

Greater Nottingham - Broxtowe Borough, Gedling Borough and Nottingham City Aligned Core Strategies Publication Version June 2012

Response of **Linby Parish Council & Papplewick Parish Council** to
Inspector's Matters, Issues and Questions

MATTER 2: THE SPATIAL STRATEGY AND HOUSING POLICY **(Q. 2, 3, 5, 6, 11, 12, 23, 24 & 25)**

Background

- .1 The representations made here, which build on earlier representations made to the Broxtowe Borough, Gedling Borough and Nottingham City Aligned Core Strategies on behalf of Linby Parish Council & Papplewick Parish Council (“the Parish Councils”) are made specifically in respect of the policies and proposals relating to Gedling Borough, unless otherwise stated.

Question 2

Response

- .2 Nottingham City is one of the eight Core Cities in England, serving as a strategic centre attracting people from a wide catchment area. Policy 2 of the ACS¹ states that **sustainable development** in the plan area will be **achieved** through a strategy of **urban concentration with regeneration**. Most development will therefore be located in or adjoining the built up area of Nottingham. Development adjacent to Hucknall is aimed at regenerating and supporting its role as a sub-regional centre and not the role of Nottingham as a Core City.
- .3 Policy 2 of the ACS is not consistent with Nottingham's Core City status in respect of the proposed allocation of two SUE's in Gedling Borough, adjacent to Hucknall.
- .4 Of the 7,250 houses to be built in GBC up to 2028, only 2,840 are proposed to be built in or adjoining the existing built up area of Nottingham [Policy 2(3)(a)]. This accounts for only 39% of all dwellings to be built in Gedling Borough. This is a disproportionate amount of growth outside of the PUA of Nottingham.
- .5 Policy 2 is also inconsistent with Nottingham's Core City status insofar as it actively promotes the development of Top Wighay Farm and land North of Papplewick Lane (comprising greenfield land on the periphery of Gedling Borough) as a priority over and above more sustainable sites within and on the periphery of the Nottingham PUA. Accordingly, contrary to the strategy of urban concentration with regeneration, the two SUE sites (comprising 1,600 dwellings in total + 9 hectares of employment land) are expected to begin to deliver housing within the first five years from the adoption of the

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ACS. Ironically, the more sustainable sites (particularly in NCC) are planned to start beyond five years.

- .6 For these reasons, the ACS fails to achieve sustainable development through a strategy of urban concentration with regeneration. This approach is not consistent with Nottingham's Core City status. The ACS is unsound on this basis.

Question 3(b)

Response

- .7 Policy 2 makes no reference to the development needs and aspirations of the other local authorities that comprise the Housing Market Area (HMA) but are not included in the ACS. There is a potential flaw here because it is not clear what allowances have been made for the likely contribution of other local authorities to meeting overall housing need. The Parish Councils are aware that Rushcliffe Borough Council has already halted its progress on its own Core Strategy due to concerns over its housing targets. It is also unclear what the implications of ADC's housing proposals are on housing provision in Hucknall.
- .8 There is also a concern that the housing figures currently within the ACS have not kept abreast of housing starts, completions and approvals within the plan area.
- .9 By way of an example, in respect of GBC, the ACS sets a target of 7,250 new homes to be built between 1 April 2011 and 31 March 2028. Taking account of new homes already built as of March 2013 (520 dwellings), this leaves 6,748 new homes to be provided for over the plan period. As of 31 March 2013, there are 1,407 dwellings with planning permission and 341 dwellings are currently being built (1,748 dwellings in total). This leaves 5,000 new dwellings to be provided for between now and 2028. GBC is currently considering live applications that, if approved, would introduce a further 930 dwellings. Of this figure, Teal Close accounts for 830 dwellings.
- .10 It is clear from the above that a significant proportion of the overall housing provision for Gedling Borough has already been provided for. If the Teal Close application is approved (decision expected in October 2013), then this would leave a residual requirement of 4,170 dwellings to be built between now and 2028. Clearly, in circumstances where GBC is proposing to release greenfield sites in the countryside (that would if not safeguarded also be within the Green Belt) to meet demand over the plan period, it is crucial that the housing situation as it stands at the point of adoption of the ACS is accurate and up to date.

