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Our Reference : 875.814
Your Reference :
Date : 21 December 2018



Mr P Whitehead
Examiner
c/o Intelligent Plans and Examinations (IPE) Ltd
Regency Offices
37 Gay Street
Bath
BA1 2NT

By email

Dear Mr Whitehead

Keyworth Neighbourhood Plan Examination

I refer to your letter dated 15 December 2017 and your request for the Borough Council to provide further information regarding the evolution of its Local Plan Part 2 housing strategy in relation to that of the Neighbourhood Plan and the reasoning behind the variation in the choice of sites between the two plans.

The Borough Council's choice of proposed housing allocations at Keyworth, as set out in its Preferred Housing Sites consultation document, is based on evidence prepared by and for the Borough Council. This includes the Borough Council's Green Belt Review and landscape assessment work. While the Borough Council was aware of and took into account the Neighbourhood Plan's recommended sites, its choice of proposed housing allocations was ultimately decided independently of the Neighbourhood Plan; albeit that three of the proposed allocations happen to accord with those sites recommended for allocation by the Neighbourhood Plan.

As you have highlighted, the Borough Council has identified a fourth proposed housing allocation at Hillside Farm to the south of Bunny Lane, which is not a site recommended for allocation by Parish Council through the Neighbourhood Plan. The reason why this site was chosen as part of proposals for the delivery of around 580 homes at Keyworth over the plan period, rather than the site to the north of Debdale Lane which the Neighbourhood Plan recommends as safeguarded land, is because it is the Borough Council's view based on its own evidence that the former site is more suitable for removal from the Green Belt and development for housing.

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9am - 1pm

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While there is this variance in approach between the two plans, the Borough Council considered it both unnecessary and inappropriate to object to the Neighbourhood Plan or to suggest that it be should be amended in this respect. The main reason is because the Neighbourhood Plan will not itself allocate any of the sites for housing development – none are now specifically listed as allocations in Policy H1 of the Neighbourhood Plan. Instead, the Parish Council has simply used the Neighbourhood Plan (at Appendix 3) as a means to recommend to the Borough Council that certain sites be allocated through the Local Plan process. Ultimately, these recommendations do not predetermine proposals within the Local Plan. Furthermore, it will be for the Local Plan process and its examination, and not the Neighbourhood Plan process and its examination, to consider the suitability for development of potential sites surrounding Keyworth which are currently located within the Green Belt. To be allocated or safeguarded for development, sites will need to be removed from the Green Belt and, as the National Planning Policy Framework (paragraph 83) makes clear, Green Belt boundaries can only be altered through the preparation or review of the Local Plan.

Overall, therefore, it is the Borough Council's view that the variance that exists between the two plans in respect of the land at Hillside Farm and to the north of Debdale Lane does not cause any harm or potential for conflict. Furthermore, it is considered that it would be out of place for the Borough Council to dictate to the Parish Council which sites it should or should not recommend for inclusion in the Borough Council's Local Plan.

May I suggest, however, that if you have any remaining concerns in respect of the status of the recommended housing allocations/safeguarded land in the Neighbourhood Plan and feel that it is not clear that they will not specifically form part of the development plan at the point the Neighbourhood Plan is adopted ("made"), then the Borough Council would be more than willing to suggest to you changes to the wording of the Neighbourhood Plan in order to, hopefully, clarify matters.

Yours sincerely



Richard Mapletoft
Planning Policy Manager

CC: Mrs D Cooke, Parish Clerk, Keyworth Parish Council