicate otherwise.

Land off Nicker Hill, Keyworth

Representations to the Local Plan Part 2: Preferred Housing Sites

on behalf of CEG

November 2017

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1.0 Introduction

1.1 These representations are submitted on behalf of CEG who are promoting Land off Nicker Hill, Keyworth as identified in the Keyworth Submission Draft Neighbourhood Plan (KNDP) (Dec 2016) and Rushcliffe Borough Council's (RBC) Emerging Local Plan Part 2. This response is made following our submission to the Local Plan Part 2: Issues and Options (March 2016) and Local Plan Part 2: Further Options (March 2017) in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.2 These representations principally relate to the following questions in the consultation summary document;

- **Question 1:** Do you agree with the Council's proposal that Local Plan Part 2 should identify enough land for around 2,550 homes?
- **Question 3:** Do you agree with the Council's proposal that no sites adjacent to the main urban area of Nottingham (within Rushcliffe) should be allocated for housing development through Local Plan Part 2?
- **Question 8:** Do you agree that Local Plan Part 2 should allocate greenfield land for housing development for around 580 homes at Keyworth in total?
- **Question 9:** Do you support the proposed allocation for housing development of the following sites in Keyworth.
 - **Site KEY4a** – Land off Nicker Hill
 - **Site KEY8** – Land between Platt lane and Station Road
 - **Site KEY10** – Land south of Debdale Lane
 - **Site KEY13** – Hillside Farm

2.0 Question 1: Do you agree with the Council's proposal that the Local Plan Part 2 should identify enough land for around 2,550 homes.

2.1 Yes

2.2 As identified in RBC's previous consultation documentation, delays to the large site allocations within the Core Strategy has created a shortfall of housing within the Borough. Whilst the 'Further Options' document (March 2017) sought to provide an additional 900 homes to meet this shortfall, the 'Preferred Housing Sites Document' (October 2017) seeks to provide a further 550 homes (in addition to the 900).

2.3 This further uplift of housing numbers will act as a buffer to housing delivery in case of further delays to the larger strategic sites as well as guard against the possibility that housing allocations in the Local Plan Part 2 will not come forward as expected.

2.4 Considering the current housing shortfall due to delays in the strategic sites coming forward, it is crucial RBC safeguard enough land through the Local Plan Part 2 to ensure housing supply is not jeopardised during the plan period.

3.0 Question 3: Do you agree with the Council's proposal that no sites adjacent to the main urban area of Nottingham (within Rushcliffe) should be allocated for housing through Local Plan Part 2?

3.1 Yes

3.2 The National Planning Policy Framework (NPPF) highlights the importance of pursuing sustainable development and providing the supply of housing required to meet the needs of present and future generations by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being. Importantly, paragraph 55 of the NPPF highlights *that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.*

3.3 Considering the level of growth required within the plan period, concentrating increased housing development around the Borough's 'Key Settlements' (namely Keyworth) that are able to provide accessible local services is the most sustainable option to successfully deliver additional housing within the next 5 years. Additional housing allocations adjacent to Nottingham will not assist in supporting the more rural communities. In addition, the potential local market saturation through allocating additional housing within the same geographical location as the strategic allocations may do little to boost the supply of housing. Providing a variety of locations for growth within different specific market areas will significantly strengthen deliverability.

4.0 **Question 8: Do you agree that the Local Plan Part 2 should allocate greenfield land for housing development at Keyworth for around 580 homes in total?**

4.1 **Yes**

4.2 Given its range of shops, services and regular public transport connections, RBC's Local Plan Part 1: Core Strategy (2014) identifies Keyworth as one of six larger 'Key Settlements' within the Borough where housing growth should be focused.

4.3 With good transport links to the wider area via the A606 Melton Road and Fosse Way passing close by to the east, and the A60 Loughborough Road to the west Keyworth is an important commuter village to Nottingham but also has an excellent employment base within the settlement itself.

