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>
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</thead>
<tbody>
<tr>
<td>Title</td>
<td>Mr</td>
</tr>
<tr>
<td>First Name</td>
<td>Ben</td>
</tr>
<tr>
<td>Last Name</td>
<td>Holmes</td>
</tr>
<tr>
<td>Organisation (where relevant)</td>
<td>Bloor Homes</td>
</tr>
<tr>
<td></td>
<td>Oxalis Planning Ltd</td>
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<tr>
<td>Job title (where relevant)</td>
<td></td>
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<tr>
<td>Address – line 1</td>
<td>C/O Agent</td>
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<td>Address – line 2</td>
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<td>Postcode</td>
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<td>E-mail Address</td>
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<td>Telephone Number</td>
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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: Oxalis Planning on behalf of Bloor Homes

3a. To which document does your response relate? (please tick one)
- Local Plan Part 2 Publication Version
- Local Plan Part 2 Policies Map
- Other supporting document: Housing Site Selection Report

3b. To which part of the document does this representation relate? (complete all that apply)
- Page no.
- Paragraph no.
- Section 3
- Policy ref.
- Site ref.: KEY 9
- Policies Map

4. Do you consider the Local Plan Part 2:

4(1) Legally compliant: Yes ☑ No

4(2) Sound: Yes ☐ No ☑

4(3) Complies with the Duty to Co-operate: Yes ☑ No

→ 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.

Justified – the plan should be based on evidence, and be the most appropriate strategy for the district when considered against other reasonable alternatives.

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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)

<table>
<thead>
<tr>
<th>Positively Prepared</th>
<th>Justified</th>
<th>Effective</th>
<th>Consistent with national policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
</tr>
</tbody>
</table>

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.

It is Bloor Homes position, as set out under a separate representation Statement prepared by Oxalis Planning, that the Plan is unsound because it fails to ensure that the full objectively assessed needs of the Borough will be met within the Plan Period and to provide an appropriate and rolling 5-year supply of land for housing.

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”).

Additional land for housing should be identified and allocated in the Local Plan Part 2 to address the under supply of housing. This should include land north of Debdale Lane, Keyworth

Please see attached Statement for details of the Site and its suitability for development.

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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 session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

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 explore the housing supply issues and to discuss the merits of land at Debdale Lane, Keyworth.

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 25/06/2018

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

localdevelopment@rushcliffe.gov.uk; or

Planning Policy
Rushcliffe Borough Council
Rushcliffe Arena
Rugby Road,
Nottingham

Representations must be received by 5pm Thursday 28 June 2018. Representations received after this time will not be considered duly made.
NG2 7YG

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

If you have any questions, please contact the Planning Policy team by telephone on 0115 981 9911, or email at localdevelopment@rushcliffe.gov.uk

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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.

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Representations must be received by 5pm Thursday 28 June 2018. Representations received after this time will not be considered duly made.
Rushcliffe Local Plan Part 2: Land and Planning Policies
Publication Version

Representation by Oxalis Planning on behalf of Bloor Homes in relation to land north of Debdale Lane, Keyworth

Land north of Debdale Lane, Keyworth
Housing Site Selection Report – site reference KEY9
CONTENTS

1.0 BACKGROUND TO HOUSING LAND ISSUES

2.0 THE SUITABILITY OF LAND NORTH OF DEBDALE LANE, KEYWORTH

3.0 KEYWORTH NEIGHBOURHOOD PLAN

4.0 DEBDALE LANE, KEYWORTH: MASTERPLAN DOCUMENT (APPENDED TO THIS STATEMENT)
1.0 Background to Housing Land Issues

1.1 Oxalis Planning have set out in detail under separate representations the need for the Local Plan Part 2 to identify additional land for development to meet a significant shortfall in housing provision. There are two fundamental problems with the approach the Council have adopted to calculating its residual housing requirement i.e. the number of dwellings the Local Plan 2 should deliver. These are firstly their approach to assessing delivery rates and secondly their approach to planning for a suitable ‘buffer’.

1.2 The Council’s assessment of housing supply as set out in their housing trajectory is unrealistic and considerably overestimates the number of dwellings that can reasonably be assumed to be delivered on the sites at Clifton and Gamston / Tollerton. Furthermore, it is considered that the Council should include an appropriate ‘buffer’ (or flexibility allowance) in their housing supply to ensure that objectively assessed needs are met in full in the Plan Period and so that an appropriate rolling five years land supply can be maintained.

