

Representor 191
Mr Jon Millhouse
(c/o Miss Paula Money)
On behalf of
Jonathan Wildgoose
Wildgoose Construction
Matters 3 and 5

**Newark and Sherwood District Council
Allocations and Development Management Development Plan
Document
-Examination in Public Representation
Prepared November 2012**

Introduction

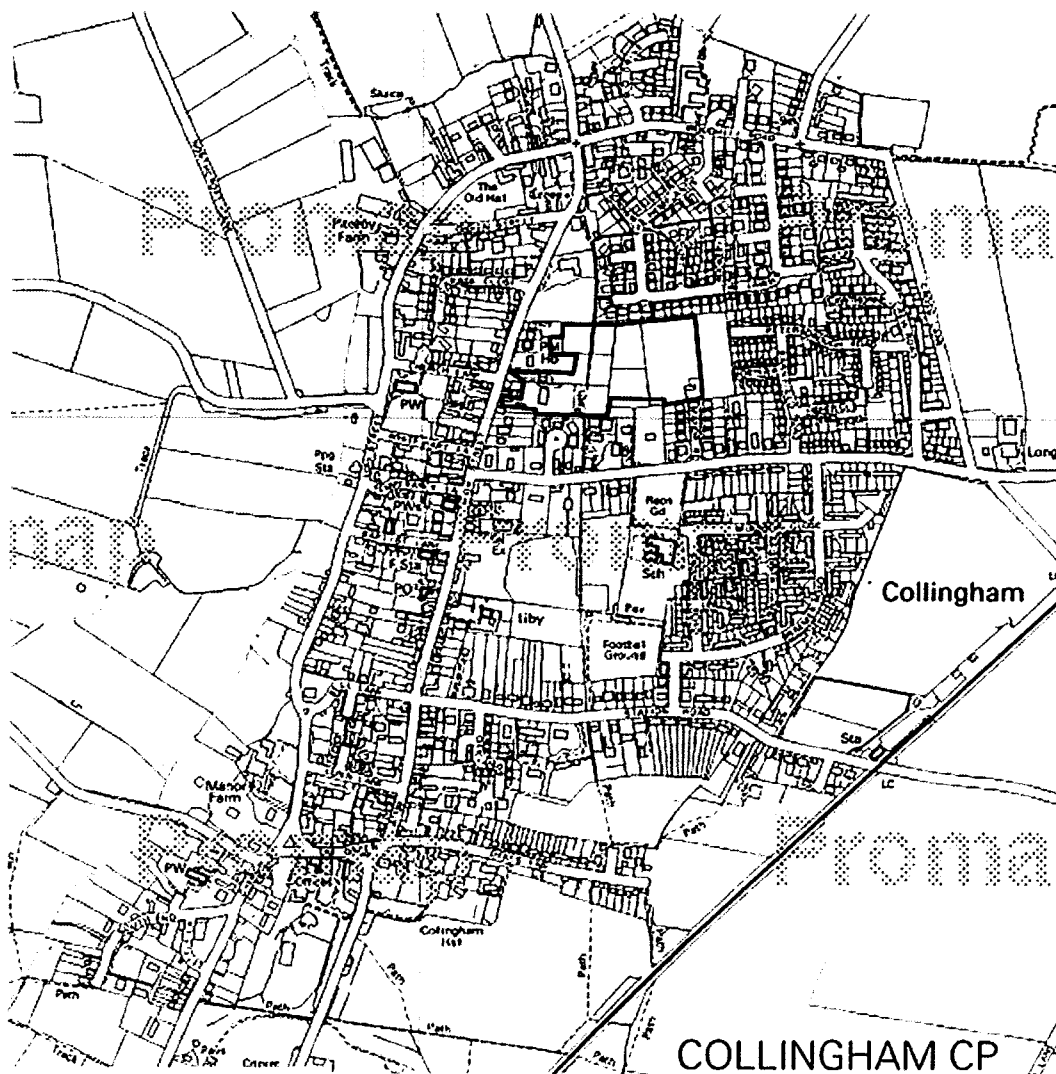
This statement has been prepared in advance of the Allocations and Development Management Development Plan Document (A & DM DPD) Examination in Public, due to commence on 11th December 2012, by Jon Millhouse of the Planning and Design Practice Ltd.

The statement has been prepared on behalf of Jonathan Wildgoose of Wildgoose Construction and follows earlier submissions by Paula Money of Phoenix Planning.

The author wishes to attend and speak at the forthcoming hearing, in relation to matters 3 and 5.

Wildgoose Construction has an interest in the site identified by the map below (land off High Street and Manor Road, Collingham). Henceforth, the land will be referred to as the 'Wildgoose site'.

Wildgoose Construction has recently submitted a planning application for the western end of the site (currently contained within the development boundary) for the construction of ten new dwellings. A copy of the plans relating to this application are provided at Appendix A.



Representation

The information below is set out according to the relevant headings provided by the Inspector's Matters and Issues paper, with reference to the soundness criteria outlined by National Planning Policy Framework (NPPF).

MATTER 3 -HOUSING

Item 8 - Will (the land allocated) provide for an appropriate housing mix...in the right locations?

Soundness criteria failed:

Justified; consistent.

Reason for soundness criteria failure:

The housing site preferred by the A & DM DPD for Collingham, Co/MU/1 (land between Station Road and Swinderby Road, Collingham), is not the most sustainable location available.

Sustainable development is a core theme of both the Adopted Newark and Sherwood Core Strategy and the NPPF. The Council therefore has a duty to allocate the most sustainable site(s) available, where appropriate.

The NPPF states that there are three dimensions to sustainable development: economic, social and environmental.

Whilst Co/MU/1 will perform an economic role in the sense that it is a mixed use site, its peripheral location means that it will make less of a contribution to the economic or social vitality of existing businesses and facilities within the village, compared with other more centrally located sites. By extending the built framework of the village into the open countryside the site is also less preferable to more centrally located sites from an environmental perspective.

How the Plan can be made sound:

By allocating land closer to the village centre.

The previous Wildgoose representation outlined two potential development options for the Wildgoose site. Option 1 provided for 64 new dwellings. Option 2 provided for 52 new dwellings.

