

Local Planning Document Publication Draft

Main Modifications

Report of Summaries (March 2018)

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Introduction

This report summarises the key issues arising from the comments received as a result of the consultation on the proposed main modifications to the Local Planning Document Publication Draft and the accompanying Sustainability Appraisal, Habitats Regulations Assessment and the Equality Impact Assessment.

A total of 74 comments were received as shown in the table below.

	Number of Respondents ¹	Number of Comments
Proposed Main Modifications to the Gedling Borough Local Planning Document Publication Draft	36	70
<i>General</i>	9	10
<i>Part A: Development Management Policies</i>	15	35
<i>Part B: Site Allocations</i>	19	23
<i>Part D: Appendices</i>	2	2
Sustainability Appraisal	3	4
Habitats Regulations Assessment and Equality Impact Assessment	0	0
TOTAL	39	74

The above table does not include the number of respondents and number of comments received on the Proposed Changes to the Policies Map of the Gedling Borough Local Planning Document Publication Draft.

¹ Some respondents have commented on more than one part of the document or on several documents.

Part A: Development Management Policies

General Comments

9 comments received.

Nottinghamshire County Council noted that the majority of their comments previously made on the Local Planning Document have been incorporated into Policy LPD 18 (Protecting and Enhancing Biodiversity). The only substantive issue is the continued use of the acronym 'pSPA' when referring to the 'prospective' Sherwood SPA in the supporting text relating to International Sites (i.e. paragraph 7.2.4). The term pSPA has a formal meaning in policy and legal terms with the 'p' meaning 'potential'. Therefore the use of "pSPA" in the Local Planning Document is erroneous and potentially misleading.

Historic England raised no objections to the proposed Main Modifications.

Highways England raised no objections and considered that the proposed Main Modifications would have no impact on the operation of the Strategic Road Network (SRN).

Woodborough Parish Council raised no objections to the Main Modifications.

Langridge Homes stated that it had no objections to the proposed main modifications. They considered the Local Planning Document met the legal tests and the tests of soundness and it was considered time to adopt the plan to ensure a step change in the supply of housing to meet OAHN. Langridge Homes are not totally satisfied with the Local Planning Document but welcomed commitment to undertake an early review by December 2018 if the Gedling Access Road (GAR) was delayed. They raised previous concerns about slow delivery on strategic sites including Top Wighay Farm. An update on progress with the Langridge sites was provided for Westhouse Farm; Lodge Farm; implementation of Dark Lane permission; and the willingness to submit an application at Willow Farm once a firm timetable had been agreed for the construction of the GAR.

A local resident from Papplewick made a number of comments that were not related to the proposed main modifications including:-

- No fracking within the Papplewick area;
- Concerns about the urbanisation of Papplewick,
- Designate Green Space front and rear of A60 at NG15 8FJ and an area of rural beauty open space; and
- Safeguarding pavements and grass verges from the introduction of cycle paths in the Papplewick area and potential danger of collisions with pedestrians.

One resident suggested an annex to the MM was added providing clarity on changes to renumbering of policies, sites, paragraphs and footnotes.

A resident of Hayden Lane made a number of comments not related to the proposed main modifications but to the potential access to H10 Hayden Lane via Dorothy Avenue. Comments suggested that road between the Griffins Head [Papplewick] and Linby should be used instead.

A resident stated the consultation documents were not easy to understand and it would be helpful to have a very simple summary and plan of the proposals. Comments included the Green Belt and open spaces should be protected. Towns and cities offer opportunities for housing and that there are still many 'pockets' for smaller plots of houses/maisonettes.

A local resident made comments not related to the proposed main modifications but to the potential development of site H21 in Burton Joyce.

List of Respondents

Highways England
Historic England
Langridge Homes Ltd
Nottinghamshire County Council
Woodborough Parish Council
Mr James Beckwith
Ms Jane Ogden
Ms Kat Sayers
Mrs Joanne Trease

Introduction, The Character of the Borough and Spatial Vision and Spatial Objectives

MM1

1 comment received.