Question 5

Response

- .11 Policy 2 does not define the settlement hierarchy appropriately in relation to the strategy of urban concentration with regeneration.
- .12 Although no longer part of the development plan, the former East Midlands Regional Plan (EMRP) continues to provide an important context for the policies and proposals in

the ACS and it continues to form a material consideration in the assessment of the soundness of the ACS. *EMRP Policy 3 (Distribution of New Development)* set out a sequential approach to the distribution of housing development starting with **a)** development concentrated **in and adjoining** the Nottingham PUA; **b)** significant levels of new development in Corby, Kettering and Wellingborough; **c)** appropriate development of a lesser scale located **in** the Sub-Regional Centre of Hucknall (in addition to other Sub-Regional Centres); and **d)** the development needs of other settlements and rural areas.

- .13 It is clear from the above that housing development should principally be directed towards the Nottingham PUA, with lesser scale development located *within* Hucknall (interestingly the policy does not refer to sites *adjacent* to Hucknall in this respect).
- .14 At para 3.2.4, the ACS states that the concentration of development in or adjoining the main built up areas of Nottingham **applies across the plan area**, rather than to individual Council areas.
- .15 Notwithstanding the above, the settlement hierarchy as set out in Policy 2 promotes growth in the main built up area of Nottingham, followed by growth *adjacent* to Hucknall. This approach to the distribution of development is inconsistent with the former EMRP.
- .16 Moreover, there should be much greater focus on the development of brownfield sites and sites in need of regeneration as a priority over greenfield sites in the open countryside to ensure that Policy 2 accords with the spatial strategy of urban concentration with regeneration. The simple objective here is that brownfield sites within and adjacent to urban areas and sites in need of regeneration should be developed before other, less sustainable, sites.

Question 6

Response

- .17 The distribution (and phasing) of sites in the ACS is not consistent with the strategy of urban concentration with regeneration and it is evidentially not a sustainable strategy for the growth of the plan area.
- .18 Whilst the strategy for growth in the ACS was carried forward from the EMRP, the spatial approach to growth and the distribution of new development in the EMRP remains consistent with the NPPF. *Policy 3 (Distribution of New Development)* of the EMRP set out a sequential approach to the distribution of housing development based on the most sustainable form of development for the plan area. This placed emphasis on urban concentration with regeneration and the development of brownfield sites first.
- .19 The distribution of sites as set out in Policy 2 of the ACS is clearly at odds with the strategy of urban concentration with regeneration. The policy gives no priority to the redevelopment of brownfield sites, whether in the main built up area of Nottingham, in Hucknall or in the key settlements identified for growth. Instead, the policy proposes the development of greenfield sites in the open countryside/Green Belt before the development of other (inherently more sustainable) sites in the plan area. Despite the

revocation of the EMRP, there is no justification for this change in policy approach and it is contrary to the NPPF.

- .20 For the above reasons, the ACS would result in an unsustainable strategy and it is therefore profoundly unsound on this basis.

Question 11

Response

- .21 The Parish Councils have serious reservations about the delivery of some of the sites listed in paragraph 3.2.13 of the ACS and in particular, the amount of housing envisaged at Top Wighay Farm and land North of Papplewick Lane.
- .22 Part of the Top Wighay Farm site was allocated for development in the Gedling Borough Replacement Local Plan (July 2005) but notwithstanding this, development has not occurred. The Parish Councils are of the opinion that this is due, in part, to **inherent constraints on these sites** including the provisional Special Protection Area designation, ecology (including the presence of a SSSI), landscape quality and high grade 2 agricultural land, the road and transport infrastructure, heritage assets including the setting of the conservation villages of Linby and Papplewick and listed buildings and structures, and the infrastructure capacity of Hucknall to accommodate development on this scale. The implications of the above development constraints inherently impact upon the deliverability of the new housing development envisaged at Top Wighay Farm.
- .23 In the case of both Top Wighay Farm and land North of Papplewick Lane, it is the case that a realistic density of development on the developable parts of the sites would result in far fewer than the 1,000 and 600 dwellings envisaged, which is based on an unrealistic density of 50dph. Not only are there inherent constraints that reduce the developable parts of the sites (including flood risk issues at land North of Papplewick Lane), but development on this scale would be out of keeping with the sites' rural location.
- .24 With regard to the Gedling Colliery/Chase Farm site, at present this is merely included in the ACS as an "*area of future housing development*" with apparently no realistic opportunity for its development within the plan period (as a result of funding issues with the Gedling Access Road) [3.2.24]. On this basis, no housing numbers are attributed to the site and no timescales set out for its planned development.
- .25 However, significant recent developments regarding the funding and as a result the deliverability of the Gedling Access Road within the plan period have changed matters profoundly. It has recently been confirmed by GBC (in a letter to its own Councillors dated 10 September 2013) that the necessary funding for the Gedling Access Road has now been secured and as a result "*there is now a real prospect that the road will be built...and the likelihood of the Gedling Colliery site being regenerated, with the new housing and employment opportunities this offers*". **I attach a copy of this letter to form Appendix A.**
- .26 This new evidence clearly has major implications on the spatial strategy for growth in Gedling, despite GBC's comment within the letter that the "*potential to develop the*