4.4 British Geological Survey (BGS) headquarters (located immediately to the north of the site within CEG's control) is the significant employer within Keyworth currently providing over 500 jobs. The Core Strategy (2014) highlights the BGS as a centre of excellence and the importance of its contribution towards employment Borough wide. The KNDP outlines BGS as a major employment site (Policy ED1) and confirms that an extension to the employment site has been put forward to RBC as part of their ongoing allocations process that is likely to result in a formal allocation in the Local Plan: Part 2.

4.5 As outlined in the KNDP, the continued growth and operation of BGS is not only important to the area's economic activity and wealth but also to the community's identity and overall vision for the future. This additional employment will consolidate Keyworth's position as an important centre for high value employment.

4.6 In addition to employment, Keyworth has an extensive range of existing facilities including shops, a medical centre, primary and secondary schools, library, leisure centre, skate- park, activity park and Keyworth Meadow Nature Reserve. The village also acts as an important local service centre for adjoining villages that are more isolated and the wider rural hinterland.

Land off Nicker Hill, Keyworth

- 4.7 Schools in the Key Settlement include South Wolds Academy and Sixth Form Secondary School, which is one of five secondary schools located in the Borough. There are also several primary schools located in Keyworth including Crossdale Primary School, Keyworth Primary School and Willow Brook Primary School.
- 4.8 In conclusion, the sustainability credentials of Keyworth mean the 'Key Settlement' can accommodate a significant proportion of housing that is required to be delivered through the Local Plan Part 2 and potentially beyond.

5.0 Question 9: Do you support the proposed allocation for housing development of the following sites in Keyworth?

○ Site KEY4a – Land off Nicker Hill

5.1 Yes

5.2 Due to Green Belt designation, the KNDP is unable to specifically allocate sites for housing as Green Belt can only be released through the Local Plan process.

5.3 However a significant amount of technical work as well as consultation and engagement has indicated a 'Preferred Housing Strategy' and 'Preferred Sites' within the KNDP.

5.4 The KNDP 'submission draft' was consulted on (in accordance with Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended)) by RBC from September - October 2017.

5.5 Representations were submitted (on behalf of CEG) to the KNDP submission document in October 2017 outlining support for the housing strategy, which identifies land off Nicker Hill for development. In addition, CEG confirmed that it looks forward to working closely with the Parish Council and the residents of Keyworth to support the final stages of the Neighbourhood Plan process and the subsequent delivery of high quality, locally responsive development that is a credit to the village.

5.6 Keyworth's Preferred Housing Strategy (outlined in the KNDP) is based around three key sites, each of which are for 150 to 160 dwellings:

- Land off Nicker Hill (7.6 Hectares)
- Land to the north of Bunny Lane (9.8 Hectares)
- Land between Platt Lane and Station Road (8.9 hectares)

5.7 In addition to the above, a safeguarded site is identified for development beyond the plan period at 'Land north of Debdale Lane'. CEG notes that the Neighbourhood Plan positively engages the NPPF principle of identifying safeguarded land in support of potential long-term growth. This issue is addressed later in these representations.

- 5.8 The Government's intention for neighbourhood planning is for communities to come together to choose where they want new houses, shops and job opportunities to be built. Accordingly, a considerable amount of consultation and engagement has been carried out during the lifetime of the KNDP in order to prepare the Housing Strategy and Preferred Sites. This has included extensive consultation with residents, community groups and environmental organisations. Consulting with local communities and empowering them to make decisions within their area is a fundamental element of the NP process. CEG fully support this process and outcome that has led to the Land off Nicker Hill being identified as a Preferred Site.
- 5.9 By virtue of its inclusion in the Pre-Submission Keyworth NP, it is clear that the Land off Nicker Hill has considerable Parish Council support and is a preferable location for development (as recommended for between 150-160 dwellings).

