
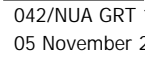


From: 
To: 
Subject: 042/NUA GRT 13/T1T2T3T4/0097
Date: 05 November 2023 18:10:17
Attachments: [Second Representation Form - JCM.doc](#)

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Good Evening

With reference to the letter regarding the Local Development Framework Plan Review Second Publication Allocations & Development Management Development Plan Document, please find attached a second representation form. In short, I do not believe any real amendments have been made to the proposed traveller site at the former Belvoir Ironworks and my concerns still stand as summarised in the attached.

All the best

Jamie Moore



Development Plan Document (DPD) Second Publication Stage Representation Form

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

The District Council have produced a guidance note 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 Second Publication Amended Allocations & Development Management DPD ('Second 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 5pm on Monday 6th November 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.

If you previously made a representation to the first Publication Allocations & Development Management DPD (November 2022) Regulation 19 stage, we would like to know how you want this to be treated. All representations made at that stage will be forwarded on to the Inspector unless you wish to supersede it with a new representation to this Second Publication Allocations & Development Management. Please make this clear at the beginning of your Representation. If your previous representation is no longer required because of the proposed changes made to this Second Publication AADMDPD, please let us know that you are happy for your previous representation to be withdrawn.

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 column two.

Title	Mr	
First Name	Jamie	
Last Name	Moore	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	37 Ribbon Pond Drive	
Line 2	Middlebeck	
Line 3	Newark	
Line 4		
Post Code	NG24 3WW	
Telephone Number		
Email Address		

Name or Organisation:	
-----------------------	--

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: 8.32
Amended AADMDPD Policy Number	X	Policy Number: NUA/GRT/13
Amended AADMDPD Policies Map Amendments	X	Part of Policy Map: Map 2 - NUA/GRT/13
Integrated Impact Assessment ¹	X	Paragraph Number: Pages 279 - 283
Statement of Consultation	X	Paragraph Number: Pages 51 - 52
Supporting Evidence Base	X	Document Name: Gypsy & Traveller Land Availability Assessment (GTLAA) - Main Report 2022 Page/Paragraph: Pages 15-16 & Pages 29 - 33

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 (NPPF) (2023).

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 | <input checked="" type="checkbox"/> |
| (2) Justified | <input checked="" type="checkbox"/> |
| (3) Effective | <input checked="" type="checkbox"/> |
| (4) Consistent with national policy | <input checked="" type="checkbox"/> |

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.

The Former Belvoir Ironworks (North) site at Middlebeck is unsuitable for a number of reasons, many noted in prior consultations. Further to my letter to Cllr David Lloyd, The Rt Hon Robert Jenrick and Cllr John Lee on 3 April 2022, I again reiterate concerns regarding the suitability of this site, specifically services and facilities (in particular the lack of any public transport facilities, and provision available at the new primary school to cater to an already increasing number of new residents and pupils), access and highways (specifically concerns regarding trip generation), availability of more appropriate alternative sites, inherent flood risk, impacts on the visual amenity of Middlebeck, the potential destruction of trees and wildlife and pending comments from the local police.

With regard to national policy, it should be noted that increasing capacity of traveller sites to the number quoted may simply increase demand overall creating an ever-growing cycle leading to ever-growing financial demand to supply.

I refer you to extracts of comments made by Urban & Civic of their objections to this site within the Statement of Consultation document from October 2022:

'Belvoir Ironworks North lies to the south of Newark South and Urban & Civic have concerns about the potential implications of this on services and facilities at Newark South, and in terms of site access and impact on the highway network. Our response to Question 9 is supported by a Transport and Highways Technical Review prepared by SLR and provided as Appendix 1.

