

MATTER 2: URBAN AREA POLICIES, SITE SELECTION, AND HOUSING SITE ALLOCATIONS

1.1 This Matter Statement is prepared on behalf of David Sparks of the Minster Veterinary Centre in relation to his land interests at Crew Lane/Fiskerton Road, Southwell. Appendix 1 includes a site location plan indicating the land subject to promotion within this Matter Statement.

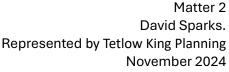
<u>Issue 2 – Site Selection</u>

IQ2.2 Is the evidence on housing need sufficiently up-to-date, having regard to any changes since 2015

- 1.2 Whilst noting that Issue 2 appears to relate to the Newark Area, it is important to highlight that there is more up-to-date evidence in relation to housing need for the Southwell Area in the form of the Southwell Housing Needs Assessment (May 2022)¹.
- 1.3 The Southwell Housing Needs Assessment (SHNA) forms part of the evidence Base to the emerging Southwell Neighbourhood Plan Review.
- 1.4 The SHNA found that data provided by the district council indicates that of the 207 homes built in Southwell since the 2011 Census, only 51 were affordable tenures, equivalent to 25%. For comparison Core Policy 1 seeks 30% provision with a 60:40 split in favour of rented tenures.
- 1.5 It also details how the supply of affordable homes has not met current demand in Southwell and that there has been a significant price growth over the last ten years with income data suggesting a large gap between the spending power of average earning households and those earning the lowest 25% of incomes, particularly where those households only have one earner.
- 1.6 The SHNA found that "the significant rise in house prices is very unlikely to have been match by growth incomes, meaning that affordability has become a huge challenge in Southwell".

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¹Authored by AECOM Infrastructure & Environment UK Limited.





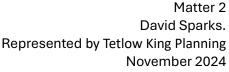
- 1.7 It goes on to set out that data suggests that Southwell requires roughly 90 units of affordable rented housing and 60 units of affordable home ownership over the Plan period (2022 to 2031). It notes that "both forms of affordable housing appear to be valuable in meeting the needs of people on various incomes".
- 1.8 The findings of the SHNA do not appear to correlate with the December 2020 Housing Needs Assessments² reporting of the Southwell sub-area which is considered further below.

IQ2.3 Are the allocations sufficient to support the need for 243 affordable homes each year across the District as set out in the December 2020 Housing Needs Assessment? Is this the most up to date evidence on affordable housing need?

- 1.9 The 2020 Housing Needs Assessment (HNA) found a need for 243 affordable homes per annum on a district-wide basis, compared to an average of just 109 built per annum over the five year period to 2018/19. The unmet future needs are more than twice the rate of delivery that has occurred to date.
- 1.10 In this context one must consider the current Plan housing target for 454 dpa which is defined within the Amended Core Strategy. The Council need a more than doubling of output of affordable housing, the main delivery driver of which is the provision of affordable homes from market housing led development, to come anywhere near to meeting identified needs and yet there is no proposed uplift in the overall Plan target to achieve this.
- 1.11 It appears inconceivable that the extent of allocations currently contained within the amended Allocations and Development Management Plan (ADMP) will be sufficient to support the need for 243 affordable homes per annum. Resultantly further allocations would be required in areas where affordability is most acute.
- 1.12 The SHNA was clear in stating that "affordability has become a huge challenge in Southwell".
- 1.13 Within the Southwell Sub-Area itself, the HNA identifies a need for 54 affordable homes per annum, comprising 32 affordable rented dpa and 22 affordable home ownership

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² Plan Review Evidence Page reference **H2**.





dpa. Over the 14 year period that the SHMA assesses (2019 to 2033) this equates to a need for 756 affordable homes in the Southwell Sub-Area.

- 1.14 When comparison is then drawn with the SHNA which found that only 51 affordable homes have been built in Southwell since 2011, the sheer scale of the affordability problem in Southwell is thrown into sharp focus.
- 1.15 Even if one were to consider the SHNA affordable housing need figures, which identify a need for at least 150 affordable homes between 2022 and 2031, equivalent to 16 affordable homes per annum there remains a substantial shortfall in delivery both now and in the future that the Plan appears unable to address at present without additional allocations in Southwell.

IQ2.4 Is the Plan sufficiently robust to enable the envisaged level of affordable housing to take place within the Plan period?