Gedling Colliery site does not change the position with regard to our Core Strategy". The Parish Councils are of the opinion that it inherently changes the position of the Core Strategy, particularly in respect of the distribution and phasing of sites to be developed within Gedling Borough.

- .27 The Parish Councils are also aware that part of the site is highly likely to be deliverable within the first five years of the plan period. We are aware that discussions have already taken place with public bodies and the Homes and Communities Agency with regards to the development of the site and an application for (part of) the Gedling Access Road is currently being considered by GBC. If the application is successful, it is predicted that a developer would be in a position to submit a planning application for 300 dwellings on part of the site in 2014/2015. The development of the remainder of the site, with funding now secured, is likely to follow thereon after.
- .28 In the above connection, it should be noted that the Gedling Colliery/Chase Farm site is capable of accommodating approximately 1,120 dwellings, with a further 800 dwellings capable of being built on the Mapperley Golf Course Site which appears in the SHLAA.
- .29 As a result of the above, Policy 2 needs to be wholly revisited in respect of the distribution and phasing of development in Gedling Borough as in its present form it is unsound and would result in an inequitable amount of development taking place on greenfield sites in the countryside in favour of brownfield sites within the main built up area of Nottingham.

Question 12

Response

- .30 The allowances for windfall sites in Gedling Borough are neither reasonable nor justified.
- .31 The NPPF (paragraph 48) advises local planning authorities that they may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to historic windfall delivery rates and expected future trends, and should not include residential gardens.
- .32 In its housing trajectory for the next 15 years, GBC has a windfall allowance of just 40 dwellings per year in the last five years of the plan period (2023 to 2028), which equates to 200 dwellings in total. There is no windfall allowance for the first 10 years of the plan period for reasons that *'sites with potential to be developed in that period have largely been identified through the annual assessment of potential housing sites.'* (Source: Gedling BC website – Frequently Asked Questions, Aligned Core Strategy).
- .33 Taking account of past windfall rates in GBC, between 2002 and 2012, **2,501 dwellings** have been built on windfall sites during this ten-year period. This equates to 250 dwellings per year on average. We are aware that within the first half of this year (January to June 2013), 30 dwellings have been built on windfall sites. The windfall allowance for GBC of 40 dwellings per year [table on page 195] is not therefore reasonable or justified in relation to past windfall rates.

- .34 It is considered that the windfall allowance should be increased in line with past trends and consideration given to including a windfall allowance within the first ten years of the plan period.

Questions 23 to 25

Response

- .35 The proposed SUE sites in GBC and named in Policy 2 are evidentially not the best options for growth. Indeed, they “*fly in the face*” of the spatial strategy of urban concentration with regeneration and are contrary to the spatial vision and spatial objectives of the ACS.
- .36 Paragraphs 3.2.23 to 3.2.26 of the ACS set out the aims of the spatial strategy in respect of Gedling Borough. We are informed that GBC remains committed to the long-term policy of urban concentration with regeneration and development to be focused in the most sustainable locations to support Nottingham’s Core City status. We are also informed that as much housing as is feasible has been located within and adjoining the Nottingham urban area [3.2.23] and that the development strategy will support the development of key regeneration sites in Gedling.
- .37 Notwithstanding that Gedling Borough embraces the large built-up suburbs of Arnold and Carlton that form part of the Nottingham Principal Urban Area (PUA), there are no strategic housing allocation sites proposed either within or adjacent to the PUA. Whilst the Gedling Colliery/Chase Farm site *is* within the PUA, it is only identified as an ‘*area of future housing development*’ with no housing numbers or timescales attributed to its development.
- .38 The two SUE sites of Top Wighay Farm and land North of Papplewick Lane are both located some distance from the periphery of the PUA (approx. 15km from Nottingham City Centre) and comprise greenfield sites within open countryside/Green Belt. They do not constitute brownfield land or land in need of regeneration. The sites do not have “*excellent connectivity*” to the Nottingham Principal Urban Area and they do not make the best use of existing infrastructure. All of the land North of Papplewick Lane and part of the Top Wighay site is safeguarded **from** development. Whilst their allocation is *supposed* to provide for the development needs of Gedling Borough (and not Ashfield) and to assist Nottingham’s Core City status, the sites are in a peripheral location in Gedling Borough and (although adjacent to Hucknall) they are not contiguous with the main urban area of Nottingham.
- .39 The sites are however located close to and within the wider setting of the conservation villages of Linby and Papplewick, two of only six conservation villages in Gedling Borough, and they contain a large number of listed buildings and structures. The development of the sites will significantly erode the area’s intrinsic natural and historic value. The new communities created in these locations will not support the populous of the plan area and will not support the role of Nottingham as a Core City.
- .40 The proposed allocation of these two sites adjacent to Hucknall with no strategic allocation within or adjoining the main built up area of Nottingham is in clear conflict with

