To whom it may concern,

Please find attached a representation for Land between Platt Lane and Station Road Keyworth.

Please confirm receipt.

Kind Regards,

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

Representation Form

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>
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<tr>
<th>1. Personal Details</th>
<th>2. Agent’s Details (if applicable)</th>
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<tr>
<td><strong>Title</strong></td>
<td>Mr</td>
</tr>
<tr>
<td><strong>First Name</strong></td>
<td>Guy</td>
</tr>
<tr>
<td><strong>Last Name</strong></td>
<td>Wakefield</td>
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<td><strong>Organisation (where relevant)</strong></td>
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<td><strong>Job title (where relevant)</strong></td>
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<td><strong>Telephone Number</strong></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: Hunter Page Planning on behalf of Miller Homes Ltd

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: [Click here to enter text.]

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

- Page no. [Click here to enter text.]
- Paragraph no. [Click here to enter text.]
- Policy ref. [Policy 4.2: Housing Allocation – Land between Platt Lane and Station Road, Keyworth]
- Site ref. Policy 4.2: Housing Allocation – Land between Platt Lane and Station Road, Keyworth
- Policies Map [Click here to enter text.]

4. Do you consider the Local Plan Part 2:

- Yes [✓] No [ ]

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

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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.

**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).

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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>
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</table>

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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 representation

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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 representation

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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.

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:

Click here to enter text.

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 28/06/2018

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
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

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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.

9911, or email at localdevelopment@rushcliffe.gov.uk
28th June 2018

Planning Policy,
Rushcliffe Borough Council,
Rushcliffe Arena,
Rugby Road,
West Bridgford,
NG2 7YG

Sent Via Email only

**Representation to the Rushcliffe Local Plan Part 2: Land and Planning Policies Publication Version. Land between Platt Lane and Station Road, Keyworth.**

This representation has been prepared by Hunter Page Planning on behalf of our client Miller Homes Ltd in relation to the Publication Version of the Rushcliffe Local Plan Part 2: Land and Planning Policies. Miller Homes have a legal interest in the land between Platt Lane and Station Road, Keyworth which is proposed to be allocated for development. This representation relates to Section 3 of the Local Plan which concerns Housing Delivery and in particular Policy 4.2 which is the specific policy covering the allocation.

This letter provides further detail on Miller Homes support for the proposed Main Modifications, relating specifically to the allocation of land between Platt Lane and Station Road, Keyworth for development.

**Planning Policy Context**

The National Planning Policy Framework (NPPF) at paragraph 182 sets out the tests to which the Local Plan must comply with to be considered sound, which are as follows:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework
Local Plan

By way of background, the Local Plan Part 1: Core Strategy was adopted in December 2014 and it allocated six large strategic sites for housing development to meet the majority of the 13,150 new homes housing target for the period 2011-2028. Since this time five of the six allocated sites have taken longer to get started than previously anticipated resulting in the sites delivering much less of the required housing for the plan period. This has resulted in a requirement to increase housing provision in the Local Plan Part 2 to compensate and provide enough land for an additional 2000 new homes. This is alongside the Government’s requirement for a five year housing land supply of deliverable housing sites throughout the plan period. To ensure this continuous supply of housing, both short term and longer term housing requirements must be accommodated, hence the requirement for further housing allocations in the Local Plan Part 2.

An additional buffer has also been applied to ensure that should there be any further delays in housing delivery there is an appropriate guard against any further shortfall. Therefore, the 21 sites allocated in the Local Plan Part 2 can accommodate 2,700 new homes providing a buffer of 700 additional houses.

In terms of locating these additional housing sites, the Local Plan Part 2 has followed the spatial strategy set out in policy 3 of the Local Plan Part 1 which set out a development hierarchy for housing. Development is to be directed in the first instance to the main built up area of Nottingham, followed by the identified ‘key settlements’ (which includes Keyworth) and finally to ‘other villages’ – in order to meet local housing needs. It was deemed unsuitable to extend the strategic sites around Nottingham and allocate any new sites within or adjoining the area, therefore the Local Plan Part 2 focuses its allocations in the ‘key settlements’ and to a lesser degree the ‘other villages’. The Local Plan Part 1 sets minimum housing targets for the ‘key settlements’ and the Local Plan Part 2 allocations will result in new housing delivery above these targets.

The subject site of this representation falls in Keyworth which is identified as a key settlement with a minimum housing target of 450 new homes. However, there is scope to accommodate an additional 600 without harming the town’s character or local amenity. This housing capacity has been spread across four sites;

- Land off Nicker Hill;
- Land between Platt Lane and Station Road;
- Land south of Debdale Lane;
- Hillside Farm.
All of which aside from Hillside Farm are identified as recommended housing allocations within the Keyworth Neighbourhood Plan.

The site specific policy states:

**POLICY 4.2**

**HOUSING ALLOCATION – LAND BETWEEN PLATT LANE AND STATION ROAD, KEYWORTH**

The area, as shown on the policies map, is identified as an allocation for around 190 homes. The development will be subject to the following requirements:

- **a)** there should be two points of vehicle access, off Platt Lane and Station Road;
- **b)** carriageway and crossing improvements to Platt Lane including the delivery of appropriate safe footpaths on either side of the road;
- **c)** improvements to the junction of Platt Lane, Nicker Hill, Normanton Lane and Station Road to reduce speeds and increase visibility;
- **d)** Green infrastructure should deliver net-gains in biodiversity through tree planting which complements other green infrastructure objectives;
- **e)** subject to access requirements, the hedgerow on Platt Lane and tree belt on Station Road must be retained;
- **f)** Green infrastructure should include a suitable buffer with the neighbouring sports facility in order to protect the amenity of residents and users of the right of way; and
- **g)** it should be consistent with other relevant policies in the Local Plan.