- 1.16 For Southwell the evidence indicates that the Plan as proposed is not sufficiently robust to enable the level of affordable housing to be delivered that is required to address unmet needs.
- 1.17 There are four allocations that are carried over from the previous Allocations and Development Management Development Plan Document (ADMP), with four deleted – three of which are due to the developments being completed. The remaining allocations in Southwell are as follows:

So/Ho/2 Southwell Housing Site 2 - Land south of Halloughton Road

- 45 dwellings allocation
- 15/01295/FULM residential development of 38 dwellings and conversion and extension of existing property to form 12 supported living units
- All 38 dwellings are constructed and sold: https://www.stagfield.co.uk/the-rise/

So/Ho/4 Southwell Housing Site 4 – East of Kirklington Road

- 45 dwellings allocation
- 20/01190/OTM 45 dwellings
 - Approved 1 June 2021



- o 23/01836/RMAM reserved matters application
 - Approved 6 September 2024
- So/Ho/5 Southwell Housing Site 5 Lower Kirklington Road
 - o 60 dwellings
 - 18/01363/FULM 80 dwellings
 - Application refused and appeal dismissed 10 June 2019
 - 19/01771/FULM 80 dwellings
 - Application refused and appeal dismissed 4 December 2019
 - 19/00035/DEC and 20/00001/DEC 80 dwellings
 - Application refused and appeal dismissed 11 June 2020
 - o 22/01106/FULM 64 dwellings
 - Application withdrawn 30 August 2022
 - o 23/00312/FULM 56 dwellings
 - Application refused 23 May 2023
- So/Ho/7 Southwell Housing Site 7 Southwell Depot
 - 18 dwellings
 - 17/00017/DEC 9 dwellings
 - Application refused and appeal dismissed 13 September 2017
 - 16/01304/FUL 9 dwellings
 - Application refused and appeal dismissed 4 November 2016
 - o 21/01091/FULM 13 dwellings
 - Application withdrawn 14 July 2021
- 1.18 These are allocations that have been in the Plan since its adoption in 2013 and the planning history therefore warrants further consideration. Both So/Ho/2 (38 dwellings built and sold) and So/Ho/4 (RM approved September 2024) appear to have no constraints to delivery.
- 1.19 However, the picture in respect of So/Ho/5 and So/Ho/7 is somewhat different. In respect of the former, there have been six years' worth of unsuccessful planning applications and appeals. This suggests there are considerable constraints to the deliverability of this allocation anytime soon.



- 1.20 The same applies to the latter whereby there is a seven year history of unsuccessful attempts to obtain planning permission on the site also indicating that there are significant constraints to the delivery of the allocation.
- 1.21 Notably all of these applications post-date the adoption of the ADMP in 2013 so the sites were extant allocations at the time of the applications.
- 1.22 Of the two sites that remain without planning permission So/HO/5 and So/Ho/7 the allocations provide for a total of 78 dwellings. If the Core Strategy CP1 affordable housing requirement for 30% provision were to be applied, then across the two sites this would result in a total of just 23 affordable homes.
- 1.23 In the context of which one must revisit the 2020 HNA which found a need for 54 affordable homes per annum in Southwell in the Period 2019 to 2033. A further 9 years of that Period have yet to elapse which would mean a residual unmet need for 486 affordable homes in the Southwell area. Windfall development sites are unlikely to plug this gap, largely due to the scale of the expected shortfall and the affordable policy thresholds.
- 1.24 As drafted, the Plan would deliver only 23 affordable homes in reply assuming the deliverability constraints that have plagued the Lower Kirklington Road and Southwell Depot sites for the past 6/7 years are able to finally be overcome.
- 1.25 That represents an astonishing 95% shortfall in affordable housing delivery relative to the needs identified.
- 1.26 Up to 14 affordable homes may be delivered at So/Ho/4 Southwell Housing Site 4 during the Plan period, but this would not make a discernible difference to the identified shortfall.
- 1.27 There can be little doubt that the Plan strategy for Southwell is destined to fail to meet the affordable housing needs of the area in which the Councils own evidence base reports that "affordability has become a huge challenge". The remedy must be the allocation of additional sites to redress the balance.

<u>Issue 3 – Housing Allocations – Southwell Area</u>

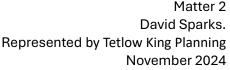
IQ2.10 (a) Is the proposed scale of housing development justified, having regard to any constraints and the provision of necessary infrastructure?