the spatial strategy of urban concentration with regeneration and the spatial vision and spatial objectives for the plan area.

- .41 The spatial distribution of growth in Gedling is also inconsistent with the vision and priorities of the Gedling Borough Sustainable Community Strategy (SCS), which seeks to create a friendly place where people make a positive contribution to and feel part of their local community. The SCS spatial vision makes it clear that the two SUE sites at Top Wighay Farm and land North of Papplewick Lane will contribute and be well integrated into Hucknall (and significantly not to the communities in Gedling). Moreover, ADC is of the opinion that the development of these sites would undermine its own objectives for the regeneration of Hucknall.
- .42 The above demonstrates that the proposed allocation of the two SUE sites at Top Wighay Farm and land North of Papplewick Lane are evidentially not the best options for growth. Policy 2 does not provide a sound basis for planning the area up to 2028.
- .43 The proposed approach to the distribution of housing development within Gedling Borough also conflicts with policies within the former EMRP. Whilst the EMRP is now revoked and there is no legal requirement for the ACS to accord with its provisions, it nonetheless provided (and continues to provide) useful background information that sets out the context for the preparation of the ACS.
- .44 The EMRP at paragraph 2.2.1 (relating to the distribution of new development) advised that urban renaissance is the key to achieving a more sustainable pattern of development because most people already live in urban areas that offer the greatest opportunity to ensure that homes, jobs and services are related to one another and hence maximise accessibility. The concentration of development also supports the efficient use of resources by reducing the need to travel longer distances, securing a more efficient use of existing and new infrastructure and services, conserving the countryside and high grade agricultural land and making use of previously developed land and buildings.
- .45 This approach was reflected in *EMRP Policy 3 (Distribution of New Development)* that set out a sequential approach to the distribution of housing development (see para 1.12). Housing development should principally be directed towards the Nottingham PUA, with lesser scale development located *within* Hucknall (interestingly the policy does not refer to sites *adjacent* to Hucknall in this respect).
- .46 The above approach was also reflected in *EMRP Policy 12 (Development in the Three Cities Sub-Area)* which stated that development should support the continued growth and regeneration of Nottingham and maintain and strengthen its economic, commercial and cultural roles. Outside Nottingham, housing development should be located within and adjoining settlements and be in scale with the size of the settlement, in locations that respect environmental constraints and where there are good public transport linkages.
- .47 The spatial approach to the distribution of development within the ACS of urban concentration with regeneration is in our view sound and accords with the advice in the NPPF and the objectives of the former EMRP. However, this spatial approach is not reflected in the strategic housing allocations proposed within Gedling Borough.