If option 1 were to be combined with the neighbouring site to the east (SHLAA reference 08_0149), which can accommodate up to 19 dwellings, this would provide for the full allocation of 80 units.

If option 2 were to be combined with 08_0149, this would achieve 71 units, leaving only 9 units to be accommodated in smaller infill sites elsewhere.

Even if the Council were to allocate the eastern section of the site (which can accommodate up to 33 dwellings) together with 08_0149 (these two areas combined are currently identified as an alternative housing site by the A & DM DPD), plus the western end of the Wildgoose site for which a planning application for 10 dwellings inside the development boundary is currently being considered, this would provide for 62 units, leaving only 18 units to be found elsewhere in the village.

The provision of housing on the Wildgoose site would be more sustainable than the provision of housing at Co/MU/1 in an economic, social and environmental sense, given the site's proximity to the existing businesses, services and facilities within Collingham.

Item 9 – Are the allocated sites viable and deliverable for the first 5 years, having regard to the provision of the necessary infrastructure, affordable housing, environmental constraints and development management policies? Is the Plan sufficiently flexible to enable delivery given the current market conditions?

Soundness criteria failed:

Effective.

Reason for soundness criteria failure:

Allocating all of Collingham's housing requirement at Co/MU/1 will amount to a lack of choice and competition within the village housing market. This could affect deliverability. In the current economic climate, without competition the developers could theoretically 'land bank' the site and choose to delay completion. Alternatively, if construction is delayed due to any unforeseen circumstances, there would be no other sites within the village to fall back on, and hence no delivery.

Even if the properties at Co/MU/1 are completed in a timely manner, in the absence of competition, sales prices may be higher than they otherwise would be were a competing site to be provided elsewhere within the village.

How the plan can be made sound:

By allocating a range of sites.

The Wildgoose site could be allocated in conjunction with the neighbouring site (08_0149) and / or another site within the village, thus ensuring a suitable level of choice and competition.

Item 10 – are alternative proposals that have been put forward in representations appropriate and deliverable? Have they been subject to sustainability appraisal and compatible with that for the plan?

And;

Item 11 – are the locations identified the most appropriate considered against all reasonable alternatives?

Soundness criteria failed:

Justified; consistent.

Reason for soundness criteria failure:

The allocation of Co/MU/1 is not justified as it is not the most appropriate location available.

The allocation of Co/MU/1 is not consistent with the NPPF, as it is not the most sustainable location available.

How the plan can be made sound:

By allocating housing within the Wildgoose site and 08_0149 or another.

The tables below demonstrate that the Wildgoose site is suitable and deliverable and more appropriate than Co/MU/1.

Table 1 –comparison of Wildgoose site and Co/MU/1 against A & DM DPD methodology (see page 142)

<i>Criteria -Sites allocated for housing, employment and community facilities as part of the A&DM DPD will:</i>	Wildgoose Site	Co/MU/1
1. Be in, or adjacent to, the existing settlement;	<ul style="list-style-type: none"> • Within an existing settlement, therefore preferable to an edge of settlement site in principle given Core Strategy and NPPF policies regarding the protection of the countryside. 	<ul style="list-style-type: none"> • Adjacent to an existing settlement.

<p>2. Be accessible and well related to existing facilities;</p>	<ul style="list-style-type: none"> • Within short walking distance of the High Street, local shopping centre, church, public houses, post office, library, doctors surgery, parish hall, primary school, pharmacy etc. • The development will improve connectivity to the village centre for existing residents residing in the eastern part of the village, by providing new and enhanced footpath links across the site. 	<ul style="list-style-type: none"> • Within short walking distance of the railway station.
<p>3. Be accessible by public transport, or demonstrate that the provision of such services could be viably provided;</p>	<ul style="list-style-type: none"> • Within short walking distance of bus stops along High Street. • Within reasonable walking distance (900m) of the railway station (via footpath N13 and Station Road). 	<ul style="list-style-type: none"> • Within short walking distance of the railway station.
<p>4. Be the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address sustainability issues;</p>	<ul style="list-style-type: none"> • Access can be provided via High Street, Manor Road and if 08_0149 is included, Foster Road and Barnfield Road, thus any impact on the highway network is spread. • The proximity of the site to local services and in particular the school will help to reduce car dependency and minimise congestion. 	<ul style="list-style-type: none"> • A larger site –the submitted planning application for the site indicates 80 dwellings plus 60 ‘C2’ units plus the site adjacent is earmarked for industry. Cumulatively these developments could have a greater impact upon the local highway network. • The isolated location of the site in relation to local services is likely to encourage car dependency and could lead to a greater level of congestion.

<p>5. Not impact adversely on the special character of the area; including not impacting on important open spaces and views, all designated heritage assets including listed buildings or locally important buildings, especially those identified in Conservation area Appraisals;</p>	<ul style="list-style-type: none"> • Previously submitted masterplans for the site (see earlier representation on behalf of Wildgoose Construction) demonstrate that the site can be developed without detrimentally impacting upon important open spaces, views or heritage assets. • The submitted planning application for 10 dwellings at the western end of the site demonstrates clearly that a development and new access can be provided sympathetically within the Conservation Area. • The development of an untidy Brownfield site adjacent to High Street will enhance the Conservation Area. 	<ul style="list-style-type: none"> • Potential impact upon the character of the countryside • Potential visual impact upon the setting of the village – the creation of a hard urban edge.
<p>6. Appropriately address the findings of the Landscape Character Assessment and the conservation and enhancement actions of the particular landscape policy zone / zones affected.</p>	<p>N/A</p>	<p>N/A</p>
<p>7. Not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites;</p>	<p>N/A</p>	<p>N/A</p>
<p>8. Not lead to the loss of locally important open space or, in the case of housing and employment, other locally important community facilities (unless adequately</p>	<ul style="list-style-type: none"> • Proposals for the site incorporate significant proportions of open-space to be made fully accessible to the public. • Apart from footpath N13 the Main Open Area is not 	<p>-</p>

replaced)	<p>currently publicly accessible.</p> <ul style="list-style-type: none"> The current Main Open Area designation is inappropriate (see item 18 of this statement) 	
9. Not be located in areas of flood risk or contribute to flood risk on neighbouring sites.	<ul style="list-style-type: none"> Site wholly outside of the flood zone 	<ul style="list-style-type: none"> Outstanding EA objection to be submitted Braemer Farm planning application.