- 1.28 The apparent difficulties with the deliverability of So/HO/5 and So/Ho/7 have already been outlined earlier in this Matter Statement.
- 1.29 The scale of housing development proposed in Southwell should be increased to redress the failure to address unmet affordable housing needs.

IQ2.10 (b) Is the allocation consistent with the development strategy in the Core Strategy?

- 1.30 Amended Core Strategy Spatial Policy 2 outlines an overall Plan target for a minimum of 9,080 dwellings between 2013 and 2033. When taking into account completions and commitments at April 2016 it notes that a total of 8,806 dwellings are to be allocated by the Council over the Plan period.
- 1.31 Policy SP2 disaggregates the overall Plan target with Service Centres expected to accommodate 30% of overall growth, equating to a minimum of 2,642 dwellings across the five service centres. Southwell is expected to accommodate 10% of this, equivalent to a minimum of 264 dwellings.
- 1.32 The allocations proposed within the current adopted version of the ADMP collectively total 298 dwellings which would exceed the minimum target for Southwell. However, MU1 for 13 dwellings has been deleted as an allocation, taking the figure down to 285 and there remain considerable concerns about the deliverability of So/HO/5 and So/Ho/7 given that they have been allocated now for over 10 years and both have seen consistently been refused at application and dismissed at appeal on numerous occasions over the past 6/7 years.
- 1.33 Given the difficulties that appear to be occurring with these two allocations when the 78 dwellings they collectively are anticipated to deliver are deducted from the residual of 285 dwellings, then there would be a total of 207 dwellings against the disaggregated minimum target of 264 for Southwell.
- 1.34 This again raises the need for additional allocations to be made in Southwell to ensure not only that market housing delivery continues for the remainder of the Plan period, but also to address the acute affordable housing issues that are afflicting the town





whereby "affordability has become a huge challenge". The remedy must be the allocation of additional sites – such as our client's land - to redress the balance.

IQ2.10 (d) Are the development requirements clear and deliverable and are any further safeguards or mitigation measures necessary to achieve an acceptable form of development? Are any main modifications necessary for soundness?

- 1.35 As has been set out in more detail earlier in this Matter Statement, there can be little doubt that the Plan strategy for Southwell is destined to fail to meet the affordable housing needs of the area.
- 1.36 It is important to acknowledge that this is an area in which the Council's own evidence base reports that "affordability has become a huge challenge". The remedy to this must be the allocation of additional sites to redress the balance and ensure that the Plan is deliverable and achieves the desired outcomes.

IQ2.10 (e) Have any further permissions been granted since the Plan was submitted for Examination?

1.37 Reserved Matters consent in relation to the outline permission for 45 dwellings on So/Ho/4 was granted in September 2024

Housing Sites

Policy So/Ho/2 indicates a development of around 45 dwellings but the trajectory shows a total of 32 dwellings between 2021 and 2023, with 6 dwellings remaining in 2023/24. What is the up-to-date situation?

- 1.38 The permission obtained was for 38 dwellings and conversion and extension of existing property to form 12 supported living units. The developer's website for the scheme indicates that 38 dwellings are constructed and sold: https://www.stagfield.co.uk/the-rise/.
- 1.39 It is unclear what the current status of the conversion for 12 supported living units is, in any event the total number of units consented was 50 so the trajectory would need to be updated to reflect this.

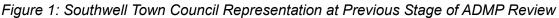


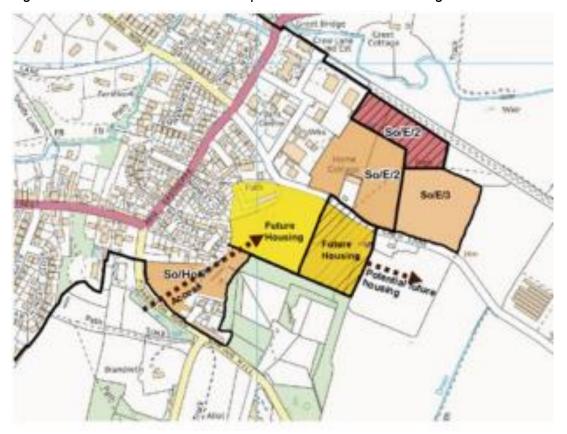
Housing Site 4

Do i. and iv. seek to achieve the same outcome? If so, is it necessary for both to form part of Policy So/Ho/4? Can the proposed development be made acceptable taking into account the various character and site constraints? What is the current status of the Southwell Neighbourhood Plan?

