Rushcliffe Local Plan Part 2:
Land and Planning Policies
Publication Version

Representation Form

Please return by 5pm on Thursday 28 June 2018 to: Rushcliffe Borough Council Rushcliffe Arena, Rugby Road Nottingham NG2 7YG

This form has two parts:
Part A – Personal details
Part B – Your representation(s). Please fill in a separate part B for each issue/representation you wish to make.

Please read the Representation Guidance Notes (available separately) and the Data Protection Notice (see below) before completing the form.

Part A (Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

<table>
<thead>
<tr>
<th>1. Personal Details</th>
<th>2. Agent’s Details (if applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title</td>
<td>Mr</td>
</tr>
<tr>
<td>First Name</td>
<td>Wayne</td>
</tr>
<tr>
<td>Last Name</td>
<td>Scholter</td>
</tr>
<tr>
<td>Organisation (where relevant)</td>
<td>Aldergate Properties Limited</td>
</tr>
<tr>
<td>Job title (where relevant)</td>
<td>Stone Planning Services Limited</td>
</tr>
<tr>
<td>Address – line 1</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Address – line 2</td>
<td>Click here to enter text.</td>
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<td>Address – line 5</td>
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<tr>
<td>Postcode</td>
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<td>E-mail Address</td>
<td>Click here to enter text.</td>
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<tr>
<td>Telephone Number</td>
<td>Click here to enter text.</td>
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</tbody>
</table>

Representations must be received by 5pm Thursday 28 June 2018. Representations received after this time will not be considered duly made.
**Part B** (please use a separate Part B form for each representation)

Name/Organisation: Aldergate Properties Limited

<table>
<thead>
<tr>
<th>3a. To which document does your response relate? (please tick one)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Plan Part 2 Publication Version ✓</td>
</tr>
<tr>
<td>Other supporting document ✓</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3b. To which part of the document does this representation relate? (complete all that apply)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Page no.</td>
</tr>
<tr>
<td>29-34</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>4. Do you consider the Local Plan Part 2:</th>
</tr>
</thead>
<tbody>
<tr>
<td>4(1) Legally compliant</td>
</tr>
<tr>
<td>4(2) Sound</td>
</tr>
<tr>
<td>4(3) Complies with the Duty to Co-operate</td>
</tr>
</tbody>
</table>

→ If you have selected No to Question 4(2), please continue to Question 5.
→ In all other circumstances, please go to Question 6.

What makes a Local Plan “sound”?  

**Positively prepared** - the plan should be prepared in a way that meets the need for housing and other development, including infrastructure and business development.

Representations must be received by 5pm Thursday 28 June 2018. Representations received after this time will not be considered duly made.
Justified – the plan should be based on evidence, and be the most appropriate strategy for the district when considered against other reasonable alternatives.

Effective – the plan should be deliverable; the housing and other development should be capable of being carried out.

Consistent with national policy – the plan should enable sustainable development and be consistent with the policies in the National Planning Policy Framework (NPPF).

5. If you consider the Development Plan is UNSOUND, do you consider this to be because it is NOT: (please tick all that apply)

- Positively Prepared
- Justified
- Effective
- Consistent with national policy

6. Please give reasons for you answer to Questions 4(1), 4(2), 4(3) and 5, where applicable.

You may also use this box if you wish to make representations on one of the Local Plan Part 2’s supporting documents (e.g. Sustainability Appraisal, Habitat Regulations Assessment or Equalities Impact Assessment). You can attach additional information but please make sure it is securely attached and clearly referenced.

See attached relating to housing allocations in Keyworth

7. Please set out what change(s) you consider necessary to make the Local Plan Part 2 legally compliant or sound, having regard to your responses to Questions 5 and 6. You will need to say why this change will make the Local Plan Part 2 legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(If you are suggesting that the Local Plan Part 2 is legally compliant or sound please write “Not applicable”).

See attached relating to housing allocations in Keyworth

8. If your representation is seeking a change, do you consider it necessary to participate at the hearing sessions of the Public Examination? (please tick one box only)

- No, I do not wish to participate at the hearing
- Yes, I wish to appear at the examination

Representations must be received by 5pm Thursday 28 June 2018. Representations received after this time will not be considered duly made.
If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

9. **If you wish to participate at the hearing sessions of Public Examination, please outline why you consider this to be necessary:**

To fully outline our concerns and to examine the level of development proposed at Keyworth and delivery from the proposed allocations.

**Please note:** the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

10. **Please indicate if you wish to be notified that:** (please tick all that apply)

- The Local Plan Part 2 has been submitted for independent examination.
- The recommendations of the Planning Inspector appointed to carry out the independent examination have been published.
- The Local Plan Part 2 has been adopted

Date form completed: 26/06/2018

Please return the completed form by **no later than 5pm on Thursday 28 June 2018** to:

(Electronic copies of this form are available to download at [www.rushcliffe.gov.uk/planningpolicy](http://www.rushcliffe.gov.uk/planningpolicy).)

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Data Protection Notice

The personal information you provide will only be used by Rushcliffe Borough Council, the Data Controller, in accordance with General Data Protection Regulation 2016/Data Protection Act 2018 to undertake a statutory function (also known as a ‘public task’)

Your personal information will be shared with the Planning Inspectorate in connection with the above purpose.

Your personal data will be kept in accordance with the Council’s retention policy and schedule. Details of which can be found on the Council’s website at http://www.rushcliffe.gov.uk/retention_schedule/

Your data protection rights are not absolute and in most cases are subject to the Council demonstrating compliance with other statutory legislation, for further information see http://www.rushcliffe.gov.uk/privacy/

Representations will be available to view on the Borough Council’s website, but any signatures, addresses, email addresses or telephone numbers will not be included. However, as copies of representations must be made available for public inspection, comments cannot be treated as confidential and will be available for inspection in full.
Dear Sir/Madam,


Stone Planning Services Limited is engaged by Aldergate Properties Limited with regard to the submission of Representations on the Rushcliffe Local Plan Part 2 Land & Planning Policies Publication Version Policies 4.1, 4.2, 4.3 and 4.4 and paragraphs 3.30 – 3.43 – Keyworth. We have completed a single form, it relates to policies 4.1, 4.2, 4.3 and 4.4.