Table 2 –assessment of current A & DM DPD sustainability matrix score for Co/MU/1

Objective	ADM DPD Sustainability Appraisal score	Comments
1. To ensure that the housing stock meets the housing needs of the District	++	
2. To improve health and reduce health inequalities	+	The site is approximately 800m from the medical centre. This is at the upper limit of a reasonable walking distance. The submitted application includes a significant proportion of elderly person's units. The distance of the site from local facilities may increase health inequalities for this group.
3. To provide better opportunities for people to value and enjoy the District's heritage	++	A score of ++ is not considered to be warranted given that the development would involve the loss of open countryside and does not have a high level of accessibility to public open spaces.

4. To improve community safety, reduce crime and the fear of crime		
5. To promote and support the development and growth of social capital across the District	++	It is not clear how the site will provide high quality, accessible facilities or amenities to meet an existing shortfall to warrant a score of ++
6. To increase biodiversity levels across the District	+	It is not clear how the development will achieve a net increase in biodiversity to warrant a score of +
7. To protect and enhance the rich diversity of the natural, cultural and built environmental and archaeological assets of the District	0	
8. To manage prudently the natural resources of the District including water, air quality, soils and minerals	-	The site comprises over 1 Ha. Of Greenfield land, therefore a score of -- is warranted
9. To minimise waste and increase the re-use and recycling of waste materials		
10. To minimise energy usage and to develop the District's renewable energy resource, reducing dependency on non-renewable sources	+	
11. 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	-	It is agreed that the site has a low (and arguably very low --) level of accessibility to facilities by walking. This factor should be given significant weight in the site selection process.
12. To create high quality employment opportunities	+	
13. To develop a strong culture of enterprise and innovation	+	

14. To provide the physical conditions for a modern economic structure, including infrastructure to support the use of new technologies	++	
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Table 3 –suggested sustainability matrix score for the Wildgoose site

Objective	Wildgoose Site - suggested sustainability Appraisal score	Comments
1. To ensure that the housing stock meets the housing needs of the District	++	The site will provide 30 or more homes.
2. To improve health and reduce health inequalities	+	Existing health facilities are within an accessible walking distance of the site.
3. To provide better opportunities for people to value and enjoy the District's heritage	++	The development will enhance an existing area of open space and make it accessible to the public. The development will also provide people with the opportunity to better enjoy the Conservation Area.
4. To improve community safety, reduce crime and the fear of crime		
5. To promote and support the development and growth of social capital across the District	++	The development will provide substantial areas of new public open space. The development will improve accessibility to existing village facilities (new footpath routes) and create new demand for those facilities (by locating housing close to the village centre).

6. To increase biodiversity levels across the District	++	The provision of public open space and a biodiversity area as proposed will enhance an existing open space and improve biodiversity levels.
7. To protect and enhance the rich diversity of the natural, cultural and built environmental and archaeological assets of the District	+	The development will enhance an untidy site within the Conservation Area, whilst protecting the structure and setting of the historic core of the village.
8. To manage prudently the natural resources of the District including water, air quality, soils and minerals	--	The site is over 1Ha. and is predominantly greenfield, however a sizeable proportion of the area to be developed is brownfield.
9. To minimise waste and increase the re-use and recycling of waste materials		
10. To minimise energy usage and to develop the District's renewable energy resource, reducing dependency on non-renewable sources	?	The development is partly within the Conservation Area, however this need not preclude a sustainable form of development (e.g. high density terraced forms could be provided; the development would be in an inherently sustainable location).
11. 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	++	The site is within short walking distance of a range of facilities, close to bus stops, and a 900m walk from the railway station.
12. To create high quality employment opportunities	0	

13. To develop a strong culture of enterprise and innovation	0	
14. To provide the physical conditions for a modern economic structure, including infrastructure to support the use of new technologies	0	

MATTER 5 –SITE SPECIFIC ISSUES

Item 18 – Is the location and size of the Main Open Areas appropriate and is it justified? Would the policies provide sufficient protection from future development in these areas?

Soundness criteria failed:

Justified, consistent.

Reason for soundness criteria failure:

The Main Open Area designation affecting the Wildgoose site is not justified in its current form as it is arbitrary, not fit for purpose and no longer required in light of more recent policy and guidance.

The Main Open Area designation in its current form is not consistent with the Collingham Conservation Area Appraisal, nor the A & DM DPD.

The Main Open Area was designated in 1999. As was argued in the previous Wildgoose representation, it would appear that there were no background assessments to justify its designation at the time.

In July 2011 a Main Open Area Review was carried out by Newark and Sherwood District Council. This gave consideration to the following:

- a) The role that the area plays in the form and structure of the settlement
- b) The level of public access or potential for people to overlook the site
- c) Whether the site is protected by other policies or designation and if so does there need to be an MOA designation in addition to this

Given that the level of public access and potential for people to overlook the site are limited, and that the site itself has very little intrinsic value (as confirmed by the Grover Lewis report submitted with the previous Wildgoose representation, entitled 'Assessment of Impact on the Conservation Area and Main Open Area'), one can only assume that the main purpose of the Main Open Area is to define the form and structure of the settlement.

Wildgoose agrees that it would be desirable to retain a buffer between the 'old' village to the west and newer development to the east. Indeed, the principle can be cited in the Conservation Area Appraisal. However, it is considered that the size and shape of the designation is completely arbitrary and that the need for this layer of designation is highly questionable.

The designation is far wider than would be required to maintain a separation between the old village and newer development, and to maintain the north-south linear open space (albeit a substantially broken one) which exists to the east of High Street.

The size and shape of the designation does not correspond with the "important area contributing to the setting of the village", or the "eastern edges character area", both of which were identified by the 2006 Conservation Area Appraisal. It does not correspond to the 2006 extension to the Conservation Area boundary either.

The Main Open Area designation is also contradicted by the identification of the eastern section as an 'alternative housing site' by the A & DM DPD.