1.3 Bloor Homes consider that the overall approach to housing in Keyworth is flawed, both because of the imposed limit on growth and the site selection process.

1.4 Keyworth is a large sustainable settlement with a good range of services and facilities, including 3 primary schools and a secondary school. It is also extremely well served by public transport and its geographic position means that it is well placed to link with jobs and higher order services found in West Bridgford and Nottingham. It is considered that the village can accommodate greater growth than the 600 dwellings proposed in the Plan.

1.5 By way of comparison, East Leake and Radcliffe, which are similar sized settlements, will have growth of well over 1000 dwellings and 900 dwellings, respectively.

2.0 The Suitability of land north of Debdale Lane, Keyworth

2.1 Land north of Debdale Lane, Keyworth (ref KEY9) is a suitable location for development and should be allocated in the Local Plan. It is well related to existing built form and development can take place without affecting the ridge line that runs along the northern boundary of the site. The site has been identified as a suitable safeguarded site in the emerging Neighbourhood Plan, but clearly has the potential to be allocated now and deliver units early in the Plan period.

2.2 The proposals for the site reflect the sites immediate context and the need to set back from the ridge line. In this way capacity is slightly reduced as it is considered that the scheme would require a relatively high level of green space. Its capacity is considered to be around 50- 75 units.

2.3 The development of the site could be undertaken in a coordinated way with the development of land north of Bunny Lane (or south of Debdale Lane) (KEY10 Policy 4.3), in particular with linked open spaces and enhanced footpath network.

2.4 A masterplanning document has previously been prepared as part of the Neighbourhood Plan process. This sets out the merits of the site and the principles which might guide development on the site. These remain relevant and therefore the document is attached as part of their representation.
3.0 **Keyworth Neighbourhood Plan**

3.1 Bloor Homes also consider that the Council’s site selection process fails to appropriately reflect the evidence base, including the extensive work undertaken as part of the preparation of the Keyworth Neighbourhood Plan.

3.2 Land north of Debdale Lane (KEY9) has been promoted by Bloor Homes as a sustainable and suitable location for development. The site has been consistently identified as a potentially suitable site in the various iterations of the Neighbourhood Plan. It is identified as a safeguarded site in the adopted Neighbourhood Plan, a recognition that the site is suitable for development and a preferred site if higher housing numbers are required. Given that the Borough Council have determined that higher numbers are required, the land north of Debdale Lane should be allocated for development in accordance with the aspirations of the Neighbourhood Plan. Details of how the site should be developed are set out above and on the Plans attached.

3.3 Land south of Bunny Lane, Hillside Farm (KEY13 and Policy 4.4 of the Draft Plan) is not considered to be a preferable site to land north of Debdale Lane. Work undertaken as part of the Neighbourhood Plan concludes that the development of this site would have additional impact on the local landscape and views into and out of the village. As a result this site has not been identified in the Neighbourhood Plan. Indeed at no point in the Neighbourhood Plan process has this site been identified as a suitable site, notwithstanding changes to the preferred sites identified in the different draft version of the Neighbourhood Plan.

3.4 Work undertaken by Bloor Homes as part of the assessment of the land north of Bunny Lane, has included an assessment of the effects of odour from Keyworth waste treatment facility. This work concluded that a precautionary approach to development should be taken and that a cordon sanitaire should be set at least 400m from the waste facility in order to ensure that potential impact from odour on the new development is appropriately mitigated and the amenity of future residents can be secured. (Please see attached Plan showing a 400m Sewage easement). This cordon sanitaire would encroach slightly into the north of Bunny Lane site, and this is taken into account in the masterplanning of the site. The Council will need to satisfy itself that the proximity of Hillside Farm to the waste treatment facility is acceptable and the suitability and development capacity of this site is not compromised as a result, particularly given the availability of potentially more suitable alternatives.

4.0 **Debdale Lane, Keyworth: Masterplan Document (appended to this Statement)**
1.0 PURPOSE OF THIS DOCUMENT

1.1 This document has been prepared in response to the letter from Keyworth Parish Council (KPC) dated 11th March 2013 which requested a range of information relating to sites being promoted for residential development in and around Keyworth.

1.2 The following sections set out details in respect of land north of Debdale Lane, Keyworth, and in particular explains why the land is suitable for new housing. This document also illustrates how the site might be developed in a sensitive and sustainable manner to reflect the aspirations of, and to provide benefits to, the local community and help to meet the housing requirements of the village.

