

REPRESENTATIONS TO THE LOCAL PLAN PART 2: LAND AND
PLANNING POLICIES DOCUMENT (LAPP) AND GREEN BELT REVIEW –
PREFERRED HOUSING SITES (OCTOBER 2017)

On Behalf of Residents of Nicker Hill, Keyworth

HOUSING DEVELOPMENT AT THE 'KEY SETTLEMENTS' - PROPOSALS
FOR KEYWORTH

November 2017

Prepared by



Vale Planning Consultants

INTRODUCTION AND SUMMARY

1. We have been instructed to make the following representations in respect of the Rushcliffe Local Plan Part 2: Land and Planning Policies Document (LAPP) – Preferred Housing Sites, October 2017, including a proposed Green Belt Review. These representations have been prepared having regard to the documents contained within the supporting Evidence Library and have assessed the compliance of the Draft Local Plan against paragraph 182 of the National Planning Policy Framework (March 2012)(NPPF). Paragraph 182 states that for a plan to be "sound" it should be:
 - * Positively prepared
 - * Justified
 - * Effective
 - * Consistent with national policy
2. These representations largely mirror those which were submitted in response to the Issues and Options stage of the Local Plan Part 2, January 2016 and the Further Options Consultation, February 2017. My clients' fundamental position in respect of which sites represent the most suitable for residential allocation has not changed since the previous rounds of consultation.
3. On this basis, we remain of the view that the proposed allocation Reference KEY 4a (Land off Nicker Hill, Keyworth) should not be allocated for residential use, but rather, should remain within the Green Belt.
4. In order to meet the current and future housing needs for Keyworth, (a principle which is fully supported by my clients), we believe that alternative Sites should be allocated for residential development on land to the north, north-west and west of Keyworth, which are better related to the highway network, have significantly less landscape and visual impact upon their surroundings and setting, and which have greater accessibility to the existing facilities and services within Keyworth.
5. In particular, this report seeks to highlight the findings of the Transport Appraisal undertaken by Highway Consultants 'Progress 10' on the instruction of the Parish Council, which was utilised to inform the Neighbourhood Plan process. This document, which is detailed below in paragraphs 28-32, highlights the problems associated with providing a suitable access point into Site KEY 4a and therefore throws significant doubt upon the deliverability of this Site.

6. This report continues therefore to set out the problems associated with the potential allocation of Site Reference KEY 4a and also sets out the credentials of other possible Sites within and on the edge of Keyworth, to promote the allocation of these landholdings, thereby meeting the requirements of the NPPF and Adopted Core Strategy, 2014.

PROPOSED SITE ALLOCATION KEY 4a

SITE DESCRIPTION

7. The Site is located within an area currently within the Nottingham-Derby Green Belt, and is situated to the north-east of the settlement of Keyworth. The landholding, at its north-western corner, fronts onto Nicker Hill, whilst it is bounded in a northerly direction by the existing British Geological Survey premises. The other boundaries of the Site abut open countryside, with Stanton-on-the-Wolds Golf course (including SINC) lying in a southerly direction and the Normanton Wolds, including the BGS Meadows SINC, lying to the east.
8. The Site is considered and assessed through the 2014 Strategic Housing Land Availability Assessment, under Reference 544: Land at Barnfield Farm, Nicker Hill, Keyworth and is also put forward as a potential residential allocation within the Draft Keyworth Neighbourhood Plan.
9. Based upon these assessments, and also based upon our own comparative assessment of this Site, against other possible Sites around Keyworth, we have identified the following issues in respect of proposed Site KEY 4a, which indicate that this landholding is not appropriate as a residential allocation, and that there are other more suitable Sites adjoining Keyworth, which should be allocated in preference.