- 1.40 The site has the benefit of reserved matters permission for 45 dwellings obtained in September 2024 which suggests that the Council has found the form of development proposals in terms of character and site constraints to be acceptable.
- 1.41 The Southwell Neighbourhood Plan Review was subject to a period of public consultation between July and September 2023.
- 1.42 It is understood that the Town Council has recently published Regulation 16 Consultation Documents. The Reserve Site is shown in the second of the two Conservation Area Plans.
- 1.43 Its inclusion within the Neighbourhood Plan Review indicates that there remains support from the Town Council for this eastwards growth of Southwell.
- 1.44 In this context it is important to highlight the Town Council's representations that have been made previously to the District Council in respect of the ADMP which have made clear their preference for the eastwards expansion of the town south of Crew Lane for residential development, including on our clients land.







- 1.45 Notably the land identified in the emerging ADMP as So/RL/1 Reserved Land to the South of Crew Lane, is clearly identified in the Town Council representation as being allocated for residential use.
- 1.46 There appears no logical reason not to allocate this land now for residential development, rather than reserve it for consideration at the next stage of Plan making.
- 1.47 To provide some historical context to this position, Southwell Neighbourhood Plan Policy HE4 supports the development of commercial uses on Crew Lane. It sets out that if the safeguarded land for the Southwell By-pass is no longer required, then the two allocated employment sites (So/E/1 and So/E/3) be considered for residential development.
- 1.48 The Neighbourhood Plan is clear in its support for commercial development at Crew Lane and provides the flexibility to allow for the allocated employment sites to come forward for residential development if the protected route for the bypass is no longer required.



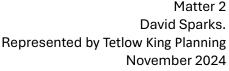
1.49 For more than 40 years Southwell Bypass was identified as a potential scheme with an estimated cost of £15m, with land safeguarded for its provision. However, in September 2016 the County Council's plans for the Bypass were scrapped through its Local Transport Plan Review with the Corporate Director Place stating that:

"The Southwell Bypass was no longer considered essential and the scheme consequently no longer scored highly on any criteria and scored low on public acceptability, affordability and value for money and likely carbon generation".

1.50 The County Council's transport team were also quoted as stating that:

"Since this scheme was last reviewed in 2011, there has also been a reduction in traffic levels through Southwell following the duelling of the A46 between Widmerpool and Newark in 2012...The A612 which runs through the town, was subsequently reduced to a C class road and the number of HGV's passing through the area has also gone down following the introduction of environmental weight restriction in 2014".

- 1.51 The opportunity now exists for alternative uses to be explored along Crew Lane in line with the clear preference of the Town Council for residential development in this part of Southwell as evidenced by their continued support through representations on the ADMP to date suggesting such allocations.
- 1.52 The Town Council's position on this could not be much clearer. They have made provision for such an eventuality through their Neighbourhood Plan and since the announcement by the County Council the Town Council have repeatedly made representations to the District Council indicating that they wish to see residential development taking place south of Crew Lane in place of the employment allocations, with commercial uses to the north of Crew Lane.
- 1.53 As the PPG sets out, the vision for neighbourhood planning is that it gives communities the power to shape the development and growth of their local areas. The elected representatives of the local community in Southwell have made it abundantly clear that they see residential growth of their local area as being in a south-easterly direction along Crew Lane, with commercial uses north of Crew Lane.
- 1.54 It is also important to note that when the site was allocated for employment uses it did not come forward and the trigger built into policy releasing it from this has been





engaged. It appears highly unlikely that the site would come forward for employment use given that it did not when it held such an allocation.

1.55 The logical conclusion is that it should be allocated for residential development now rather than kept in reserve for unknown reasons to consider in a future review. This would also help to provide greater flexibility in the Plan to enable land south of Crew Lane to come forward for residential development to remedy the deliverability problems that appear to be constraining So/Ho/5 and So/Ho/7 from delivering the homes that are needed.

Housing Site 5

Do i. and iv. seek to achieve the same outcome? If so, is it necessary for both to form part of Policy So/Ho/5? Can the proposed development be made acceptable taking into account the various character and site constraints?

- 1.56 There appear to be considerable difficulties in finding a deliverable solution to development on this allocation. It has been an allocation now for 11 years and for the past six years has had a succession of refused applications and dismissed appeals.
- 1.57 The planning history suggests that there are question marks over the deliverability of this site anytime soon.
- 1.58 To ensure the continued supply of new homes to help to alleviate the acute affordable housing problems afflicting Southwell, it is considered necessary for additional residential allocations to be made at Southwell.