**JUSTIFICATION**

In accordance with Policy 8 the Core Strategy, 20% of the new homes should be affordable homes (comprising intermediate, affordable rent and social rent housing). This level of affordable housing was established following the consideration of local financial viability issues.

The site is within a local green infrastructure corridor. This corridor seeks to protect and enhance pedestrian connectivity east of Keyworth, towards Normanton on the Wolds and beyond to Cotgrave. It also encourages net-gains in biodiversity through increases in tree cover and the ecological connectivity of woodland sites.

Miller Homes support the allocation of land between Platt Lane and Station Road, within the emerging Local Plan for development.
Neighbourhood Plan

The Keyworth Neighbourhood Plan was adopted on the 30th May 2018 and now forms part of the development plan, it holds the same legal status as the Local Plan. Policy H1 sets out the housing strategy and supports the delivery of between 450-480 new houses in Keyworth. It also states how housing should be developed at the densities set out in policy H3, subject to compliance with the Rushcliffe Local Plan and its proposals for the number of dwellings on individual allocated sites. It also recommends that sites should come forwards through allocations in the Local Plan. Policy H3 states, where sites are green field or create a new settlement edge, density should not exceed 30dph with densities at the urban edge being no more than 20dph.

The proposed allocation on land between Platt Lane and Station Road is also supported in the emerging Neighbourhood Plan for approximately 150-160 homes as demonstrated at paragraph E.9 to E.14 at Appendix E.

The principle of development is therefore supported in this location as part of both adopted and emerging policy.

Deliverability of the Site

A previous application was submitted on the site in 2013 by our client (Miller Homes) for residential development of up to 200 dwellings; creation of two accesses and associated public open space, landscaping and drainage infrastructure (LPA ref: 13/01197/OUT). It was close to reaching agreement but was suspended due to issues with the Neighbourhood Plan and was subsequently withdrawn in January 2015.

In light of the recently adopted Keyworth Neighbourhood Plan and the more advanced stage of the Local Plan Part 2, Miller Homes are currently preparing a planning application for the site. A pre application meeting is to be held with the LPA shortly and this will be followed by the submission of an application. Due to the previous application and our client’s current position, a number of technical documents have been prepared which have informed the proposed site layout (which is currently being finalised) and can demonstrate the ability of the site to deliver a housing development for around 190 dwellings.

These reports have concluded that overall, the subject site is located within a sustainable position, being accessible to a number of facilities and services by sustainable modes of transport and can be effectively integrated with the existing built form and surrounding countryside. Furthermore, the site is not
constrained by significant heritage, flooding, landscape or biodiversity issues which cannot be avoided or mitigated. The Green Belt Review concludes that the land is of low-medium Green Belt importance and the site has been removed from the Green Belt to accommodate the Local Plan Part 2 housing allocation.

The proposal seeks to erect around 190 new homes embracing the context of the site and its policy constraints, 20% affordable housing will be provided.

Vehicular access to the site will be gained off both Station Road and Platt Lane due to the size of the development, two access points are required. In accordance with the previous planning application the required visibility splays are achievable. Pedestrian access will also utilise these access points along with the maintenance of the PROW which currently crosses the site.

Appropriate parking and turning areas will also be provided along with space for servicing and refuse collection, in accordance with local and national guidelines. Contributions towards upgrading pedestrian and cycle links will be made as part of the proposal. Including pedestrian facilities at Station Road/Nicker Hill junction and along the site frontage on Station Road. This is in addition to signalisation of the A606 Melton Road/Main Road T junction.

The proposed layout and form will be reflective of the surrounding local vernacular in terms of scale and detailing it also provides a LEAP and overspill car parking for the nearby sports pavilion.

Sufficient work has been undertaken to demonstrate that the site is deliverable and developable in the context of the NPPF. The NPPF states that for sites to be considered ‘developable’ they should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. To be considered ‘deliverable’ the Framework requires sites to be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered within five years and, in particular, that development of the site is viable.

**Available**

The site is un-used, in single ownership, and is being actively promoted by a developer. There are no legal or ownership problems or significant constraints which could limit development. It can, therefore, be considered to be available now.
Suitable

As set out above the application site has no physical constraints that would prevent or delay development coming forward. The site is suitably and sustainably located for residential development with good accessibility to local services, facilities and employment opportunities via foot and other sustainable modes of transport. Accordingly, the site is clearly a suitable location for residential development.

Achievable

This site adjacent to the urban area is in a location that developers find attractive to bring forward housing sites for development. Residential development represents a viable future use for the site which can be delivered quickly. As such, development of the site can be considered achievable.

Summary and Conclusion

Miller Homes recognise the positive approach taken by Rushcliffe Borough Council to meet its housing requirements and support the allocation of land between Platt Lane and Station Road, Keyworth to help meet this need.

The site is suitably and sustainably located for development, and is ‘deliverable’ in the context of the NPPF. The site has been subject to a host of technical assessments that accompanied the previously withdrawn application, although these are being updated the conclusions remain that the site can accommodate the proposed level of residential development. The current application is consistent with the emerging policy and meets the requirements of policy 4.2 along with the recommendations for the sites development set out in the adopted Keyworth Neighbourhood Plan.

The detailed work to be undertaken as part of this application further reinforces the suitability and achievability of the site to deliver housing. Hunter Page Planning also request to attend future hearing sessions in order to provide an update on the status of the application and provide any additional material on the deliverability of the site if required by the Inspector.

Yours sincerely

Guy Wakefield MRTPI
Hunter Page Planning
Appendix 1 – Site Location Plan