- .48 The EMRP set out regional priorities for the release of land for housing. *EMRP Policy 17 (Regional Priorities for Managing the Release of Land for Housing)* stated that local authorities should work across administrative boundaries in all of the Region's Housing Market Areas (HMAs) to ensure that the release of sites is managed to achieve a sustainable pattern of development. Local development frameworks should contain policies to manage the release of housing across both local planning authority areas and the wider HMA area. To achieve this, within the Nottingham Core HMA and Hucknall, joint development plan documents will be expected, with the development of joint Core Strategies across the HMAs particularly encouraged. In the supporting text to the policy, paragraph 3.1.24 stated that phasing policies in the Local Development Frameworks in the Nottingham Core HMA and Hucknall should contain reference to the monitoring of housing delivery across the Housing Market Area and to the release of later phases of development in that context. Co-operation and joint working will be necessary to ensure that the release of sites is managed to achieve a sustainable pattern of development. Similarly, at paragraph 4.2.30, we were informed that in the Nottingham Core Housing Market Area and Hucknall, further work on identifying the precise scale of urban extension is required. Based on the evidence from the sustainable urban extensions study, the six local planning authorities in this area should identify both the precise scale and location of sustainable urban extensions.
- .49 Within the above context, ADC has raised a formal objection to the ACS on the basis of the two proposed SUE sites at Top Wighay Farm and land North of Papplewick Lane. Given the requirements of the NPPF (and the former EMRP) for cross-boundary co-operation and the duty to co-operate, it is important to understand the basis for these objections, which are shared by the Parish Councils.
- .50 ADC is of the opinion that the two SUE sites are inappropriate for reasons that they comprise a) disproportionate growth outside the Nottingham PUA; b) disproportionate growth for the Sub-Regional Centre of Hucknall; and c) they fail to ensure that brownfield regeneration opportunities are maximised, in line with the spatial objectives of the ACS.
- .51 Taking each point in turn, there is a clear disparity with the apportionment of housing as set out in *EMRP Policy Three Cities SRS 3* and that proposed by Gedling. *EMRP Policy Three Cities SRS 3* set out the provision for new housing within the Nottingham Core HMA and Hucknall within the context of the overall housing provision set out in *EMRP Policy 13a*. The policy set out a requirement for the overall provision of 3,030 dwellings per annum (dpa) of which 2,040 dpa should be within or adjoining the Nottingham PUA. Within this overall framework of provision, GBC was specifically required to provide 400 dpa, of which '**at least**' 230 dpa should be within or adjoining the Nottingham PUA, including sustainable urban extensions as necessary. This equated to 57.5% of new housing development to be located in or adjacent to the Nottingham PUA. However, only 39% of new housing development in GBC would be in or adjacent to the Nottingham PUA. In this connection, Policy 2 is in clear conflict with *EMRP Policy Three Cities SRS 3*. The use of the term '**at least**' adds even greater weight to this objection insofar as the proportion of housing to be directed to the Nottingham PUA was expressed as a minimum not a maximum.
- .52 The second strand of the objection to the ACS is that the two SUE sites proposed adjacent to Hucknall comprise disproportionate growth for Hucknall. Paragraph 2.2.10 of

the EMRP stated that development in the Sub-Regional Centres should support their individual roles and functions and not be of a scale and character that prejudices the urban renaissance of the Nottingham PUA. *EMRP Policy 12* carried forward these objectives. The proposed SUE sites within GBC adjoining Hucknall at Top Wighay Farm (1,000 dwellings + 9 hectares of employment land), Land North of Papplewick Lane (600 dwellings) and the Bestwood Strategic Location (500 dwellings), together with Ashfield's own housing requirement for Hucknall (2,987 dwellings in total) would amount to a 40% increase in housing stock for Hucknall. This clearly equates to a significant level of growth for Hucknall, above that planned for by Ashfield DC and considered to be sustainable. This level of growth for Hucknall is out of scale and character with the role and function of Hucknall and does not support the urban renaissance of the Nottingham PUA.

- .53 Within the above context, the Parish Councils are also of the opinion that this level of growth is wholly disproportionate in relation to the scale and character of the conservation villages of Linby and Papplewick. Whilst the two SUE sites of Top Wighay Farm and land North of Papplewick Lane may not directly adjoin these villages, they are located within their wider confines (i.e. the wider setting and approaches to the villages) and sufficiently close that they will undoubtedly have a harmful impact on their character, appearance and function as historic rural settlements.
- .54 There is also concern with the impact of this level of growth on Hucknall's infrastructure and that the combined impacts of all of the additional development for Hucknall, including that proposed by GBC and ADC, has not been fully assessed. ADC makes the point that all of its own housing provision for Hucknall will be made within its existing urban boundary, with no development beyond the urban boundary, the most significant allocation being the Rolls Royce site which is capable of accommodating 900 dwellings plus employment uses.
- .55 The third strand of the objection to the ACS is similar to the point we have raised above insofar as the two SUE sites are on undeveloped greenfield land. Around one-third of the Top Wighay Farm site and all of the land North of Papplewick Lane site is grade 2 agricultural land. This conflicts with one of the spatial objectives of the ACS to value the countryside for its productive quality and paragraph 112 of the NPPF. Whilst it is recognised that it is challenging to accommodate the level of growth required, there are other alternative sites within GBC that are more appropriate and capable of providing the level of housing growth needed, most notably the Gedling Colliery/Chase Farm site and Teal Close.
- .56 In the above connection, ADC undertook its own review of the alternative sites submitted to GBC's Strategic Housing Land Availability Assessment (SHLAA) and in its opinion, the Sustainability Appraisal accompanying the ACS does not provide a consistent approach in the consideration of the merits of each potential site and considers that there is a lack of evidence to support the two proposed SUE sites at Top Wighay Farm and land North of Papplewick Lane.
- .57 By way of background, the purpose of the '*Appraisal of Sustainable Urban Extensions*' study (CD/KEY/08) was to provide advice on the most suitable locations for the development of SUEs adjacent to the Nottingham PUA and the Sub-Regional Centres of Hucknall and Ilkeston. The study focused on nine directions for growth, most notably