POORLY RELATED TO THE BUILT FRAMEWORK OF KEYWORTH

10. The Site has only a small frontage to Nicker Hill, with the remainder of the Site moving away from the existing built form of Keyworth and extending further out into open countryside. Indeed, as currently proposed, there is a significant area of land which lies between the existing built development on Nicker Hill and the residential allocation. If developed therefore, the new housing will appear fragmented and poorly related to the existing settlement of Keyworth, with open gaps between the new and existing development, which will prohibit the new built form from becoming a cohesive part of the community.

11. Owing to the extent of the proposed allocation at KEY 4a, its future development will lead to an uncomfortable protrusion of built form, projecting into open countryside to the east. Again, this does not sit logically within the existing built form of Keyworth, but rather, would create an incongruous and visually intrusive development, which would be detrimental to the surrounding countryside and the setting of the village.

POOR SUSTAINABILITY CREDENTIALS

12. The Site is located at the far north-eastern side of the settlement of Keyworth, which is situated a significant distance away from the village centre and the local facilities and services located therein. Indeed, the Site is approximately 20 minutes walk from the village centre, including one of the existing primary schools and at least 15 minutes from the retail offering on Wolds Drive and therefore reliance on the private car is highly likely, even to access existing community facilities, which one would normally expect to access on foot. The alternative primary school, located on Willow Brook is just over 1km from this proposed Site KEY 4a, which would be accessed up a relatively steep walk along Nicker Hill. The lack of immediate access to fundamental services is further exacerbated by the steep incline of the route from the Site to Wolds Drive or the village centre, which includes a steep ascent or descent at the end of Meadow Drive or Highview Avenue. Indeed, in order to gain access to Wolds Drive or the village centre, pedestrians must initially cross the busy Nicker Hill, which does not have any safe pedestrian crossing places. Once across Nicker Hill, the route along High View Avenue onto Mount Pleasant is via an unadopted, unmade road surface and therefore there is no certainty of improvement or street lighting, making this route unsuitable and unsafe for pedestrians and particularly those who are less mobile or with children.
13. In addition, access to public transport facilities from Site KEY 4a is very limited, given that the closest bus stop will be located at least 800 metres from the proposed dwellings on this Site. Given that a significant proportion of the properties envisaged on this Site are to be aimed at the elderly population, this distance to walk to a bus stop seems excessive and incredibly unrealistic.
14. In reviewing Green Belt boundaries, the National Planning Policy Framework indicates, through Paragraph 84, that Local Planning Authorities should “take account of the need to promote sustainable forms of development”. In this respect, it is submitted that the proposed allocation of Site KEY 4a does not represent the most sustainable option, and that there are other possible Sites around Keyworth, which would promote the three strands of sustainable development – economic, social and environmental – to a much greater extent.

15. In particular, Sites located to the north, north-west and west of Keyworth have a much closer relationship to the existing village centre and associated facilities and services, as well as Keyworth Primary School and South Wolds Academy and Sixth Form. Site References KEY 9 (Land North of Debdale Lane (1)), KEY 12 (Land North of Debdale Lane (2)) and KEY 10 (Land South of Debdale Lane (1)) are considered to enjoy much better sustainability credentials, owing to their ready accessibility to the facilities found within Keyworth Village Centre, which are within a 10 minute walk of these possible residential allocations. This fact is recognised through your own Authority Assessment of these Sites, through the SHLAA, dated 2011. In addition, these Sites have excellent access to the main employment opportunity within this locality, which is provided at Ruddington Business Park to the west of Keyworth.

