



Development Plan Document (DPD) Publication Stage Representation Form

Publication Amended Allocations & Development Management Development Plan Document (DPD)

A guidance note has been produced to assist in the completion of this form. Copies have been provided in correspondence and additional copies are available at: Castle House, Libraries in the District and <https://www.newark-sherwooddc.gov.uk/aadm-representation/>

Newark and Sherwood District Council is seeking your comments on the Publication Amended Allocations & Development Management DPD ('Publication AADMDPD'). Comments received at this stage should be about whether the Plan is legally compliant, sound and whether it has met the duty to cooperate. All representations must be received by the Council by 12 Noon on 9th January 2023.

This form has two parts- Part A- Personal / Agent Details and Part B- Your Representation(s) and further notification requests. (Please fill in a separate sheet (Part B) for each aspect or part of the Local Plan you wish to make representation on). Documents to support your representations (optional) should be referenced.

Privacy Notice

Apart from your comments below, the personal information you have provided will only be used by Newark & Sherwood District Council in accordance with the UK General Data Protection Regulation and the Data Protection Act 2018 and will not be shared with any third party.

The basis under which the Council uses personal data for this purpose is to undertake a public task.

The information that you have provided will be kept in accordance with the Council's retention schedule, which can be found at: <https://www.newark-sherwooddc.gov.uk/dataprotection/>

Please note the Council cannot accept anonymous responses. All representations received will be made available for public inspection and therefore cannot be treated as confidential. They will also be:

- Published in the public domain;
- Published on the Council's website;
- Shared with other organisations for the purpose of developing/adopting the Publication AADMDPD and forwarded to the Secretary of State for consideration;
- Made available to the Planning Inspector appointed by the Secretary of State to examine the Publication AADMDPD; and
- Used by the Inspector to contact you regarding the Examination of the Plan.

When making representations available on the Council's website the Council will remove all telephone numbers, email addresses and signatures.

By submitting your Response Form/representation, you agree to your personal details being processed in accordance with these Data Protection Terms.

PART A- Personal / Agent Details

In circumstances where individuals/groups share a similar view, it would be helpful to the Inspector to make a single representation, stating how many people the submission is representing and how the representation was authorised.

1. Personal Details

2. Agents Details

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text" value="Ms"/>	<input type="text" value="Miss"/>
First Name	<input type="text" value="Georgia"/>	<input type="text" value="Charlotte"/>
Last Name	<input type="text" value="Guest"/>	<input type="text" value="Bailey"/>
Job Title (where relevant)	<input type="text" value="Strategic Land Manager"/>	<input type="text" value="Senior Planner"/>
Organisation (where relevant)	<input type="text" value="Bellway Homes Limited"/>	<input type="text" value="Turley"/>
Address Line 1	<input type="text"/>	<input type="text" value="8 Quay Court"/>
Line 2	<input type="text"/>	<input type="text" value="Colliers Lane"/>
Line 3	<input type="text"/>	<input type="text" value="Stow-Cum-Quy"/>
Line 4	<input type="text"/>	<input type="text" value="Cambridge"/>
Post Code	<input type="text"/>	<input type="text" value="CB25 9AU"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
Email Address	<input type="text"/>	<input type="text" value="REDACTED"/>

Name or Organisation:	<input type="text" value="Bellway Homes Limited"/>
-----------------------	--

PART B- Representation(s)

3. To which part of the DPD does this Representation relate?

Part of the Publication AADMDPD:	Mark if Relevant (X)	Specify number/part/document:
Amended AADMDPD Paragraph Number	X	Paragraph Number: 1.31, 1.27, 1.29 and 6.5
Amended AADMDPD Policy Number	X	Policy Number: Ra/E/1 (Rainworth Employment Site 1)
Amended AADMDPD Policies Map Amendments		Part of Policy Map:
Integrated Impact Assessment ¹		Paragraph Number:
Statement of Consultation		Paragraph Number:
Supporting Evidence Base		Document Name: Page/Paragraph:

4. Do you consider the DPD to be LEGALLY COMPLIANT?

Yes

No

5. Do you consider the DPD to comply with the Duty-to-Cooperate?

Yes

No

6. Do you consider the DPD to be SOUND?

Yes

No

*The considerations in relation to the Legal Compliance, Duty to Cooperate and the DPD being 'Sound' are explained in the Newark & Sherwood Development Plan Document Representation Guidance Notes and in Paragraph 35 of National Planning Policy Framework 2021 (NPPF).

