

## 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 4: ECONOMIC DEVELOPMENT (Q. 3, 6, 9, 11 & 15)**

#### **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 3**

##### **Response**

- .2 The Parish Councils are of the opinion that the evidence base does not justify the proposals for the extent of employment provision in Gedling.
- .3 The ACS<sup>1</sup> sets out a requirement for GBC to find **22,800m<sup>2</sup>** of office floorspace (Use Class B1 (a) & (b)) and **10 hectares** of land for industrial and warehouse use (Use Class B1(c), B2 & B8). However, the more up to date evidence of the Office and Employment Provision Background Paper 2012 (CD/BACK/04) concludes that sufficient land is available to meet the anticipated demand for industrial and warehousing land over the plan period, based on the NCRELS study as updated (CD/KEY/3 – 5).
- .4 GBC has confirmed to the Parish Councils that 33 hectares of employment land is currently allocated in the extant Gedling Local Plan that has yet to be developed. The evidence suggests therefore that GBC has far more employment land allocations than is required to meet demand over the plan period. As a result, the more sustainable sites should be allocated for the appropriate amount of employment development over the plan period and the less sustainable sites, including Top Wighay Farm, should be removed from the ACS.

#### **Question 6**

##### **Response**

- .5 A planning application for a mix of uses at Teal Close, including 8 hectares of employment land, is currently before GBC for consideration. The Teal Close site is located immediately adjacent to the Nottingham PUA and it is a highly sustainable site in

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<sup>1</sup> The Greater Nottingham – Broxtowe Borough, Gedling Borough and Nottingham City Aligned Core Strategies Publication Version June 2012

development terms. This site should therefore be included in Policy 2. For the reasons advanced above, the site at Top Wighay Farm should be removed from the ACS.

### **Question 9**

#### **Response**

- .6 GBC's policy has been not to challenge the Local Plan Inspector's report of 2004 on a number of employment sites despite the fact that the report is almost 10 years old and the evidence base relating to the demand and supply of employment (and housing) land is now entirely different to that which existed at the time of the previous Local Plan Inquiry. As a result, GBC has undoubtedly under-estimated the scope for additional housing sites by not re-assessing some poorly located and poorer performing employment sites, including Bestwood Business Park.
- .7 GBC's reasoned justification for not re-assessing the employment allocation at Bestwood Business Park is that the site is protected under Policy E3 (of the extant Local Plan) and the decision to not release the site for housing was supported by the Local Plan Inspector. However, there is a far more recent evidence base (as set out in CD/KEY3-5 and CD/BACK/04) that indicates that there is an oversupply of employment land in Gedling and therefore the poorer employment sites should be released for housing.
- .8 In the case of Bestwood Business Park, the site owners (St Mowden Developments Ltd) are actively promoting the site for residential development, which is capable of accommodating 180 dwellings. This site is evidently suitable for housing, given its location in a sustainable position within the settlement and surrounded by complimentary uses, and there are no overriding constraints for its residential development.
- .9 The lack of desire to re-assess existing employment allocations in light of the latest available evidence comprises a fundamental flaw in the way in which GBC has approached its decision to housing and employment land allocations. The Parish Councils are of the opinion that there is the potential to secure a significant amount of new housing on existing employment allocations, which in turn would reduce the need to release greenfield sites in the countryside/Green Belt for development, in particular Top Wighay Farm and land North of Papplewick Lane. The ACS does not therefore provide a sound basis on which to plan for the development needs of the area.

### **Question 11**

#### **Response**

- .10 The Parish Councils are of the opinion that the impact of the employment development at Top Wighay Farm (in Policy 2) on the Rolls Royce site in Hucknall has not been fully or accurately appraised.
- .11 The Rolls Royce site (in Hucknall) is being taken forward by ADC as a strategic sub-regional site for the whole of the Greater Nottingham conurbation. It will not simply provide for the employment needs of Hucknall or Ashfield. This has, to a limited extent, been recognised by the proposed modifications to the wording of the ACS (ref C155). However, the amended wording (at paragraph 3.4.6) does not overcome the

fundamental issue of the impact that the development of Top Wighay Farm will have on the future prospects for the regeneration through development of the Rolls Royce site.

- .12 The Gedling Borough Sustainable Community Strategy (SCS) identifies as part of its vision and priorities that “*Gedling should be a place that attracts investment, to create a variety of convenient facilities for essential services and shopping, cultural and social activities and also to provide business opportunities and **local jobs**.*” [Para 2.8.1].
- .13 The Top Wighay Farm site has a close relationship to Hucknall and a peripheral relationship to Gedling Borough. However, **80%** of the residents of Gedling live in the suburbs of Arnold and Carlton and **50%** of the Borough’s residents work in the City of Nottingham. The employment allocation at Top Wighay would not therefore provide for the employment needs of the residents of Gedling Borough and will compete with the future prospects for development of the Rolls Royce site, a brownfield site within the existing urban area of Hucknall.
- .14 The Greater Nottingham Employment Background Paper (CD/BACK/04) identifies a requirement for Hucknall of 15,400m<sup>2</sup> of office floorspace (which ADC has equated to be 1.5 hectares of land) and a requirement for 14 hectares of industrial land. Taking account of Ashfield’s proposed employment allocations for Hucknall, ADC is of the opinion that the demand and supply of employment land is broadly in balance, even without the Rolls Royce site that would bring forward an additional 20 hectares of land.
- .15 On this basis, the employment land allocation at Top Wighay Farm would not only fail to serve the needs of the residents of GBC, contrary to the Gedling Borough SCS, but of even greater concern is the fact that the development of this site would compete directly against the future development of the Rolls Royce site, within Hucknall, undermining its regeneration and resulting in an oversupply of employment land in this part of the Greater Nottingham conurbation.
- .16 In respect of the above, the ACS could be made sound by the removal of the employment allocation at Top Wighay Farm, the re-assessment of GBC’s poorer quality employment site allocations for allocation for housing development, and the allocation of the more sustainable employment allocations at Gedling Colliery/Chase Farm and Teal Close.

### **Question 15**

#### **Response**

- .17 Policy 7(e) of the ACS states that the Gedling Colliery/Chase Farm site “*offers the opportunity for the redevelopment and reuse of brownfield land to create a new sustainable neighbourhood*”. The policy also says that for it to be developed, it will require the construction of the Gedling Access Road.
- .18 Whilst Policy 2 of the ACS identifies the site as an “*area of future housing development*”, no housing figures are attributed to it or timescales for development. 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.

- .19 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”*. A copy of the letter is appended to our response to Matter 2 (The Spatial Strategy and Housing Policy).
- .20 This new evidence clearly has major implications on the prospects for delivery of the Gedling Colliery/Chase Farm site and brings back into question the potential for the development of 800 houses on the Mapperley Golf Course site. 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.
- .21 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, for reasons explained in our response to Matter 2 (para. 1.27).
- .22 As a result of the above, Policies 2, 4 and 7 of the ACS need to be wholly revisited in respect of the distribution and phasing of development in Gedling Borough. In its present form the ACS is unsound and would result in an inequitable amount of development taking place on greenfield sites in the countryside/Green Belt in favour of brownfield sites within the main built up area of Nottingham.

**Relevant hearing session:** Week 1 – Thursday 17<sup>th</sup> October: Day 3 (2pm)<sup>2</sup>

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<sup>2</sup> Examination hearing session as per draft programme dated 22 August 2013