**Housing Delivery**

The Rushcliffe Core Strategy indicates a need for a further 13,150 dwellings, 2011-28. The majority of these are allocated at the 6 identified Strategic sites:

- a. South of Clifton
- b. Melton Road, Edwalton
- c. North of Bingham
- d. RAF Newton
- e. East of Gamston
- f. Cotgrave Colliery

In addition, a further 1500 dwellings were attributed to the key settlements of Keyworth (450), Ruddington (250), Radcliffe on Trent (400) and East Leake (400). This left additional distribution of dwellings, across “other villages”.

In acknowledgement of the risks and actual issues associated with delivery from the strategic sites and some of the larger sites at the Key Villages, a further Green Belt Review was initiated by RBC to review the distribution of housing across the Borough. The Council, in its part 2 Plan, indicates a need to provide for a further 2,000 dwellings but in recognition of potential slippage has allocated 2,700 dwellings.

Whilst supporting the Council’s recognition of a need for more houses, better and more reliable delivery and the provision of housing in sustainable locations where people want to live we do not consider it is sufficiently flexible. An examination of the Council’s delivery trajectory still shows a very high reliance on the very large strategic sites, particularly over the next 5 years. It is understood that work has only started on two of these - Cotgrave Colliery and Melton Road, Edwalton. We are conscious that the Council initially anticipated (Core Strategy Trajectory) that 5 of the Strategic Sites would have been started by March 2016 and that by March 2018, 1850 houses would be completed. Even if the current trajectory is met these sites will only deliver 452 homes in that period. In my opinion this is far short of delivering a boost let alone a significant boost to housing numbers.
Notwithstanding this the Council still expects that delivery in the current year (2018/19) will come from north of Bingham (50 units) and on 2019/20 there will be 200 units from RAF Newton (50), North of Bingham (100) and South of Clifton (50). We believe this trajectory is unduly optimistic. Whilst RAF Newton has an outline planning consent issued in 2014 there is still no reserved matters approval. Furthermore, the funding of the footbridge over the A46 is still not resolved. There is no planning consent for land East of Gamston. Land north of Bingham has Reserved Matters approval for phase 1 (317) but still no start on site. With regard to land south of Clifton an outline application was submitted in July 2014 and a resolution to grant permission subject to the S106 agreement being signed was made in January 2017. Work has not commenced.

We also feel that delivery from some of the Key Villages sites will be delayed. Many of the identified sites lack a detailed planning permission and a builder.

The Council also needs to be mindful of the impending Housing Delivery Test. In the period 2011-14 just 72% of the required homes were delivered and 77% 2014-17. The anticipation is that just 71% will be delivered 2017-20. The Plan “plans to fail” in that respect rather than seeks to give an early boost to the supply of housing in the Borough. Continuing to rely on Strategic Sites will not achieve this.

**Keyworth**

Our client owns land immediately to the west of proposed allocation 4.3. (Plan 1)

The Adopted Rushcliffe Core Strategy identified Keyworth as a Key Settlement capable of accommodating sustainable growth. Under Policy 3 – Spatial Strategy, it stated that a *minimum* of 450 dwellings will need to be provided in or on land adjoining Keyworth throughout the Plan Period. That will require amendments to the green belt boundary.

Keyworth, therefore is identified as a sustainable settlement in the Borough of Rushcliffe and one that is able to sustain further growth; it could accommodate significantly in excess of the minimum figure of 450 dwellings as set out in the Core Strategy Part 1. Keyworth, in common with most settlements, in the Borough is encased by the Green Belt.

The current consultation indicates that Keyworth has the scope to “sustain around 600 dwellings”. It is a popular residential location where there is a good demand for houses.

**Housing Numbers**

The Part II Plan Preferred Housing Site consultation 2017 recognised the potential to increase the level of housing in Keyworth. An increased figure of “about” 580 dwellings over the Plan period was proposed and, we understand following discussion with Rushcliffe BC, that figure was 'capped' following advice on capacity from the Education Authority regarding primary school provision. Irrespective of our argument that this “cap” is unjustifiable, we consider that greater flexibility needs to be embedded in the Part 2 Plan to enable housing to be delivered at the identified sustainable settlements, such as Keyworth. Hence, we suggest that the policy be amended to refer to a **minimum** of 800 dwellings in Keyworth.

The education capacity issue is not supported by evidence and we note that there is no longer reference to this “constraint” in the Publication Version. We have enquired of Rushcliffe BC who have directed us to the Education Authority. Discussions with the Education Authority indicate that this work has still to be undertaken. We were advised that
the EA will look at the detail of Keyworth and the statistics provided, and that officers of the Education Authority will meet with the Academy Trust responsible for Keyworth.

Our analysis identified that Keyworth has 3 Primary schools and a Secondary School; the latter is South Wolds Academy which also has two of the Primary Schools within it family of schools. The primary schools are:

<table>
<thead>
<tr>
<th>School</th>
<th>Published admission number</th>
<th>Expected school roll (NCC Information 18/19)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Willow Brook Primary School</td>
<td>30</td>
<td>169</td>
</tr>
<tr>
<td>Crossdale Drive Primary Academy</td>
<td>30</td>
<td>188</td>
</tr>
<tr>
<td>Keyworth Primary and Nursery Academy</td>
<td>30</td>
<td>133</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>90</strong></td>
<td><strong>490</strong></td>
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A Single form entry primary school has a normal capacity of 210 children. Each school has the same intake capacity giving a total capacity of at least 630 without further expansion of any of the schools. The ONS data shows that each school has a capacity of 230 places and hence a total of 690 places across Keyworth. Hence spare capacity of at least 140 spaces based on the Education Authority’s school information 2018/19 and 200 places based on the ONS data. Based on 21 primary school places per 100 dwellings that would provide for at least 666 dwellings without new primary facilities being needed.