¹ The Integrated Impact Assessment (IIA) integrates Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA). Sustainability Appraisals (SA) are a requirement of the Planning and Compulsory Purchase Act 2004 and Strategic Environmental Assessments (SEA) are required by European Directive EC/2001/42, which was transposed into UK law by the Environmental Assessment Regulations for Plans and Programmes (July 2004). The EqIA is a way of demonstrating the District Council is fulfilling the requirements of the Public Sector Equality Duty contained in section 149 of the Equality Act 2010. HIA is a recognised process for considering the health impacts of plans and undertaking this type of assessment is widely seen as best practice.

7. The DPD is not sound because it is not:

- (1) Positively Prepared
- (2) Justified
- (3) Effective
- (4) Consistent with national policy

8. Please provide precise details of why you believe the DPD is, or is not, legally compliant, sound or in compliance with the duty to cooperate in the box below.

If you wish to provide supplementary information to support your details, please ensure they are clearly referenced.

We consider that the emerging Newark and Sherwood Publication Amended Allocations Development Management Document (DPD) is not legally sound. We believe the DPD will not effectively deliver on the economic and residential objectives set out for in Rainworth. Rainworth is recognised as a 'Service Centre' and has a range of shops and a secondary school, which serves part of the Sherwood Area and the southern part of the Mansfield Fringe. Rainworth is well related to Mansfield Sub-Regional Centre with its jobs and facilities and is therefore considered to be a sustainable location for continued growth.

The adopted A&D DPD identifies Land West of Colliery Lane for employment development (under Policy Ra/E/1 Rainworth), and this is retained in the emerging DPD. However, the site is the subject of an outline planning application (application ref:21/00996/OUTM) for 91 dwellings submitted in April 2021 and which is yet to be determined. Should planning permission be granted on this site, another employment site will be needed to meet needs within the plan period. Our client's site at Land north of the A617 provides both a short-and longer-term opportunities for a mix of employment uses and housing within Rainworth. Please refer to our supporting covering letter, which supports this representation and provides precise details as to why we believe the emerging DPD is not legally sound.

(Continue on a separate sheet/expand box if necessary)

9. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 6 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is clear that this growing housing need should be addressed, and we recommend that the Part 2 Plan should commit to an early, full review of the Core Strategy. This is referenced and supported under Paragraph 1.31 in the emerging AADMDPD, which states that the NPPF will require that in 2024 the Council reviews the Amended Core Strategy to see if it remains up-to-date, and at that point it is likely that the Council will begin the process of developing a new Local Plan.

Further changes are required to Policy Ra/E/1 Rainworth if the current outline planning application (ref:21/00996/OUTM) for 91 dwellings submitted in April 2021 is approved. This site has been the subject of planning permissions granting commercial development of this site historically (under application ref: 06/01030/OUTM & 7/00474/RMAM). However, clearly, commercial development has not taken place and these permissions have now lapsed. Should this application be approved, this would leave Rainworth with no employment allocations. Land West of Colliery Lane is considered to be an important employment allocation and one of only two such allocations in this part of the District.

(Continue on a separate sheet/expand box if necessary)

Please note your Representation should cover succinctly all the information, evidence and supporting Information necessary to support/justify the Representation and the suggested change, as there will not normally be a subsequent opportunity to make further Representations based on the original Representations at the Publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for Examination.**

10. If your Representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral Examination	Yes, I wish to participate at the oral Examination
<input checked="" type="checkbox"/>	<input type="checkbox"/>

11. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary.

N/A

(Continue on a separate sheet/expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination.

12. Please tick the relevant boxes below to receive notifications (via email) on the following events:

- DPD submitted to the Secretary of State for Inspection
- Examination in Public hearing sessions
- Planning Inspector’s recommendations for the DPD have been published.
- DPD has been formally adopted.

Signature: [REDACTED]

Date: 9th January 2023

Please return this form by 12 Noon on 9th January 2023 to one of the addresses below:

Email: planningpolicy@nsdc.info

Post: **Planning Policy & Infrastructure Business Unit**
Newark & Sherwood District Council
Castle House
Great North Road
Newark
NG24 1BY

Office Use Only

Date of Receipt:

Representation No:

9th January 2022
Delivered by email

Ms Cara Clarkson
Newark and Sherwood District Council
Brunel Drive
Newark
NG24 2EG

Ref: BELQ3021

Dear Ms Clarkson,

NEWARK AND SHERWOOD PUBLICATION AMENDED ALLOCATIONS DEVELOPMENT MANAGEMENT DOCUMENT (DPD) REGULATION 19 CONSULTATION – REPRESENTATIONS

These representations to the Newark and Sherwood Publication Amended Allocations Development Management Document (DPD) Regulation 19 consultation have been prepared by Turley on behalf of our client, Bellway Homes Limited (Bellway).

