



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

David Wilson
Homes East
Midlands 905154
agent Heaton
Planning 780466

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)
David Wilson Homes East Midlands	Name	Liam Toland
Click here to enter text.	Address	Heaton Planning, 9 The Square, Keyworth, NG12 5JT
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	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>
Don't know	<input type="checkbox"/>

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

PLEASE SEE ATTACHED STATEMENT FOR FULL DETAILS OF OUR OBJECTIONS AND REPRESENTATIONS.

(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	<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)

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

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

Click here to enter text.

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 STATEMENT FOR FULL DETAILS OF OUR OBJECTIONS AND REPRESENTATIONS.

(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 type="checkbox"/>	<input checked="" type="checkbox"/>
Site KEY8 – Land between Platt Lane and Station Road (estimated capacity around 190 homes)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Site KEY10 – Land south of Debdale Lane (1) (estimated capacity around 190 homes)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Site KEY13 – Hillside Farm (estimated capacity around 50 homes)	<input checked="" 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 STATEMENT FOR FULL DETAILS OF OUR OBJECTIONS AND REPRESENTATIONS.

(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"/>

	Yes	No
Site RAD05a – Land north of Grantham Road to south of railway line (1a) (estimated capacity around 140 homes)	<input type="checkbox"/>	<input type="checkbox"/>
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

No

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

Click here to enter text.

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)

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>

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.

Heaton | Planning

Planning Consultants

Representations to the Rushcliffe Local Plan Part 2: Preferred
Housing Sites Consultation

Prepared by Heaton Planning

On Behalf of

David Wilson Homes East Midlands



**MINERALS,
WASTE & ENERGY
DEVELOPMENT**



**EDUCATION &
LOCAL AUTHORITY
DEVELOPMENT**



**HOUSING &
RESIDENTIAL
DEVELOPMENT**



**COMMERCIAL &
INDUSTRIAL
DEVELOPMENT**



**RURAL
DEVELOPMENT**

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

1 Introduction

- 1.1.1 These objections and representations to the Local Plan Part 2: Land and Planning Policies – Preferred Housing Sites (LP2) consultation are prepared by Heaton Planning on behalf of our client David Wilson Homes East Midlands (DWH) who have an interest in Land South of Selby Lane, Keyworth. DWH have actively promoted Land South of Selby Lane, Keyworth (Appendix 1 – DWH Proposed Development) through the Rushcliffe Core Strategy, LP2 stages and the Keyworth Neighbourhood Plan as a suitable sustainable residential development with a unique character to create a community which both integrates with and respects the local area.
- 1.1.2 It is considered that a residential development at Land South of Selby Lane can form part of a sound development strategy for Keyworth and DWH object to the omission of the site from LP2.
- 1.1.3 These representations relate specifically in terms of the following questions:

2 Housing Land Supply

2.1 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?

- 2.1.1 DWH agree with the revised approach in the LP2 to identify enough land to meet the shortfall in housing delivery due to the delays of the strategic allocation sites. However, due to the development of all but one of the six sites taking longer to get underway than had previously been expected, further delays to the delivery of new homes on those large allocated sites will cause the housing land shortfall to increase further and lead to the failure of the Council to meet the housing requirement by 2028. Therefore, it is considered that a target of 2,550 homes is insufficient and the Council need to ensure that the potential failure of the six allocated sites to deliver in the plan period is planned for.
- 2.1.2 There is a real need to look carefully at delivering targeted sustainable development schemes in the Key Settlements in order to maximise the potential for utilising existing capacity. A wider distribution of growth across the Key settlements is a solution to deliver the necessary housing numbers. This would prove more feasible and secure greater levels of delivery than having to appraise and environmentally

assess expansions to the strategic allocations. It is not considered sustainable, based on existing service and infrastructure provision, for any further greenfield sites to be allocated at smaller 'other villages'.

- 2.1.3 In terms of meeting the housing land supply shortfall, and the requirement for additional growth/housing numbers, we consider that a proportion of the increased level of housing should be allocated to Key Settlements such as Keyworth.

3 Housing Development at the 'Key Settlements' – Keyworth

3.1 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?

- 3.1.1 No - DWH consider that Keyworth has the capacity to comfortably accommodate a figure higher than 580 homes.