Notwithstanding this we also consider that there is physical room at each of the schools to enable further classrooms to be constructed. It is noted that Keyworth Primary School provides accommodation on 2 floors and this could be extended. Other schools could also accept further development. Contributions towards their provision would be secured by way of a Section 106 Agreement.

From this we conclude that there is no evidence to base a cap upon housing development in what is one of the most sustainable Key Settlement in the Borough. It appears that our assessment has been agreed by the Council, but we believe that primary school capacity is still being used to cap the level of development in Keyworth.

The need for additional education space and the ability for schools to accommodate such will be the subject of robust assessment at the Part 2 Examination. We suspect that the Council is continuing to use the previous education capacity restriction, which we have demonstrated is not supported by the evidence, to artificially subdue housing numbers in Keyworth. No doubt the Examination Inspector will wish to explore this issue.

Such examination will also need to take account of the needs for accommodation for the elderly which can be expected to be met, since elderly persons housing does not create additional education needs. If we assume the elderly persons need is to be met from the number of dwellings now proposed, then additional education capacity exists. A total of 580 homes, being 420 for housing plus 160 for elderly persons; produces a PE demand of 88 spaces leaving ample capacity for additional housing or put another way there is capacity for at least 666 homes plus elderly persons housing of 160 without expanding PE; giving a total of at least 826 homes. In 2015 the Keyworth Parish Council/ Commercial Estates Group published a Plan for Land at Nicker Hill, Keyworth showing a 60-bed care facility with 20
self-contained bungalows and 40 higher dependency apartments. That is a total of 120 units.

The 2014 Keyworth Neighbourhood Plan provided for 200 dwellings on Site KEY 4 of which 80 were for elderly accommodation. KEY8 was identified to deliver 80 retirement units. Hence a need for a total of 160 elderly units of accommodation was forecast. The need has not dissipated but is not expressly provided for; the KNP no longer provides for any through "allocations" and neither did the Preferred Housing Sites consultation. One concern is that no elderly accommodation may be delivered, yet delivery of it is a long-held objective of the Council and the Keyworth Neighbourhood Plan. In our view additional land is required to deliver such.

Furthermore, Policy H2 of the Neighbourhood Plan indicates that “elderly person accommodation” should be located within 400 metres of shops and services. Plan 4 attached shows the relative distances of sites from the centre.

The other Key Settlements are to have far higher levels of housing. Radcliffe will be expected to accommodate a further 520 (increasing from 400 to 920 [+250%]), Ruddington 410 houses (increasing from 250 to 575 (including the Asher Lane appeal) [+110%]) and East Leake 400 (increasing to 1,000 [+250%]).

It is our belief that Keyworth (increasing from 450 to 600 [+33%]) can accommodate more than the “around 600” dwellings indicated in the Publication Version. This should be at least 800 houses.

**KEY 10 and KEY11.**
A SHLAA for our Client’s site (KEY 11) was submitted in June 2015 to the Council. Our Client’s land could be used to achieve a comprehensive and sustainable scheme for this area of Keyworth which delivers the priorities identified by the Council.

We note from the Post Regulation 14 Consultation Report that accompanied the Keyworth Neighbourhood Plan consultation (December 2015 - January 2016) that it only examined the sites to be "allocated". We have reviewed those comments and note from the bar chart at 7.1 of that document that 115 respondents were in favour of the strategy and 120 against. There is no analysis by site or by direction of growth. We have previously aired our concern that the site selection process was flawed and operated as a “closed shop”. We have noted a large number of comments referring to the west of the village being better placed for access to the A60. Allocated sites to the north east of the village will generate traffic movements that have to pass through the village centre to reach the A60. Sites on the west of Keyworth will not have this adverse impact.

The RBC Green Belt Review Part 2(b) September 2017 Consultation provided a detailed review of SHLAA sites in relation to the importance of the Green Belt. Whilst sites are referenced under KEY prefixes with numerals to identify individual sites in the Sustainability Appraisal, the Green Belt Review references sites under the KEY prefix with individual sites identified by letters.

The RBC Green Belt Review Part 2(b) September 2017 addresses the Green Belt around Keyworth. It identified 5 strategic directions (see Plan 2 attached). Within each Strategic Direction were a number of individual sites. Our client’s site (KEY11) is noted as KEY/O. The adjacent KEY/10 is subdivided into two sites KEY/N and KEY/M. These sites sit within
Strategic Direction Keyworth West which is considered by the Council to be of low – medium importance in green belt terms.

With regard to KEY/O we have consistently objected to the Council's detailed analysis. The adjacent site (KEY/N) scores 15 (Part of Site 4.3) whilst KEY/O scores 16. KEY/M scores 12.

Sites KEY/O and KEY/N scored the same in respect of the five purposes of including land in the Green Belt (Paragraph 80 of NPPF): prevent merging of settlements, assist in safeguarding the countryside from encroachment, preserve setting and special character of the historic settlement and assist in urban regeneration.

The single point difference related to the Green Belt Purpose – assist in safeguarding the countryside from encroachment. Site KEY/N scores 1 point lower because of its relationship with the existing house on the Bunny Road frontage. We do not consider that the presence of this property impacts on the scoring and both KEY/O and KEY/N should be scored 4. All three sites M/N/O have low-medium impacts on the green belt.

The illustrative masterplan (Plan 3) shows how our client’s site could be developed with the adjacent site (KEY/N and KEY/M – Policy 4.3) and provides a more logical and comprehensive scheme. This masterplan demonstrates a large area of open space which would form a linear park to the west of the development; this would also form a long term soft edge to the green belt.