Although the DPD is at a progressed stage of preparation, we take this opportunity to support our Bellway's site on land to the north of the A617, Rainworth, and introduce the Council to the potential the site represents to meet the future needs of Rainworth.

Bellway

Bellway Homes, a FTSE 250 company, is the fourth biggest housebuilder in the UK, and is therefore well placed to deliver much needed market and affordable homes to help address the country's ongoing housing shortage. Bellway is a five-star housebuilder given its emphasis on build quality, customer care and health and safety and builds quality homes to suit local housing styles, as well as providing social housing to housing associations.

Bellway, alongside their consultant team, is seeking to work closely with the community, the Parish Council and Newark and Sherwood District Council, through the Local Plan process and beyond to assist in meeting future needs in the District. In the meantime, Bellway would be pleased to meet with the District and/or Parish Council to discuss the site and answer any questions they may have.

The representations are submitted with the following documents:

- Representation Form (**Appendix 1**)
- Site Location Plan (**Appendix 2**)

8 Quay Court
Colliers Lane
Stow-cum-Quay
Cambridge
CB25 9AU

Land north of the A617, Rainworth

The site comprises circa 62 hectares of arable land located to the north of the Rainworth Bypass (A617). The site is bound by existing trees and hedgerows and has an undulating topography. The northern site boundary is defined by a public footpath and adjoins the wooded edge of the Rainworth Water Local Nature Reserve. The public footpath continues along the route of Rainworth Water to mark the western extent of the site with a sewage treatment works adjacent. The site is enclosed to the south by the A617 and the settlement edge of Rainworth. A cycleway runs along the eastern boundary following the line of a former mineral railway.

The site sits on the southern edge of the Sherwood Forest which is designated as a Site of Interest in Nature Conservation (SINC), a local ecological designation which covers a wide area. The SINC extends along the western and northern edges of the site and forms part of the northernmost extent of the site. The Rainworth Heath Site of Special Scientific Interest (SSSI) is located further west, beyond the SINC. Both are designated for their heathland characteristics. A regionally important geology site follows the eastern boundary of the site. There is also a nature reserve to the north.

All nearest facilities to the site are located to the south, beyond the Rainworth Bypass. The core of Rainworth village is located circa 500m to the south and includes convenience stores, restaurants, takeaways, public houses, a health centre, and a village hall. There are two primary schools nearby, the Python Hill Academy 300m to the south and the Lake View Primary School circa 900m to the south west. The Joseph Whitaker Secondary School is circa 1km to the south.

At this early stage of promoting the site Bellway are exploring three different initial potential development options for the site:

- Option 1: Up to 500 new homes, 2FE primary school, local centre, outdoor sports facilities and open space
- Option 2: Up to 700 new homes, employment land, 2FE primary school, local centre, outdoor sports facilities and open space
- Option 3: Up to 1,000 new homes, 2FE primary school, local centre, outdoor sports facilities and open space

Any emerging proposed layout will be informed by technical assessment and survey work to be undertaken in due course.

The site is generally well-contained by surrounding vegetation and built form so does not form a prominent feature within many views beyond public rights of way within the immediate vicinity. Overall, the site is not within any landscape designations and whilst containing some positive landscape features which any new development can preserve and enhance, it is not beyond the ordinary in landscape terms.

The site in Rainworth has not previously been assessed in either the 2017 or 2021 Strategic Housing and Employment Land Availability Assessments (SHELAA) and is not otherwise covered by any specific policy designations, expect for Policy DM8 (Development in the Open Countryside).

Rainworth is well positioned to accommodate SUE scale growth given its proximity to Mansfield, which elevates the level of service provision for residents of the village. Green Belt currently restricts growth to the south of Rainworth, therefore appropriate growth should be located to the north.

