



**NEWARK &
SHERWOOD**
DISTRICT COUNCIL

**NEWARK & SHERWOOD ALLOCATIONS &
DEVELOPMENT MANAGEMENT POLICIES
DEVELOPMENT PLAN DOCUMENT**

MATTER 5 – SOUTHWELL AREA
(ISSUES 19 to 21)

**Statements on behalf of Newark & Sherwood
District Council**

November 2012

Issue 19: Would the scale, density and greenfield location of allocated sites be appropriate and contribute to the sustainable development of the District?

- 19.1 It is considered that the scale, density and greenfield location of the allocated sites is appropriate and contributes to the sustainable development of the District. The process of site selection has followed a robust methodology and has been founded on the outcome of Sustainability Appraisal, a proportionate, suitable and sound evidence base and the taking account of stakeholder consultation input. This has resulted in a sustainable pattern of growth being identified which is considered to be the most appropriate approach when considered against all other reasonable alternatives.
- 19.2 The approach adopted in terms of the density of the allocations took Core Policy 3 of the Core Strategy (CS) (LDF10) as its starting point and has sought to secure densities of 30 dwellings per hectare (dph) or more. Drawing upon available evidence (including the Strategic Housing Land Availability Assessment, EB8) and consultation input, this approach has also taken account of site specific circumstances and constraints to establish appropriate and sustainable density levels. This process has resulted in densities both above and below 30dph.
- 19.3 It was viewed as essential that realistic and deliverable densities were pursued in order to provide confidence in the deliverability of the strategy and to ensure that the needs of the settlement are met. It is though important to note that the dwelling numbers identified for each allocation represent an estimate of site capacity and that higher or lower levels may be delivered through the Development Management process.

Southwell

- 19.4 A number of Representors, including Southwell Town Council and Southwell Civic Society have put forward an alternative approach to site selection in Southwell based in part around higher densities on particular sites. Central to this alternative approach is site So/Ho/6 'Rainbows' which is argued to be suitable for a higher density and for combination with the adjoining 'Tucks Yard'.
- 19.5 However So/Ho/6 is subject to a range of heritage constraints which severely restrict the sites 'developable area'. Including the Listed Buildings and associated Curtilage Listed structures whose status would need to be preserved (see Appendix 1 for a Plan showing the extent of the Listings) and the potential impact on the Burgage area of the Conservation Area.
- 19.6 In terms of the suggested introduction of Tucks Yard this was the subject of consultation with the Highways Authority who were not satisfied with the sites proposed access arrangements via Monckton Drive.
- 19.7 These constraints in combination with the difference in site levels between So/Ho/6 and the surrounding residential areas are viewed as limiting what, at this stage and level of detail, can be considered as an appropriate density and confidently deliverable level of development.

- 19.8 Site So/Ho/7 'Southwell Depot' was identified for an increased level of development. Further work concluded that the small scale linear nature of the site could support an increased density of 40dph, but that to go beyond this level would not be deliverable.
- 19.9 The site selection process has resulted in all reasonable and currently deliverable brownfield sites (So/Ho/6, So/Ho/7 and So/MU/1) being allocated at levels appropriate to their specific site circumstances. This approach has also prioritised the allocation of appropriate sites within the existing settlement boundary (So/Ho/6, So/Ho/7 and So/Ho/3). However it was not possible to provide for the level of development identified for the Town within the existing settlement framework. Following the consideration of all available alternative options this has necessitated the allocation of greenfield sites in gateway locations.
- 19.10 In response to comments received at the Options Report stage, which highlighted the need for sensitive development in gateway locations, it was considered that further work was necessary in order to guide the site selection process. This was important to ensure that the most suitable gateway locations were selected. As a result the 'Southwell Gateway Sites Assessment' (EB25) was undertaken. Importantly the study has provided for a robust and sound assessment of all the potential gateway site options and has tested their suitability in gateway terms.
- 19.11 This work informed a series of amendments to the approach within the Publication DPD. Crucially this included the removal of the land West of Allenby Road (Site So/Ho/1 in the Options Report) from the strategy. The study concluded (Page 7, EB25) that the site was both open and prominent with no natural screening to the west. It was therefore considered that the potential for successfully assimilating the site into its surrounding landscape context would be more difficult to achieve than with other gateway site options.
- 19.12 In addition Land east of Kirklington Road (So/Ho/4) was brought into the approach. The assessment (Page 56, EB25) of the site highlighted the need for additional landscape buffering to the west in order to retain the semi-rural character of Kirklington Road. It was considered that taking account of the sites surrounding landscape and built environment setting, the presence of existing screening and through the provision of such landscaping to the west, that there was the potential for the sites successful future assimilation. The site was therefore viewed as suitable in gateway terms.
- 19.13 The content of the Gateway Assessment (EB25) and wider evidence base have contributed to a robust and sound approach to site selection. This has enabled appropriate and sustainable levels of development to be identified which reflect individual site circumstances. It is therefore considered that the scale of greenfield residential site allocation is both justified and also represents the most appropriate approach when considered against all reasonable alternatives.
- 19.14 A number of Representations which present different approaches to site selection have been made, these are addressed below.