3.1.2 The main reasoning for the figure of 580 dwellings in Keyworth is that the Local Education Authority has indicated that pupil demand for primary school places from up to 580 dwellings could be accommodated but no more than this. However, insufficient primary school places is not considered to be a justified reason for restricting growth at Keyworth and this was the position taken by the Planning Inspector at Hallfield Farm, Appeal ref: APP/X2410/A/11/2161715. The Hallfield Farm application was originally refused on the basis that there was insufficient capacity at the local primary school to accommodate the places generated by the development and the school was unable to expand, however the Inspector did not concur that this was an adequate reason for refusal. Although the Inspector was satisfied that there is pressure on spaces across the local primary schools, this could be mitigated to the extent necessary to provide additional capacity by way of the education contribution, which we consider is the case at Keyworth.

- 3.1.3 On the above basis, it is therefore considered that Keyworth has no identified constraints to provide upwards of 580 dwellings to satisfy the identified need for Rushcliffe.

3.1.4 In terms of uplifting the level of housing at Keyworth, the village was assessed as having potential for a medium to high level of growth compared with other settlements in the Greater Nottingham sub region in the Greater Nottingham Sustainable Locations for Growth Study (2010) and as a comparison, it scored higher than East Leake in the Greater Nottingham Accessibility Study (2010).

- 3.1.5 Other key settlements have been allocated much bigger increases in housing

numbers from the numbers in the Core Strategy to the revised numbers in LP2 as shown in the table below:

Key Settlement	Core Strategy	LP2	% Increase
Keyworth	450	580	29%
East Leake	400	800	100%
Radcliffe	400	820	105%
Ruddington	250	410	64%

- 3.1.6 As discussed in Paragraph 3.1.2 and 3.1.3, Keyworth has no identified constraints to provide upwards of 580 dwellings and has been shown to perform better in terms of potential for growth than other key settlements of a similar size. Therefore, we see no reason why housing numbers do not show a similar increase to those in East Leake, Radcliffe and Ruddington as shown above.
- 3.1.7 Furthermore, although it is a very early stage, some consideration should be given to the revised way to calculate housing need for an area such as Keyworth set out in the current DCLG consultation on Planning for the Right Homes in the Right Places. The main element of the consultation document is the Government’s introduction of a standardised method for assessing housing need, to be adopted by all local planning authorities, to make the process “simpler, quicker and more transparent”.
- 3.1.8 In terms of the calculation of a figure for Keyworth, the proposed formula is simply to take the population of Keyworth – 7,000 (source: Keyworth Parish Neighbourhood Development Plan Submission Draft – December 2016) and calculate what percentage it is of the overall population in the local planning authority area. RBC’s population is 111,600 (source: Adopted Local Plan Part 1: Core Strategy), therefore, Keyworth’s percentage of the overall population is 6.3%. Thus, the housing need figure in Keyworth is 6.3% of RBC’s housing need, which the Local Plan Part 1: Core Strategy sets as a minimum of 13,150 homes between 2011 and 2028 (774 per annum). Therefore, 6.3% of 13,150 gives a housing need figure for Keyworth of 828, which is significantly higher than that being proposed in LP2.
- 3.1.9 The inclusion of sites such as Land off Selby Lane in LP2 would help meet the identified housing need for Rushcliffe and also provide greater certainty in terms of housing supply/delivery over the Plan period and significant weight should be placed on the ability of a developer such as DWH in bringing forward a suitable and acceptable scheme.
- 3.1.10 An uplift in the target figure of 580 dwellings at Keyworth provides an excellent opportunity for development in a sustainable location which can make a positive

contribution to housing supply during the plan period. In our view a more ambitious approach can be taken to housing supply in Keyworth as we have recommended above. The allocation of small and medium sized sites for residential development on the edge of Keyworth will increase the Local Plan's flexibility and assist the authority in identifying a 5 year supply of deliverable homes.

- 3.1.11 Finally, an uplift in the housing target at Keyworth is in line with the ethos of the NPPF (paragraph 47), and increases the Local Plan's flexibility to assist the Local Authority in identifying a 5 year supply of deliverable homes. It would also help provide much needed affordable market housing in a location where house prices are high. Therefore, on the basis of the above, an uplift in the housing target for Keyworth provides an excellent opportunity for a more ambitious approach to be taken to significantly boost housing supply.

4 Housing Development at the 'Key Settlements' – Keyworth

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

- **Site KEY4a – Land off Nicker Hill (1) (estimated capacity around 150 homes)**
- **Site KEY8 – Land between Platt Lane and Station Road (estimated capacity around 190 homes)**
- **Site KEY10 – Land south of Debdale Lane (1) (estimated capacity around 190 homes)**
- **Site KEY13 – Hillside Farm (estimated capacity around 50 homes)**

- 4.1.1 DWH are not in support of KEY4a, KEY8 and KEY10 and do not consider these to be the most appropriate or sustainable locations for residential development.

- 4.1.2 As set out in our previous representations to the Keyworth Neighbourhood Plan, Local Plan Part 2: Land and Planning Policies Document (LAPP) and draft Green Belt Review (part 2(b)) Consultation, we contend that there were no justifiable reasons for the inclusion of certain sites instead of Land South of Selby Lane. We consider that a residential development at Land South of Selby Lane (KEY03) would make an important positive contribution to Keyworth in terms of design, form and location, to the character and functions of the surrounding landscape and development could come forward in combination with other sites in order to provide the required housing supply and provide a balanced approach to growth around Keyworth. Development of this site would not jeopardise Green Belt objectives and would form

a natural extension to 'round off' the edge of the settlement.

- 4.1.3 DWH have serious concerns regarding a range of errors contained in the Housing Options Interim Sustainability Appraisal Report, the findings of the Green Belt Review and the Housing Site Selection Interim Report in respect of site KEY03. The errors and clear bias in the analysis and scoring towards this site along with unreasoned negative findings reinforces our belief that findings have been retrofitted to justify the existing site selection. Our concerns are set out below:

4.2 Housing Options Interim Sustainability Appraisal Report

- 4.2.1 In terms of the Housing Options Interim Sustainability Appraisal Report, the summary findings for site KEY03 state that *"The development of this greenfield site would have significant negative impacts on environmental objectives due to the potential adverse effects on priority habitats and the local wildlife site"*. This is fundamentally incorrect as KEY03 would have no impact on any local wildlife site (LWS) as the site is a considerable distance from the nearest LWS, with Stanton Way and associated residential development situated between Site KEY03 and the nearest LWS (Stanton on the Wolds Golf Course). Site KEY03 is intensively farmed agricultural land and is therefore unlikely to have any key habitats. Furthermore, the only priority habitats identified on site are mature hedgerows, which could be incorporated within a landscaping scheme for the development of the site and any adverse impacts mitigated.
- 4.2.2 The above statement is also at odds with the findings for KEY04a, which is directly adjacent to BGS Meadow LWS and is also in close proximity to Stanton-on-the Wolds Golf Course LWS. For Site KEY04a, the Housing Options Interim Sustainability Appraisal Report states that "the land is also bounded by and contains within it established mature hedgerows which are a LBAP priority habitat and the pasture may contain locally important neutral grassland plant species. The site also contains ditches which are also a priority habitat". Despite the number of environmental constraints, the summary states that site KEY04a would only have negative impacts on environmental objectives and not the significant impacts attributed to KEY03, which is inconsistent.
- 4.2.3 Site KEY08, is similar to KEY03 in that it is bounded by established mature hedgerows/trees which are a LBAP priority habitat. However, similarly as for KEY04a, the summary findings have been watered down in order to give a more favourable view to the site such as stating that the adverse effects on priority habitats could potentially be mitigated, which was not stated for KEY03.

- 4.2.4 Other issues in terms of KEY03 relates to the summary in terms of landscape, which states that *“there is considered to be a negative effect due to high landscape quality”*. This is despite the Landscape section stating that *“despite the good condition of the landscape resource within the study area, it has a low landscape value”*. It also states that *“the landscape susceptibility is also low”* and *“the landscape sensitivity is low”*. Therefore, there appears to be no reason for the site to be considered to have a negative impact on high landscape quality and also calls into question the LVIA score of 60/100.
- 4.2.5 Contrastingly for Site KEY04a, the Landscape section states that there is a high landscape quality and a medium landscape value. Despite this, the summary findings state that this site will have the same effect as KEY03 and scores only 1 point more i.e.61/100

