

## HEARING STATEMENT

### Newark and Sherwood District Council Allocations and Development Management Policies Development Plan Document

#### Hearing Statement of Ben Holmes on behalf of Bloor Homes Ltd

#### MATTER 5: SITE SPECIFIC ISSUES

##### Southwell Area

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

- 19.1 The Plan is not based on a sound process of sustainability appraisal including testing of reasonable alternatives and it does not represent the most appropriate strategy in the circumstances.
- 19.2 The process of site allocation decisions in Southwell is not justified based on the evidence available. In particular the process has placed disproportionate weight on the conclusions of the Southwell Gateway Sites Assessment. Furthermore the Southwell Gateway Site Assessment document is itself, flawed because it focusses too narrowly on a small number of issues and has clearly been prepared 'retrospectively' to justify allocation decisions.
- 19.3 A more rounded, balanced and objective appraisal of alternatives would conclude that land west of Allenby Road, Southwell should be allocated for development. This was the conclusion of the Council when it assessed the site in the SHLAA and the Allocations and Development Management Options Report.
- 19.4 Land west of Allenby Road should be allocated for development.
- 19.5 The Southwell Gateway Site Assessment is very narrow in its focus and inequitable in its reporting. It places considerable emphasis on the issue of existing screening at the expense of other relevant landscape and visual matters. Key issues are overlooked, including the impact of development on sensitive receptors, the quality of existing landscapes, the impacts as a result of the loss of landscape and biodiversity and the relationship between individual sites to existing built form. This results in an overly positive appraisal of certain locations and overly negative appraisal of others.
- 19.6 It is our view that the Southwell Gateway Sites Assessment is unsound, and the locations identified for development in Southwell are not the most appropriate when considered against all reasonable alternatives.
- 19.7 By way of comparison, land west of Allenby Road is a more sustainable, deliverable and appropriate site than sites So/Ho/4, So/Ho/5 and So/Ho/2.
- The Allenby Road site relates well to existing built development and would not significantly extend the current urban boundaries; westward because of existing development to its south and northward because of So/Ho/1. Sites So/Ho/5 and So/Ho/2 would extend the 'urban boundary' significantly.
  - The Allenby Road site can be developed in a manner which can ensure that existing residential amenity is protected.
  - The Allenby Road site can be accessed in a safe and convenient manner and relates well to the centre of Southwell, to schools and other services.

- Site So/Ho/4 contains significant vegetation which has landscape and biodiversity value, it also has an orchard on part of the site and contains allotments, the loss of which has not been properly assessed.

Similarly Site So/Ho/2 is of significant ecological interest, the SHLAA notes that it is “*not suitable due to environmental constraints, the entire site is a ‘Site of Interest for Nature Conservation’*”.

Conversely land at Allenby Road does not contain any features of landscape or biodiversity merit.

- 19.8 These are significant differences which appear to have been discounted in the allocation process, whereas no ‘balance’ has been applied to the ‘gateway’ issue in relation to land west of Allenby Road.
- 19.9 The Plan is not sound because the approach to decisions on site allocations has not been made on a sound planning basis taking into account all available evidence and taking a proper balanced judgement. In this regard the Plan is not justified and is an inappropriate strategy when considered against the reasonable alternatives. It is therefore contrary to the NPPF. In particular the allocation decisions; particularly the omission of land west of Allenby Road, is based on evidence which is narrowly focussed and therefore in itself not a sound base on which key decisions should be made.
- 19.10 Notwithstanding our concerns regarding the assessment of reasonable alternatives, Bloor Homes do not think that the Plan has been positively prepared because it will not ensure that the full, objectively assessed needs of Southwell, are met. The Core Strategy acknowledges at paragraph 4.13 that Southwell *‘has a serious housing need which is perpetuated by high local house prices’*. However the level of growth directed to Southwell has been constrained, due to perceived capacity and environmental constraints. The work undertaken as part of the site allocation process has shown that Southwell is not constrained to the extent previously thought and additional development can be accommodated. The suitability and availability of land west of Allenby Road demonstrates that additional housing can be provided in a sustainable manner.
- 19.11 The Plan should be amended and the land west of Allenby Road should be allocated for residential development to help meet the *‘serious housing needs’* of Southwell. The allocation could include appropriate criteria for the provision of landscaping and open space on the western edge of the site between the existing public footpath and the site boundary. The site can accommodate about 60 dwellings.