- **Services & Facilities** - *The site assessment, as set out at paragraph 3.16.11 of the Options Report, states that the site is considered reasonably located in respect of access to services and facilities, with specific reference to the Middlebeck development - that is, Newark South. The Transport and Highways Technical Review sets out that the Belvoir Ironworks North site cannot be considered as having sustainable access to facilities and services, including at Newark South, with, for example, Middlebeck Primary School being in excess of an 800-metre walk. Moreover, Urban & Civic are concerned about the pressure that around 30 pitches may have on services and facilities being provided as part of the Newark South development. For example, Middlebeck Primary School, which opened September 2021, provides additional school places to meet the demand from the Newark South development only, and Urban & Civic is, therefore, concerned that should children from the gypsy and traveller pitches take school spaces at Newark South then this will result in the needs of children at Newark South not being met. It should be noted that this additional pressure would be combined with pressure from new housing in the immediate locality, with the appeal for up to 322 dwellings on Land at Flowserve Pump Division being allowed in June 2021 (Ref: APP/B3030/W/20/326097), and also proposals within this Options Report if taken forward - in particular, the extension to Site NUA/HO/10 - Land North of Lowfield Lane, and Opportunity Sites, notably the Tarmac Site within Bowbridge Road Policy Area.*
- **Access & Highways** - *The Transport and Highways Technical Review concludes that, based on the information available, it is unclear as to whether a safe and suitable access to the Belvoir Ironworks North site can be achieved for the proposed use in visibility terms. Furthermore, based*

on the potential level of trip generation associated with the use, there may be a requirement for the access to the site to include a central treatment on Bowbridge Lane (such as a ghost island right turn), but no information is available to demonstrate that such a junction arrangement would be deliverable within land controlled by the local highway authority and that associated with the site. In terms of trip generation, the Transport and Highways Technical Review sets out that daily movements to and from the site could be in the order of 300 vehicles, with potential peak hour trip generation in excess of 30 two-way movements, which is the typical threshold at which a local highway authority would require operational assessments to consider the highway impacts at off-site junctions. This level of traffic is of concern to Urban & Civic as it would be utilising highway capacity that has been designed and delivered to support the delivery of Newark South and other existing planned housing allocations in Newark. In this respect, the Newark South development is delivering the SLR, with triggers for delivery including that no more than 600 dwellings are to be occupied unless Phase 1 of the SLR is complete and that no more than 700 dwellings are to be occupied unless construction of Phase 2 of the SLR has commenced. Urban and Civic object to additional development coming forward and taking capacity on the highway network, that should first and foremost be used to facilitate the delivery of dwellings at Newark South, whilst development at Newark South is constrained. For the reasons given above, Urban & Civic respectfully request that Site 2 - Belvoir Ironworks North, Newark (Ref: 19_0004) is categorised as not suitable, with the site assessment amended accordingly to take account of the constraints in terms of access to, and capacity of, services and facilities, and site access and highways.'

Within the same report, objections were noted by residents based on concern regarding the following, many of which have yet to be addressed:

- *'Increase in Anti-Social Behaviour/crime*
- *Undermine delivery of remaining Middlebeck phases*
- *Area already seeing a lot of development*
- *Environmental Concerns - waste and littering*
- *Supporting infrastructure (schools, amenity facilities and roads etc.) unable to support development*
- *Localised parking issues will be exacerbated (Flaxley Lane)*
- *Flood risk*
- *Poor public transport connections*
- *Increased traffic*
- *Tensions between settled and travelling communities*
- *Out of keeping with character of the area*
- *Existing sites should be expanded*
- *Site too close to waste tips and sites with groundworks underway*
- *Pitch numbers too high due to impact on properties directly adjacent*
- *Thorough investigation of land contamination required*
- *Impact on amenity of adjoining cottages'*

I also refer you to the information contained within the Newark and Sherwood Local Development Framework Plan Review Integrated Impact Assessment. As the proposed site is located beyond the Urban Boundary of the Newark Urban Area and as there is a lack of public transport connectivity for the proposed site, there will be further reliance on making journeys using private motor vehicle which causes more traffic on the road potentially creating highway safety issues (especially in an area home to many children), noise and further pollution. Furthermore, due to the dependence upon using private motor vehicles this will limit the level of impact on climate change.

I also refer you to comments made by Highway Engineers from the GTLAA report from 2022 with regard to physical constraints.