4.3 Draft Green Belt Review

- 4.3.1 We continue to disagree with the assessment of Green Belt land around Keyworth specifically in terms of Land South of Selby Lane (KEY/H). Despite a wide range of concerns raised on the Draft Green Belt Review Part 2b for the issues and options stage of LP2, these appear to have been ignored with the questionable scoring remaining roughly the same and confusingly, the scoring has actually improved for some sites. For instance, the scoring for land off Nicker Hill – KEY/D (although the site has been reduced in size) has improved by 3 points.
- 4.3.2 It is considered at this stage that the cumulative impact of removing Key/A, KEY/D and the BGS from the Green Belt needs to be given proper consideration. Furthermore, KEY/M and KEY/N need to be considered as one site as both these appear to make up Site KEY 10 – Land South of Debdale Lane, which is being recommended for allocation in LP2.
- 4.3.3 The Green Belt Review Consultation Report attempts to addresses some of the issues raised in our previous representations, however, it only picks and chooses particular points raised for sites and on the whole, largely ignores the points raised on the proposed allocated sites.
- 4.3.4 The following section will consider the supposedly updated findings of the Green Belt Review in terms of the 3 most relevant purposes of the Green Belt with regards to Land South of Selby Lane and the allocated and safeguarded sites included in the Draft Neighbourhood Plan and as part of LP2.

Check Unrestricted Sprawl of Settlements

- 4.3.5 With regards to the purpose of the Green Belt to check unrestricted sprawl of settlements, Land South of Selby Lane has been allocated a score of 5.
- 4.3.6 The Green Belt Review Consultation Report sets out that the site only shares one complete boundary with neighbouring residential developments on the south of Selby Lane plus a short distance along Selby Lane to the north. Its remaining boundaries are adjacent to open countryside or allotments, which are not within Keyworth's physical boundary (nor are they inset from the Green Belt). The nearby school and church are not adjacent to the site.
- 4.3.7 It is accepted that the site only adjoins residential development on its western side and for a short distance to the north of Selby Lane and that the allotments are not within Keyworth's physical boundary. However, it is considered that Selby Lane constitutes a defensible boundary and the allotments serve a residential purpose and the nearby school and church are obviously adjacent to the site to the north.
- 4.3.8 As discussed below, KEY/M is scored with 4, despite the fact the site shares only one one boundary with neighbouring residential development and would facilitate a wide intrusion into the countryside between Bunny Lane and Debdale Lane.
- 4.3.9 Further justification for the score of 5 is that the site doesn't follow a defensible boundary and that a larger area would need to be removed to ensure a robust and permanent boundary is established.
- 4.3.10 Reference to the site being visually disconnected appears to be a somewhat engineered consideration to score the site as 5 given the site's connection to the existing settlement. It is very difficult to understand where the site would be visible from any location to the north. In terms of views from the east, a development of this site would be viewed in the context of the existing settlement developed along the ridgeline. Furthermore, the proposed landscaping buffer would further integrate the development into the existing built form.
- 4.3.11 It seems illogical that Land South of Selby Lane, one of the smallest sites assessed would lead to greater sprawl than the larger sites assessed.
- 4.3.12 Therefore, on the basis of a fair and objectively assessed score, it is considered as a worst case, the site receives a revised score of 4.
- 4.3.13 In terms of KEY/A, this has been scored as 2, despite only having 1 recognised boundary with Keyworth. It has also been stated that it would create an opportunity to round off the north eastern boundary of Keyworth, which it is considered that Land South of Selby Lane presents to the south eastern boundary of Keyworth. It is

therefore considered fair to score KEY/A as 3.

- 4.3.14 KEY/D has been given a score of 2, which has been reduced from a score of 4 in the Draft Green Belt Review Part 2b for the issues and options stage of LP2. Although the site has been reduced in size, this is still a large area of land and development of this site would constitute a conspicuous intrusion and extend across land which is prominent. It is difficult to understand how a large area of land such as this site can score significantly less than a substantially smaller site such as KEY/H as by the very nature of the extensive site, it will lead to a greater sprawl of a settlement. Therefore, given that this large site has only 1 boundary with the existing settlement and it would form a prominent intrusion into open countryside, a score of 5 is considered appropriate. This assessment matrix appears to have been totally ignored in formulating a score of 2.
- 4.3.15 Given the location of Key/D and KEY/A adjacent to the BGS, if the BGS is removed from the Green Belt, these sites would cumulatively lead to a significant intrusion into open countryside and the sprawl of Keyworth northwards. Therefore, cumulatively a score of 5 is considered appropriate for these sites.
- 4.3.16 KEY/M is scored with 4, despite the fact the site borders only one side of Keyworth and would facilitate a wide intrusion into the countryside between Bunny Lane and Debdale Lane. KEY/N has been scored as 5 and both these appear to make up Site KEY 10 – Land South of Debdale Lane, which is being recommended for allocation in LP2. Therefore, based on the assessment matrix and the cumulative impact of KEY/M and KEY/N, a score of 5 is considered appropriate for KEY/M.
- 4.3.17 With regards KEY/P, it scored 3, despite stating that the land if developed would form a prominent intrusion into open countryside. However, it is agreed that the visual intrusion would be limited to the area around Debdale Lane. Therefore, a score of 3 is seen as acceptable. With regards KEY/L, a score of 2 is considered fair.