- 19.15 The Representation from Representor 49 concerning the southern element of site X5(So), not subsequently included within So/Ho/4, has sought to demonstrate its suitability as an allocation. However the access constraints identified in the sites rejection remain unresolved with no demonstration of deliverable arrangements provided.
- 19.16 Representors have also put forward a reconfiguration of sites around Crew Lane which focuses on the reallocation of So/E/2 in combination with So/AS/3 for residential development and the deletion of the Southwell Bypass Line. This alternative approach was investigated following the Options Report stage but was not considered to be appropriate.
- 19.17 As detailed in the response to Issue 21, though the Council acknowledges that there is the potential for the status of the Bypass line to change within the Plan Period, it is considered that it remains necessary for the Plan to safeguard the line at the present time. The proposed line of the Bypass would leave the reconfigured residential allocation poorly integrated with the settlement and also act as a significant barrier to accessing services and facilities.
- 19.19 In addition to the issue of the Bypass line, the area is subject to fundamental access constraints limiting the suitability of the area for residential development. Crew Lane Close is not considered suitable in highway terms and there is limited potential for its upgrading to overcome these concerns. Access would therefore need to be provided through the industrial estate which is not considered as either desirable or suitable.
- 19.20 Through its assessment as part of the Additional Sites Consultation (ADM10) Additional Site 4 'Land at Crew Lane / Fiskerton Road was concluded to be unsuitable due to the same constraints in terms of access arrangements and the Bypass Line. Furthermore the south of the site which rises up to Fiskerton Road was viewed as having a potentially detrimental landscape impact.
- 19.21 Crew Lane Industrial Estate provides the current focus for employment development within the Town, and with the constraints to residential development it is considered that the area remains the most appropriate location for employment land provision. This is reflected through the designation of the Crew Lane Industrial Estate Policy Area (So/E/1), to guide the coherent planning of the area, and the allocation of two new employment sites to provide for future employment growth.
- 19.22 The Housing Needs Assessment (EB5) identified significant shortfalls in smaller properties, and an acute housing need amongst elderly people and younger generations wishing to stay in the area. Meeting this need was a contributory factor in the level of the growth set for the settlement through the CS. In response to Representor 172, Policy So/HN therefore seeks to supplement Core Policy 3 of the CS in providing for a platform to deliver housing types reflective of local need and a more balanced community. It is considered that appropriate safeguards concerning site circumstances and viability have been built into the policy approach.

Farnsfield

- 19.23 Site Fa/Mu/1 lies to the west of Farnsfield and was identified as a Preferred site at the Options Stage and has been carried through into the Plan. This site allocation, including the specific criteria for achieving acceptable development on the site is supported by the developer. Representor 141 however believes that development to the east of Farnsfield, identified in the Options Report as Fa/AS/1 and Fa/AS/2 provides a more suitable opportunity around Fa/Ho/1.
- 19.24 Representor 3 believes that site Fa/Ho/1 can accommodate a greater number of dwellings, and Representor 141 considers that it should be extended to the north and supports the allocation on that proviso. As the site cannot be accessed via Brickyard Lane, it will need to be accessed through existing residential development. The number of units that can be provided is therefore constrained by the capacity of The Ridgeway and its junction with Southwell Road.
- 19.25 Representor 141 has put forward different scenarios for development to the east of Farnsfield, Options Report sites Fa/AS/1 and Fa/AS/2. The representation refers specifically to two scenarios but also suggests that the comments made at the Options stage remain relevant. For the avoidance of doubt the representation has been taken to include development scenario 3 referred to in their table on page 2 of their representation.
- 19.26 Scenario 3 includes the northern section of Fa/AS/2. At the Options stage the owners of this site indicated that they had no intention of releasing the land for development now or in the future. Scenario 3 is not therefore deliverable.
- 19.27 Scenario 2 is made up of the land to the north of Fa/Ho/1 and the southern part of Fa/AS/2 as well as land, both inside and outside of the village envelope, belonging to the dwelling Broadlands (also identified as Scenario 1). As noted above, additional dwellings around Fa/Ho/1 are not considered appropriate here due to highways issues. The land to the south, adjacent to Southwell Road would be more visually prominent when approaching the village from the main road. That part of Broadlands within the village envelope could be sensitively redeveloped without additional land being allocated. Without the site to the north of Fa/Ho/1 being available it would be difficult to achieve the required dwelling numbers on this site alongside appropriate boundary treatment which would be required in this prominent location.