We object to the proposed Green Belt boundary in this location; it should be extended to exclude our Client’s land. A linear park on the western side of the site would ensure that new development is not prominent in the landscape, will create a sensitive transition from urban to rural and will form a new long term physical edge to the Settlement / Green Belt that incorporates Cottons plantation. It is the case that the earlier Draft KNP provided a linear park on part of KEY11 (eastern part) which presumably would have been removed from the Green Belt. This site does not need to be kept permanently open and its deletion from the Green Belt would allow a permanent, defensible Green Belt boundary to be formed which would not need to be altered at the end of the Plan period. This is consistent with Paragraph 85 of the NPPF.

The site, in combination with KEY10 presents an appropriate extension to Keyworth for residential purposes that will result in very limited conflict with the wider function of the Green Belt.

Our clients have commissioned Golby and Luck to assess the landscape implications of development of our client’s site. The Assessment is attached (Appendix 1).

It provides a robust assessment of KEY11 and the cumulative impact of developing KEY10 (Policy 4.3 allocation) and KEY 11. In addition to its own analysis it considers the existing evidence base, notably:

1. AECOM - Landscape and Visual Assessment of Potential Sites Study 2017
2. RBC - Detailed review of Nottingham- Derby Green Belt within Rushcliffe 2017
4. Keyworth PC - Green Belt Review 2024

The assessment concludes that KEY 10 and KEY11 are of a 'low landscape and visual sensitivity'. Any development on the sites would be contained below the ridge line in
keeping with the wider character of the settlement immediately to the east. Its development would avoid the extension of the settlement onto the more prominent south facing slopes to the south of Bunny Lane.

In conclusion, KEY11 in conjunction with KEY 10 presents, in landscape and visual terms, an appropriate extension to the settlement for residential purposes that will result in limited conflict with the wider function of the Green Belt.

Safeguarded Land

The Draft 2016 KNP identified sites housing for a minimum of 450 houses. The table below indicates how their form and density have changed over the last 3 years.

<table>
<thead>
<tr>
<th>Site</th>
<th>2014 KNP</th>
<th>Draft 2016 KNP</th>
<th>RBC House Site Selection Paper</th>
<th>Publication Version</th>
</tr>
</thead>
<tbody>
<tr>
<td>KEY10 – South of Debdale Lane</td>
<td>200</td>
<td>150-160</td>
<td>190</td>
<td>190</td>
</tr>
<tr>
<td>KEY 4 – Land at Nicker Hill</td>
<td>200 including 80 for the elderly</td>
<td>150-160</td>
<td>150</td>
<td>150</td>
</tr>
<tr>
<td>KEY8 Station Road/Platt Lane</td>
<td>80 retirement units</td>
<td>150-160</td>
<td>190</td>
<td>190</td>
</tr>
<tr>
<td>KEY 13 – Hillside Farm</td>
<td>-</td>
<td>-</td>
<td>50</td>
<td>70</td>
</tr>
<tr>
<td><strong>MINIMUM TOTAL</strong></td>
<td><strong>480</strong></td>
<td><strong>450-480</strong></td>
<td><strong>580</strong></td>
<td><strong>600</strong></td>
</tr>
</tbody>
</table>

We consider that the densities set out in the Publication Version are overly optimistic. Delivery is likely to be much nearer to the densities anticipated in the Neighbourhood Plan in view of the design and character criteria, the provision of on site public open space, and attenuation areas. Against this background we believe that additional housing sites need to be identified in the Part 2 Plan.

Paragraph 83 of the Framework provides the basis for a review of green belt boundaries. The Rushcliffe Local Plan has a time frame of 2014-2028, it’s development boundaries, and hence the green belt boundaries, should endure beyond the Plan Period. It is clear that any further development in Keyworth will need to be on green belt land, there are no further opportunities in the settlement boundary.

Paragraph 85 of the National Planning Policy Framework (NPPF) requires that when local planning authorities define Green Belt boundaries they, where necessary, identify areas of safeguarded land in their Local Plans. The purpose of safeguarded land is to provide land to meet longer term needs stretching beyond the plan period. The NPPF also identifies that safeguarded land is not allocated for development; planning permission for its permanent development should only be permitted following a Local Plan review which proposes the land for development.

Safeguarded land should be considered by the Council due to:

1. It provides a degree of permanence to the Green Belt boundaries put in place by the Local Plan and means that future reviews of the Green Belt may not be needed.
2. It ensures that the need to define Green Belt boundaries using defensible features on the ground does not result in large sites being developed all at once where this would cause problems for local infrastructure.
3. It provides flexibility and allows for the non-delivery of allocated sites to be addressed without a fundamental review of the whole Local Plan.

We consider that there is a case in Rushcliffe which is heavily constrained by Green Belt to identify more safeguarded land. This is clearly evident from the Council’s Local Plan 2 Trajectory. Keyworth is encased by Green Belt. It is a popular settlement where people want to live. The trajectory published by the Council shows that all allocated sites will be built out by 2024 in Keyworth. It is unrealistic to take the view that housing will not be required across the entire plan period and beyond.

**Sustainability Appraisal**
The Sustainability Appraisal Publication Draft 2018 (SA) appraised 5 growth options for Keyworth
- Core strategy minimum (450 dwellings)
- 25% + growth than Core Strategy (580)
- 50%+ growth than Core Strategy (705)
- 100% + growth than Core Strategy (940)
- 125% + growth than Core Strategy (1058)

The consultation document indicates an increase of 33% (600 houses). We consider this to be far too low for a Key Settlement such as Keyworth which has a broad range of facilities:
1. Shopping Centre
2. Recent multi million £ Medical Centre
3. Two Dental practices.
4. Leisure Centre
5. Employment opportunities such as the British Geological Survey HQ
6. Parks and public open space
7. Regular bus connections to Nottingham
8. Secondary School
9. Three Primary Schools
10. Public Houses
11. Places of Worship
12. Library

As stated earlier it would appear that the only reason for a cap on development was a perceived concern about primary education capacity which is not supported by any evidence.