1.3 The land is being promoted by Bloor Homes Ltd, one of the UK’s largest privately owned house building companies, completing around 2000 new homes every year. Bloor Homes have appointed a team of specialist external consultants to assist them with this project, including Oxalis (town planning), Define (urban design and landscape), Halcrow (technical and environmental), Northern Transport Planning (highways), and Nexus Heritage (historic environment).

1.4 The remainder of this document is structured as follows:

2. Site location and description
3. Site assessment (Sustainability Appraisal)
4. Emerging development ideas
5. Community benefits
6. Concluding comments
2.0 SITE LOCATION AND DESCRIPTION

2.1 The site is located on the western side of Keyworth. It is bounded to the east by the rear gardens of properties located on Rancliffe Avenue.

2.2 The site consists of an agricultural field, with some hedgerows intact on the boundaries of the site and separating the two fields. The site extends to approximately 5.4 ha (13.5 acres). It slopes upwards away from Debdale Lane, and then flattens out towards the north of the site.
3.0 SITE ASSESSMENT (SUSTAINABILITY APPRAISAL)

3.1 Any consideration of a site proposed for development should begin with an understanding of the context and characteristics of the site. This section draws on work and information already available or in progress which help define and assess the site’s key characteristics. The work undertaken demonstrates that this site is clearly suitable for residential development.

3.2 Appendix 1 contains further information regarding this Appraisal, and highlights the positive fit of this site against key sustainability measures. The site is suitable and sustainable in terms of:

- Impact on local character and residential amenity
- Environmental value
- Infrastructure
- Accessibility

View of Keyworth from within Site
Environmental Value

3.6 The site at Debdale Lane scores well in sustainability terms in part because there are no overriding constraints to development. Various technical and environmental studies have been commissioned that demonstrate that:

- there are no protected species identified by surveys to date on the site;
- the site has some established boundary trees and a number of hedgerows – the proposal is for the vast majority of existing trees and hedges to be retained, supported by new planting;
- the local landscape is, although varied, not of particular high value, and wider visual impacts can be limited through the retention of established boundary vegetation, and a proposed new ‘soft edge’ to Keyworth. The site would not impact on more sensitive landscape and open views to the north;
- the site is not prone to flooding or drainage problems, and can be developed without causing additional risk of flooding elsewhere.

Infrastructure

3.7 Investigations as to the impact of the development of the site on local highways and sewerage infrastructure are ongoing, to include detailed survey and modelling exercises.

3.8 Preliminary highway work suggests that traffic generated by the proposed development can be accommodated on the network without detrimental impact on safety or capacity.

3.9 Initial work on the local sewerage system would suggest that treatment capacity at the works to the south of Bunny Lane exists, but improvements to network capacity may be required to accommodate foul water flows from the development. Detailed modelling work has been commissioned to ascertain the extent of improvements required.
3.10 The site is located so as to provide good access to the main services and facilities available within Keyworth. The site is approximately 1 km from ‘The Square’ at the heart of Keyworth village which accommodates many key services and shops, including the Medical Centre. However, there is also a local supermarket, a local pub, and other local retail facilities approximately 450 metres from the site on Nottingham Road and Debdale Lane.

3.11 Local employment is also within easy reach of the site, and, crucially, the site is also well located for access to the 15 min daytime frequency buses into Nottingham which stop on both Manor Road and Nottingham Road.

3.12 In terms of access to education and leisure facilities, the site is approximately 1 km from the South Wolds Secondary School and Keyworth Leisure Centre, 1 km from Crossdale Primary School, and 700 m from Keyworth Primary and Nursery School.
4.0 EMERGING DEVELOPMENT IDEAS

The Emerging Masterplan

4.1 Not all of the land within the site should be developed, indeed far from it. It is our considered view that whatever the scale of development that might be deemed suitable on this site, significant green and open space should be provided.

4.2 A significant advantage of the size of the site is its potential to provide a high quality, green and pleasant environment whilst still making a valuable contribution to the housing requirement for Keyworth.

4.3 Our emerging proposals include a new ‘soft edge’ to this part of Keyworth. New housing would be provided with integrated green spaces, as well as new public open space, and with a sensitive approach to the site boundaries. Based on our work to date, the site could accommodate around 50 homes and provide significant new open space.

4.4 At this stage our proposals for the site have by no means been finalised and some direct engagement with the Parish Council and the local community to help progress the scheme would be welcomed as there are a number of site specific opportunities that could be directly shaped by local input reflecting local preferences and ideas.