Conclusion

- 19.28 The approach set out above has provided for a sustainable pattern of growth which ensures that the needs of the Southwell Area are met and that doing so contributes to the sustainable development of the District.

Issue 20: Do the policies include adequate and appropriate safeguards with regard to the potential effects of development on the historic environment, flooding and biodiversity? Has satisfactory provision been made in respect of transport and other infrastructure requirements?

- 20.1 The site selection process was informed by assessments of impact on the historic environment, risk of flooding and biodiversity. It is considered that the approach has made satisfactory provision for transport and other infrastructure requirements. Some sites were discounted during the process due to unresolvable conflict with these issues and where they did not prevent allocation but required addressing through the development of the site, they were made site-specific criterion.
- 20.2 The impact of site allocations on the Area's historic environment has been considered throughout the process. Central to this has been input from English Heritage, the National Trust and the County Archaeologist. Where Heritage Assets did not prevent allocation but presented issues that required further consideration, these have been identified as site specific requirements.
- 20.3 Key to the distinctive character of Southwell are the Southwell Minster, the Archbishop's Palace, Thurgarton Hundred Workhouse and the Holy Trinity Church. It is considered that policies So/PV 'Southwell Protected Views' and So/Wh 'Thurgarton Hundred Workhouse' provide an appropriate and effective approach to protecting the views of and across these assets and the setting of the Workhouse. The policies have been informed by the Southwell Landscape Setting Study (EB24A) which, having been prepared by suitable qualified professionals and involving input from English Heritage and the National Trust, has provided a sound and robust assessment.
- 20.4 The National Trust and English Heritage made Representations concerning the Submitted version of the Southwell Landscape Setting Study (EB24) and the spatial extents of the policy approaches. To address these Representations further work has been undertaken. This has resulted in an updated Southwell Landscape Setting Study (EB24A) and as set out in the Schedule of Further Proposed Modifications, proposed amendments to the wording of policies So/E/1, So/PV and So/Wh and Map 6 of the Plan. The Statement of Common Ground between the Council and Representors provides further detail on the position agreed between the parties.
- 20.5 Site So/MU/1 'Land at the former Minster School' has been subject to Representations, including those from Southwell Town Council, Southwell Civic Society and the Southwell Heritage Trust, which object to the suitability of the site for allocation due to heritage constraints. The site has however previously been subject to planning consent and through gaining such consent was able to demonstrate a suitable scheme. It is considered that this illustrates the potential for the site to be brought forward in a sensitive manner.
- 20.6 The approach to allocation therefore provides for site requirements which appropriately address the heritage issues through providing for a master plan approach, appropriate archaeological measures and the provision of enhanced open space. The approach has taken account of guidance from the County Archaeologist, and reflects the level of archaeological evaluation undertaken through and the knowledge gained from the previously consented proposal.
- 20.6 Assessment of flood risk has been undertaken through the Strategic Flood Risk Assessment (SFRA) (EB32), with the Level 2 (Phase 2) (EB34) stage specifically

considering potential allocations. This work has informed the site selection process with preference being given to locating development in Flood Zone 1.