including Direction A (Around Hucknall), Direction B (North of Bestwood) and Direction C (Northeast of Arnold/Gedling).

- .58 The overall assessment for Hucknall (as set out at paragraphs 2.4.1 to 2.4.3 of CD/KEY/08) was that there are many important environmental and heritage constraints within this direction for growth, particularly to the north and east but that the opportunities here for sustainable transport, regeneration and economic development, together with brownfield opportunities within the existing built-up area, make this direction for growth '*amenable to some development*'. The recommendation was that **some** residential and employment growth in this area is suitable and desirable and should support the role of Hucknall.
- .59 The overall assessment for land north of Bestwood was that there *may* be potential for **some** 'rounding off' of the urban edge that will eat to a lesser extent into the surrounding Green Belt. The area would be **unsuitable for larger-scale development**. The recommendation was that the area can support some residential growth adjacent to the Nottingham PUA and would help to regenerate deprived communities.
- .60 The overall assessment for land north east of Arnold/Gedling was that in environmental terms, it is one of the most constrained directions for growth and that very little land is suitable for development. The recommendation was that the area could support **some** residential growth within the area free from environmental constraints adjacent to the Nottingham PUA east of the proposed Gedling Colliery Country Park.
- .61 The Parish Councils have concerns about the Sustainability Appraisal accompanying the ACS. In particular, it is considered that there are flaws in the way in which GBC has assessed the merits of the different key potential development sites, as explained below.

Top Wighay Farm

- .62 The site is identified as being suitable to accommodate 1,000 new dwellings together with 9 ha of employment land. However, this would be based on a density of 50 dwellings per hectare. This density would be out of character with the area, comprising an edge of urban area site adjacent to a low density residential area in a rural location. The Infrastructure Delivery Plan is also unclear about the requirement for health services relating to the site and in terms of impact on health, the appraisal has not taken into account impact on health and well-being from traffic congestion. This is a particularly pertinent point in respect of the impact of the proposed allocation on the health and well-being of the residents of Linby. In terms of transport, the suitability of the site for 1,000 dwellings and employment was originally based on an extension to the NET tramline into the site **and** a high quality bus service, but there is no mechanism within the ACS to ensure this will happen. Apparently, it now no longer needs to happen.
- .63 There is further concern about the increase in traffic that will be generated by the proposed allocation. The Transport Study that was undertaken prior to the allocation of the SUE sites in the ACS was only a Phase 1 assessment and therefore failed to provide the necessary level of detail to make an accurate assessment of the suitability of the site for this amount of development. The more recent Transport Study, completed after the public consultation on the publication version of the ACS, contains potentially serious flaws, which we highlight in our response to Matter 6 (Transport).

- .64 Insufficient cross-boundary work has been undertaken to fully assess the overall impact on the highway network, taking account of other sites to be developed in Hucknall (in particular the Rolls Royce site that will accommodate up to 900 dwellings and employment uses). There is also concern in relation to the impact that the allocation of a large employment site (9 hectares) at Top Wighay would have on the future employment expansion at the Rolls Royce site.

North of Papplewick Lane

- .65 The site is identified as being suitable to accommodate 600 new dwellings. However, this would be based on a density of 50 dwellings per hectare. This density would be out of character with the area, comprising an edge of urban area site adjacent to a low density residential area in a rural location. The Infrastructure Delivery Plan is also unclear about the requirement for health services relating to the site and in terms of impact on health, the appraisal has not taken into account impact on health and well-being from traffic congestion. This is a particularly pertinent point in respect of the impact of the proposed allocation on the health and well-being of the residents in Papplewick. The Parish Councils do not agree that there will be no social implications resulting from the proposed allocation. Similar concerns relating to traffic in respect of the Top Wighay Farm site are relevant to this site. It should also be pointed out that the north east part of the site is within flood zone 2 and although other sites have a similar impact (e.g. East of Lambley Hill and Redhill) they have scored worse in terms of flood risk, highlighting inconsistencies with the assessment of different sites.