4.5 However, an illustrative masterplan has been prepared underpinned by a number of proposed design principles – see overleaf. It is characterised by:

- A sensitive approach to structural landscaping, reinforcing and enhancing existing vegetation along the ridgelines and site boundaries;
- A generous approach to open space, providing a new landscaped western edge to Keyworth, linear open spaces features, new play space and biodiversity enhancements;
- A generous approach to landscaping around dwellings, enabled by a relatively low density development appropriate to a village location; and
- Extending and enhancing the network of footpaths and cycle paths to connect the proposed open spaces and existing community facilities and services within Keyworth.

4.6 As shown by the indicative masterplan (Figure 3), the suggestion is that the majority of the new green and open space will be provided to the north of the site softening the built development edge.

4.7 The emerging proposal is that existing hedges be retained and enhanced to form part of the landscaping or ‘green infrastructure’ on site - see the section below on community benefits.

4.8 The main access will be from from Debdale Lane, incorporating pedestrian and cycle access.

4.9 The site will utilise existing water (foul and surface) and power networks, with investment or improvements made where necessary. New drainage infrastructure will be provided to ensure the development is sustainably drained to mimic natural conditions. Such systems usually improve local land drainage by reducing the volume and rate at which surface water runs off the land.

4.10 The drainage system is being designed to store surface water runoff during large rainfall events and release it in a controlled manner, ensuring that there will be no negative impacts in terms of local flooding. This new infrastructure will form part of the new open space and landscaping on site, and will also assist in improving biodiversity.
Create new access from Debdale Lane. Establish wetland habitat at base of slope incorporating public access and drainage features. Buildings set back from localised ridgeline to limit the visual impact in views from the north.

Existing vegetation retained as features within the development where practical. Less dense and looser arrangement of housing facing countryside edge. Woodland planting along northern boundary provides a landscape feature, additional wildlife and amenity benefits and screening for the proposed development.

Generous offset and control of building heights alongside existing settlement edge, particularly where adjacent to bungalows. Perimeter footpath provides amenity benefits.
5.0 COMMUNITY BENEFITS

LEGEND

1. Deeper back gardens and controlled height of buildings (including bungalows) along edge with existing properties.

2. Create open space focus around main entrance, with buildings arranged to provide frontage and softened by tree planting around the edges.

3. Possible incorporation of drainage and wetland features into focal open space.

4. Improvement of Debdale Lane entrance to allow access into the proposed development.

5. Retention of existing vegetation along the edges of the site, where possible.

6. Retained lane to allow access to pumping station and countryside beyond, with potential links to the Bunny Lane site.
5.1 Our emerging proposals for the site at Debdale Lane seek to maximise the benefits to local residents while providing an attractive new environment and high-quality homes for new residents.

5.2 Development in Keyworth will support existing facilities to the benefit of existing and new residents. There is evidence that school rolls are falling, in part as a result of a general ageing population in the village and a lack of new homes over recent years. In addition, the Leisure Centre has been under threat of closure in the recent past. Increasing the demand for such local services through providing new homes is likely to make a direct and positive contribution towards addressing these local challenges for the benefit of existing and new residents.

5.3 The community benefits of our emerging proposals for Land at Debdale Lane are varied in nature – key benefits include:

- a new ‘soft edge’ to this part of Keyworth, with new and retained tree and hedgerow planting to minimise the visual impact and better integrate the village with the countryside beyond;
- significant new open space provision on site, well beyond the amount required by local policies, including a children’s play area accessible to new and existing residents;
- a network of linked footpaths providing opportunities for recreation and exercise, as well as access to the countryside beyond, and linking with existing residential areas;
- provision of landscaped drainage features providing new wetland habitats which could form a new ‘nature walk’ as part of the network of paths referred to above, improving local biodiversity for the enjoyment of existing and new residents;
- a mix of high-quality house types to meet a range of local needs and aspirations, including affordable homes that will help local people secure new homes in the village, together with homes specifically aimed at local residents who wish to downsize and remain living in Keyworth; and
- a site layout and design characterised by homes set within gardens with off-street parking, creating a visually attractive new area within the village.

5.4 We are aware of aspiration for ‘a smaller version of Rushcliffe Country Park’ which has emerged from local surveys and community engagement, and that such a facility would be valued in terms of the enhancement to local nature conservation and for leisure use. The emerging approach proposed on this site, with the generous open space provision including the potential of semi-wetland habitats as part of the sustainable drainage infrastructure, could meet such a local objective. Additional benefit could be realised by this being linked to footpath and cycle path networks as proposed in the indicative masterplan.