Housing Delivery

- 5.10 The RBC Local Plan Part 2 seeks to identify enough land suitable for housing development in order to help meet Rushcliffe's housing target of 13,150 new homes between 2011 and 2028 in addition to land allocated as strategic sites through the Core Strategy.
- 5.11 At the time of the Issues and Options Consultation for Part 2 of the Local Plan (March 2016) it had been expected that land for around 1,100 homes would have to be allocated. This was the cumulative total of the minimum housing requirements set by the Core Strategy for the following key settlements: East Leake (400 homes), Keyworth (450 homes), Radcliffe on Trent (400 homes) and Ruddington (250 homes), which gives a total of 1,500 homes, minus the fact that at East Leake had an approved planning permissions that already satisfied its minimum 400 housing requirement in full.
- 5.12 The 'Further Options' document published by RBC in March 2017 considered that delays to five of the six large strategic sites allocated for development within RBC's Core Strategy had led to a shortfall of housing in the Borough. Therefore, RBC sought to identify land for 900 further homes (in addition to the 1,100 homes it originally needed to identify) over the plan period (2019-2024) – 2,000 in total.

- 5.13 However, as noted in the Local Plan Part 2: Preferred Housing Sites document (October 2017), potential further delays to the delivery of new homes on the existing strategic allocations will cause the housing shortage to increase further. As a result RBC propose to identify a level of additional housing supply in order to provide some level of 'buffer' should delivery of the existing strategic allocations be further delayed or should allocations proposed through the Local Plan Part 2 not come forward at all. As such, the Local Plan Part 2: Preferred Housing Sites document proposes to allocate 25 sites to deliver around 2,550 homes in total (550 more than proposed in the 'Further Options' document in March 2017).
- 5.14 As outlined in our representations to the Local Plan Part 2: Further Options (March 2017) CEG consider that a proportion of these additional homes can be successfully delivered on Land off Nicker Hill. CEG therefore retain and reiterate its arguments in favour of additional land to be allocated within its control to satisfy housing need within the current plan period. It is understood that capacity within the existing schools has led to a decision to limit growth at Keyworth. However, given the number of schools, both primary and secondary, it is surprising that education capacity provides a definitive short / medium term constraint to growth at one of the Borough's most sustainable settlements.
- 5.15 Notwithstanding the above, and the primary argument that the site promoted could accommodate additional housing within the plan period, CEG reiterate the availability and opportunity of safeguarding land to the south east of the Land off Nicker Hill for housing development beyond the plan period.
- 5.16 Paragraph 85 of the NPPF outlines that when defining Green Belt boundaries, Local Planning Authorities should '*where necessary, identify in their plans areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period*' (our emphasis).

- 5.17 Of note, the most recent Government consultation on changes to the NPPF (*'Planning for the right homes in the right places'*) outlines that as part of the new approach they intend to make it clear within the NPPF that Local Plans should be reviewed every five years. Importantly, we note that Rushcliffe's current housing requirement has been established through the need to accommodate growth within the wider housing market area, with Nottingham's growth demand's being partially met by the adjoining local authority areas. Nottingham is constrained in its future growth due to its administrative area being generally contiguous with the Nottingham urban area. Existing opportunities to expand have been exploited through the allocation of major growth areas adjacent to Nottingham. A number of these have been delayed in coming forward – and as a consequence have increased the pressures to find additional allocations to meet the current housing requirement in Rushcliffe. Opportunities for longer- term growth (through a review of housing numbers in the HMA) will therefore need to look to the larger sustainable and accessible settlements - such as Keyworth.
- 5.18 Taking this into consideration, the RBC Core Strategy (2014) will be out of date in 2019. It will need to be reviewed resulting in additional higher housing number for Rushcliffe beyond the current Local Plan period. Therefore, in line with the NPPF we would recommend that there are exceptional circumstances (NPPF Paragraph 83) to justify the removal of additional 'safeguarded' land from the Green Belt through the Local Plan Part 2 in order to ensure the boundary is capable of *'enduring beyond the plan period'* (NPPF paragraph 83).
- 5.19 Land abutting 'Land off Nicker Hill' to the south east is available and deliverable and would provide an excellent opportunity for such 'safeguarded land'.
- 5.20 In line with the NPPF, (and without prejudice to CEG 's principal argument that additional land should come forward now) this 'safeguarded land' would not be allocated for development through this Local Plan but be removed from the Green Belt boundary in order to meet longer term demand as required beyond the plan period. It would be released for housing development only following Local Plan review.