CONFLICT WITH NATIONAL POLICY IN RESPECT OF GREEN BELT – COALESCENCE BETWEEN SETTLEMENTS AND CHECKING THE SPRAWL OF LARGE BUILT-UP AREAS

16. Site KEY 4a is currently located within the Nottingham – Derby Green Belt, which is given a high level of protection through National Planning Policy. It is acknowledged however, that in order to meet the ongoing housing needs of Keyworth during the Local Plan period 2011 – 2026, land within the Green Belt will need to be released and allocated for residential development. Indeed, the Adopted Core Strategy sets out, within Policy 3 the requirement to deliver at least 450 no. dwellings within or adjoining Keyworth across the plan period. Given the most up-to-date assessments in respect of housing delivery since the start of the plan period and the current 5 year housing land supply position, it is apparent that the Key Settlements (along with other sustainable villages), may need to accommodate an increased level of growth, with Keyworth accommodating around 580 no. new homes. It is recognised that in order to deliver this level of development, Green Belt boundaries will need to be reviewed. In doing so, and in considering the importance attached to Green Belt land, it is absolutely imperative that the revision of Green Belt boundaries around Keyworth is well considered and based upon a clear approach.

17. The purposes of including land within the Green Belt are set out within Paragraph 80 of the NPPF. Here it is stated that there are five purposes of including land within the Green Belt, including:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment.

18. In applying these considerations to Site KEY 4a, it is submitted that this landholding forms an important break between Keyworth and the village of Stanton-on-the-Wolds to the south. Indeed, the northern-most development within Stanton encompasses a number of dwellings along Melton Road, which would almost directly abut the new development proposed within the KEY 4a residential allocation. The full development of Site KEY 4a would therefore lead to these neighbouring settlements merging into each other, in direct contravention with National and Local Policy as outlined above in Paragraph 14.
19. Indeed, it appears that SHLAA Site Reference 151 has been discounted as a potential residential development site, owing to its potential conflict with Green Belt policy, insofar as its development could lead to the coalescence between Keyworth and Stanton-on-the-Wolds. We submit that this same rationale should be applied in the consideration of Site KEY 4a.
20. In addition, Paragraph 85 of the NPPF stresses that, in reviewing Green Belt boundaries, Local Planning Authorities should “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.” The Site identified as Key 4a comprises open arable fields, with some blocks of conifer planting; however, the boundaries of the proposed allocation appear to have been drawn indiscriminately and without reference to any strong, recognizable or permanent features, which would provide any long term physical or visual barrier or enclosure to the proposed development of this Site.
21. The residential development of Site KEY 4a would encroach into the open countryside and would not form a logical ‘rounding off’ of the existing built form to Keyworth. Indeed, the original assessment of this Site within the 2010 Strategic Housing Land Availability Assessment indicated that this landholding, in conjunction with adjoining land, could accommodate up to 1,070 no. dwellings. Given the lack of defined visual or physical boundaries to the proposed Site Allocation, it is of grave concern that the Green Belt boundary would not be defensible, leading to further proposals for the development of surrounding land, which would be extremely difficult to resist. The proposed allocation of this land would therefore lead to the possible unrestricted sprawl of Keyworth over the coming years, to the detriment and harm of the countryside, again in conflict with National Planning Policy in respect of the protection of the Green Belt and countryside.

DETRIMENT TO LANDSCAPE CHARACTER

22. A thorough assessment and consideration of the proposed residential development of Site KEY 4a was set out at Paragraph 3.7 of the submissions made by Freeth Cartwright Solicitors LLP on behalf of residents of Nicker Hill in respect of the draft Keyworth Neighbourhood Plan. This assessment remains relevant and is therefore replicated below:

“Within the 2010 ‘East Midlands Regional Landscape Character Assessment’ (EMRLCA) the site located within landscape character area 8A ‘Clay Wolds’. The character of the area is dominated by small villages and farms, arable and pasture farming, expansive views and prominent ridges close to villages. The EMRLCA states that the aim should be to protect the character of this countryside and that ‘care should also be taken to prevent coalescence, ensuring separation is maintained between the urban fringe and surrounding settlements.” In rural areas, village expansion should also generally be avoided in open, elevated areas where development would ‘damage the sense of remoteness and expansive views.’