Housing Site 7

Policy So/Ho/7 refers to around 18 dwellings whilst the trajectory shows 15 dwellings to be completed in 2031-2033. Does either the policy or trajectory need to be revised? Are there particular issues on this site that mean it will not come forward until later in the Plan period?

1.59 Given the planning history of the Southwell Depot site it is unclear on what basis the allocation has been revised upwards in terms of unit numbers, given that there appear to be deliverability issues with the site as there have been a series of refused application and dismissed appeals and most recently a withdrawn application on the site.





1.60 To ensure the continued supply of new homes to help to alleviate the acute affordable housing problems afflicting Southwell, it is considered necessary for additional residential allocations to be made at Southwell.

Other Matters – Proposed allocation for residential development on land South of Crew Lane

- 1.61 Our client, David Sparks, owns the Minster Veterinary Centre which is a well-established and trusted local employer who have concerns about the challenges facing Southwell and the rural economy, particularly in terms of skills, employment, housing and the future of Southwell as a place to work, live and visit.
- 1.62 The Minster Veterinary Centre has grown into a successful practice in six locations in the North of Nottinghamshire. As a practice it already works with a range of partners to deliver training and practical animal veterinary services to the domestic, farming and equine markets but has the opportunity to develop further. It currently employs 140 staff and serves farm, equine and small animal clients across the county and beyond.
- 1.63 The landowner has a long-term commitment to Southwell and its continued prosperity and growth. Through their successful veterinary practices, they have come to recognise the importance of education in supporting future generations of livestock and animal owners. As a local landowner and businessman our client is willing to invest his land in the future of the town. Their vision is to facilitate the development of housing on his land to unlock finance to invest in a new small animal hospital facility to further expand his existing business at the Minster Veterinary Centre
- 1.64 As a local resident and business owner with a vested interest in the future of Southwell the landowner has an ambition to maximise the community benefit of the site and therefore, subject to detailed viability testing and other obligations sought, aim to provide a policy compliant 30% affordable housing offer, together with 5% self-build and custom housebuilding plots.

Highways, Access and Transportation

1.65 The Nottinghamshire County Council 6C's Design Guide states that a 'residential access road' with a carriageway width of 5.5 metres can serve up to 400 dwellings, but with 'normally no more than 150 from a single point of access. The 6C's Design Guide



also states that a wider 6.75m 'major residential access road' can serve up to 1,000 dwellings with normally no more than 400 dwellings from a single point of access.

- 1.66 Our clients overall land ownership has direct frontage to two public highways, namely Fiskerton Road and Crew Lane. Either could provide access to the proposed site, although it's acknowledged that they have different characteristics and would require different forms of mitigation as part of the site development.
- 1.67 To be clear, it is only the area identified as 'potential future housing' by the Town Council and hatched red in figure 2 below for which our client is seeking any allocation at this stage of the Plan Review process.



Map 6 - Southwell Proposals Key

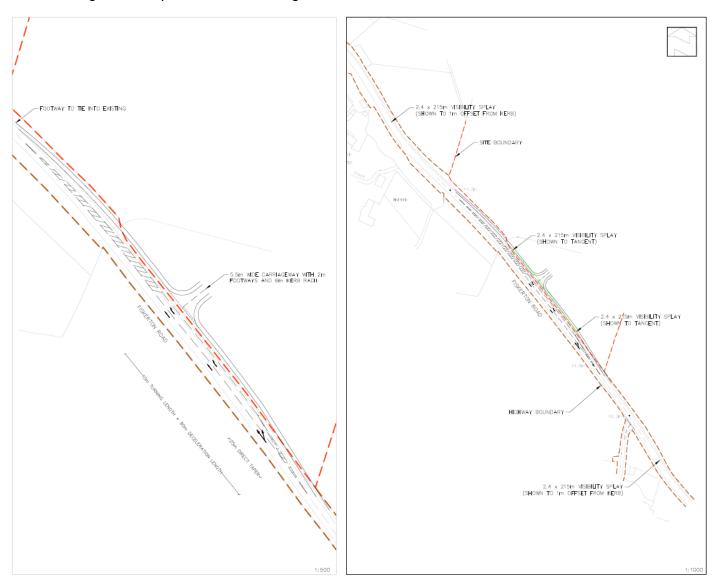
Figure 2: Potential Housing Allocation South of Crew Lane

1.68 The Fiskerton Road frontage is capable of accommodating access with sufficient visibility splays to accommodate development. ADC Infrastructure have prepared details of potential site access arrangements from Fiskerton Road, comprising of a simple priority-controlled T-junction with ghost island right turn lane.