The SA makes no reference to any education capacity constraints

The 5 growth options are assessed in the SA and it concludes that there are 'minimum negative effects’ associated with 4 of the 5 options - no impact assessment is offered for the + 125% option. On each option the positive social impacts are noted with potential increased participation and use of shops, library, leisure centre and bus services.

We consider there is a strong case, supported by the SA, for further growth beyond the 600 set out in the consultation document.
Individual sites are assessed in the SA and at page 70 their impacts on Strategic objectives is set out in tabular form. KEY10 and KEY11 score virtually the same, each having just one ‘red’ that relates to Natural Resources and results from the fact that part of the sites are Grade 2 land. Across the settlement there is very little variance between the 4 identified sites - KEY 4a, KEY 8, KEY 10 and KEY 13. It is a fine judgement.

**Sustainability**

We attach Plan 4 which shows the location of the identified sites in relation to the village centre. This demonstrates that KEY11, together with KEY 10, is well placed in terms of proximity. The site lies within 750-1000m from the village centre. This should be compared with two of the other identified sites in the Consultation document:

1. Platt Lane/Station Road – 1,250 – 1,500 metres
2. Nickers Hill – 1,000 – 1,250 metres.

It is a matter of fact that there were a large number of objections from local residents to these sites due to highway/poor access to the village centre.

Paragraph 84 of the framework states:

*"When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development."

We consider that additional land should be released from the green belt now and either allocated to meet current and future needs or identified as safeguarded land. Without such development will be directed away from sustainable settlements such as Keyworth, where growth is constrained by green belt, to less sustainable locations. Such an approach would be inconsistent with paragraph 84 of the framework and emerging NPPF.

In the light of the above and our green belt and landscape evidence we consider that site KEY 11 should be identified for residential use in conjunction with KEY10. Furthermore, there is no education issue which would require restricting housing capacity and reference to 600 dwellings should be deleted and a higher figure of a minimum of 800 considered.

When measured against the tests for soundness in paragraph 192 of the NPPF our comments are:

1. Positively prepared – Keyworth is a highly sustainable settlement. It can accommodate more housing than is currently indicated in the Plan. The Plan fails to boost the supply of housing, fails to provide sufficient sites and fails to maintain sufficient supply throughout the plan period. Keyworth can accommodate a minimum of 800 houses.

2. Justified – the Plan does not adequately justify why allocations 4.1, 4.2, 4.3 and 4.4 have been selected ahead of KEY 11. The evidence does not support this strategy.

3. Effective – the Plan is not effective as it does not take full advantage of the sustainable nature of Keyworth by only allocating land for around 600 dwellings. Importantly no residential properties are provided for in Keyworth beyond 2024. Keyworth is a Key Settlement with all everyday services; it needs housing delivery across the entire plan period.
4. Consistency with national policy – there are several elements of the Green Belt Review scoring and the site selection assessment that are not consistent with national policy; for example, the Plan fails to ensure that a further green belt review is unnecessary at the end of the plan period. It also fails to deliver sustainable patterns of development.

We would be grateful if you would take consideration of our comments.

Yours faithfully

Paul Stone
Director - Stone Planning Services Limited

Plan 1 – Client’s ownership
Plan 2 – Strategic Green Belt Review Plan
Plan 3 - Concept Master Plan KEY10 (Policy 4.3) and KEY11
Plan 4 – Housing Options Site distances to Village Centre
Appendix 1 - Golby & Luck Landscape Summary
Land North of Bunny Lane, Keyworth (KEY11)

Landscape Summary Report

Client: Aldergate Properties Ltd
Date: October 2017
Ref: GL0832
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2 THE SITE & SUPPORTING STUDIES 2
3 LANDSCAPE & GREEN BELT ISSUES 6

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GL0832 02 Site Location
GL0832 03 Photographic Views 1, 2 & 3
GL0832 04 Photographic Views 4, 5 & 6
GL0832 05 Photographic Views 7 & 8

APPENDIX 1

Concept Masterplan (Signet Planning)
1 INTRODUCTION

1.1 This landscape report has been carried out by Golby + Luck Landscape Architects following instruction by Aldergate Properties Ltd to provide a summary of the landscape and Green Belt issues relating to the land north of Bunny Lane, Keyworth (the site); see GL0832 01 and 02.

1.2 The following summary report is guided by techniques and guidelines set out in the Guidelines for Landscape and Visual Impact Assessment - Third Edition (2013), published by the Landscape Institute and Institute of Environmental Management and Assessment (GLVIA).

1.3 This summary report includes a number of representative views that have been taken from the public highway, public rights of way, and publically accessible land. Site work was carried out in October 2017.

1.4 In the production of this report reference has been made to the following documents and information:

- National Planning Policy Framework (2012) (NPPF);
- The Greater Nottingham Landscape Character Assessment (2009);
- Landscape and Visual Analysis of Potential Development Sites (updated 2017);
- Rushcliffe Green Belt Review Part 2 (b) (Detailed Review of the Nottingham-Derby Green Belt within Rushcliffe – Rural Towns and Villages) (2017)
- Rushcliffe Local Plan Part 2: Land and Planning Policies – Further Options;
- Keyworth Neighbourhood Plan Strategy Options – Landscape Analysis (2014)
- British Listed Buildings online resource (http://www.britishlistedbuildings.co.uk/map);
- DEFRA MAGIC online environmental database (http://magic.defra.gov.uk/MagicMap.aspx);
- Historic England - The National Heritage List for England (http://list.historicengland.org.uk/mapsearch.aspx);
- Ordnance Survey information Explorer 1:20,000 and Street Plus 1:10,000; and
- Google Earth aerial photography.
2 THE SITE & SUPPORTING STUDIES

Site Location

2.1 The site (KEY11) extends to approximately 13.3 hectares of land comprising 4no. recliner shaped fields maintained as pasture for grazing set just beyond the western edge of Keyworth, Nottinghamshire.

2.2 The fields within the site are rectilinear in shape forming part of a wider area of enclosed pasture set on the north side of Bunny Lane. Field boundaries are defined by mixed native hedgerows that are of varying quality, containing intermittent tree cover. There is a small deciduous copse in the most northerly field called Cotton’s Plantation.