Gedling Colliery/Chase Farm

- .66 Although this site is included within the ACS, it is only identified as an area of future housing development, with no timescales and no housing numbers attributed to it. For reasons explained above, the ACS is now profoundly flawed in respect of the future development of this site.
- .67 In terms of the housing objectives of the ACS, this site scores 2 more than the land North of Papplewick Lane site but the same as the Top Wighay Farm site, despite the obvious benefits of its location within the Nottingham PUA and the regeneration benefits its development would bring. Inconsistencies in the way that different sites have been assessed are again highlighted. In terms of the impact on health objectives, this site scores 3 more than both the land North of Papplewick Lane and Top Wighay Farm sites. In terms of impact on natural resources and flooding, the site scores more negatively than the two SUE sites largely as a result of the increase in traffic its development would bring. However, the two SUE sites (comprising 1,600 dwellings) would have a greater impact on traffic than the development of this site (with a possible 1,200 dwellings). In addition, this site does not comprise grade 2 agricultural land (as with the two SUE sites) and it is not within a flood risk area (as with part of the Papplewick Lane site). In terms of impact on transport, despite the site's obvious sustainable location credentials, it scores worse than the two SUE sites in terms of transport impact. The low score appears to be mainly due to the alleged difficulties in providing the Gedling Access Road which is said to be essential in order for the site to be developed, yet with no available evidence to support this claim or to show what level of development could be accommodated here without the need for the new road.

Gedling Colliery/Chase Farm/Mapperley Golf Course

- .68 The Sustainability Assessment indicates that the site has been rejected but it is unclear as to why. The site is far more sustainable than the two SUE sites. In terms of impact on housing objectives, it is unclear why this site has scored only 4 positives when it would assist in the delivery of nearly twice as many dwellings as Top Wighay Farm and yet only achieved the same scoring. In terms of health, the site scores better than the two SUE sites. In terms of social impacts, the site also scored better than the two SUE sites. The assessment of the environmental impact of the site is flawed because this site could bring about much greater benefits in terms of green infrastructure and biodiversity. The score relating to impact on landscape is also inaccurate because there is too much weight placed on the loss of the golf course and insufficient weight placed on the environmental improvements to be achieved at Gedling Colliery. Despite similar issues in respect of natural resources and flooding to the two SUE sites, this site has not scored as highly.

North of Redhill/New Farm

- .69 The Sustainability Assessment appendices (on page 188) indicate that this site is far more sustainable than the two SUE sites and yet it is unclear why the site has been rejected. In terms of housing and social impacts, this site scores better than the two SUE sites. There are inconsistencies with the way in which the impact on the natural environment and flooding of this site has been assessed in relation to the two SUE sites. The impact assessment on transport is also flawed, with inconsistencies with the scoring of the transport element of this site compared to the two SUE sites. The site has scored much worse than the two SUE sites and yet the only reason cited is the uncertainty regarding the provision of a bus service and dedicated bus lane, despite it being well integrated into the Nottingham PUA.
- .70 In light of the above, the Parish Councils are of the opinion that there are inconsistencies with numerous elements of the Sustainability Appraisal relating to the sites in GBC, a number of issues have been overlooked and the Sustainability Appraisal does not provide an accurate assessment of the sustainability of the sites in Gedling. As such, it has not been demonstrated that there are no reasonable alternatives to the sites put forward to be allocated for housing in GBC.

Teal Close

- .71 The site at Teal Close comprises an 8 hectare site located immediately adjacent to the Nottingham PUA, within GBC. Despite the fact that there is a live planning application seeking to secure permission for the development of the site for a mix of uses, including 830 dwellings, and despite the fact that the site evidently comprises a more suitable and sustainable site for development than the two SUE sites of Top Wighay Farm and land North of Papplewick Lane, the site is not identified in Policy 2 of the ACS. This site should be one of the first sites in GBC to be developed, in accordance with the strategy of urban concentration with regeneration.

