

**Michael Evans MRTPI : Comments on Matters and Issues for Examination December 2012
Representor 134, 131, 132, 133, 135, 205, 19**

**Newark and Sherwood District Council Allocations Development Management
Development Plan Document.**

Matter 1 Compliance and Procedural.

1. Yes

2. Yes

Matter 2 General Issues.

3. Yes

4. Yes.

5. Yes

6. Yes

7. Yes

Matter 3 Housing.

8. The allocations document represents the minimum allocations required to comply with the Regional Spatial Strategy and the Core Strategy.

In the particular case of Southwell, the town has been scheduled to accept a level of growth approximately half that which it would have otherwise had apportioned to it by based on its size and sustainability credentials. The rationale behind this is because it is alleged that the town has such a sensitive landscape setting and built environment that the search for a greater number of sites would have been unduly problematic. The consideration of all sites within Southwell must therefore reflect that in any other circumstance, the number of sites selected for development should in fact have been double than that currently put forward.

It is for this reason, that there remains some well founded doubt as to whether the number of allocated sites in Southwell has in fact truly reflected the full need of the town during the next plan period.

9. Yes. However, the core strategy provides the greatest allocations of market housing where that demand is lowest, and the least allocation where market demand is strongest. In this sense, the plan fails to adequately respond to market growth factors and therefore the deliverability of many sites in areas of poor demand must be questioned. Conversely, the disproportionate restraint in Southwell where market demand and sustainability factors are high, implies that such sites are likely to be brought forward into the market at an early stage.

10. Alternative sites around Southwell have not been subject to a full sustainability appraisal or robust viability assessments.

11 No

Matter 4 Retail Employment Mixed-Use

12 13 14 No comment.

Matter 5 Site Specific Issues.

Newark Area.

15 Yes

16. 17. 18 No comment.

Southwell Area.

19. The scale of housing requirement allocated in this document is below the true need and market demand for Southwell. Sensitive development of the town would contribute to the sustainable development of the District as a whole.

20. Yes.

21. The Southwell bypass has no realistic prospect of funding in the plan period. Even if this were the case, the selected protected line is entirely inappropriate. It damages community infrastructure in the form of playing fields at the rugby club and Minster School. It seriously detracts from the most critical views of the Minster and its setting. It seriously damages the character and appearance of Easthorpe conservation area and its landscape by paying no regard to a sensitive alignment and route through the conservation area. It would require the removal of many mature trees and important conservation features. The line is an engineering pipe dream that would fail current environmental and planning scrutiny.

The protected line distorts the correct interpretation and allocation of employment land along its route and it should not be protected in this way by prescribing a definitive line on a plan.

Representations Ref..... refer.

If essential, a separate criteria based policy should be introduced which requires that future development proposals should be balanced against the likely prospect against the by-pass delivery and that the bypass undertake a full environmental and economic impact analysis prior to it being promoted as a potential road scheme.

The intended downgrading of the A612 to C Road status, removes even further the justification for retention of a protected bypass route in this plan.

Nottingham Fringe Area

23. The inappropriate and insensitive alteration to the green belt boundaries around Lowdham should be deleted. Lowdham has severe constraints in terms of greenbelt setting and flood risk. For

the minimal contribution towards the overall housing targets of the District, the approach should be taken that no alterations to the greenbelt boundary should take place.

Detailed representations were made in terms of Allocated Site0/H/3 – Housing Site 3 which appears to be a bizarre and unjustified proposed allocation. (Reference.....)

Matter 6 Development Management Policies.

32. The Council adopted the Community Infrastructure Levy very early and set a rate which was ambitious in current market conditions. Experience has shown that the net effect of imposing the CIL tariff at this level has been to greatly reduce the provision of affordable housing due to viability tests.

Matter 7

33. Broadly a correct balance has been struck between strategic policies and site allocations.

34: Sites So/Ho/2 and So/Ho/5 have been the subject of detailed technical studies in order to demonstrate delivery is possible. These have been provided to the Council. The landowners are all willing parties. A planning application is in the course of preparation.

In respect of SO/HO/2, a planning application has been prepared but not yet submitted in deference to the Examination and plan making process.

35. The NPPF and Localism Act can work together but this should not prevent or inhibit the determination of individual planning applications which have been formulated through the LDF/Local Plan process. The Growth and Infrastructure Bill places a greater emphasis on early housing delivery. If a LPA has been slow or reticent in plan preparation there is a stronger case for Neighbourhood Plans. Here the Council have produced a clear and convincing Core Strategy and Allocations Document upon which sound Development Management decisions can now be made.

Michael Evans MRTPI