2.3 The landform within the site is varied, falling from a high-point of approximately 80m above ordnance datum (AOD) at the mid-point of the eastern boundary, to a low-point of 55m AOD at the sites northern boundary. The landform of the site forms part of a local ridgeline that extends east across the settlement. The northern most slopes of the ridge are generally steep, falling into a local valley setting aligned with Debdale Lane to the north of the site. To the south the landform falls from the ridge at a more gentle gradient across Bunny Lane into a topographical bowl that is contained by a ridgeline to the west that is contiguous with Wysall Lane, and a steep wooded ridgeline to the south at Windmill Hill. To the west of the site the ridgeline falls to approximately 75m AOD extending through Rancliife Wood toward the junction of Keyworth Lane and Wysall Road.

2.4 The existing settlement to the east has an edge that is the result of consecutive phases of development shaped by the same rectilinear field pattern of the site cutting across the landform. To the west of the settlement there are number of farms that extend along Bunny Lane that include Greenhays Farm, Wheatcroft Farm, and an outlying individual property called Woodfields. To the south of Bunny Lane is a sewage treatment works set on lower lying ground.

2.5 The site does not provide any public access, or recreation function. In fact there are relatively few public rights of way associated with the surrounding farmland, the most notable being the footpath on the south side of Bunny Lane that extends between Keyworth and Wysall Road to the west.

2.6 The site is not covered by any landscape designation that would suggest an increased value, or sensitivity to change. Its features are not considered to be rare, or irreplaceable.
There does not appear to be any statutory, or non-statutory designations that would prohibit its development for residential purposes.

Supporting Studies

2.7 There are a number of supporting landscape and Green Belt studies that have been produced that have considered the local context of the site, and associated land at the settlement edge of Keyworth. In these studies the site (KEY11) and various surrounding land parcels have been given specific reference numbers; see GL0832 02.

2.8 The Landscape and Visual Analysis of Potential Sites Study prepared by AECOM on behalf of Rushcliffe Borough Council in July 2017 concluded that the site (KEY11) was of low landscape sensitivity, and low visual sensitivity. This overall finding was the same for KEY10 to the east, KEY9 and KEY12 to the north, and KEY13 to the south-east. KEY14 to the south of Bunny Lane was assessed as being of medium landscape sensitivity, and medium visual sensitivity.

2.9 Whilst this study found some variation in scores between these land parcels, it is important to note that they were all (except for KEY14) assessed as being of low landscape and visual sensitivity.

2.10 In the Rushcliffe Green Belt Review – Part 2 (b) (Detailed Review of the Nottingham-Derby Green Belt within Rushcliffe – Rural Towns and Villages) (2017) the site is identified as KEY/O set within the Keyworth West strategic area that was assessed as low-medium Green Belt value. This is comparable to the Keyworth North East, Keyworth North-West, and Stanton-on-the-Wolds strategic areas. The Keyworth South strategic area was assessed as having a medium-high Green Belt value.

2.11 In this study the site is assessed as having medium-high Green Belt value. The study scores each land parcel with the low-medium value category ranging from 11 to 15, and the medium-high value category ranging from 16-20. The site scored 16, this score is not accepted and is only a single point from being classified as a low-medium value. The adjoining land parcel KEY/N (this comprises the western half of KEY10) is assessed as having a low-medium Green Belt value with an overall score of 15. The difference between KEY/O and KEY/N is the lands function in “Assisting in safeguarding the countryside from encroachment”. When assessing this function the study states:
“Although the land is open countryside in character, the existence of a residential unit adjacent to the farm on Bunny Lane prevents a maximum score of 5”

2.12 It is clear that the Green Belt assessment is suggesting that the existence of Greenhays Farm and its associated properties limits the degree to which the development of KEY/N would constitute urban sprawl. The same consideration must be given to KEY11.

2.13 As this summary report has already highlighted, the ability to view these sites is restricted to the immediate local highway, and a single public footpath that runs to the south of Bunny Lane. When approaching the settlement from the west along Bunny Lane the first view of the site is set in the immediate context of Wheatcroft Farm as illustrated on View 1; see GL0832 03. The farm presents as a substantial area of built-form, comprising houses, outbuildings and barns. Beyond the farm there are wider views towards Keyworth on the horizon. When considering KEY/O (the site) the same assessment exercise must be applied as it was for KEY/N. Wheatcroft Farm and its associated houses, outbuildings and barns, alongside wider views of the settlement must also prevent the maximum score of 5 when considering the issues of encroachment.

2.14 If this were applied the sites Green Belt value would reduce to low-medium, comparable with the adjoining land to the east.

2.15 In addition to the Local Authorities assessment, Keyworth Parish Council commissioned a Neighbourhood Plan Green Belt Review (2014). In this study the site forms part of Area I at the western edge of the settlement. The average Green Belt assessment scores in Table 2 of this study clearly show that the site forms a part of one of the least important landscapes in Green Belt terms at the settlement edge.

2.16 The Parish Council also commissioned a Neighbourhood Plan Strategy Option – Landscape Analysis (2014). The study appraises the effects on landscape character and visual amenity for the various development scenarios proposed for Keyworth. However, in reviewing the issue of character this analysis has wrongly considered the Policy Zones NW04 Cotgrave Wooded Clay Wolds, and SN04 Cotgrave and Tollerton Village Farmlands. Keyworth and its immediate landscapes are set within NW03 Widmerpool Clay Wolds, as identified on Figure 1 of this analysis document. It is therefore unclear as to why this Policy Zone has not been considered as part of this study.
2.17 It is clear that the site has been considered in a number of studies that have been prepared to inform the emerging Local Plan and Neighbourhood Plan, and in each study it performs well in both landscape and Green Belt terms. The only notable constraint applicable to the site relates to its landform with the western part of the site sloping away from the settlement, and the potential for this to result in an increased perception of urban sprawl due to a disconnect with the settlement.