SHLAA Sites

- .72 In addition to the above, the Parish Councils have also undertaken an (albeit not exhaustive) review of the smaller (i.e. less than 500 dwellings) sites submitted to Gedling's SHLAA to seek to identify the capacity of land that could potentially be allocated for housing against the Council's provision of 7,250 dwellings by 2028. Of those sites considered by GBC to be *potentially suitable for development*, there is (at

least) sufficient land to accommodate around 4,500 dwellings (including the Bestwood Strategic Site allocation). A further 2,283 dwellings are identified as not suitable but in some cases that is because GBC are seeking to protect existing employment allocations which may not be required. Whilst we appreciate that it may well be the case that some of the sites identified as not suitable are indeed not suitable for housing, there is overwhelming evidence to suggest that there are suitable sites within the existing main built up area of Nottingham to accommodate a significant amount of new housing development.

- .73 The above brings into question the approach to the distribution of housing in the ACS and its focus on developing greenfield sites in the countryside/Green Belt first, before more suitable previously developed sites within settlement boundaries.

Relevant hearing session: Week 1 – Wednesday 16th October: Day 2 (all day)²

Word count: 6,508³

Date: 18th September 2013

² Examination hearing session as per draft programme dated 22 August 2013

³ The Inspector accepted in her note on further written statements that she is prepared to be flexible on word count on this matter due to the extent of the questions raised.

Appendix A



All Members
Gedling Borough Council

Corporate Director

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Our Ref: 13-006 SB/CAG
Your Ref:

10 September 2013

Dear Councillor

GEDLING ACCESS ROAD

You may have read or heard recently about important news concerning the future of the Gedling Access Road.

I am pleased to be able to confirm that significant progress has been made over the past few months, such that there is now a real prospect that the road will be built. This in turn increases the likelihood of the Gedling Colliery site being regenerated, with the new housing and employment opportunities this offers.

The key developments relate to funding, where a package has been assembled from various sources.

Perhaps most significantly, the newly established Local Transport Board (LTB) for Nottinghamshire and Derbyshire has agreed to allocate a significant proportion of the funding delegated to it by government towards the cost of the Access Road. The Board has agreed to make available £10.8 million towards the scheme, to be spent between 2015 and 2019. This is one of only six schemes supported by the Board across Nottinghamshire and Derbyshire and is the largest single scheme it is supporting from the £31.2 million available to it for that period. Nottinghamshire County Council promoted the scheme to the Board and has indicated in principle support to contribute a further £5 million, subject to discussion and agreement at the County Council over the coming months. This is a major vote of confidence in the Borough and reflects the significant growth opportunities (both in terms of new homes and access to new jobs) that the road opens up.

In addition, the Homes and Community Agency (HCA), which had already earmarked £7 million towards the road's costs, has agreed a further £3 million through its Public Land Infrastructure Fund. The Borough Council has indicated in principle provision of £7 million through the Community Infrastructure Levy, assuming that the Levy is agreed and adopted. Together with developer contributions from the Gedling Colliery site, this package should provide the funding to construct the road.

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The timing is complex, as some funding strands (predominantly those from the HCA) must be spent or committed before March 2015, while other funding strands (including that from the LTB) do not become available until later. The agenda is therefore still a very challenging one and all partner agencies have much to do to take the project forward.

Nottinghamshire County Council will lead on highway matters. Initially, they will need to secure approval for their contribution, on which I understand they intend to report to committee in Autumn 2013. They will also need to prepare and present a business case to the Department for Transport to secure the release of the LTB funds and commission or carry out various studies and evidence gathering exercises to inform the planning application.

The HCA will look to secure a Development Partner for the site, with a view to appointing a partner once the planning application for the road has been considered. An early task will be to develop a Master Plan for the site, which will be subject of full consultation.

Our roles include consideration of planning applications promptly and with due diligence, and progression of the Community Infrastructure Levy. It is expected we will be able to determine the planning application for the road by June/July 2014 – a planning application for the development site could follow later in the year or early in 2015. We are of course ensuring a continued separation between our role in determining the planning applications and our role as a partner in the wider planning of the potential development.

The potential to develop the Gedling Colliery site does not change the position with regard to our Core Strategy. In particular, we must still be able to deliver a five year land supply, plus 5%, for development - while the news about the Access Road is encouraging, the full development of the site is unlikely in five years and is still subject to some uncertainty. However, the Core Strategy can be reviewed in future and, if progress with the Access Road continues to be made, it offers the possibility future flexibility to either reallocate current planned development or for the Borough to accommodate further growth with the economic benefits such growth brings.

I will provide further updates on this exciting development in due course. In particular, we are planning a briefing for members about the Gedling Colliery area, including news about the Gedling Country Park, later in the Autumn and I hope to be able to present the latest situation about the road at that session.

Yours sincerely



Stephen Bray
Corporate Director

cc Vernon Coaker MP
Mark Spencer MP

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