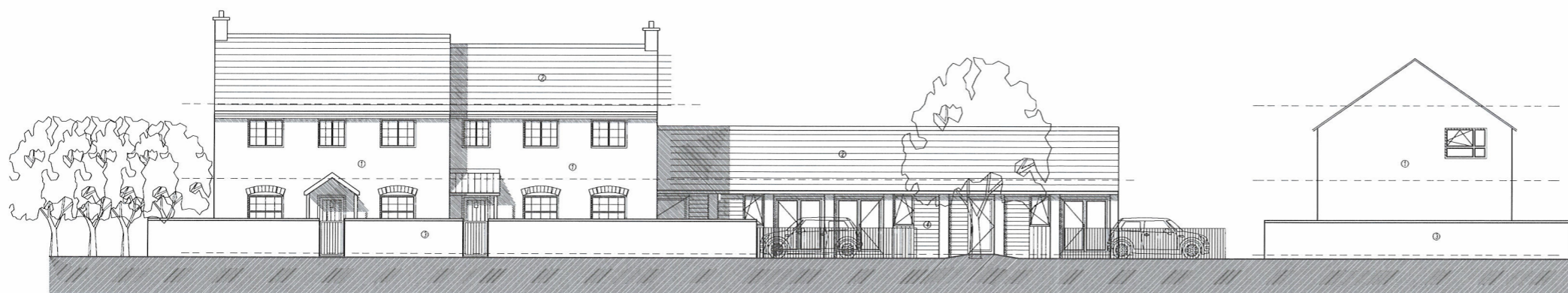
How the Plan can be made sound:

By removing altogether or otherwise reducing the size of the Main Open Area affecting the Wildgoose site.

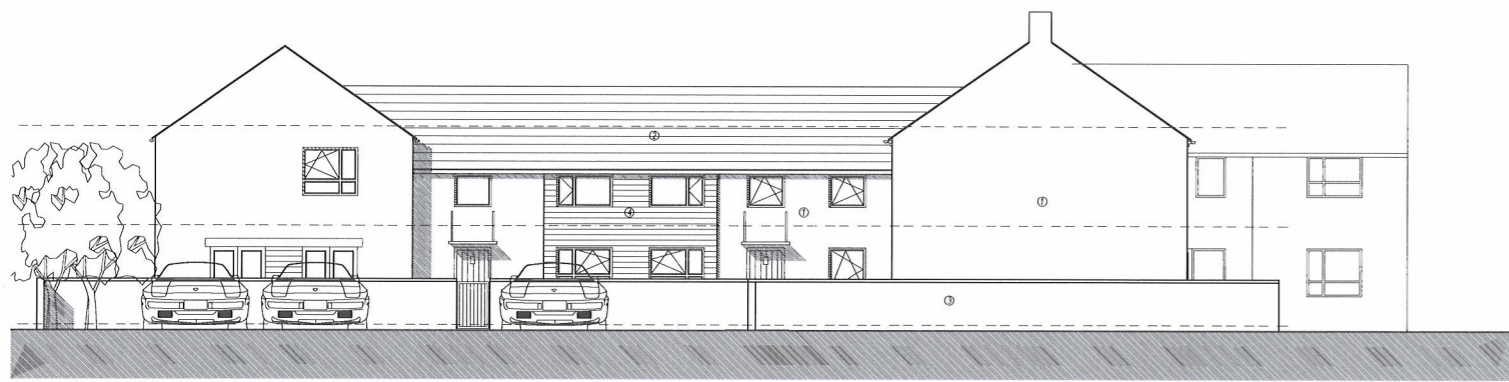
It is considered that the removal of the Main Open Area designation would be justified, particularly now that the Conservation Area boundary has been extended eastwards and a detailed Conservation Area Appraisal prepared. This should provide sufficient protection to ensure that any development maintains a separation between the old village and newer development to the east, and protects the character of the Conservation Area.

Alternatively, the Main Open Area should be reduced in size so that it covers a narrower section (around footpath N13), necessary to maintain a buffer, plus the land to the south of Copper Beeches, which, unlike the Wildgoose Site, can be seen from High Street.

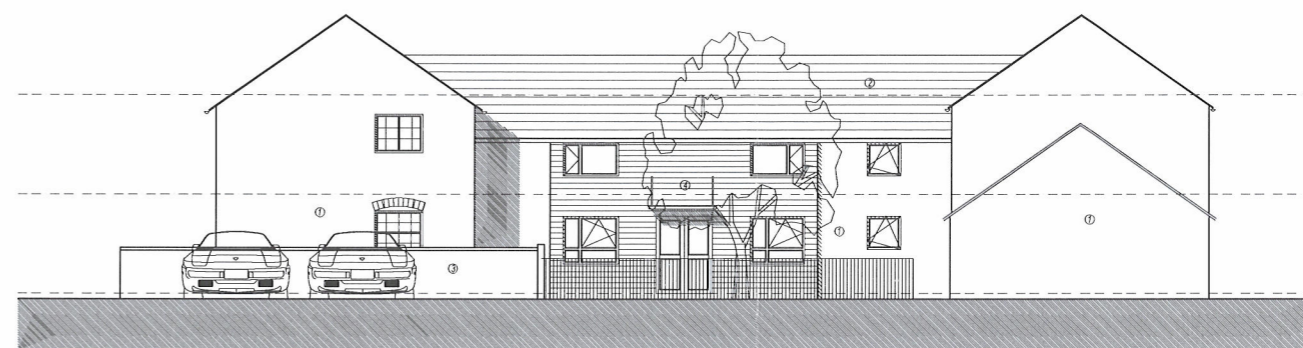
Appendix 1 –copy of drawings submitted as part of the planning application submitted by Wildgoose Construction on 20th November 2012 for 10 dwellings on the western part of the site