2.18 The following section of this summary report considers this issue in more detail and demonstrates that whilst the development of the site will extend the settlement further to the west this will not automatically result in the perception of urban sprawl as indicated in some of these supporting documents, and will in fact present as a logical extension to the settlement (in combination with KEY10) maintaining a ridgeline location in keeping with the wider character of the settlement. A concept masterplan has been prepared illustrating this potential extension; see Appendix 1.
3 LANDSCAPE & GREEN BELT ISSUES

3.1 In landscape terms, the Local Authority’s recent assessment has concluded that the site and wider setting to the west of Keyworth is considered to be of low landscape sensitivity. The land to the north-west of the settlement north of Debdale Lane is also assessed as being of low landscape sensitivity, and the landscape the south of Bunny Lane (KEY14) is assessed as being of medium sensitivity.

3.2 The GLVIA under Box 5.1 sets out a number of criteria to assist in the identification of valued landscapes. These provide a useful guide in confirming the findings of the Local Authorities assessment.

3.3 In terms of quality and condition, the site displays a general lack of effective landscape management, with poorly maintained boundary hedgerows. This is typical of the pasture associated with both the site (KEY11), and the adjoining land KEY10.

3.4 In terms of scenic quality, the site and its local setting cannot be described as being particularly attractive, or valued for its contribution to a landscape of notable scenic quality. The relatively poor management and condition of the landscape features associated with the site have a direct effect on its scenic quality.

3.5 In terms of rarity, the features of the site are both common and widespread in the local landscape setting, and therefore cannot be considered as rare, or irreplaceable.

3.6 In terms of representativeness, the features of the site are not considered to be of particular importance, or providing a strong representation of the local character associated with the Widmerpool Clay Wolds Policy Zone.

3.7 In terms of conservation interests, the features of the site are not considered to be of particular ecological, wildlife, or cultural heritage value;

3.8 In terms of recreation value, the site is maintained as private land and does not provide any recreation or public access function.

3.9 In terms of perceptual aspects, the site is located near to the settlement edge, and is set alongside a ribbon of domestic and farmstead development that aligns the approach to Keyworth along Bunny Lane. The site does not display the characteristics of a wilderness landscape, or a landscape with high levels of tranquility.
3.10 In terms of associations, there are no know associations between the site and works of art, literature, or local history that would suggest any increased value.

3.11 In summary the site is clearly not a valued landscape, and based on its characteristics cannot be considered any greater than low value. In terms of susceptibility, the site is of slightly increased susceptibility to the change when compared to land at the immediate settlement edge. However, when considered in tandem with the neighbouring land KEY10, and the existing ribbon of domestic and farmstead development alongside Bunny Lane it is clear that the site is of no greater that low-medium susceptibility to change. This confirms the Local Authorities assessment that the site is of low landscape sensitivity.

3.12 In visual terms, the Local Authorities assessment has also confirmed the site as being of low visual sensitivity.

3.13 This report includes a number of representative views; see GL0832 03 to 05. Photographic view locations are shown on the Site Context plan; see GL0832 01.

3.14 It is important to first note the limited number of public visual receptors in the locality of the site. This in turn correlates with a restricted visual envelope where receptors will have restricted opportunities to see the site, or appreciate any change through development within it.

3.15 View 1 is taken from Bunny Lane approximately 200m to the west of the site. This is the first opportunity along the lane to view the fields at the western edge of the site. Travelling further along the lane towards Keyworth visibility of the site becomes restricted by landform and the roadside hedgerow. It is important to note that from this location there is an open appreciation of Wheatcroft Farm with the settlement of Keyworth beyond. Users of the public highway in this location are not unaware they are approaching a settlement, and development within the site in this location would only add to this understanding. There would be a visual effect associated with any development within the site but this can be effectively mitigated through new planting measures, and whilst this would add to the settled character of the view is debatable this would result in the perception of unrestricted urban sprawl.

3.16 View 2 is taken from Bunny Lane, approximately 600m from the site looking east. This view demonstrates how the site is quickly screened from view by Rancliffe Wood. There is a view along the lane toward the spire of St Mary Magdalene Church that is of some value, and this view could be interrupted if land on the south side of Bunny Lane were developed.
3.17 View 3 is taken from the burial ground car park at Wysall Lane, approximately 585m from the site looking north-west. This is one of few public receptors on the south side of Bunny Lane that provides an open appreciation of the western edge of the settlement. There is also a public footpath extending west from Keyworth to Wysall Road but it is set lower in the valley where the landform restricts any view of the site. From the car park and the public footpath KEY13 is prominent, extending across sloping land on the southside of Bunny Lane. Equally prominent is KEY14 that extends west from KEY13. KEY10 and the site (KEY11) are viewed set on the ridgeline making far more limited contribution to this view. The development of KEY10 and KEY11 would have a far more limited effect on the setting of this view when compared to the development of KEY13 and/or KEY14, and would therefore result in a more limited perception of urban sprawl.

3.18 View 4 is taken from Wysall Lane approximately 1.7km from the site looking north. From this location the western edge of Keyworth is visible in the ridgeline to the north. KEY13 is partially visible on the southside of Bunny Lane, as is the adjoining land KEY14. KEY10 and KEY11 run across the ridgeline but there are no views into the site. Whilst the development of KEY10 and 11 would result in views from this location towards the settlement on the ridgeline, it would avoid the development of the south facing slopes, and the perception of the settlement falling off the ridge into the valley. Each scenario will result in adverse visual effects, albeit limited, and both will result in the perception of urban sprawl to varying degrees. However, it is considered preferable to retain the ridgeline character of the settlement, and avoid the urbanisation of the valley slopes.

3.19 View 5 is taken from Wysall Road approximately 1.18km from the site looking north-east. As with View 4 the site and KEY10 are viewed on the ridgeline, with the site opening up towards its western boundary as it drops slightly from the ridgeline. Whilst this allows for a restricted view of the site, and potential views of development within it, this view is set in the immediate context of the built-form at Weatcroft Farm, and is far more restricted than the open views that exist across the land to the south of Bunny Lane (KEY13 & KEY14).