Green Belt

- 5.21 Rushcliffe's Green Belt Review Part 2 (b) provides a detailed appraisal of the Nottingham-Derby Green Belt within Rushcliffe and its rural towns and villages. The work was undertaken to support Green Belt release and make land available in order to meet the minimum housing targets within the Core Strategy, and to potentially consider longer-term requirements so the issue of Green Belt does not have to be revisited in the next review of the Local Plan. This includes review of all other existing "inset" boundaries in order to correct any minor issues in relation to current Green Belt boundaries.
- 5.22 It is apparent that as part of the 'strategic review' Keyworth north-east (which Land off Nicker Hill lies within) and Keyworth west both scored very similarly gaining a strategic Green Belt score of 'low-medium'. Land to the north and south of the village were deemed to perform better when assessed against the objectives and purpose of the Green Belt, meaning that they are less suitable for development and should be retained in the Green Belt. Therefore, urban growth to the north east and west will have a more limited impact on the purposes of the Green Belt.

Appropriate Green Belt Boundary

- 5.23 Pursuant to the above, CEG recommend a change to the proposed Green Belt boundary that reflects the need to additionally safeguard land for potential future release, and importantly, defines the proposed Green Belt boundary using physical features that are readily recognisable and likely to be permanent as set out in the NPPF paragraph 85 bullet point 6.
- 5.24 The revised Green Belt boundary as currently proposed in the Local Plan Part 2 is arbitrary, incongruous to the rest of the settlement and is not defined by a readily recognisable feature. Moving the proposed Green Belt boundary further north as illustrated in Appendix 1 would allow for the natural stream boundary to be followed which is also in line with the existing British Ecological Survey Site boundary (identified for Green Belt release in the Green Belt Review Part 2 (b)). As outlined in the Green Belt Review Part 2 (b), the British Geological Survey Centre is considered to be a significant intrusion into the Green Belt which already breaks the strategic boundary along Nicker Hill. As such, the release of Land off Nicker Hill (up to the natural stream boundary) provides a far more logical and permanent boundary for the current allocated site allowing appropriate longer-term growth of the village within an area that has the least impact upon the purposes of the Green Belt as confirmed by the Council's technical evidence base.

- 5.25 In line with NPPF requirements, this would enable a readily recognisable and clear boundary along an existing physical feature to be established.

Deliverability

- 5.26 CEG is committed to deliver Land off Nicker Hill and moving forward, welcome the opportunity to work with Rushcliffe Borough Council, Keyworth Parish Council and the residents of Keyworth to produce masterplan concepts to deliver development at the Preferred Site that is of high quality and positively adds to the character of Keyworth.
- 5.27 Comprehensive site specific technical assessments and studies including transport, ecology, flood risk, landscape and the historic environment have been carried for Land off Nicker Hill which has helped inform the KNDP housing strategy and demonstrates the Site to be deliverable and developable. This work has included initial engagement with various Statutory Consultees including the Highway Authority.