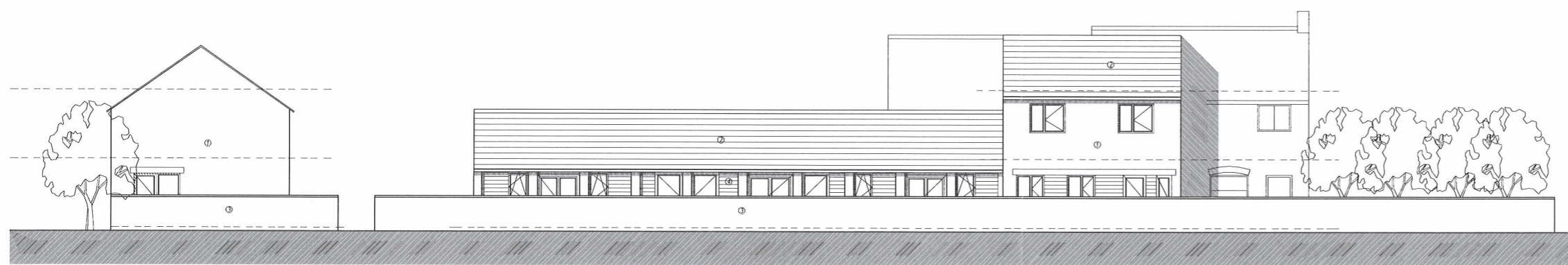
ELEVATION A-A



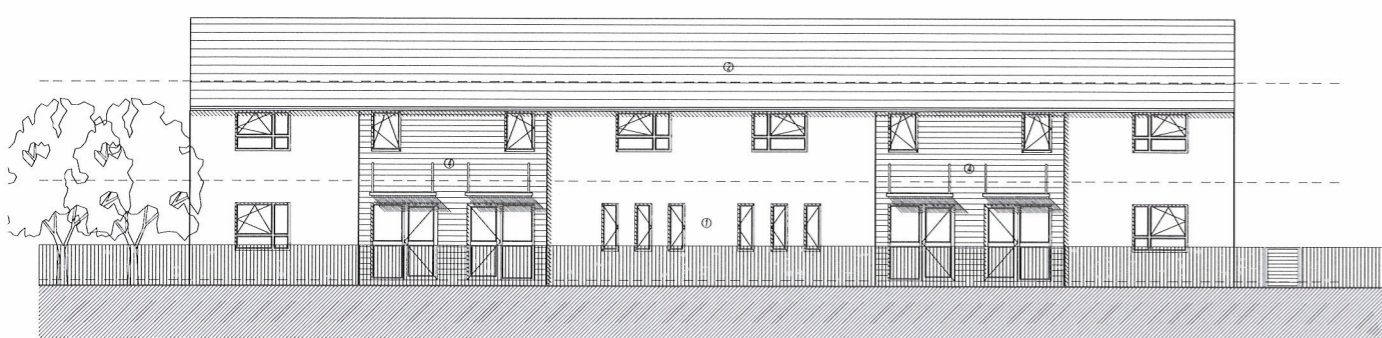
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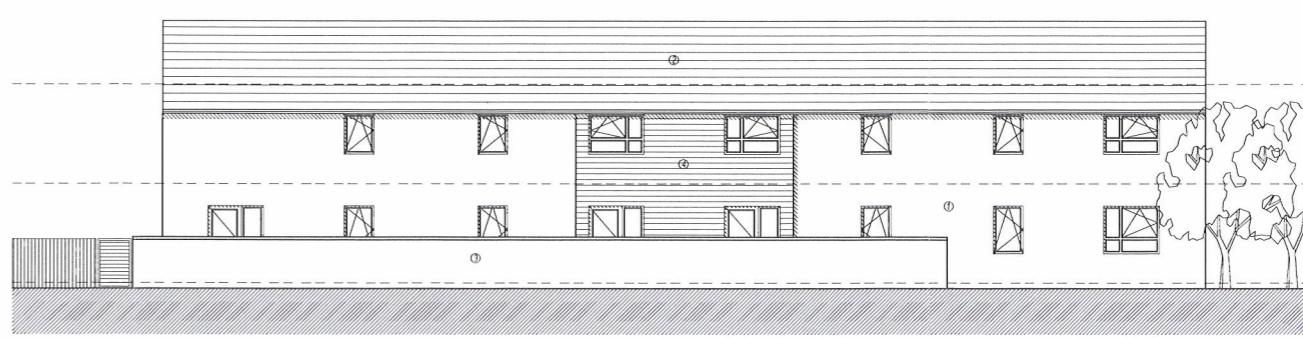
ELEVATION F-F