- 1.69 The site access carriageways shown by ADC Infrastructure illustrate that it is possible to provide carriageways measuring 5.5 metres in width or 6.75 metres and include 10 metres kerb radii.
- 1.70 It would be anticipated that localised widening on Fiskerton Road would be required to accommodate the right turn lane with the length of the lane and tapers designed in accordance with the requirements for a road with a 60 mph speed limit.
- 1.71 A road with a 60 mph speed limit requires visibility splays of 2.4 x 2.15 metres. These splays could be accommodated within highways land and land forming part of the proposed development site. They would therefore be cleared and kept free of obstructions.

Figure 3: Proposed Access Arrangements from Fiskerton Road





- 1.72 The proposed access junction shown at figure 3 would be designed to the relevant standards and with appropriate visibility splays enabling safe and suitable access to the site and for its connection to the wider highway network.
- 1.73 Access may also be provided from Crew Lane subject to localised highway upgrade works. Whilst Crew Lane is currently a rural road with a carriageway measuring around 3 metres wide with grass verges either side, shallow drainage ditches and boundary hedges, it is considered that a suitable highways access arrangement would be achievable.
- 1.74 The guidelines for providing for journeys on foot describes acceptable walking distances for commuters, where up to 500 metres is the desirable walking distance, up to 1,000 metres is an acceptable walking distances, and up to 2,000 metres is the preferred maximum walking distance.
- 1.75 Figure 4 shows the pedestrian catchment area based upon a 2,000 metre walking distance from the centre of the site. The catchment area covers most of Southwell and the associated facilities, including The Minster School (1.9 km), Southwell Leisure Centre (1.9 km), Southwell Medical Centre (1.9 km), veterinary centre (600 metres) and Southwell Garden Centre (120 metres).



Figure 4: Pedestrian Journeys on Foot

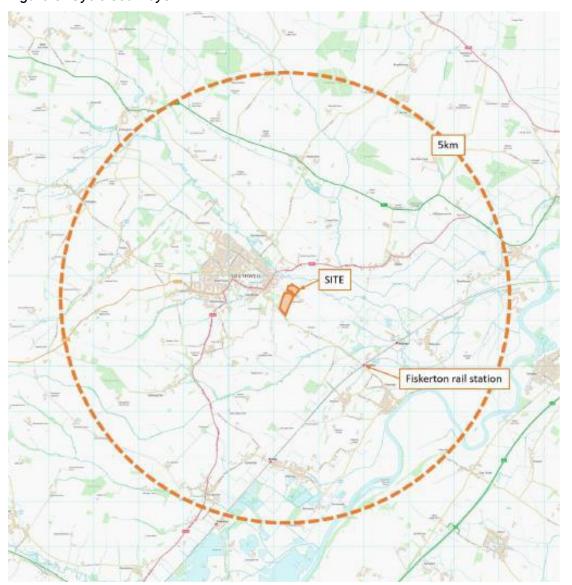
Source: ADC Infrastructure Site Appraisal (2017)



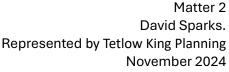
- 1.76 With regards to pedestrian infrastructure, there is a footway on the northern side of Fiskerton Road that connects to the existing footway network in Southwell linking the site with the local amenities throughout the town. These amenities include a range of schools, a health centre, a leisure centre, a veterinary practice and a garden centre. The site is also well connected with the centre of the town, being around 1,500 metres walking distance, which provides local services and facilities including pubs, hotels and restaurants.
- 1.77 Development of the site could take access from Fiskerton Road, and footways would be provided throughout the development which would connect to existing infrastructure. A pedestrian route could also be provided on to Crew Lane. Hence, a continuous link could be provided between the site and the centre of Southwell. Therefore, residents of the development would be able to walk to places of employment and also access the services and facilities available in Southwell. As such the site does not suffer from poor connectivity or sustainability for pedestrians.
- 1.78 In terms of cycle travel, cyclists are typically prepared to cycle up to 5 km for nonleisure journeys such as those to school or work. Figure 5 shows the cycle catchment area based on a 5 km distance from the centre of the site. It covers all of Southwell, and the neighbouring villages of Fiskerton, Rolleston, Bleasby, Upton, Thurgarton and Morton.