To prevent neighbouring towns merging into one another

- 4.3.18 In terms of preventing the merging of settlements, Land South of Selby Lane (KEY/H) scores a 2 due to claims that the loss of the site would increase the perception that Keyworth and Stanton on the Wolds are merging. The settlement of Keyworth already abuts Stanton on the Wolds, so it is very difficult to understand how a development at Land South of Selby Lane would increase the perception of merging. As stated as part of the justification, there are no settlements south of Keyworth which are within the Green Belt. Therefore, based on the assessment matrix, a score of 1 is considered

appropriate, due to development of this site not reducing distance between settlements.

- 4.3.19 KEY/A has been scored as 1 with the justification stating that due to the BGS's intrusion into the Green Belt, the development of the site would not reduce the distance between Keyworth and Normanton-on-the-Wolds/Plumtree. This seems unfathomable, and again totally contradictory to how Land South of Selby Lane has been treated. The Green Belt Review Consultation Report states that it disagreed with a suggested score of 3 against merging for KEY1 as part of our previous representations and that this site shares two boundaries with Keyworth and would round off the settlement. However, that overlooks the fact that KEY/A would extend development beyond the BGS closer to both Normanton-on-the-Wolds and Plumtree. Therefore, a score of a 3 is seen as acceptable.
- 4.3.20 In terms of KEY/D, this has been given a score of 2 as it does not form part of the buffer between Keyworth and Normanton-on-the-Wolds and does not extend beyond the BGS. Despite this, the fact that the BGS site is still within the Green Belt at the time of assessment, a score of 2 is considered fair. However, as stated above, if all the sites proposed in this location of Keyworth are taken forward, cumulatively the impact will be far greater than they are individually.
- 4.3.21 KEY/M is scored with 1 due to it only resulting in a minor reduction in the distance between Keyworth and Bunny/Bradmore. Taking account that Land South of Selby Lane was given a score of 2, despite not reducing the distance between settlements, it appears highly questionable that a site that would facilitate a wide intrusion into the Green Belt and reduce the distance between 2 settlements is scored lower.
- 4.3.22 KEY/N is scored as 2, however, in terms of the merging of settlements, it is considered that KEY/N needs to be considered alongside KEY/M as KEY/N can't be delivered without KEY/M and both these form Site KEY 10 – Land South of Debdale Lane, which is being recommended for allocation in LP2. Therefore, a score of 3 is seen as a minimum for KEY/M and KEY/N.
- 4.3.23 With regards KEY/L and KEY/P, scores of 1 are considered fair.

Assist in Safeguarding the Countryside from Encroachment

- 4.3.24 In terms of assisting the countryside from encroachment, Land South of Selby Lane scores a 4. As stated in previous representations, the edge of Keyworth is prominent to the north western corner of the site and is considered the overriding feature of the land. Furthermore, as stated previously, development of this site would be viewed in

the context of the existing settlement developed along the ridgeline.

- 4.3.25 Mitigation measures which may reduce a development's prominence are not considered within the Green Belt review, although the proposed landscaping buffer would further integrate the development into the existing built form.
- 4.3.26 Therefore, given the relatively small scale of the proposed development site together with the overriding feature of the existing settlement, a score of 3 is considered fair.
- 4.3.27 In terms of the allotments along Selby Lane, reference is made that development of Land South of Selby Lane would be an intrusion into the countryside and isolate the allotments and land between Widmerpool Lane and Stanton Lane. This statement is perplexing and as allotments serve residential purposes, development of this site would not therefore isolate them.
- 4.3.28 KEY/A has been scored as 3 and states that the Green Belt designation has prevented the encroachment of inappropriate development within the site, which is surely the case with all the sites under consideration. The BGS may be clearly visible and prominent, however, this site is still classified as Green Belt and as stated, residential developments on Platt Lane are screened by mature trees and therefore clearly visible. Furthermore, given that the site is located beyond the north western edge of Keyworth, the urban edge may be visible but is certainly not an overriding feature. Therefore, based on the assessment matrix, a score of 4 is considered appropriate.
- 4.3.29 In terms of KEY/D, this has been given a score of 3, being reduced from a previous score of 4, without any justification for this reduction.
- 4.3.30 KEY/M is scored with 3 and the score for KEY/N has been reduced from 5 to 4, again without any clear justification. As stated previously KEY/N can't be delivered without KEY/M and both these form Site KEY 10 – Land South of Debdale Lane, which is being recommended for allocation in LP2, therefore there would be significant encroachment into the countryside. A score of 5 for both sites is therefore considered a correct score.
- 4.3.31 With regards to KEY/L and KEY/P, scores of 2 and 3 respectively are considered fair.