The need to prevent coalescence between settlements has already been discussed. It is considered that due to the site’s topography which rises from east to west and due to the landform of the surrounding landscape, the site is within a prominent position and will be highly visible from the east, south-east and north-east of the site. Any development would therefore be highly visible and could not successfully be sensitively screened within the landscape in order to protect the existing landscape character.”

23. Given the availability, deliverability and suitability of other more or equally sustainable Sites around Keyworth, it is strongly submitted that these Sites offer the potential to provide the requisite housing numbers for this settlement, without extending into open countryside, without harm to the landscape character and without encouraging the coalescence of neighbouring settlements.

DETRIMENT TO SITES OF IMPORTANCE FOR NATURE CONSERVATION

24. A Site of Importance for Nature Conservation (SINC) known as BGS Meadow is located partially within and immediately adjoining the proposed Site KEY 4a, and a further SINC, Stanton Golf Course is located directly to the south and east. These areas are protected owing to the diverse range of habitats they offer to rare species, which have often suffered under the pressures of new development. In this case, Policy 17 of the Adopted Core Strategy states that:

“1. The biodiversity of Rushcliffe will be increased over the Core Strategy period by:

a) protecting, restoring, expanding and enhancing existing areas of biodiversity interest, including areas and networks of priority habitats and species listed in the UK and Nottinghamshire Local Biodiversity Action Plans;

and

e) ensuring that where harm to biodiversity is unavoidable, and it has been demonstrated that no alternative sites or scheme designs are suitable, development should as a minimum firstly mitigate and if not possible compensate at a level equivalent to the biodiversity value of the habitat lost.

2. Designated national and local sites of biological or geological importance for nature conservation will be protected in line with the established national hierarchy of designations and the designation of further protected sites will be pursued.

3. Development on or affecting other, non-designated sites or wildlife corridors with biodiversity value will only be permitted where it can be demonstrated that there is an overriding need for the development and that adequate mitigation measures are put in place.”

25. With this Policy in mind, it is clear that areas of biodiversity interest, including SINCS and Local Wildlife Areas should be given a high level of protection and that, where development is absolutely necessary, alternative sites which do not impact upon or harm protected species should be considered more favourably.

26. This position is further supported through the supporting text to Policy 17 of the Core Strategy and through the recently published ‘Rushcliffe Nature Conservation Strategy 2016 – 2020’. The former states at Paragraph 3.17.2 that “The East Midlands currently compares unfavourably with other regions in England in terms of the surface area covered by designated nature conservation sites, has lost more wildlife than any other region in England and has lost large amounts of its wildlife habitats with losses continuing and those that remain becoming increasingly small, isolated and fragmented.”

27. The Rushcliffe Nature Conservation Strategy goes on to stress that designated wildlife sites, including SINCs or Local Wildlife Area are “important sites that could not easily be restored once lost.” It also highlights the principle set out in the NPPF of pursuing sustainable development, which “includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution”. Section 12 of the Nature Conservation Strategy continues, stating that:

“It is important to ensure that where development is permitted, not only are valuable sites (SSSI, LWS and LNR) and other hard to replace sites protected from direct development, but a ‘mitigation hierarchy’ is followed that seeks to avoid ecological harm, and where necessary mitigates or compensates for losses (Section 118, NPPF).”

28. Given this clear, evident desire to protect Sites of Importance for Nature Conservation and given the absolute recognition that once such sites are damaged by development pressures, their importance for biodiversity and habitat provision is likely to be lost in the long term, it seems illogical and unsound to promote the allocation of land at Site KEY 4a, which is subject to a local wildlife designation. This is particularly the case, given that there are alternative sites which would not have this impact upon recognised wildlife assets. It is submitted therefore, that such sites should be given more favourable consideration, and that greater weight should be attributed to the protection and enhancement of the SINCs within and adjacent to Site KEY 4a.