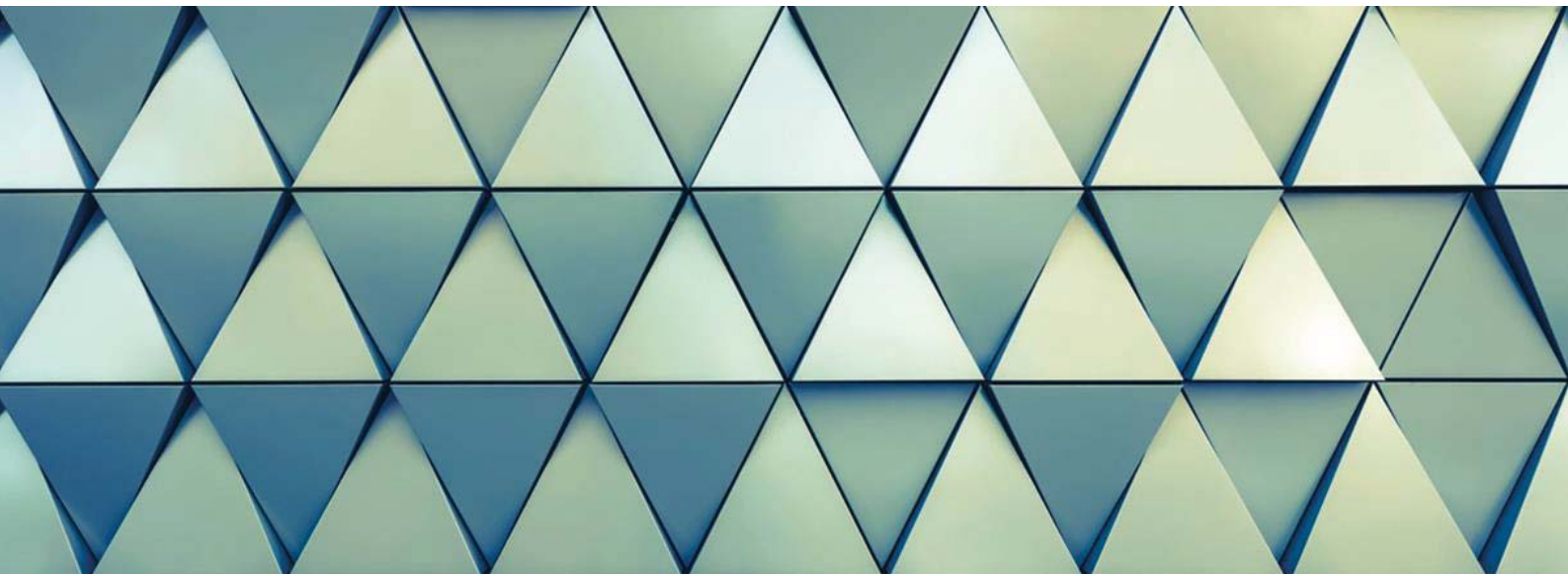
6.0 Conclusion

- 6.1 CEG agree with the uplift in housing numbers as proposed through the Local Plan Part 2: Preferred Housing Sites and the requirement to deliver a further 550 houses (in addition to the additional 900 houses proposed in the 'Further Options Document') during the plan period in order to meet the housing shortfall from the Core Strategy.
- 6.2 CEG further support RBC's proposed housing strategy to deliver 580 homes at the 'Key Settlement' of Keyworth and confirm that the Land off Nicker Hill is available and deliverable and fully support the site's release from the Green Belt and subsequent allocation within the Local Plan Part 2. However, as set out in previous submissions, CEG contend that the land within its control can accommodate additional development without significantly prejudicing Green Belt objectives. Furthermore, CEG consider that Keyworth, as a settlement, can accommodate an additional housing growth uplift within this plan period given its sustainable credentials in terms of service and community infrastructure. Notwithstanding this CEG urges the Council to plan in a proactive way for the future within the context of an inevitable Borough wide need to accommodate additional housing growth. This representation highlights the availability and opportunity of safeguarding land to the south east of Land off Nicker Hill for housing development beyond the plan period allowing for an additional housing buffer should the other sites in the Key Settlement fail to come forward.
- 6.3 In line with the NPPF, this 'safeguarded land' would not be allocated for development through the Local Plan but be removed from the Green Belt in order to meet longer- term demand as required beyond the plan period. This would assist in expediting future Local Plan processes under proposed mandatory five-year reviews as set out in the Government's consultation on changes to the NPPF.
- 6.4 CEG consider that the Green Belt boundary within the site location should be aligned further north-east (see Appendix 1) and defined by the existing stream and existing BGS Site allowing for a readily recognisable and clear Green Belt boundary.
- 6.5 CEG remain committed to working with the Local Authority, Parish Council and local residents to ensure that development on Land at off Nicker Hill is of a high quality, which reflects the needs and character of Keyworth and is, accordingly, something that Keyworth can be proud of.