In the adopted Amended Core Strategy Rainworth is recognised as a 'Service Centre' (tier 2 of the settlement hierarchy) and has a range of shops and a secondary school which serves part of the Sherwood

Area, and is considered to sustainably accommodate growth. It is clear that Newark will be unable to take the majority of growth in the next plan period, and whilst the DPD allocates a large percentage of future development to the Newark Urban area, other locations will need appropriate allocations to meet local needs and aid regeneration. Development opportunities should therefore be presented in other key settlements, such as Rainworth within the District and these are concerns in the shorter term regarding this emerging plan, which is set out in more detail below.

Representations

The Council's supporting Housing Needs Assessment (2020) emphasises that under the current demographic scenario, the strongest need is for 2 to 3-bedroom houses and 2-bedroom bungalows within the District. Larger greenfield sites, which the part 2 plan is not provided for, offer the opportunity for a greater proportion of family units with increased private amenity space, which has become of increased importance throughout and following the pandemic.

Beyond this, there is a need to regularly review plans every five years to ensure they remain up to date, as required by National Planning Policy Framework paragraph 33. In just over a year the adopted Core Strategy will be five years old. Given the length of time it takes to review a plan, to meet this requirement Newark and Sherwood should now be commencing a review of its Core Strategy. Indeed, as much as acknowledged in the emerging AADMDPD at paragraph 1.31.

As the adopted Core Strategy will be five years' old in just over a year, and given the adopted Core Strategy was a partial review of a previous plan, Bellway are of the view that the Part 2 Plan should include a policy specifically committing the Council to commencing a full review of the Core Strategy immediately following the Part 2 Plan's adoption.

Section 1 Background Context – Employment

The emerging DPD sets out the detail for how employment land will be provided across the District. It explains that employment land provision established in Spatial Policy 2 of the Amended Core Strategy identifies a requirement of 83.1 hectares, distributed amongst the five areas for the period 2013 to 2033. Paragraph 1.27 states that in total the District has a supply of 176.69 hectares of employment land. However, under Paragraph 1.29 it announces that it is possible that the levels of employment delivery anticipated in the plan may not be achieved, "as with the housing situation".

It is unclear where the 176.69ha employment supply figure has derived from, given that the evidence base for the plan includes no up-to-date report regarding employment supply provision, with the most recent study being the out of date 'Employment Land Forecasting Study' published in August 2015. Up-to-date evidence is therefore needed to identify the requirement of employment land provision.

Section 6 Mansfield Fringe Area

The Mansfield Fringe Area covers the western part of the district and is closely related to the Mansfield Sub-Regional Centre, in terms of jobs, public transport and other facilities. Within the Mansfield Fringe Area, Rainworth is recognised as a Service Centre and has a range of shops and a secondary school which serves part of the Sherwood Area and the southern part of the Mansfield Fringe. Rainworth is well related to Mansfield Sub-Regional Centre with its jobs and facilities.

Under paragraph 6.5 of the emerging AADMDPD it states that previous completions and committed development will all contribute towards delivering 264 homes at Rainworth between 2012 and 2033.

However, it is clear that there is a residual requirement for the AADMDPD to identify sites that are capable of delivering new dwellings in Rainworth (which is emphasised in paragraph 6.5).

In the Amended Core Strategy, Rainworth was allocated 10% of growth (circa 264 homes) between 2013 – 2033, and 187 of these units have already been completed or committed, leaving the plan to identify land for only 77 additional new homes. In contrast, 660 new homes were identified for Edwinstowe, 477 homes of which were still to be identified. The largest settlement is the Newark Urban Area, where 5,294 new homes are proposed, with 803 homes of which were still to be identified.

The NPPF (paragraph 60) is clear that the standard methodology should be used to determine the ‘minimum’ number of homes needed, also taking into account housing needs that cannot be met within neighbouring areas. In the adopted A&D, DPD, the Council allocated 247 new dwellings in Rainworth, compared with 264 in the emerging AADMDPD (under paragraph 6.5). There’s clearly an increase in housing need within Rainworth that will need to be addressed in the shorter term.

It is important that adequate provision is also made for suitable sites around Rainworth in order to guarantee that a range of housing is provided to meet local needs. Indeed, the NPPF is clear that the supply of new homes should be provided for across a range of sites to meet identified needs and also emphasises the role sustainable urban extensions can have in existing towns – ‘The supply of large numbers of new homes can often be best achieved through...significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities’ (under paragraph 73).

Paragraph 6.5 of the emerging DPD also identifies a guideline requirement for 10.4 hectares of new employment land in the Mansfield Fringe Area during the plan period. It states that sufficient land has been completed or has the benefit of planning permission to meet the employment requirements in the Mansfield Fringe Area. Whilst some of the allocations have the benefit of planning permission and may already be under construction, in any case the allocations are retained in the DPD unless the development of the site is complete. It is clear from the Council’s public access register that employment allocation Ra/E/1 has a planning application awaiting determination for residential development. If approved, this would leave Rainworth without an employment allocation and thus a shortfall in supply. This is explored in further detail below.

Policy Ra/E/1 Rainworth Employment Site 1

The adopted A&D DPD identifies Land West of Colliery Lane for employment development (Policy Ra/E/1 Rainworth), whilst this is retained in the emerging DPD. Notwithstanding this, the site is the subject of an outline planning application (application ref:21/00996/OUTM) for 91 dwellings submitted in April 2021 and which is yet to be determined. In the submission, the Applicant argues that this site is not appropriate for employment use given its site constraints, including the severe topography of the site, overall scale of the site and requirements for an access off the A617 to serve an employment use. However, this site has been the subject of planning permissions granting commercial development of this site historically (under application ref: 06/01030/OUTM & 7/00474/RMAM). However, clearly, commercial development has not taken place and these permissions have now lapsed.

Should this application be approved, this would leave Rainworth with no employment allocations. Land West of Colliery Lane is considered to be an important employment allocation and one of only two such allocations in this part of the District. Should this planning permission be granted, a replacement employment site would be required in Rainworth to accommodate the need that this site would have otherwise provided for.

The Site to the north of the A617 is capable of accommodating employment uses and could provide an access off the A617 or potentially from the existing roundabout to the east. This site is a reasonable alternative and is available for a mixed-use residential and employment development in the short term, to accommodate the potential loss of the proposed employment allocation off Colliery Lane, and in the medium to long term, given the size of the site and opportunity it presents to meet future needs.

There are no constraints that cannot be overcome and could be capable of providing a suitable vehicular access from the A617 Rainworth bypass. In addition, and a particular benefit of locating employment development to the north of Rainworth, the site would allow employment traffic to bypass the centre of Rainworth, given the proximity to the A617 bypass and potential for a direct access on to it.

Whilst Land West of Colliery Lane has been allocated for employment uses for some time, a lack of demand due to the economic climate and viability has resulted in the site never coming forwards for a sole employment use. An Employment Land Statement prepared by JLL to support the application reference 21/00996/OUTM demonstrated that this site was marketed by JLL since 2019 with no offers and limited interest (in all cases not sustained beyond initial inquiry) for employment purposes. Therefore, if the application for residential development is approved on this site, this leaves Rainworth without an employment allocation.

Therefore, it is clear that one of the key strengths of the mixed-use allocation for Bellway's site will support the delivery of employment land required to meet the ambitious economic objectives of Newark and Sherwood and can be brought forward in the medium-longer term.

Summary

Overall, Rainworth is recognised as a 'Service Centre' and has a range of shops and a secondary school, which serves part of the Sherwood Area and the southern part of the Mansfield Fringe. Rainworth is well related to Mansfield Sub-Regional Centre with its jobs and facilities and is therefore considered to be a sustainable location for continued growth.

It is clear that this growing housing need should be addressed, and we recommend that the Part 2 Plan should commit to an early, full review of the Core Strategy. This is referenced and supported under Paragraph 1.31 in the emerging AADMDPD, which states that the NPPF will require that in 2024 the Council reviews the Amended Core Strategy to see if it remains up-to-date, and at that point it is likely that the Council will begin the process of developing a new Local Plan.

Finally, the adopted A&D DPD identifies Land West of Colliery Lane for employment development (Policy Ra/E/1 Rainworth), whilst this is retained in the emerging DPD. Notwithstanding this, the site is the subject of an outline planning application (application ref:21/00996/OUTM) for 91 dwellings submitted in April 2021 and which is yet to be determined. Should planning permission be granted on this site, another employment site will be needed to meet needs within the plan period, and Bellway's site at land north of the A617 provides both a short-and longer-term opportunities for a mix of employment uses and housing.

We trust that these representations are in order but please do not hesitate to contact us should you require anything further. Bellway would welcome the opportunity to meet with officers to discuss the benefits of land north of the A617 and potential development options.

Yours faithfully,



Charlotte Bailey
Senior Planner