ACCESS / HIGHWAY IMPACT

29. It has already been established that Site KEY 4a is poorly related to the village centre of Keyworth and the associated services located therein. For this reason, it seems evident that new residents of a development in this location would be reliant upon the private car to access many essential facilities, such as local shops and the primary school. This will lead to congestion within the village centre and will also intensify the use of Nicker Hill itself, potentially leading to increased dangers, especially for pedestrians or bicycle users. The lack of crossing point for pedestrians across Nicker Hill, along with the unadopted highway route utilised to access facilities on Wolds Drive further exacerbates these dangers. Indeed, these issues already appear to have been identified through the SHLAA Assessment carried out in respect of Site KEY 4a, which states:

“Poor access by foot – Nicker Hill is a busy road and some distance from amenities.”

30. Building upon this, the Parish Council commissioned its own detailed Transport Appraisal, which was to be utilised to inform the Neighbourhood Plan process and which considers the merits or limitations / restrictions of each of the potential development Sites adjoining Keyworth. This Transport Appraisal was carried out by independent consultants 'Progress 10 – Transport and Design'.

31. In respect of Site KEY 4a, this independent appraisal identifies that the landholding has a very short frontage to Nicker Hill, which is on the inside of a bend. It is also stressed within the report that:

“The scale of this site is likely to generate in excess of the 500 trip threshold for the necessary provision of a GIRTL under the guidance in DMRB. This will affect the required junction design for the site and the resulting requirements of the frontage.

There is a wide verge of over 3 metres fronting the site however the verge width deteriorates in the leading direction and given the short active site frontage it is considered unlikely that a viable junction design with a ghost island right turn lane could be achieved.

This puts the delivery of this site in doubt without access to a longer frontage.

(My emphasis added)

The issues with the access strategy however mean that the development of this site will need to determine a viable access strategy before any thought of development can take place.”

32. Based upon the findings of this initial Transport Appraisal, it is clear that Site KEY 4a is severely constrained in its ability to accommodate a suitable access point to facilitate any level of residential development. Given the clear imperative to deliver new housing in the short term, and to ensure that any Site allocated is actually able to deliver the new homes required, it seems that Site KEY 4a must be significantly downgraded in considering its suitability and deliverability, as an access solution is not available and appears to be in some doubt, given the appraisal carried out by Progress 10, outlined above.

33. Given that this Transport Appraisal was specifically commissioned to inform the Neighbourhood Plan process and was to be utilised to assist in determining which Sites are the most suitable, deliverable and developable, it seems irrational to ignore its findings, which clearly indicate the fundamental access constraints to the development of Site KEY 4a.

34. In addition, it appears that only one point of access has been identified into the Site, which is adjacent to the boundary with the Natural Environment Research Council (NERC) premises, within which is located the British Geological Survey premises. The other occupants on this Site include private companies IGS Ltd and Panalytical, plus outposts of the University of Nottingham and the Health and Safety Executive (HSE). It is also our understanding that NERC wishes to attract more companies and other organisations to the site, as it develops it into a business park.
35. The existing commercial enterprise currently employs at least 600 members of staff, a figure which looks set to increase as the operations from this Site continue to grow and develop. Many of those accessing this Site commute by private car, leading to an existing congestion problem along Nicker Hill at peak times. Any proposed residential development at Site KEY 4a will further exacerbate this problem, leading to increased congestion, conflict between road users and potential highway danger. Given the potential scale of development proposed for Site KEY 4a, a single point of access and egress seems inadequate and could lead to even further issues of congestion. Furthermore, it is submitted that a single point of access is wholly inadequate in respect of access for emergency services.
36. Again, given the availability of other Sites which have already demonstrated an access solution and in some cases, which have much better accessibility to existing services, facilities, employment and education opportunities, it seems reasonable to consider such Sites more favourably and to promote their allocation in advance of Site KEY 4a.