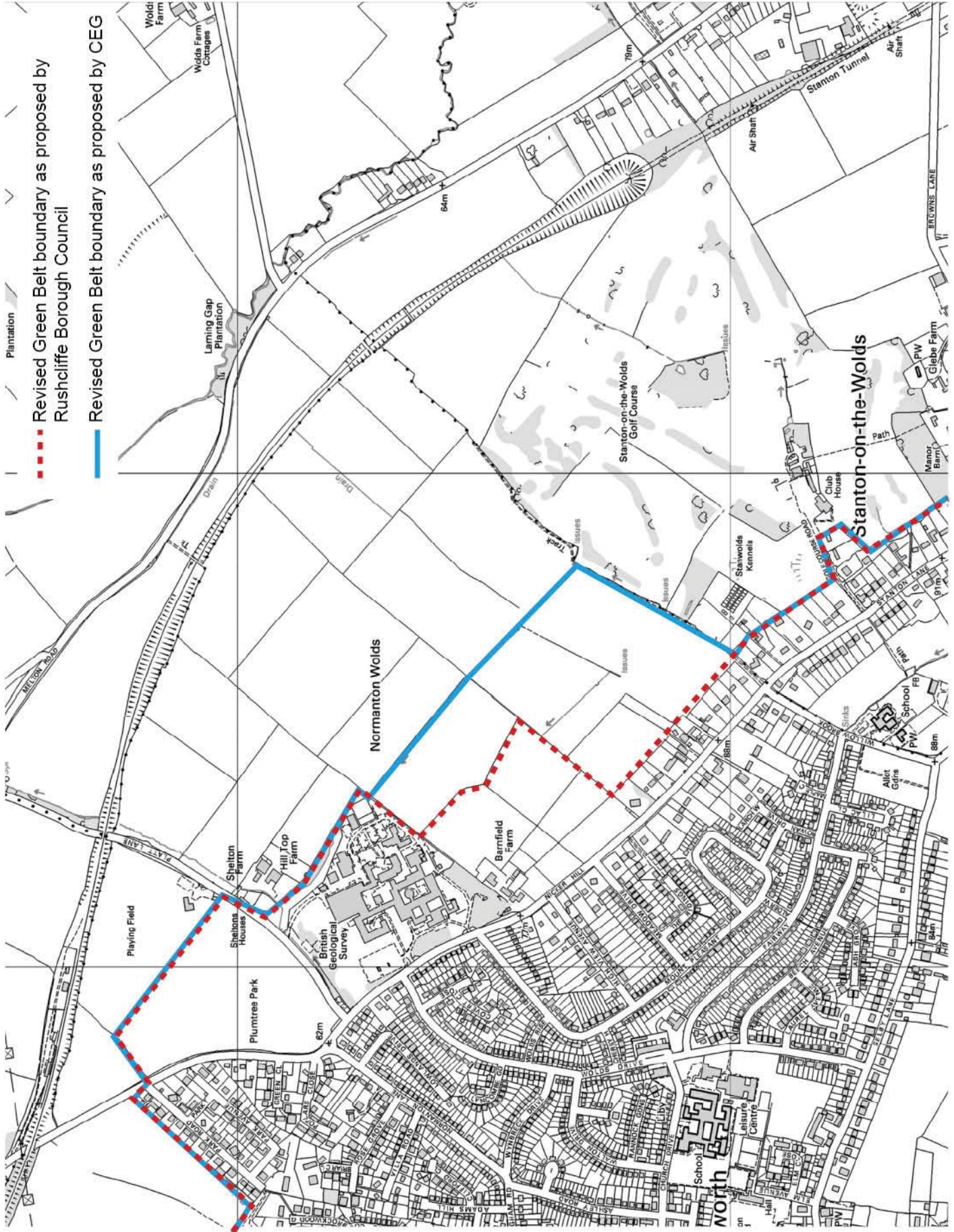
**Nexus Planning
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Appendix 1: CEG's proposed Green Belt boundary



--- Plantation

--- Revised Green Belt boundary as proposed by Rushcliffe Borough Council

— Revised Green Belt boundary as proposed by CEG