Figure 5: Cycle Journeys



- 1.79 Although there are no dedicated cycle routes in the vicinity of the site, many of the roads in Southwell are lightly trafficked and residential in nature. Hence, there are no physical barriers to prevent cycle travel to and from the proposed site. The proposed development could provide new cycle routes between Crew Lane and Fiskerton Road which would comply with the requirements of Neighbourhood Plan Policy TA1.
- 1.80 The 6C's Design Guide states that "generally walking distances to bus stops in urban areas should be a maximum of 400m and desirable no more than 250m. In rural areas the walking distance should not be more than 800m."





- 1.81 The nearest bus stops to the site are located on Fiskerton Road and the A612 Easthorpe Road with these stops comprising of flag and poles with timetable information. These are located within 800 metres of the site.
- 1.82 Fiskerton Railway Station is located approximately 2 km east of the site and accessed via Fiskerton Road therefore within recommended walking distance. The station is operated by East Midlands Trains and services are available to Lincoln, Newark, Nottingham, Loughborough, Leicester and St Pancras International as well as the more local stations such as Rolleston and Bleasby.
- 1.83 The TRICS database has been utilised to undertake capacity assessments at the following junctions:
 - A612/Church Street priority-controlled junction;
 - A612 Church Street/Market Place mini roundabout;
 - A612 Westgate/Nottingham Road T-junction; and
 - A612/Newark Road/Crew Lane priority controlled staggered crossroad junction.
- 1.84 At the A612/Church Street priority-controlled T-junction there is not an accident problem and as traffic volumes would not materially alter then there would not be an adverse impact on the local highway network arising from the proposed development.
- 1.85 At the A612 Church Street/Market Place mini-roundabout there would be a relatively modest increase in traffic movements but these additional flows at the junction are not likely to have a severe impact when added to the existing scenario.
- 1.86 The A612/B6396 Westgate/Nottingham Road T-junction is unlikely to be adversely affected by the proposed development of the site.
- 1.87 At the A612/Newark Road T-junction a moderate increase is anticipated but given that around 40% of this would route straight through the junction to and from Upton the development of the site would not adversely impact upon this junction.
- 1.88 The proposed development would retain the localised public rights of way and seek to enhance them by integrating them within the site masterplan layout. This would meet the requirements of Neighbourhood Plan Policy E4.



Utilities

- 1.89 Record drawings obtained from National Grid Gas show a medium pressure gas main running along Racecourse Road and an intermediate pressure main along part of Crew Lane and along the site boundary between Crew Lane and Fiskerton Road. Low pressure mains are shown in Fiskerton Road and the roads on the eastern fringe of Southwell.
- 1.90 The proximity of the strategic, intermediate and medium pressure gas mains suggests that providing gas infrastructure to serve the site should be feasible without undue difficulty.
- 1.91 Record drawings obtained from Severn Trent Water show a three inch diameter water main in the south verge of Crew Lane and a six inch diameter water main in the carriageway of Fiskerton Road.
- 1.92 Record drawings obtained from Western Power Distribution show high voltage overhead cables crossing the site just north of and approximately parallel to Crew Lane (11kv cables) and also the northern extremity of the site adjacent to Racecourse Road (33kv cables). A substation is present on Crew Lane and the cables appear to emanate from this. This sub-station is clearly significant in the local electricity supply infrastructure and may have capacity to serve the site.

<u>Flooding</u>

- 1.93 Our clients land interests to the south of Crew Lane are unconstrained by flood risk. Nonetheless in order to ensure that development of the site would not result in any unacceptable flood risk impacts to the surrounding area, it is proposed that Sustainable Drainage Systems would be incorporated into the drainage design.
- 1.94 Consideration would also be given to any Local Drainage Designations within Southwell which would ensure compliance with Core Policy 9 and Core Policy 10A and Neighbourhood Plan Policy E2.
- 1.95 Neighbourhood Plan Policy E1 requires a Flood Risk Assessment (FRA) to take account of the most up to date Environment Agency flood mapping. The site is not unduly constrained by flood risk, although an outline or detailed application would be





accompanied by an FRA to provide more detailed evidence of this and ensure compliance with policy E1.