NEIGHBOURHOOD PLAN

37. It is recognised that the Keyworth Neighbourhood Plan has been approved by the Parish Council, but is yet to be approved by the local community through the Referendum process. It is acknowledged that within the most recent draft, the Neighbourhood Plan has advanced and supported the allocation of Site KEY 4a for residential purposes.
38. However, it should be stressed that the Neighbourhood Plan has not yet been formally scrutinised by an independent qualified person and nor has it been subject to a community referendum.

39. Indeed, there appears to be a danger that, rather than a robust and independent assessment of all possible development sites being carried out as part of the Neighbourhood Plan process, the Community Group has been side-tracked by promises made by landowners, in respect of the delivery of certain types of housing. There is a suggestion in respect of Site KEY 4a that the Neighbourhood Plan Steering Group gave support to the residential allocation of this Site, on the basis that the landowner originally provided a commitment to deliver housing for the elderly. However, the provision of extra care facilities and new employment originally promised by the promoters of the site at Nicker Hill has been dropped. This was a unique proposition at the time of the Residents` consultation and its disappearance further undermines the allocation of Site KEY 4a. Clearly, if housing specifically targeted to meet the needs of the elderly is required in Keyworth, its delivery should be sought by Rushcliffe Borough Council as part of the planning process and based upon evidence at that time, rather than this being developer-led and utilised as a 'bargaining chip' with the Neighbourhood Steering Group.
40. Whilst we do not wish to call into question the genuine desires of the Neighbourhood Steering Group to deliver appropriate development for its community, we do wish to ensure that Sites are being allocated by Rushcliffe Borough Council based upon their planning merits and upon their ability to deliver sustainable development. This process should be based upon a clear assessment by the Borough Council of the relative merits of all possible Sites in and around Keyworth.
41. Indeed, there is a genuine concern that Sites may be allocated by Rushcliffe Borough Council within the Part 2 Local Plan, based upon the stated desires of the Neighbourhood Steering Group, which then subsequently, the local community fail to support through the referendum of the Neighbourhood Plan. In these circumstances, the Neighbourhood Plan would be required to comply with the provisions of the Local Plan in respect of the allocations made, but would fail to be adopted, owing to lack of support from the community of Keyworth. Clearly, this would result in a complex legal matter.
42. In order to avoid this, it seems imperative that Rushcliffe Borough Council are certain of the planning merits of all possible development sites, and not just those advanced as part of the draft Neighbourhood Plan. In this respect, we submit that there are other, more suitable sites around Keyworth, which could deliver the requisite housing numbers and types of housing required (including homes for the elderly) over the plan period, but which score more favourably in respect of their relationship with the existing built form of Keyworth, their sustainability credentials, their impact upon the landscape and sites of importance for nature conservation, and their relationship with the Green Belt and Green Belt policy.

CONSIDERATION OF OTHER POSSIBLE SITES

SITE KEY 8 – LAND AT PLATT LANE, KEYWORTH

43. This Site is located to the north-east of the village and is largely triangular in shape, being bound by existing development on two sides: to the south by Platt Lane and the British Geological Survey premises and to the west by existing residential development on Station Road.
44. Whilst my clients are of the view that this Site suffers several of the same problems associated with proposed Site KEY 4a, it is submitted that it actually presents a better option for housing development than the Site off Nicker Hill for the following reasons:
- a. It does not impact upon any recognised nature conservation designation and would not therefore detrimentally affect the biodiversity or habitats of the locality.
 - b. Owing to its relationship with the existing built form of Keyworth, it does not form an illogical extension to the village, but rather ‘rounds off’ the existing form of development.
 - c. There is scope for strategic landscaping to enhance the already logical boundary to the development, thereby providing a long term physical and visual boundary to the built edge of the village.
 - d. It does not present the danger of merging or coalescence with any neighbouring settlement.
 - e. Its development would not impact upon the landscape setting and would not detract from important views into and out of the settlement, which are key to anchoring the village into its rural setting.
45. Whilst it is recognised that this Site does not have the ready access to the facilities and services found within the village centre of Keyworth, in common with Site KEY 4a, it is submitted that for the reasons outlined above, the Site at Platt Lane would actually be more appropriate and would deliver a more sustainable form of development.