ELEVATION C-C



ELEVATION D-D



ELEVATION E-E

- MATERIALS KEY**
- 1 RED BRICK
 - 2 PAN TILE
 - 3 BRICK WALL
 - 4 TIMBER CLADDING

PlanningDesign

Ground Floor, Suite 4
 Woburn House
 Vernon Gate
 Derby
 DE1 1UL

Tel: 01332 341 371
 Fax: 01332 341 555
 E-mail: info@planningdesign.co.uk

CLIENT ADDRESS
 CSL Business Machines LTD

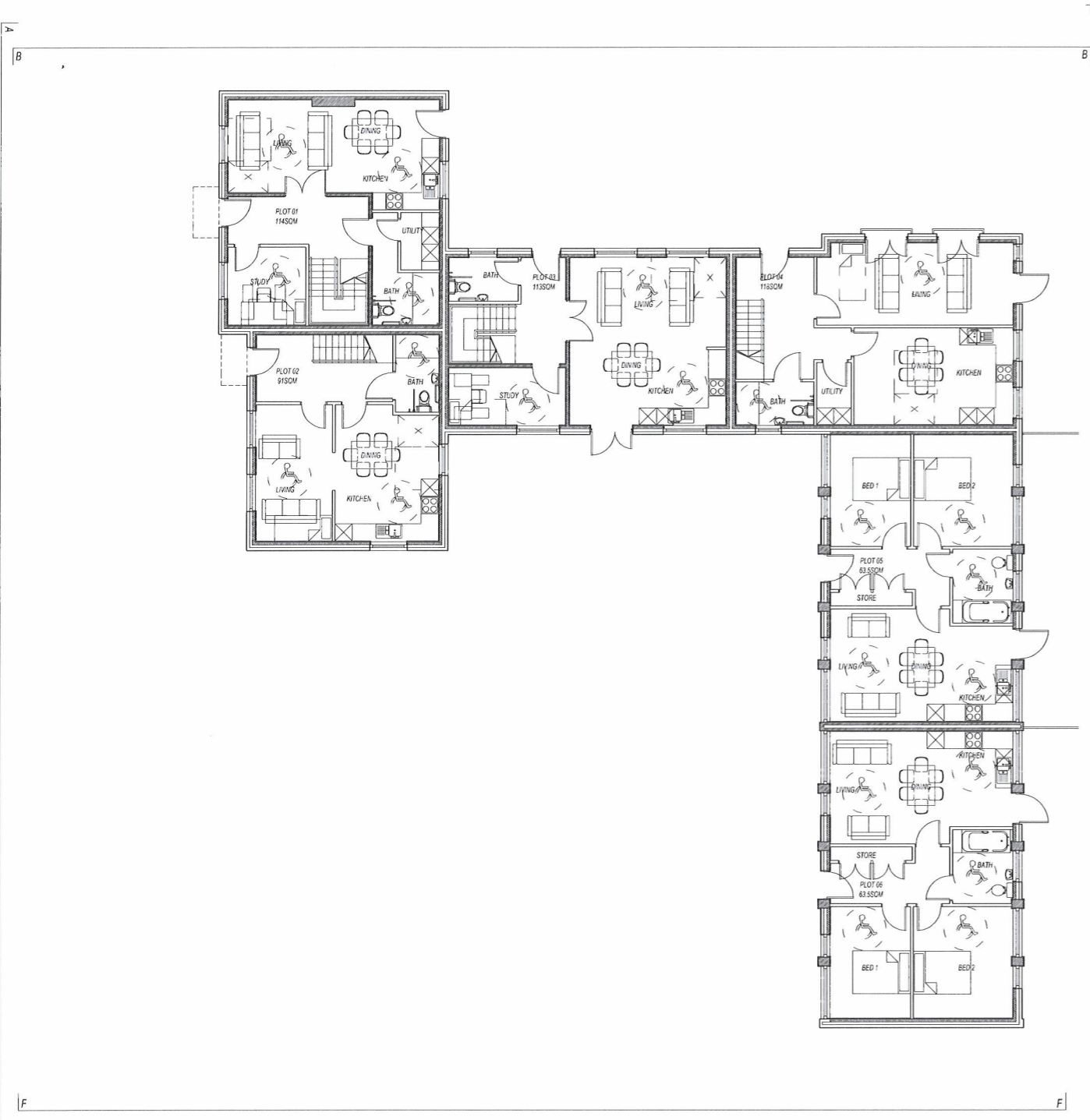