Conclusion

- 4.3.32 The scores of the above assessment relating to the proposed allocated sites along with Land South of Selby Lane (KEY/H) are set out in the table below together with the original scores (outlined in brackets) as set out in the Green Belt Assessment report.

Table 1

	KEY/H	KEY/A	KEY/D	KEY/L	KEY/M	KEY/N	KEY/P
Check unrestricted sprawl of settlements	4 (5)	3 (2)	5 (2)	2 (2)	5 (4)	5 (5)	3 (3)
Prevent merging of settlements	1 (2)	3 (1)	2 (2)	1 (1)	3 (1)	3 (2)	1 (1)
Assist in safeguarding the countryside from encroachment	3 (4)	4 (3)	4 (3)	2 (2)	5 (3)	5 (4)	3 (3)
Preserve setting and special character of historic settlement	1	2	1	1	1	1	1
Assist in urban regeneration	3	3	3	3	3	3	3
Revised Green Belt Score	12 (15)	15 (11)	15 (11)	9 (9)	17 (12)	17 (15)	11 (11)

4.3.33 As outlined above, the revised score for Land South of Selby Lane (KEY/H) indicates that the site is of low-medium value compared to the medium high value set out in the Green Belt review. Development of this site would not lead to an intrusion into the countryside and would be viewed in the context of the existing settlement developed along the ridgeline. The proposed landscaping buffer would further integrate the development into the existing built form.

4.3.34 The assessment above highlights our concerns regarding the inaccuracy and consistency in the scoring and reinforces our belief that findings have been retrofitted to justify the site selection, and in some cases key constraints identified and indeed the assessment matrix methodology have been ignored in scoring the proposed allocated and safeguarded sites.

4.4 Housing Site Selection Interim Report

4.4.1 In terms of the Housing Site Selection Interim Report, as with the sustainability appraisal the report incorrectly states at paragraph 6.31 that site KEY03 is fundamentally constrained by landscape sensitivity. It further states in Appendix 2: Site Schedules in the overall summary for the site that *“the prominence of the site within the landscape is a constraint and this is recognised in the Green Belt Review and Landscape Assessment”*. However, as set out above, that is incorrect as the landscape assessment sets out that *“it has a low landscape value”*, *“the landscape susceptibility is also low”* and *“the landscape sensitivity is low”*. It is utterly confusing how this same factually incorrect statement has appeared on a number of occasions in 2 separate reports.

- 4.4.2 In terms of the Green Belt Review, as set out above, the revised score for Land South of Selby Lane (KEY/H) indicates that the site is of low-medium value compared to the medium high value set out in the Green Belt review. Development of this site would not lead to an intrusion into the countryside and would be viewed in the context of the existing settlement developed along the ridgeline. The proposed landscaping buffer would further integrate the development into the existing built form.
- 4.4.3 As outlined above, a number of the sites identified as proposed allocations in LP2 and in the Neighbourhood Plan will have cumulative impacts and it is our belief that a balanced approach to growth around Keyworth is the most optimal option with the inclusion of Land South of Selby Lane as an allocation.
- 4.4.4 Other factors such as sustainability and technical considerations such as transport and access are key in supporting the appropriateness of site selection.
- 4.4.5 The location of Land South of Selby Lane on the south eastern edge of Keyworth is sustainable, with excellent access to public transport, local facilities and amenities, promoting non-car use. Of note is the fact that a second area of land approximately 0.6ha opposite the site (part of KEY/G) is within the DWH control. This is intended to be offered for community use.
- 4.4.6 It is considered that a residential development at Land South of Selby Lane can form part of a sound development strategy for Keyworth and would make an important positive contribution to Keyworth in terms of design, form and location, to the character and functions of the surrounding landscape.

5 Conclusions

- 5.1.1 An uplift in the target figure of 580 dwellings at Keyworth provides an excellent opportunity for development in a sustainable location which can make a positive contribution to housing supply during the plan period. In our view a more ambitious approach can be taken to housing supply in Keyworth as we have recommended above. The allocation of small and medium sized sites for residential development on the edge of Keyworth will increase the Local Plan's flexibility and assist the authority in identifying a 5 year supply of deliverable homes.
- 5.1.2 It is considered that the DWH proposals can help meet the needs of Keyworth in the years to come, as a sustainable, deliverable housing development with an appropriate housing mix, including open market homes which cater for both young families and the elderly, as well as affordable housing provision.

- 5.1.3 There are significant merits of supporting smaller sites such as that promoted by our client. Smaller sites are not reliant on significant infrastructure delivery and cumulatively could support growth required in the Borough without the significant encroachment into the Green Belt that would be required for one single larger site/allocation.
- 5.1.4 Land South of Selby Lane would also provide the Council with the greater potential of meeting the existing housing land supply shortfall and providing a means to achieving a 5 year housing land supply in the early years of the plan period. The recently published Housing White Paper echoes this and encourages local authorities to make appropriate allowance for the fact that smaller sites tend to be built out more quickly than larger ones.
- 5.1.5 Land South of Selby Lane is considered to present an excellent opportunity for a sustainable and deliverable development in a good location which can make a positive contribution to housing supply during the plan period. This indicates that a more ambitious approach can be taken to housing supply in Keyworth as recommended above
- 5.1.6 The inclusion of sites such as Land South of Selby Lane in the Local Plan would provide greater certainty in terms of housing supply/delivery and assist the authority in identifying a 5 year supply of deliverable homes. Significant weight should also be placed on the ability of a developer such as DWH in bringing forward a suitable and acceptable scheme.

Appendix 1 – Proposed Development

About David Wilson Homes East Midlands

David Wilson Homes is part of Barratt Developments PLC, the nation's largest house builder. It has a long established reputation for developing high quality homes and building sustainable communities, where people aspire to live.

The company is proud to have been awarded 5 star builder status for four consecutive years by the National House Building Council. This accolade demonstrates the quality of both our product and service; awarded only to those house builders who receive a higher than 90% recommendation by their customers.

David Wilson Homes East Midlands directly employs over 250 employees across Leicestershire, Nottinghamshire, Derbyshire, Lincolnshire and Warwickshire. Building over 650 homes each year, it is committed to developing quality homes in outstanding locations.

Key message

We consider that a new housing development at Selby Lane will be highly sustainable in terms of design, built form and community use. We look forward to working with the Neighbourhood Plan Steering Group and the local community to create an exemplar development with a strong sense of place.

**For further information,
please get in touch...**

Planning Manager – John Deakin
Planner – Helen Bareford

01530 276700



Where quality lives

David Wilson Homes

Our Vision:

Proposed development on land off Selby Lane, Keyworth



De Lacy Court, Castle Donington - a bespoke development incorporating traditional features from the village



Plaques demonstrating local ecology in homes at Parker's Place, Mountsorrel



Homes at Nursery Gardens, Measham incorporate Victorian features inspired by surrounding homes



Where quality lives

David Wilson Homes

dwh.co.uk

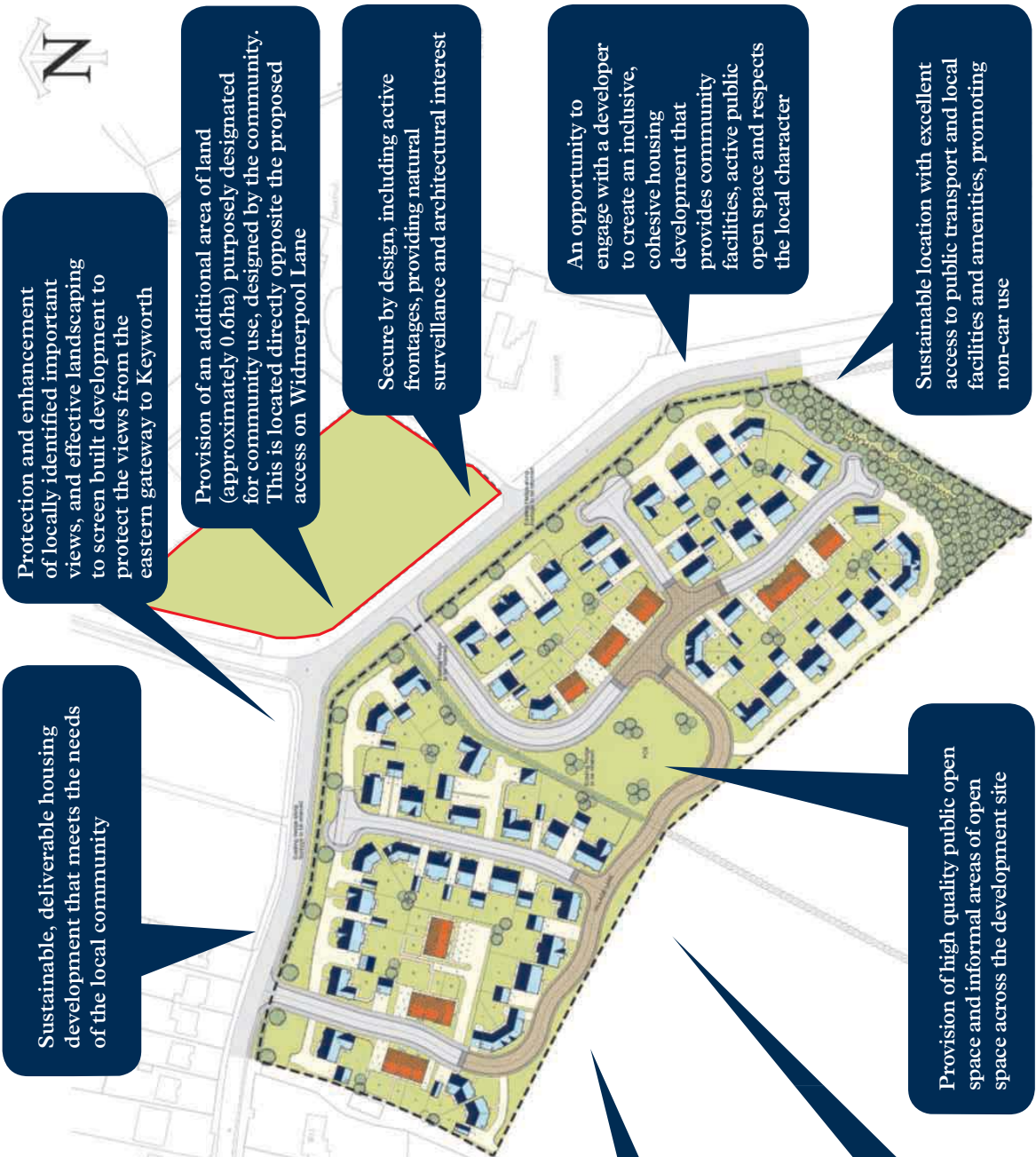
Land off Selby Lane, Keyworth - Proposed development and community benefits

We envisage the Neighbourhood Plan Steering Group to be an integral part of the process to influence emerging proposals on land off Selby Lane, Keyworth. We are working in partnership with the Landowner and Heaton Planning to provide a sustainable development with a unique character to create a community which both integrates with and respects the local area.

Our proposals are at an early stage as we continue to promote the site through the emerging Neighbourhood Plan.

- The proposed site layout reflects the history of Keyworth, the character of the surrounding area and takes into consideration its location with respect to local services and facilities.

- Detailed technical assessments have not been produced at this early stage; however initial appraisal work has established the site is free from major constraints to prevent residential development.
- We do not propose to submit a planning application without the approval of the Neighbourhood Plan. We aim to produce further detailed technical work once development principles have been agreed by the Steering Group of the Neighbourhood Plan.



Protection and enhancement of locally identified important views, and effective landscaping to screen built development to protect the views from the eastern gateway to Keyworth

Sustainable, deliverable housing development that meets the needs of the local community

Provision of an additional area of land (approximately 0.6ha) purposely designated for community use, designed by the community. This is located directly opposite the proposed access on Widmerpool Lane

Secure by design, including active frontages, providing natural surveillance and architectural interest

An opportunity to engage with a developer to create an inclusive, cohesive housing development that provides community facilities, active public open space and respects the local character

Sustainable location with excellent access to public transport and local facilities and amenities, promoting non-car use

A distinctive scheme that responds positively to the local area. The proposed layout, density and built form optimises key open spaces and natural features of the site

Provision of a mix of dwellings ranging from 2 to 5 bed properties including open market and affordable homes

Provision of high quality public open space and informal areas of open space across the development site