- 20.7 Two of the allocated sites in Southwell (So/Ho/3 ‘Land at Nottingham Road’ and So/MU/1 ‘Land at the former Minster School’) are partially located within Flood Zones, but as detailed in the Sequential Approach Statement (EB36) both are considered sequentially appropriate.
- 20.8 It is considered that the surface water impact of allocated sites can be addressed through their development and by provision of appropriate mitigating measures. Each residential allocation carries the requirement to positively manage surface water and to ensure that there is no detrimental impact in run-off into surrounding residential areas or the existing drainage regime. These requirements provide the basis for effective surface water management and address the concerns of Representors regarding Site So/Ho/2 ‘Land south of Halloughton Road’.
- 20.9 The preparation of the Plan has taken appropriate account of biodiversity issues through the site selection process and in defining site specific requirements. Importantly this has been informed by relevant evidence and the undertaking of consultation with specific bodies. With regard to So/Ho/3 ‘Land at Nottingham Road’ whilst the Council notes the Representation from Nottinghamshire Wildlife Trust it is considered that the allocation provides for sufficient safeguards to the impact on biodiversity through the provision of replacement habitat.
- 20.10 The impact of growth on the transport network, local services and facilities was a key consideration in the formulation of the CS, with the Infrastructure Delivery Plan (IDP) (EB1 and EB2) and District Wide Transport Study (DWTS) (EB30) assessing the impact of, and identifying the infrastructure improvements necessary to support growth. There also remains the flexibility to address any further impact of allocated or windfall sites through the Development Management process.
- 20.11 Building on the IDP (EB1, EB2) and the Transport Study (EB30) further input has been sought from the Highways Authority and other infrastructure providers, which has guided the site selection process and the setting of appropriate site specific requirements.
- 20.12 Infrastructure requirements (including those relating to transport) will be delivered through a combination of developer contributions and the Community Infrastructure Levy (CIL). Those which cannot be attributed to the development of any one site and that are considered to be ‘Strategic Infrastructure’ will be funded through the CIL which came into effect on 1st December 2011. Local infrastructure requirements which arise as a result of growth in the Southwell Area will be met through Developer Contributions, and where appropriate, through funding assistance as set out in the Funding Statement (E38).
- 20.13 A number of Representations refer to issues concerning impact on infrastructure. As part of this Representors have made submissions concerning the impact of site So/Ho/2 on the Nottingham Road and West Gate junctions. However it has been agreed by the Highways Authority that the site’s potential highways impact and access arrangements can be satisfactorily addressed.

20.14 Representors 172 and 135 have objected to the phasing of sites So/Ho/4 and So/Ho/5. This requirement was included on the basis of discussions with Severn Trent and is necessary to allow for investigations into impact on the sewerage network and for remedial work to be undertaken if necessary.

Issue 21: Is there uncertainty over funding and delivery of the by-pass and, if so, is the Plan sufficiently flexible to cope with this?

21.1 The Southwell Bypass is identified within the Local Transport Plan (LTP) (CD1) as a major and significant scheme for which the County Council are currently safeguarding the route. The Bypass is listed as a scheme within the current Implementation Plan but it is not identified for funding and delivery within the first 5 year period.

21.2 Discussions with the Highways Authority have highlighted that the devolution of funding for major local transport schemes to the Local Enterprise Partnership (LEP) from 2015 onwards may lead to a review of major road scheme priorities across the LEP. However it is important to note that this review is yet to be undertaken and that it is not appropriate to pre-empt its outcome.

21.3 Given the inclusion of the Bypass within the LTP it is considered that the approach adopted by the Plan accords with the requirements of Section 10 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (ND8), which obliges Local Plans to have regard to policies within the LTP. The safeguarding of the Bypass route also seeks to implement the approach set within Spatial Policy 7 ‘Sustainable Transport’ of the Adopted Core Strategy DPD, which states that the Council will safeguard the locations of highway or public transport schemes identified within the LTP (CD1).

21.4 Whilst it is acknowledged by the Council that there is the potential for the status of the scheme to change within the Plan Period, the Plan is not dependent upon the provision of the Bypass to support or facilitate future growth. Rather the inclusion of the proposed Bypass within the LTP is intended to provide a possible solution to address the separate issue of through traffic to the Town.