3.20 View 6, 7 and 8 are all taken from Bradmore Lane to the north of Keyworth. These views illustrate the degree to which the ridgeline, and subsequent views towards KEY10 and KEY11 are available from this section of highway. Cotton’s Plantation is visible from each of these views, with varying degrees of visibility into the site, the adjoining land to the east (KEY10), and the wider settlement that is set on the top of the ridge. Any development strategy for KEY10 and KEY11 should seek to restrict development from the ridgeline to ensure these views remain substantially unchanged. This in turn will limit any effect on both
visual amenity, and the function of the Green Belt in particular by preventing the perception of unrestricted urban sprawl.

3.21 The purposes of the Green Belt are clearly defined under paragraph as:

- “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;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”

3.22 As already established the combined development of KEY10 and the site (KEY11) will not result in coalescence of Keyworth and any other settlement, or the loss of the separate character and identity of any surrounding settlements; and will not have any effect on any historic features or assets valuable to the setting of the settlement. The purpose of assisting in urban regeneration through prioritising the recycling of derelict, or other urban land is not considered relevant as the majority of the Borough’s housing land will be delivered through the release of greenfield sites.

3.23 Therefore the two purposes relevant to the site is to check the unrestricted sprawl of built-up areas, and safeguarding the countryside from encroachment. Strictly by definition the development of any greenfield land at the edge of a settlement will result in encroachment and urban sprawl. It is therefore important to understand the degree to which the development of the site will be perceived as either urban sprawl, or a prominent encroachment.

3.24 KEY10 and KEY11 are assessed as being of low landscape and visual sensitivity, and by definition it can then be assumed that the site does not form part of a valued or prominent part of this landscape, and does not contribute to its more valued scenic quality.

3.25 In plan form the development of the site would appear as a wide extension of the settlement to the west, resulting in both a significant encroachment and unrestricted urban sprawl. However, as the consideration of visual setting has demonstrated development within the site will not be seen as either a major encroachment, and it will not represent unrestricted urban sprawl. The development of KEY10 and the site (KEY11) will extend the settlement along the ridgeline, avoiding the development of the more prominent south-facing slopes to the south of Bunny Lane that provide a setting to views
from the local footpath network, and views from the burial ground at Wysall Lane. Where
development within the site has the potential to become more prominent as it falls slightly
with the landform, it will be set in the immediate context of the existing built-form at
Wheatcroft Farm, and wider views of the settlement to the east. To the north development
can be kept below the ridgeline to avoid any changes to the setting of views from
Bradmore Lane.

3.26 In summary, the site and adjoining KEY10 are assessed as being of low landscape and
visual sensitivity. The site and KEY10 share a ridgeline setting that extends west from the
settlement to the north of Bunny Lane. This is distinct from the wider setting to the south of
Bunny Lane that comprises sloping land open to view from the local public footpath
network, and wider views from the burial ground car park, and the wider highway network.

3.27 The combined development of the site and KEY10 will create an extension of the
settlement, contained to the ridgeline in keeping with the wider character of the
settlement to the east; see Appendix 1. The development of the site will avoid the
extension of the settlement onto the more prominent south-facing slopes, to the south of
Bunny Lane. Where the site falls the west its will be seen in the immediate context of the
built-form of Wheatcroft Farm, and wider views of the settlement beyond. In the short-
term this will result in the increased perception of settlement at this western gateway to
Keyworth but this can be effectively mitigated through new structural planting measures.
From the north at Bradmore Lane development within the site can be set below the
ridgeline, limiting any effect on the open and undeveloped character of the countryside
and associated Green Belt.

3.28 The site, in combination with KEY10 presents in landscape and visual terms an appropriate
extension to the settlement for residential purposes that will result in limited conflict with the
wider function of the Green Belt.
Figures
View 1 - From Bunny Lane at Woodfields approximately 200m from the site looking east

View 2 - From Bunny Lane approximately 600m from the site looking east

View 3 - From the burial ground car park approximately 585m from the site looking north-west
View 4 - From Wysall Lane at Wembley Pub approximately 1.7km from the site looking north

View 5 - From Wysall Road approximately 1.18km from the site looking north-east

View 6 - From Bradmore Lane approximately 900m from the site looking east
View 7 - From Bradmore Lane on top of Blackcliffe Hill approximately 595m from the site looking south

View 8 - From Bradmore Lane approximately 1.19km from the site looking south-west
**KEY PRINCIPLES**

1. Steeper sloping land remains undeveloped and utilised as multi-functional greenspace.
2. Development parcels reflect the historic field patterns with the potential for hedgerows to be integrated into the streets.
3. Pedestrian link through to Croft road integrating the development.
4. Outward looking dwellings are set back from the boundary and interfaced with landscaping to create an attractive edge and a sensitive transition from rural to urban creating a new, long-term physical edge to the settlement/Green belt.
5. New Pedestrian/Green corridor along the rideline with routes extending around the perimeter of the site.
6. Frontage development to Bunny lane follows the existing building line.
7. Scheme integrates well with the existing highway network connecting onto Bunny lane in two locations, as well as a pedestrian link to croft lane.
8. Development served by two points of access which can be connected into a loop.
9. Development is offset from outward looking existing dwellings.

**CONCEPT MASTERPLAN**

Land at Bunny Lane, Keyworth

Drawings: EM204/4/05/REVA
Scale: 1:1000
Date: 01/09/15
Figure 5: Proposed housing allocations at Keyworth

- KEY04a: Land off Nicker Hill (1)
- KEY08: Land between Platt Lane and Station Road
- KEY10: Land South of Debden Lane (1)
- KEY13: Hillsdale Farm

Keyworth
1750 m
1500 m
1250 m
1000 m
750 m
500 m

Keyworth Centre