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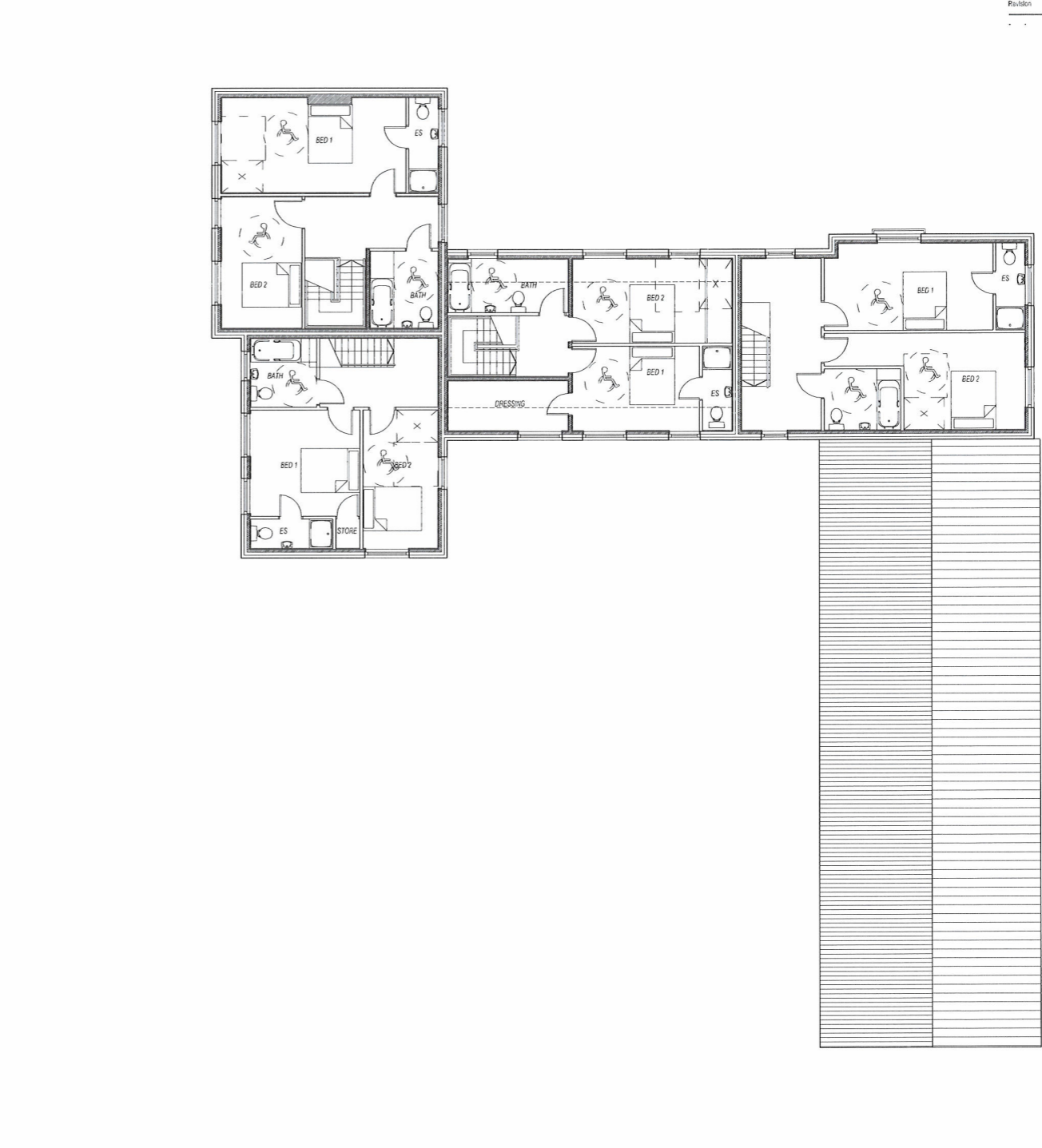
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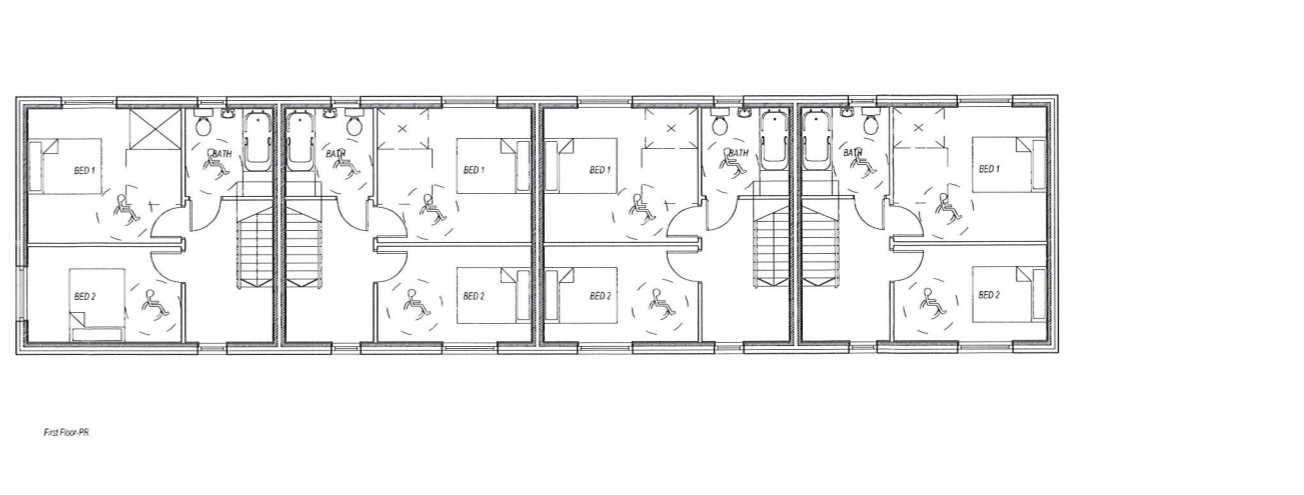
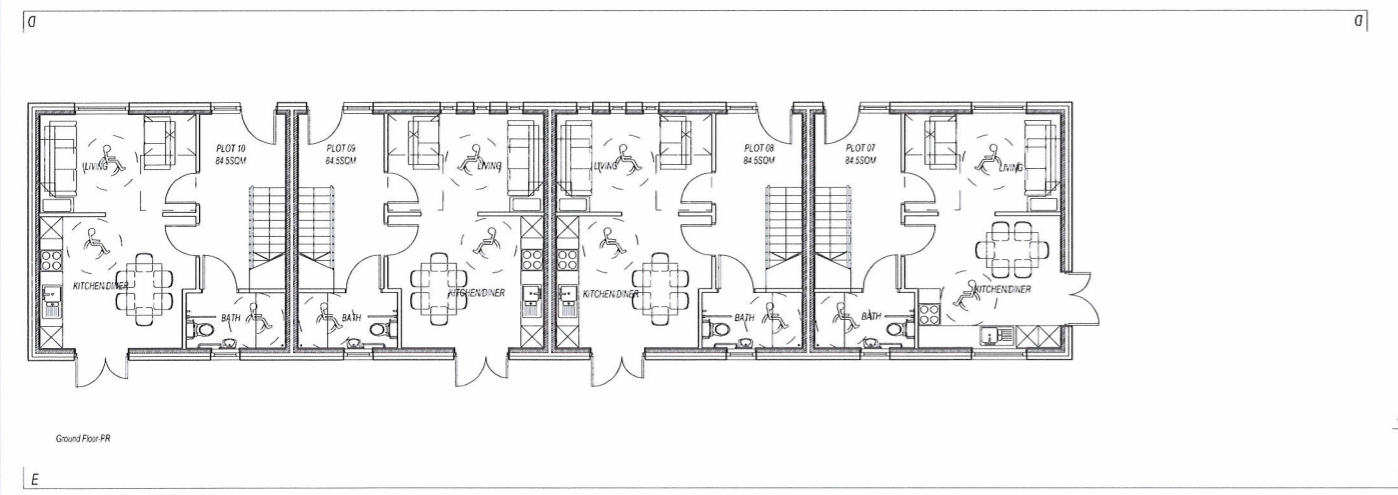
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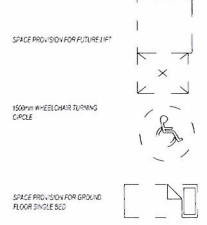
Ground Floor FR