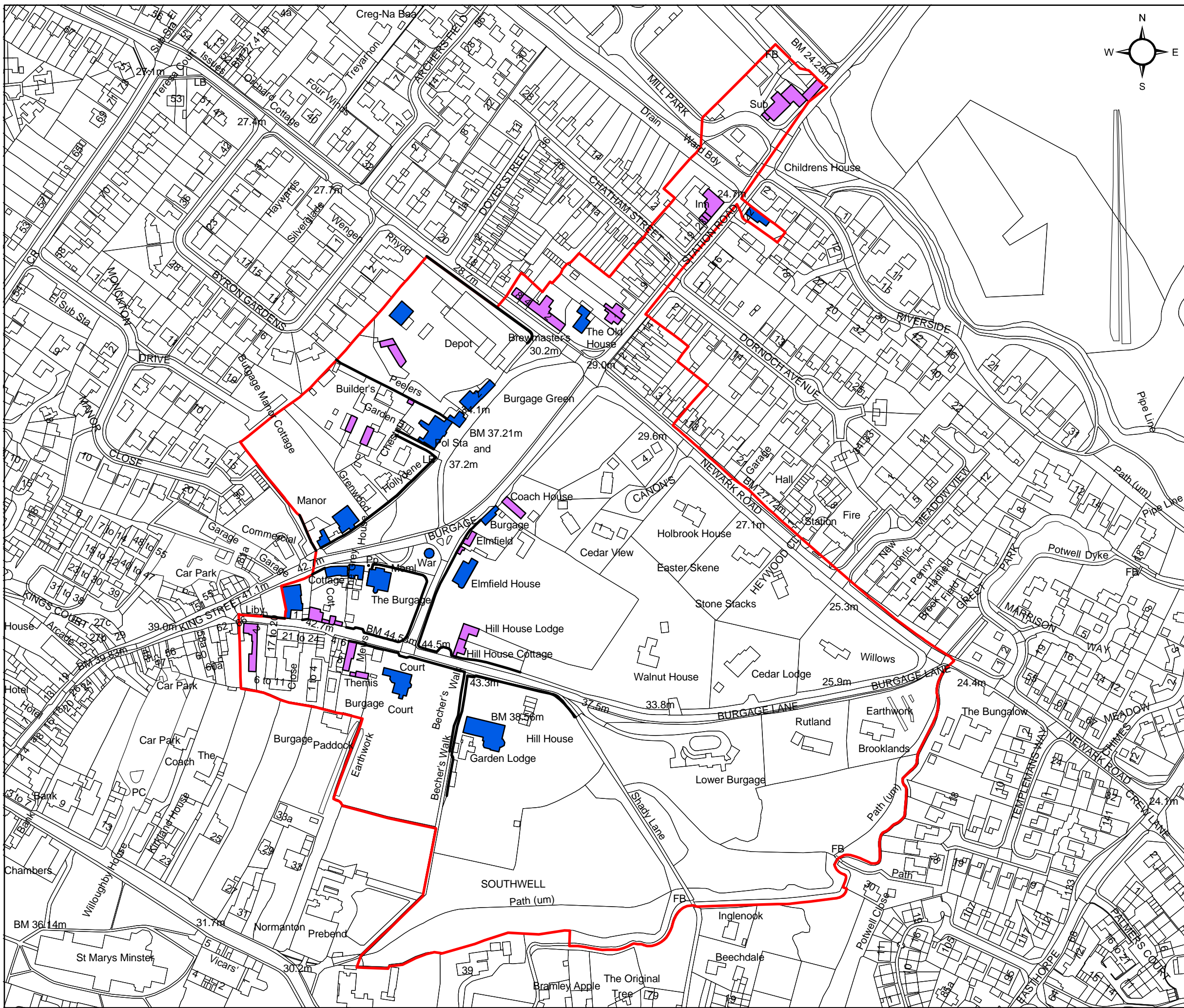
21.5 Though the presence of the safeguarded line has influenced how the Council approached the planning of future development in the settlement, it is considered that the route predominantly affects the south east of the Town. Whilst the proposed route links the south and east of the Town, the south of the settlement is viewed as an unsuitable location for future growth, due to potentially detrimental impact on both the setting of the Minster and wider Town. This is reflected in the rejection of site X2(So) at the Options Report stage.

21.6 The outcome of the site selection process concluded that the Crew Lane area, located to the south east of the Town, was the most appropriate and sustainable location for future employment development in the settlement. A significant factor in arriving at this conclusion was, as detailed in Issue 19, the fundamental access issues which the sites around Crew Lane are subject to and which limit the suitability of the location to employment uses.

- 21.7 Accordingly two new allocations have been identified (So/E/2 and So/E/3) within a wider Crew Lane Industrial Estate Policy Area (So/E/1) that seeks to provide for the coherent future planning of the area. Policy So/E/1 provides for an approach which both facilitates the delivery of the employment allocations should the Bypass line be maintained, and that also allows for the comprehensive review of the Policy Area should its status change.
- 21.8 As a result it is therefore considered that the approach adopted by the Plan represents a sufficiently flexible approach which is able to respond to a change in the status of the Bypass.

Appendix 1

Burgage Character Area Plan (Southwell Conservation Area Character Appraisal Excerpt)



Map 7 - Burgage Buildings

- Character area boundary
- Significant walls, listed and unlisted
- Grade**
- II
- Unlisted Buildings of local interest

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