'An independent report has been submitted objecting to this site. The cited trip generation is based on a single site which was counted in 2010 and the outputs are not included in the appendices so cannot be verified. The HA have not been able to locate the site on the TRICs data base but have located the site on Google maps. The trip rates may be high and linked to the poor sustainability of this site which has access only to the major road network with no footways/no community facilities within walking distance.

It is also noted in the introduction to this note that trip rates may also be higher per unit due to Gypsy

communities which often have extended families all living together. This of course is not in itself a reason to object to a site, and instead requires application of a lesser threshold for provision of a TA/TS. If the submitted report is correct, it would be appropriate to require one for this site.'

I also refer you to additional comments present within the GTLAA report from 2022 with regard to flood risk concerns:

'Flood Risk Comments: Section of Bowbridge Lane at the access to the site located within Flood Zone 2. As part of planning appeal in 2015 the flood depths were considered to be shallow (and acceptable) turning right when leaving site, but deep and unacceptable turning left. Was deemed acceptable if restricted to right turn only during times of flooding. Emergency access option onto the Sustrans route was also considered. There is the potential that appropriate emergency access arrangements could be put in place, subject to further detailed investigation. Caravans are a highly vulnerable use in flood risk terms, but following national Planning Practice Guidance can be compatible with Flood Zone 2 - subject to application of the Exception Test.'

A portion of the site is within Flood Zone 2 as well as areas along Bowbridge Lane which would provide access to the site. As caravans are vulnerable to a flood risk, the land would have to be safe from a flood risk to be viable and I would assert there are alternative sites that would be safer and more suitable.

From the documentation required, it appears the below has not yet been completed (or results of investigations not yet published):

- *'On-site SuDS required to address water quality*
- *Conducting a check with EA with regards to it being former contaminated land to avoid risk of groundwater contamination and movement of contaminants to Middlebeck through any nearby/associated drainage of the site*
- *Further investigations to ground contamination and issue of impact on the amenity of adjoining cottages*
- *A follow up with Urban & Civic regarding access and highways comments with the Highways Authority'*

I also believe it would be incredibly useful to see proposed design plans for the proposed site.

I also refer you to the summary of site assessments below with respect to the 40 sites assessed and their viability with regard to suitability, availability and achievability. As can be clearly noted, many sites have far better assessments of all three areas than the proposed site at Former Belvoir Ironworks (North) with comparable pitch allocations.

Appendix 1: Summary of Site Assessments

GTLLA Ref	Site Address	Site Area	No. of Pitches	Suitability	Availability	Achievability
19_0001	Land at Barnby Road & Clay Lane, Newark	1.52ha	27	May be Suitable	Available	Achievable
19_0002	Land at Fen Lane, Balderton	0.93ha	2	May be Suitable	Not Available	May be Achievable
19_0003	Land at Denton Road, Balderton	1.56ha	0	Not Suitable	May be Available	Not Achievable
19_0004	Former Belvoir Ironworks (North), Newark	2.35ha	15-27	May be Suitable	May be Available	May be Achievable
19_0007	Green Park, Tolney Lane, Newark	1.24ha	10	May be Suitable	Available	Achievable
19_0008	Park View, Tolney Lane, Newark	0.39ha	13	May be Suitable	Available	Achievable
19_0009	The Old Stable Yard, North of Winthorpe Road, Newark	0.46ha	14	May be Suitable	Available	Achievable
19_0010	Land at Station Road, Collingham	5.13ha	93	May be Suitable	Available	May be Achievable
19_0011	Land adjacent Shannon Caravan Site, Ollerton	2.73ha	49	May be Suitable	Available	Achievable
19_0012	Land off Newark Road (North), Ollerton	0.3ha	0	Not Suitable	Available	May be Achievable
19_0013	Land off Newark Road (South), Ollerton	0.24ha	0	Not Suitable	Available	May be Achievable
19_0014	Land at Cottage Farm, Cross Lane, Blidworth	2.35ha	0	Not Suitable	Available	May be Achievable
19_0016	Gravelly Lane, Fiskerton	2.54ha	46	May be Suitable	May be Available	May be Achievable
19_0017	Trent Lane, Newark	1.67ha	15	May be Suitable	Not Available	Not Achievable
19_0018	Land at Chestnut Lodge, Barnby-in-the-Willows	0.39ha	20	May be Suitable	Available	Achievable
19_0019	Land at Seven Oaks, Edingley	0.13ha	0	Not Suitable	Available	Not Achievable
19_0020	Shannon Caravan Site, Ollerton	1.72ha	9	May be Suitable	Available	Achievable
19_0021	The Paddock, Ollerton	0.56ha	3	May be Suitable	Available	Achievable
19_0022	The Stables, Ollerton	0.34ha	4	May be Suitable	Available	Achievable
19_0023	Dunromin, Ollerton	0.20ha	5	May be	Available	Achievable