Landscape and Visual Impact

- 1.96 The Main Open Area Review (July 2011) which forms part of the evidence base of the adopted Plan does not include the proposed site as an area to be retained nor an area to be added.
- 1.97 As illustrated by the Council's Policies Map and Southwell Neighbourhood Plan Proposals Map B, the proposed site does not fall within the Southwell Protected Views cones, nor does it fall immediately within the Workhouse immediate setting.
- 1.98 Policy SoAP1 seeks to protect the Southwell Conservation Area. The proposed site is sufficiently detached from the Conservation Area that it is considered it will not negatively impact upon its significance.
- 1.99 Policy SoAP1 and So/PV seek to protect and enhance the setting of Southwell, including the Workhouse. The protection for the Workhouse and its immediate setting is covered in more detail through Policy So/Wh. The proposed development does not fall within any of the view cones and compliance with these Policies as well as Core Policy 13 could be achieved.

Heritage Impacts

1.100 The proposed site is sufficiently detached from the Southwell Conservation Area to have no impact upon its significance as illustrated by figure 6 below.



Figure 6: Southwell Conservation Area



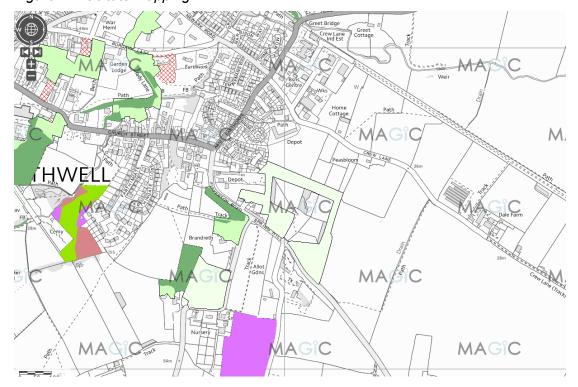
Source: https://maps.nottinghamcity.gov.uk/insightmapping/#

Ecology

1.101 Data taken from Magic Map indicates that there are no habitats of note within the proposed site as illustrated by figure 7.



Figure 7: Habitats Mapping



Source: https://magic.defra.gov.uk/MagicMap.aspx

- 1.102 The mapping data also indicates that the site is not constrained by any European Protected Species.
- 1.103 The Nottinghamshire Insight Mapping system³ indicates that the site is unconstrained by Local Wildlife Sites, existing or proposed Local Nature Reserves, national Nature Reserves, Specials Areas of Conservation, Sites of Special Scientific Interest or any Tree Preservation Orders.
- 1.104 It is intended that development proposals will be informed by a Phase 1 Habitat Survey in the first instance. Should this identify any ecological matters which require further action then a suitable mitigation strategy would be developed and incorporated into the development proposals in order to meet the requirements of Core Policy 12

Archaeology

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³ https://maps.nottinghamcity.gov.uk/insightmapping/#



1.105 The site is not known to be of any archaeological significance. It is proposed that a desktop based archaeological investigation would accompany an outline or detailed application for development proposals on the site.

Ground Investigation

1.106 There are no known former uses considered likely to lead to contaminants being present within the ground of the proposed site. It is proposed that a site investigation report would accompany an outline or detailed application for development proposals on the site.

Potential future eastwards growth of Southwell

1.107 Figure 8 provides an illustration of how the proposed site could link with So/RL/1 to the west and has the potential for a further future phases of residential and employment uses north of Crew Lane providing linkages to So/E/2.



Figure 8: Illustration of the potential for future eastwards growth of Southwell along Crew Lane





Conclusion

- 1.108 This statement has identified that the district housing target is insufficient to deliver the sufficient affordable homes to meet the identified need, an uplift in the number of homes targeted by the Plan is required.
- 1.109 This is also the case in Southwell, where 54 affordable homes are required per annum over the Plan period. The past delivery of affordable homes in Southwell evidences the scale of this challenge, and unfortunately the Plan as currently drafted would fail to redress this issue.
- 1.110 Specifically, the allocations identified in Southwell would result in a significant shortfall in affordable housing delivery relative to the identified need. The only remedy to this issue is to allocate additional sites to redress the balance: the scale of housing development proposed in Southwell should be increased to redress the failure to address unmet affordable housing needs.
- 1.111 There are opportunities to allocate further land for residential development in Southwell, including our client's land, as indicated in Appendix 1, and the reserved land at So/RL/1 Reserved Land to the south of Crew Lane. The Plan should be revised to accommodate the allocation of our client's land.



APPENDIX 1:

Site Location Plan

Land edged red = land subject to promotion

Land edged blue = further land within Mr Spark's control