SITES KEY 9 AND 12 – LAND NORTH OF DEBDALE LANE, KEYWORTH

46. These Sites are located to the north west of the existing settlement of Keyworth and sit comfortably within a framework of existing residential development, being bound to the east and south by dwellings located on Rancliffe Avenue and Debdale Lane respectively.

47. In assessing these Sites, it is submitted that they score much more favourably than the proposed allocation at Site KEY 4a, for the following reasons:

- a. They are much more sustainably located, with ready access to the village centre of Keyworth, which can be reached on foot within 10 minutes. Being on the western side of the village, they also have much better access to the larger employment opportunities offered at Ruddington Business Park.
- b. They do not impact upon any recognised nature conservation designation and would not therefore detrimentally affect the biodiversity or habitats of the locality.
- c. Owing to their relationship with the existing built form of Keyworth, they do not form an illogical extension to the village, but rather 'round off' the existing form of development.
- d. There is scope for strategic landscaping to enhance the already logical boundary to the development, thereby providing a long term physical and visual boundary to the built edge of the village.
- e. They do not present the danger of merging or coalescence with any neighbouring settlement.

48. For these reasons, it is argued that Sites KEY 9 and KEY 12 are significantly more suitable for residential development than proposed Site KEY 4a and offer a much more sustainable option for a range of housing types.

SITE KEY 10 – LAND AT BUNNY LANE, KEYWORTH

49. This Site is located to the west of the main built up framework of Keyworth and incorporates a rectangular shaped piece of land, currently in agricultural use. On its eastern edge, the Site abuts existing residential development, whilst to the south and north, the Site is contained by Bunny Lane and Debdale Lane respectively.

50. My clients wholeheartedly support the proposed residential allocation of this Site, for the same reasons as outlined above at Paragraph 42 and wish to emphasise the sustainability credentials of this Site for housing, as well as the minimal harm this proposal would create in respect of landscape impact, detriment to biodiversity and conflict with Green Belt policy (specifically, the reasons for including land within the Green Belt).

51. We submit however, that the extent of proposed protected open space is perhaps excessive and that a greater proportion of this overall landholding could be utilised to deliver the required housing numbers for Keyworth. Given the stated benefits of this Site, as set out above, this seems like the most appropriate and sustainable location for housing delivery and therefore we believe that the capacity of this Site should be maximised. Notwithstanding this fact, we welcome the inclusion of an area of protected open space, which will assist in creating a community asset, as well as providing suitable landscaping to provide a soft edge to the built form of Keyworth.

SITE KEY 13 – HILLSIDE FARM, KEYWORTH

52. This Site is also located to the west of Keyworth and immediately adjoins Site KEY 10, described above. The landholding is contained on its northern and eastern boundaries by existing residential development and forms a logical extension to the built form of the village.

53. The Site was considered through the 2014 SHLAA process, but was not put forward as a proposed housing allocation within the Issues and Options Local Plan Part 2. We submit however, that this Site has better sustainability credentials and provides a more appropriate option for housing, than proposed Site KEY 4a, for the same reasons as outlined above at Paragraph 42. Indeed, the assessment of this Site carried out as part of the SHLAA process indicates that the only potential negative issue relates to the proximity of the sewage works located off Bunny Lane to the south-west of Site KEY 13. It is acknowledged that this matter would need to be addressed as part of any future Planning Application, however, given the distance between the sewage works and the proposed development site, along with the potential for mitigation measures, it is submitted that this is not an insurmountable constraint to development. We therefore support the Allocation of this Site for residential development.

SITES KEY 5 AND KEY 6 – LAND AT TOP HILL FARM, PLATT LANE, KEYWORTH

54. These Sites are located to the far north-east of Keyworth and abut the British Geological Survey premises to the south, Platt Lane to the west and open countryside to the north and east. These Sites were assessed along with additional land to the north through the 2014 SHLAA process under Reference 545 and 543.