				Suitable		
19_0024	Greenwood, Ollerton	0.14ha	1	May be Suitable	Available	Achievable
19_0025	The Mulberries, Collingham	1.04ha	19	May be Suitable	Available	May be Achievable
19_0026	Land between Tinkers Lane and A1133, Girton	1.72ha	31	May be Suitable	Available	Achievable
19_0027	Bowers Caravan Site, Tolney Lane, Newark	0.38ha	3	May be Suitable	Available	Achievable
19_0028	Church View, Tolney Lane, Newark	1.08ha	10	May be Suitable	May be Achievable	May be Achievable
19_0029	Shannon Falls, Tolney Lane, Newark	1.04ha	19	May be Suitable	Not Available	Not Achievable
19_0030	Hose Farm, Tolney Lane, Newark	0.76ha	9	May be Suitable	Available	Achievable
19_0031	Land opposite Ropewalk Farm (Farm View), Tolney Lane, Newark	0.64ha	3	May be Suitable	Available	Achievable
19_0032	Castle View, Tolney Lane, Newark	1.26ha	0	May be Suitable	Available	Not Achievable
19_0033	Riverside Park, Tolney Lane, Newark	0.57ha	9	May be Suitable	May be Available	May be Achievable
19_0034	The Paddocks, Tolney Lane, Newark	0.32ha	3	May be Suitable	Available	Achievable
19_0035	New Paddocks & Ark Bungalow, Tolney Lane, Newark	0.18ha	0	May be Suitable	Available	Not Achievable
19_0036	Sandhill Sconce, Tolney Lane, Newark	1.31ha	11	May be Suitable	Available	Achievable
19_0037	Hirram's Paddock, Tolney Lane, Newark	2.68ha	7	May be Suitable	Available	Achievable
19_0038	Taylor's Paddock, Tolney Lane, Newark	0.03ha	1	May be Suitable	Available	Achievable
19_0039	Price's Paddock, Tolney Lane, Newark	0.19ha	1	May be Suitable	Available	Achievable
19_0040	Maryland Paddock, Tolney Lane, Newark	1.03ha	19	May be Suitable	Available	Achievable
19_0041	Ropewalk Farm, Tolney Lane, Newark	0.91ha	17	May be Suitable	May be Available	May be Achievable
19_0042	The Burrows, Tolney Lane, Newark	0.23ha	2	May be Suitable	Available	Achievable
19_0043	Land at Newark Road, Wellow	0.43ha	0	May be Suitable	Not Available	Not Achievable

(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.

Further to the above comments, many of which extracted from previous objections and concerns to the plans that have been raised before, further work and enquiries need to be undertaken to ensure that all potential issues have been addressed and can be eliminated to ensure the proposed site is viable and suitable for the traveller community.

(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.

(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:

Date: 05.11.2023

Please return this form by 5pm on 6th November 2023 to one of the addresses below:

Email: planningpolicy@newark-sherwooddc.gov.uk

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

Information is available at:
<https://www.newark-sherwooddc.gov.uk/aadm-representation/>

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Date of Receipt:

Representation No: