

## Greater Nottingham - Broxtowe Borough, Gedling Borough and Nottingham City Aligned Core Strategies

### Response of Linby Parish Council, Papplewick Parish Council and Newstead Parish Council to Proposed Main Modifications (March 2014)

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#### Background

- 1.1 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 and Newstead Parish Council (“the Parish Councils”) are made specifically in respect of the main modifications relating to the Borough of Gedling.

#### Main Modification 3 (Mod3)

- 1.2 The Parish Councils welcome the proposed insertion of new paragraph **3.2.8a** which forms part of the justification for Policy 2 (The Spatial Strategy) insofar as it recognises that the release of Green Belt and other greenfield land in the early part of the Plan Period would conflict with the ACS’s strategy of urban concentration with regeneration and with the advice in the National Planning Policy Framework (“the NPPF”).
- 1.3 In respect to the proposed amendments to paragraph 3.2.9, the inclusion of the Sustainable Urban Extension at Teal Close for 830 homes is welcomed given that previously Gedling Borough Council (“GBC”) resisted the inclusion of this site. However, the Parish Councils object to the proposed numbers of homes at the Gedling Colliery/Chase Farm site of “at least 600 homes” on the basis that the site is capable of delivering over 1,000 new homes. There is no evidence to suggest that over 1,000 homes cannot be delivered on the site within the Plan Period, indeed the evidence that has been submitted to the Inquiry suggests that with the funding now in place for the Gedling Access Road, this number of homes can be provided on this site. Given that this is perhaps the most sustainable site in the Borough of Gedling, it is submitted that the number of homes to be provided on this site be increased to “at least 1,000 new homes” and that the amount of employment land is also stated in the ACS, to provide clarity and certainty. The consequences of the above amendments on the need to release Green Belt / Greenfield sites should then be reconsidered and reviewed, as for example an increase of 400 homes to 1,000 homes would obviate the need to release Land at Papplewick Lane, which is a far less sustainable greenfield site in Green Belt.

#### Main Modification 4 (Mod4)

- 1.4 In respect of the proposed amendments to **Policy 2.3(a)**, whilst the increase in the number of new homes in Gedling Borough in or adjoining the existing main built up area of Nottingham from 2,840 to 4,045 is welcomed, with the correct application of new homes on the Gedling Colliery/Chase Farm site, this figure can be increased even further, to around 4,500 new homes. Taking account of the number of homes already built together with existing commitments and completions (2,268 as of March 2013), the residual number of new homes to be delivered on less sustainable (and therefore less appropriate) sites over the Plan Period would be **732 new homes**. This figure will be even lower as of today given there has been another year of house building.

### **Main Modification 5 (Mod5)**

- 1.5 The Parish Councils object to the proposed reduction in the number of new homes allocated in Bestwood Village from 500 down to 260 new homes. There are two extant planning applications submitted by Landridge Homes and St Mowden Developments on sites within Bestwood Village for a total of 331 new homes (71 more than stated in the ACS). Policy 2.3(c) should therefore be amended to read “Bestwood Village (up to 331 homes)”. This reduces further the residual number of new homes to be built on the less sustainable sites within the Borough of Gedling to 661 new homes.
- 1.6 The Parish Councils also object to the proposed reduction of new homes in Calverton from 1,300 homes down to 1,055 (a reduction of 245 homes). GBC suggest that the reduction in housing numbers in Calverton is a reflection of the proposed change to the overall distribution of housing which provides for a greater proportion of housing within the main urban area of Nottingham. However, the result of this reduction in housing numbers in Calverton is not that more houses are to be delivered in and adjoining the Nottingham Principal Urban Area but that there is pressure to allow the release of the Green Belt / greenfield sites at Top Wighay Farm and Land North of Papplewick Lane. If the housing number for Calverton was revised back to 1,300 new homes, this would reduce further the residual number of new homes to be built on the less sustainable sites within the Borough of Gedling to 416 new homes.

### **Main Modification 6 (Mod6)**

- 1.7 The proposed modifications to Policy 2 do not address the fundamental flaw in the ACS insofar as it continues to support and promote the development of the least sustainable Green Belt / greenfield sites first, before urban and previously developed sites. The policy does not therefore accord with the ACS’s strategy of urban concentration with regeneration. For example, the proposed modifications to Policy 2 footnote continues to promote the development of Land North of Papplewick Lane and Top Wighay Farm as available for housing from the date of adoption of the Core Strategies. This is in clear conflict with the approach to sustainable development as set out in the NPPF (Para 17). It is also the case that Land North of Papplewick Lane is not capable of accommodating over 500 houses and as such, it should not be allocated at all in the opinion of the Parish Councils, but certainly not within the ACS as a “strategic allocation”.

### **Main Modification 9 (Mod9)**

- 1.8 The Parish Councils support the inclusion of Teal Close as a new strategic allocation in the ACS.
- 1.9 In respect of Policy 2.5, the Parish Councils also support the removal of the words “if development commences in the plan period” in relation to the Gedling Colliery/Chase Farm site insofar as it provides more certainty that this site will be delivered in the Plan Period, which in light of the funding being secured for the Gedling Access Road will now transpire.
- 1.10 The Parish Councils object to the continuing proposals to allocate Land North of Papplewick Lane and Top Wighay Farm as strategic allocations. It has been demonstrated (above) that neither sites are now required for housing development given

the proposed modifications to secure more housing in and adjoining the Nottingham Principal Urban Area and the inclusion of these sites continues to conflict with the ACS's strategy of urban concentration with regeneration and with the advice in the NPPF. Moreover, the significant concerns that were raised by Ashfield DC with regard to the ability of Hucknall to accommodate the proposed growth by GBC on the edge of Hucknall in terms of its infrastructure capacity, particularly in light of Ashfield DC's own proposals for growth within Hucknall, continue to be ignored by GBC. In this respect, the duty to co-operate with Ashfield DC has and continues to not be met in the preparation of the ACS.

- 1.11 The Parish Councils also object to the continuing proposals to promote significant new economic development at Top Wighay Farm. The implications of the developments at Teal Close and Gedling Colliery/Chase Farm that were introduced during the Inquiry process on the need to release Green Belt land has not been addressed by the proposed modifications in the ACS, despite demonstrable evidence to suggest that the Top Wighay Farm site is not required to meet the economic development needs of the Borough.

#### **Main Modification 10 (Mod10)**

- 1.12 The Parish Councils support the inclusion of Gedling Colliery/Chase Farm as a new strategic allocation in the ACS.
- 1.13 However, the Parish Councils object to the number of new homes allocated to the site. There is neither justification nor explanation as to why the number of homes for the site is not at least 1,000 given that the site is able to accommodate and deliver this number of houses. This is one of the most sustainable sites in the Borough of Gedling and therefore its potential for new development should be maximised.
- 1.14 Notwithstanding the proposed modification to paragraph 3.2.24 to suggest that there are challenging delivery issues for the Gedling Colliery/Chase Farm site in relation to funding for the Gedling Access Road, evidence has been presented to the Inquiry to demonstrate that funding is indeed available. The proposed modifications by GBC do not therefore reflect the facts of the matter and appear to offer some doubt as to whether the site can or will be delivered.
- 1.15 Again, the Parish Councils object to the continuing proposals to promote significant new economic development at Top Wighay Farm. The site is included amongst other sites that are clearly far more sustainable and whose promotion for development should be a priority for the Borough. At present, its promotion for development is on a par with Teal Close, Gedling Colliery/Chase Farm and land in the vicinity of the HS2 Station at Toton. This does not reflect the ACS's strategy of urban concentration with regeneration.

#### **Main Modification 11 (Mod11)**

- 1.16 Reference is made in the preamble to the proposed modifications relating to Land North of Papplewick Lane to the reduction in the number of homes on the site from 600 to 300 homes and to the applications currently before GBC and Ashfield DC. Crucially, the application before Ashfield DC relates to the proposed access to the site that lies within the Borough of Ashfield. Ashfield DC has raised considerable concern to the proposed

access arrangements, not least insofar as the proposal for the use of one access only to serve a development of 300 homes is substandard. A single point of access should serve up to 150 homes only. Other concerns are raised in relation to the proposals and the Planning Officers have recommended that the application is refused. There is therefore uncertainty regarding the deliverability of the site. It is also factually incorrect to state that the entirety of the site lies within Gedling Borough. It does not. That is why there are two separate planning applications.

- 1.17 Moreover, the site is not required to meet the housing needs of the Borough of Gedling, for the reasons advanced above. Ironically, whilst the number of homes for the site has been reduced by 300 as a result of the impacts on the services and facilities in Hucknall, no such consideration has been given to GBC's proposals to develop Top Wighay Farm, which would have an even greater impact on services and facilities in Hucknall.

#### **Main Modification 14 (Mod14)**

- 1.18 The Parish Councils object to the proposed reduction in the number of new homes allocated in Bestwood Village from 500 down to 260 new homes. There are two extant planning applications submitted by Landridge Homes and St Mowden Developments on sites within Bestwood Village for a total of 331 new homes (71 more than stated in the ACS). Policy 2.3(c) should therefore be amended to read "Bestwood Village (up to 331 homes)". This reduces further the residual number of new homes to be built on the less sustainable sites within the Borough of Gedling to 661 new homes.

- 1.19 Again, it is ironic that GBC's reasoning for reducing the number of homes in Bestwood Village by 240 is the cross boundary impact of housing development in Gedling Borough impacting on the services and facilities in Hucknall, and yet GBC are continuing to promote the development of Top Wighay Farm for 1,000 new homes. The proposed modifications simply do not make sense, particularly in light of the residual housing requirement for new homes beyond the Nottingham Principal Urban Area which has been calculated to be only 416 new homes taking account of the number of homes already built together with existing commitments and completions.

- 1.20 The Parish Councils would also suggest that the location of Bestwood Village means that it would be more appropriate for it to fit under "the main built up area of Nottingham" in the settlement hierarchy.

#### **Main Modification 15 (Mod15)**

- 1.21 The Parish Councils object to the proposed reduction of new homes in Calverton from 1,300 homes down to 1,055 (a reduction of 245 homes). GBC suggest that the reduction in housing numbers in Calverton is a reflection of the proposed change to the overall distribution of housing which provides for a greater proportion of housing within the main urban area of Nottingham. However, the result of this reduction in housing numbers in Calverton is not that more houses are to be delivered in and adjoining the Nottingham Principal Urban Area but that there is pressure to allow the release of the Green Belt / greenfield sites at Top Wighay Farm and Land North of Papplewick Lane. If the housing number for Calverton were revised back to 1,300 new homes, this would reduce further the residual number of new homes to be built on the less sustainable sites within the Borough of Gedling.

### **Main Modification 18 (Mod18)**

- 1.22 The ACS's approach to releasing Green Belt land for development is supported by the Parish Councils insofar as it places the development of Green Belt land at the bottom of the sequential approach to site selection.
- 1.23 However, the proposed modifications are not reflected in Policy 2 and in particular in GBC's proposals to development Land North of Papplewick Lane and Top Wighay Farm for 1,300 new homes (in total). Policy 2 actually prioritises the development of these sites over more sustainable sites and in so doing, makes a mockery of the proposed modifications to Policy 3.

### **Main Modification 19 (Mod19)**

- 1.24 The proposed modifications to the monitoring arrangements in respect of Policy 4 are noted but GBC has failed to address the fundamental question of the need for 10 hectares of employment land within its Borough. The 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).
- 1.25 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.

### **Main Modification 29 (Mod29)**

- 1.26 The proposed modifications to Policy 14 are noted but GBC has failed to address the fundamental concerns raised by the Parish Councils and Ashfield DC (and others) in respect of the impact of the proposed development at Top Wighay Farm on the local highway network and on the priority for new development being on sites that are already accessible.

### **Main Modification 30 (Mod30)**

- 1.27 The proposed modifications to Policy 15 are noted but GBC has failed to address the fundamental concerns raised by the Parish Councils and Ashfield DC (and others) in respect of the impact of the proposed development at Top Wighay Farm on the local highway network and on transport infrastructure.

### **Main Modification 33 (Mod33)**

1.28 The proposed modifications to Policy 18 are noted but it is clear that the IDP does not provide detailed infrastructure capacity, constraints and requirements associated with the proposed SUE allocations of Top Wighay Farm and Land North of Papplewick Lane in terms of their cumulative impacts with Ashfield DC's development proposals in Hucknall. This is significant insofar as the two SUE sites will be completely reliant upon the services and facilities in Hucknall. The Parish Councils share the concerns previously expressed by Ashfield DC in this respect and raise similar objections to the soundness of the IDP and ACS on this basis.