5.5 The images on the following pages illustrate the character of the proposed open space and landscaping.
Images of Proposed Open Space & Landscaping
6.1 The site north of Debdale Lane offers a number of opportunities for development:

- being a sustainable potential development site in Keyworth in terms of accessibility and impact on the local area;
- having no features of specific environmental value that would constrain development; and
- having the potential to deliver a high-quality new residential area, which addresses housing need in the area and minimises the impact on existing residents.

6.5 Our emerging proposal for this site at Debdale Lane seeks to maximise the benefits to local residents, which are varied in nature, and will be delivered through a sensitive approach to the development of the site.
This appendix provides a sustainability appraisal of the site at Debdale Lane. It draws on the existing and emerging evidence base from various technical assessments which will support a future planning application.

The assessment uses the following scale to indicate **likely impacts**:

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<tr>
<th>Significant Positive</th>
<th>Minor Positive</th>
<th>Neutral or unknown</th>
<th>Minor Negative</th>
<th>Significant Negative</th>
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<td>++</td>
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<td>0</td>
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**NPPF high-level definition of sustainable development:**

<table>
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<tr>
<th>Sustainability measure/criteria</th>
<th>Likely impact</th>
<th>Further information or notes, references to evidence base</th>
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<tbody>
<tr>
<td>Social</td>
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<td></td>
</tr>
<tr>
<td>Provide housing required to meet local needs.</td>
<td>++</td>
<td>The proposal will contribute directly to meeting the Borough Council’s emerging spatial strategy, delivering new housing in Keyworth.</td>
</tr>
<tr>
<td>Providing a high-quality built environment.</td>
<td>++</td>
<td>A high-quality new residential environment, easily accessible to the village centre, will be provided. Indicative masterplan and key development principles prepared.</td>
</tr>
<tr>
<td>Support local health, social, and cultural well-being.</td>
<td>+</td>
<td>Proximity to existing residential areas and facilities will support social and cultural well-being, and also enables walking to local facilities which can support healthy lifestyles.</td>
</tr>
<tr>
<td>Environmental</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Contribute to protection or enhancement of natural, built, and historic environment.</td>
<td>o/-</td>
<td>Development will not damage historic environmental or built features, but will involve the loss of a greenfield site. Heritage Assessment undertaken.</td>
</tr>
<tr>
<td>Improve biodiversity.</td>
<td>++</td>
<td>The creation of new habitats combined with the retention of existing hedgerows and trees on site will lead to an improvement in biodiversity. Phase 1 Ecology Assessment undertaken for the site. Further surveys during April 2013.</td>
</tr>
<tr>
<td>Environmental (continued)</td>
<td>Use natural resources prudently, minimise waste and pollution.</td>
<td>+</td>
</tr>
<tr>
<td>Adapt to climate change including moving towards a low carbon economy.</td>
<td>+/o</td>
<td>New homes would be built to high environmental standards, minimising energy, and water use. Proximity to the village facilities would support walking and cycling, and proximity to established quality bus routes will also reduce the need for car journeys. A Flood Risk and Drainage Assessment has been undertaken.</td>
</tr>
<tr>
<td>Economic</td>
<td>Contribute to a strong, responsive, competitive economy by ensuring sufficient land in the right place at the right time.</td>
<td>++</td>
</tr>
<tr>
<td>Identify and coordinate development requirements, including the provision of infrastructure.</td>
<td>++</td>
<td>The infrastructure required to provide a high-quality environment would be delivered, as would any necessary improvements to wider infrastructure near the site. Positive input and technical work with utilities providers (e.g. Severn Trent) on-going – no constraints identified; some investment or improvements will be made as part of the development.</td>
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### Assessment against Rushcliffe Borough Council’s Sustainability Objectives:

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<tr>
<th>Objective</th>
<th>Likely impact</th>
<th>Further information or notes, references to evidence base</th>
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</thead>
<tbody>
<tr>
<td>To ensure that the housing stock meets the housing needs of Greater Nottingham</td>
<td>++</td>
<td>The proposal will contribute directly to meeting the Borough Council’s emerging spatial strategy, delivering new housing in Keyworth.</td>
</tr>
<tr>
<td>To improve health and reduce health inequalities</td>
<td>+</td>
<td>Proximity to local facilities will enable social and cultural well-being, and also encourage walking or cycling which can support healthy lifestyles.</td>
</tr>
<tr>
<td>To provide better opportunities for people to value and enjoy Greater Nottingham’s heritage</td>
<td>o</td>
<td>Best practice will be adopted to ensure a safe new residential area, incorporating natural surveillance and other approaches to ‘design out’ crime.</td>
</tr>
<tr>
<td>To improve community safety, reduce crime and the fear of crime in Greater Nottingham</td>
<td>++</td>
<td>No direct impact. At best a minor positive impact on the basis of increased local demand for and engagement in volunteering and other community focused activity.</td>
</tr>
<tr>
<td>To promote and support the development and growth of social capital across Greater Nottingham</td>
<td>o</td>
<td>Development will not damage historic environmental or built features, but will involve the loss of a greenfield site.</td>
</tr>
<tr>
<td>To increase biodiversity levels and protect and enhance Green Infrastructure across Greater Nottingham</td>
<td>++</td>
<td>The creation of new habitats and the retention of existing hedgerows and trees on site will lead to an improvement in biodiversity. Emerging proposals are for generous new G.I. provision. Phase 1 Ecology Assessment undertaken for the site.</td>
</tr>
<tr>
<td>To protect and enhance the rich diversity of the natural, cultural and built environmental and archaeological/geological assets, and landscape character of Greater Nottingham, including Greater Nottingham’s heritage and its setting</td>
<td>o/-</td>
<td>New homes will be built to high environmental standards, minimising energy, and water use, by a developer with experience and a good track-record. Loss of a greenfield site. Flood Risk and Drainage Assessment shows site is not prone to flooding, and can be developed without creating additional risks of surface water flooding elsewhere.</td>
</tr>
<tr>
<td>To prudently manage the natural resources of the area including water, air quality, soils and minerals whilst also minimising the risk of flooding</td>
<td>+</td>
<td></td>
</tr>
<tr>
<td><strong>Objective (continued)</strong></td>
<td><strong>Likely impact</strong></td>
<td><strong>Further information or notes, references to evidence base</strong></td>
</tr>
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<td>------------------------------------------------------------------------------------------</td>
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<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>To minimise waste and increase the re-use and recycling of waste materials</td>
<td>+/o</td>
<td>New homes will be built to meet environmental regulations and standards, with best practice applied where possible to minimise waste and to encourage recycling.</td>
</tr>
<tr>
<td>To minimise energy usage and to develop the area’s renewable energy resource, reducing dependency on non-renewable sources</td>
<td>+/o</td>
<td>New homes would be built to high environmental standards, minimising energy, and water use.</td>
</tr>
<tr>
<td>To make efficient use of the existing transport infrastructure, help reduce the need to travel by car, improve accessibility to jobs and services for all and to ensure that all journeys are undertaken by the most sustainable mode available</td>
<td>++</td>
<td>Proximity to the village facilities will support walking and cycling, and proximity to established quality bus routes will also reduce the need for car journeys.</td>
</tr>
<tr>
<td>To create high quality employment opportunities</td>
<td>o</td>
<td></td>
</tr>
<tr>
<td>To develop a strong culture of enterprise and innovation</td>
<td>o</td>
<td></td>
</tr>
<tr>
<td>To provide the physical conditions for a modern economic structure including infrastructure to support the use of new technologies</td>
<td>o</td>
<td></td>
</tr>
</tbody>
</table>
Dear Sir/Madam

Please find attached representations to the Rushcliffe City Council Local plan Part 2: Land and Planning Policies Publication Version made by Oxalis Planning on behalf of Bloor Homes in relation to Land south of Debdale Lane Keyworth - Policy 4.3

It would be appreciated, if you would kindly confirm the receipt of this email.

Kind regards

Naheida Janjua

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This email has been scanned for spam and malware by The Email Laundry.
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>Ben</td>
</tr>
<tr>
<td>Last Name</td>
<td>Holmes</td>
</tr>
<tr>
<td>Organisation (where relevant)</td>
<td>Bloor Homes</td>
</tr>
<tr>
<td>Organisation (where relevant)</td>
<td>Oxalis Planning Ltd</td>
</tr>
<tr>
<td>Job title (where relevant)</td>
<td>C/O Agent</td>
</tr>
<tr>
<td>Address – line 1</td>
<td>C/O Agent</td>
</tr>
<tr>
<td>Address – line 2</td>
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<td>Address – line 3</td>
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<td>Postcode</td>
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<td>E-mail Address</td>
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<tr>
<td>Telephone Number</td>
<td></td>
</tr>
</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: Oxalis Planning on behalf of Bloor Homes

3a. To which document does your response relate? (please tick one)

- Local Plan Part 2 Publication Version
- Local Plan Part 2 Policies Map
- Other supporting document please state which:

3b. To which part of the document does this representation relate? (complete all that apply)

- Page no. 33
- Paragraph no.
- Section 3
- Policy ref. Policy 4.3: Housing Allocation – Land south of Debdale Lane, Keyworth
- Site ref. Policy 4.3: Housing Allocation – Land south of Debdale Lane, Keyworth
- Policies Map

4. Do you consider the Local Plan Part 2:

- 4(1) Legally compliant Yes ✓ No
- 4(2) Sound Yes No ✓
- 4(3) Complies with the Duty to Co-operate Yes ✓ No

→ 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.
**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)

<table>
<thead>
<tr>
<th>Positively Prepared</th>
<th>Justified</th>
<th>✓</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effective</td>
<td>Consistent with national policy</td>
<td>✓</td>
</tr>
</tbody>
</table>

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.

The allocation of land south of Debdale Lane (north of Bunny Lane) in Policy 4.3 is strongly supported. The site is a suitable and sustainable location for development and can make a positive contribution to meeting the housing needs of the area.

Considerable work has been undertaken as part of the preparation of a Planning application for the site. This work confirms that the site is suitable for development and that there are no physical or environmental constrains which would preclude or restrict development on the site. A summary of this work together with general details about the sustainability of the site are set out in the attached Statement.

---

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”).

The attached Statement demonstrates that the land south of Debdale Lane can accommodate around 215 dwellings in accordance with the land use and landscape principles established by Policy 4.3. To be consistent and to provide clarity and certainty the Policy should be amended to refer around 215 dwellings rather than the 190 dwellings currently proposed.
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 session at the examination. I would like my representation to be dealt with by written representation
[ ] Yes, I wish to appear at the examination

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:

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 25/06/2018

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

localdevelopment@rushcliffe.gov.uk; or

Planning Policy
Rushcliffe Borough Council
Rushcliffe Arena

Representations must be received by 5pm Thursday 28 June 2018. Representations received after this time will not be considered duly made.
Representations must be received by 5pm Thursday 28 June 2018. Representations received after this time will not be considered duly made.
Policy 4.3 - Housing allocation:
Land south of Debdale Lane, Keyworth
CONTENTS

1.0 SUPPORT FOR POLICY 4.3
2.0 IMPACT ON LOCAL CHARACTER AND RESIDENTIAL AMENITY
3.0 ENVIRONMENTAL VALUE
4.0 INFRASTRUCTURE
5.0 ACCESSIBILITY
6.0 MASTERPLANNING

ATTACHMENT:

A. MASTERPLAN DEVELOPMENT FRAMEWORK
1.0 SUPPORT FOR POLICY 4.3

1.1 Land south of Debdale Lane (north of Bunny Lane), Keyworth (Policy 4.3) is a suitable and sustainable location for development. Its proposed allocation is strongly supported. The site has been a preferred site in all of the various iterations of the Keyworth Neighbourhood Plan and is a recommend allocation in the adopted Neighbourhood Plan.

1.2 The land is being promoted by Bloor Homes Ltd, who are one of the UK’s largest privately-owned house building companies, completing around 2000 new homes every year.

1.3 The criteria set out under Policy 4.3 are supported. The principles set out mirror the Masterplanning principles for the site established by Bloor Homes through their site assessment and design work. Details of this are set out below. Key principles are the retention of green space on the northern part of the site and a significant green edge on the western part of the site. It should be noted however, that even with this arrangement the site can deliver around 215 dwellings. It may be helpful for the Local Plan Part 2 Publication Version to be amended slightly to reflect this – a modification to refer to ‘around 215 houses’ rather than to ‘around 190 houses’.

2.0 THE SUITABILITY OF LAND SOUTH OF DEBDALE LANE

2.1 Considerable work has been undertaken to assess the suitability of the site for development. Indeed work to prepare a planning application for the site is now well advanced. As summary of the merits of the site and key components of the emerging scheme are set out below under a series of separate topic based headings.

3.0 SITE DESCRIPTION AND LOCATION

3.1 The site is located on the western side of Keyworth. It is bounded to the east by the rear gardens of properties located on Park Avenue, Croft Road, and Intake Road.

3.2 The site is in agricultural use, currently separated into three fields with some hedgerows intact within and on the boundaries of the site. The site extends to approximately 15.3 ha (37 acres). It slopes gently upwards to the north away from Bunny Lane, and then flattens out before falling more sharply further north towards Debdale Lane.

4.0 IMPACT ON LOCAL CHARACTER AND RESIDENTIAL AMENITY

4.1 A sensitive approach to layout, landscaping and building design on this site will ensure that the character and amenity of the area is protected. This is particularly relevant in terms of the approach to the boundary with existing properties to the east.

4.2 Whilst Keyworth is a hill top settlement, the topography of the area combined with existing robust vegetation in and around the site (including hedgerows and small tree copses and areas of woodland), limit views of the site from the surrounding area.

4.3 The development proposals will seek to ensure that the more visually sensitive parts of the site are retained as public open space. Furthermore, a sensitive landscaping scheme will be developed, with significant additional hedge and tree planting to further screen and filter views of the site.
5.0 ENVIRONMENTAL VALUE

5.1 The site south of Debdale Lane (north of Bunny Lane) scores well in sustainability terms, in part because there are no overriding constraints to development. Various technical and environmental studies have been commissioned and demonstrate that:

- there are no protected species identified by surveys to date on the site;
- the site has some established boundary trees and a number of hedgerows – the proposal is for the vast majority of existing trees and hedges to be retained, supported by new planting;
- the local landscape is varied, but not of particular high value, and any wider visual impacts can be limited through the retention of established boundary vegetation, and a proposed new ‘soft edge’ to the settlement; and
- the site is not prone to flooding or drainage problems and can be developed without causing additional risk of flooding elsewhere.

6.0 INFRASTRUCTURE

6.1 Investigations as to the impact of the development of the site on local highways and sewerage infrastructure, has included detailed survey and modelling exercises.

6.2 The highway work undertaken suggests that traffic generated by the proposed development can be accommodated on the network without any detrimental impact on highway safety or capacity.

6.3 Work on the local sewerage system suggests that treatment capacity at the works to the south of Bunny Lane exists, but improvements to network capacity may be required to accommodate foul water flows from the development.

7.0 ACCESSIBILITY

7.1 The site is well located, providing easy access to the main services and facilities available within Keyworth as shown in Figure 2. The entire area proposed for development on the site is within 800m of ‘The Square’ at the heart of Keyworth which accommodates many key services and shops, including the recently constructed Medical Centre.

7.2 Local employment opportunities are also within easy reach of the site. The site is also well located for access to the 15 min daytime frequency buses into Nottingham and West Bridgford, with stops on Moor Road being no further than 500m from any part of the site.

7.3 In terms of access to education and leisure facilities, the site is approximately 1km from South Wolds Secondary School and Keyworth Leisure Centre and is around 700m from Keyworth Primary and Nursery School.

8.0 MASTERPLANNING

8.1 An illustrative masterplan has been prepared, based on a number of key design principles (this is attached to this Statement):
• A sensitive approach to structural landscaping, reinforcing and enhancing existing vegetation along the ridgelines and site boundaries;

• A generous approach to open space, providing a new landscaped western edge to Keyworth, linear open space features, new play space and biodiversity enhancements;

• A generous approach to landscaping around dwellings, enabled by a relatively low density development appropriate to a village location; and

• Extending and enhancing the network of footpaths and cycle paths to connect the proposed open spaces and existing community facilities and services within Keyworth.

8.2 The community benefits of the proposals are varied in nature, and include:

• a new ‘soft edge’ to this part of Keyworth, with new and retained tree and hedgerow planting, to minimise the visual impact and better integrate the village with the countryside beyond;

• significant new open space provision on site, well beyond the amount required by local policies, including a children’s play area accessible to new and existing residents;

• traffic calming on Bunny Lane to assist local efforts to reduce the speed of traffic entering the village;

• a network of linked footpaths around the site, providing opportunities for recreation and exercise, linking with the existing residential area to the east (Croft Road);

• the opportunity to provide an attractive new circular walk linking existing footpaths on Debdale Lane, the new footpath network provided as part of the development site, and the public footpath network south of Bunny Lane that links into the village and countryside beyond;

• a mix of high-quality house types to meet a range of local needs and aspirations, including affordable homes that will help local people secure new homes in the village, together with homes specifically aimed at local residents who wish to downsize and remain living in Keyworth; and

• a site layout and design characterised by homes set within gardens and with offstreet parking, creating a visually attractive new area within the village.
LEGEND
- Red Line Boundary (15.24 Ha)
- Indicative Residential Development Blocks
- Public Open Space
- Indicative Drainage Features
- Indicative Play Area Locations
- Deeper Back Garden Buffer
- Primary Access Road
- Development Area (approx. 7.41 Ha)
- Indicative Proposed Tree Planting
- Green Spine
- Footpath
- Steeply Sloping Land

Scale 1:2,500