First Floor FR



PLAN KEY



PlanningDesign

Ground Floor, Suite 4
 Woburn House
 Vernon Gate
 Derby
 DE1 1UL

Tel: 01332 341 371
 Fax: 01332 341 355
 E-mail: info@planningdesign.co.uk

CLIENT ADDRESS
 CSL Business Machines LTD

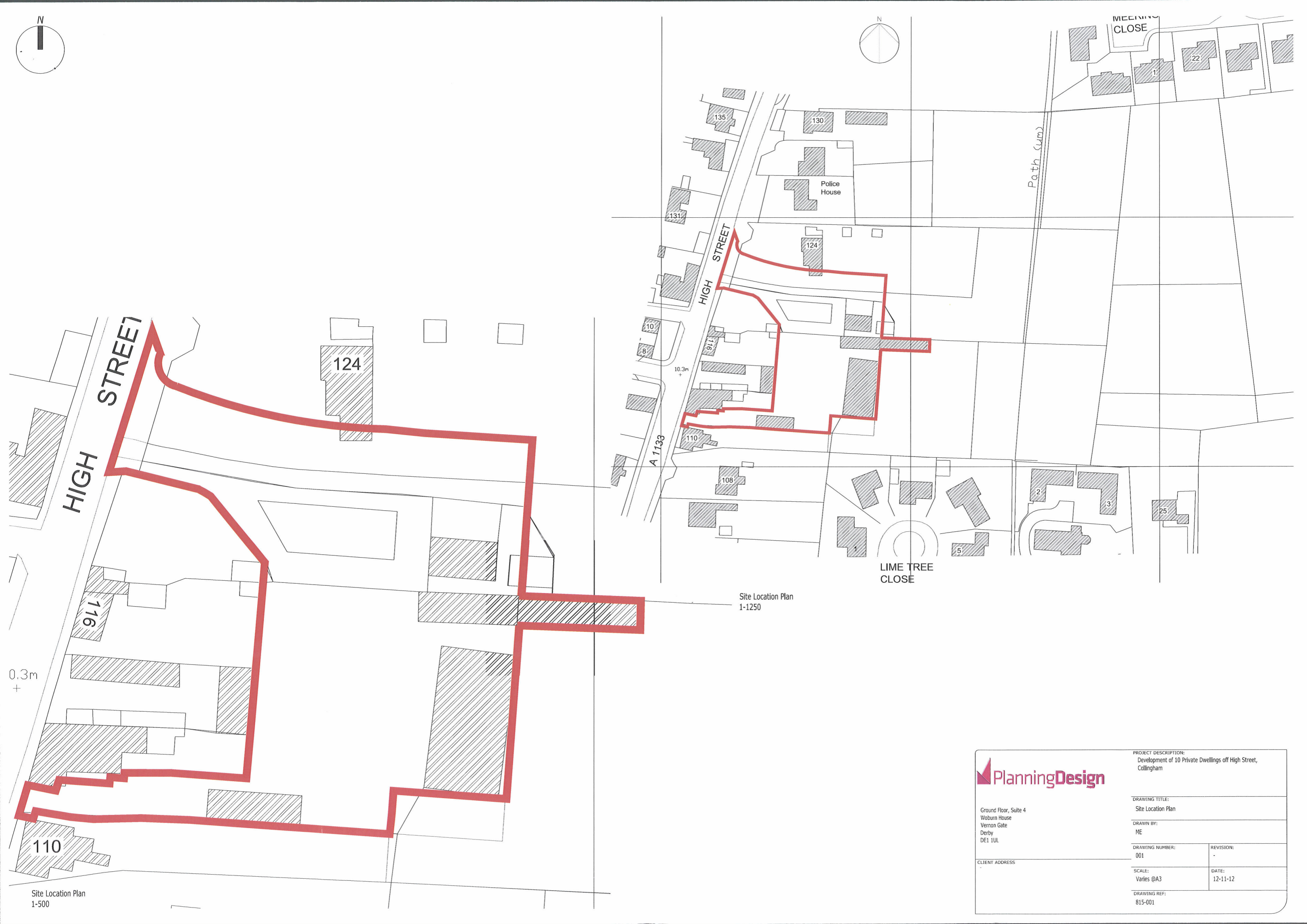
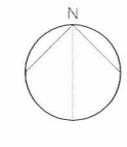
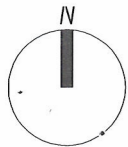
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 Proposal For 10 Private Dwellings on Land off High Street, Colongham

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 Plans-FR

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 ME

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HIGH STREET

HIGH STREET

LIME TREE CLOSE

Path (um)

124

116

110

135

130

131

124

10

8

9

116

110

108

2

3

25

5

Site Location Plan
1-1250

0.3m
+

Site Location Plan
1-500

PlanningDesign

PROJECT DESCRIPTION:
Development of 10 Private Dwellings off High Street,
Collingham

DRAWING TITLE:
Site Location Plan

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ME

DRAWING NUMBER:
001

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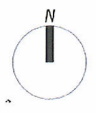
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Ground Floor, Suite 4
Woburn House
Vernon Gate
Derby
DE1 1UL

SCALE:
Varies @A3



VEHICLE AND PERESTRIAN ENTRANCE

EXISTING ACCESS TO FIELD RETAINED

RESIN BOUND GRAVEL

PAN TILE ROOF

BOUNDARY OF "MAIN OPEN AREA" AS DEFINED BY LOCAL PLAN PROPOSALS MAP

10.3m

PEDESTRIAN ENTRANCE

EXISTING ACCESS TO FIELD RETAINED.
POTENTIAL NEW PUBLIC FOOTPATH TO FOOTPATH N13
(SUBJECT TO FOOTPATH REGULATION ORDER)



Ground Floor, Suite 4
Woburn House
Vernon Gate
Derby
DE1 1UL

Tel: 01332 347 371
Fax: 01332 347 555
Email: info@planningdesign.co.uk

CLIENT ADDRESS:
CSL Business Machines LTD

PROJECT DESCRIPTION:
Proposal For 10 Private Dwellings on Land off High Street,
Cullingham

DRAWING TITLE:
Site-PR

DRAWN BY:
NE

DRAWING NUMBER:
003

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Architect to be notified of any discrepancies in dimensions immediately.

Appendix 2 –copy of master plan options previously presented at public consultation events by Wildgoose Construction



Collingham Park Option 1



Ground Floor, Suite 4
 Woburn House
 Vernon Gate
 Darby
 DE1 1UL
 Tel: 01332 347 371
 Fax: 01332 347 555
 Email: info@planningdesign.co.uk

CLIENT ADDRESS
 * Widgeon Construction Limited
 Millers
 Ashover
 Chesterfield
 S45 0EY

PROJECT DESCRIPTION:
 - Redevelopment of land at Collingham

DRAWING TITLE:
 Site Plan-PR Opt 1

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 H.Ethels

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SCALE:
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DRAWING REF:
 659-007

REVISION:
 A

DATE:
 06-07-12

John Blow Primary School

Collingham Park Option 2



Planning Design
 Ground Floor, Suite 4
 Station House
 Vernon Gate
 Bedy
 2021 2011
 Tel: 01223 497 971
 Fax: 01223 281 055
 Email: info@planningdesign.co.uk
 www.planningdesign.co.uk
 - Strategic Construction Limited
 Project Manager
 545 02V
 - Redevelopment of land at Collingham
 Planning
 M. Daniels
 007
 1:500 @A2
 06-07-12
 659-008