55. The site assessments of both areas identified a significant concern in respect of the potential development of this Site, relating to the high quality landscape condition and the important views provided by this landholding, from the A606. The assessment also highlights the important role played by this Site in providing a 'strong intact rural character with arable and pasture farming and pockets of woodland' being key features. It also highlights the 'escarpment on the eastern edge of the character area, which forms a backdrop to views within the Vale of Belvoir.'

56. Indeed, this Site suffers from many of the same problems identified in respect of proposed Site KEY 4a, including its poor sustainability credentials, its impact upon the landscape and areas of importance for biodiversity and its poor relationship with the existing built framework of Keyworth.

CONCLUSIONS

57. The above assessment of the possible other sites for residential allocation has provided a clear indication of the sequentially preferable sites for housing in and around Keyworth. For completeness, it is submitted that the following Sites should be allocated for residential development within the Part 2 Local Plan and thus removed from the Green Belt:

1. Site KEY 10 – Land South of Debdale Lane – Approximately 190 dwellings.
2. Site KEY 9 – Land North of Debdale Lane (1) – Approximately 110 dwellings.
3. Site KEY 12 – Land North of Debdale Lane (2) – Approximately 160 dwellings.
4. Site KEY 13 – Land at Hillside Farm – Approximately 50 dwellings.

58. The allocation of these four Sites provides for approximately 510 dwellings within or adjoining Keyworth, as required by the current assessment of housing need for the Borough. If, through the Planning Application process, it were shown that these Sites could not deliver the anticipated numbers of dwellings as identified above, owing to currently unknown constraints, or the requirement to provide strategic landscaping for example, it is our submission that the following Site should also be safeguarded for future residential development:

5. Site KEY 8 – Land between Platt Lane and Station Road – Approximately 190 dwellings.

59. Furthermore, if for any reason, it was discovered through the Planning Process that any of the Sites identified above within Paragraphs 55 or 56 were not considered suitable to accommodate the residential development anticipated, it is considered that Site Reference KEY 13 still has a greater suitability to deliver new housing, owing to its better accessibility, enhanced sustainability criteria and limited impact upon the natural environment, than the landholding identified as Site KEY 4a.
60. This order of preference for residential allocations is based on a robust and clear assessment of the credentials of the various Sites identified around Keyworth. This demonstrates that the Sites located to the west of Keyworth, including Sites KEY 10, KEY 9 and KEY 12 are the most suitable and sustainable locations for new housing development and as such, these Sites should be allocated for residential purposes.
61. In light of this appraisal, it is submitted that Site KEY 4a should be removed as a proposed housing allocation and retain its status as Green Belt.

APPENDIX 1 – LIST OF RESIDENTS REPRESENTED

E and M Cameron – Lynedale

Shan and Emma Hussain – The Heathers

Roger and Lesley Davis – Privet Court

Jeff and Jan Hooley – Birchwood

Michael and Shirley Main – Charnwood

Ian and Margaret McLaren – Greenacres

David Ovadia – The Hawthorns

Don and Jenifer Anderson – Beechlea - 102a Nicker Hill

Sunil and Jyoti Dhar – Field House

Peter and Sue Copley – Ingleby

Jack and Stephanie Pye – 2 Willow Brook

Perm and Sally Bachra – Swallowfield

Chris and Di Mellor – Springdale

Richard and Liz Brown – Green Gables

Tony and Gill Hill – The White House

Alan and Dorothy Hopkinson – The Orchard

Jonathan and Donna Worsley – Firs Farm

Doreen Gee – Firs Lodge

Bob and Dee Wolfenden – Starlings

Paul Needham – Patarno

Richard and Barbara Mercer – Tuchwood

Duncan and Alison Cameron – September House

Tom and Terry Bond – The Cottage