Calverton Parish Council supported the proposed modification which recognised the role of Neighbourhood Plans as part of the Development Plan.

MM2

1 comment received.

Calverton Parish Council supported the proposed modification which recognised the role of Neighbourhood Plans as part of the Development Plan.

MM3

2 comments received.

A local resident considered that developers should be “required” to check with Nottinghamshire County Council on minerals as opposed to the wording “advised”.

A local resident from Papplewick made comments not related to the proposed modification which are summarised under 'General Comments'.

List of Respondents

Calverton Parish Council

Mr Paul May

Ms Kat Sayers

Climate Change, Flood Risk and Water Management

MM4

2 comments received.

Whilst not related specifically to the proposed modification, a local resident from Papplewick made a number of comments arguing that Papplewick was not suitable for wind turbines including impact on the rural location countryside and concerns over urbanisation of the Village.

Although not related to a specific proposed modification a local resident stated that the Borough Council should make sure it notified people in the areas affected and not just an article in a newspaper.

MM5

1 comment received.

The Willow Farm Action Group welcomed the paragraph but remain concerned that it fails to adequately set out the requirement for the planning authority and developers to fully consider the impact of proposed development on the surrounding area. The group referred to the Willow Farm site and whilst no surface water flood risk was shown on this site, the street below site H3 suffers a high risk of surface water flooding. They argued for greater clarity and protection and a requirement for a comprehensive flood risk assessment of both the site and surrounding area identifying the level of risk and additional risks posed by the development and mitigation measures. Development should not result in any heightened risk of flooding than the case before construction. The group proposed a form of wording to this effect.

MM6

1 comment received.

A local resident commented that no more building should take place in areas used for flood catchment or where it would increase the flow into these areas. It was considered that climate change should also be taken into account.

MM7

1 comment received.

In relation to proposed modification a change to add Controlled Water Risk Assessment to the list under planning information was suggested by a local resident and reference included to all required assessments, reports and findings from independent investigators being made public and a paragraph added to the proposed modification stating where to access these reports.

List of Respondents

Willow Farm Action Group
Mr Colin Allen
Mr Paul May
Ms Kat Sayers

Environment Protection

MM8

No comments received.

MM9

No comments received.

MM10

3 comments received.

The Coal Authority supported the modification as proposed.

A local resident considered the Borough Council should be clearer. They considered that this modification relating to responsibility for a safe development was a weak statement and if there is damage, the consequences for the landowner should be listed out. Another resident considered that safety should also be assessed by the Council to ensure it is feasible and correct.

MM11

No comments received.

List of Respondents

The Coal Authority
Mr Colin Allen
Ms Kat Sayers

Green Belt

MM12

4 comments received.

Calverton Parish Council objected to the proposed modification as it was considered that it undermined the recently made Calverton Neighbourhood Plan in particular Policy G1. Criterion b) could potentially be used to refuse a planning application

which incorporates an access to/from Oxton Road which is a key requirement of the Neighbourhood Plan. It was viewed that the Local Planning Document needs to provide certainty but also flexibility. An access from Oxton Road provides an opportunity to commence development at the northern end of the North West Quadrant Urban Extension. The Parish Council is aware that site H16 is likely to require ground works and as a consequence access from Oxton Road is likely to be front loaded and logistical requirements of cut and fill works lends its self to a north to south works programme. Policy LPD 16 needs to be consistent with the Calverton Neighbourhood Plan as recognised in the suggested amendment to the Policy put forward by the Parish Council.

The landowner of site H16 noted that the split between the housing allocation and safeguarded land was dictated by housing need and high level evidence but did not take into account real world construction constraints and the safeguarding policy should not prejudice the delivery of the housing allocation. Suggested change to MM12 Policy LPD 16 b).

A local resident made comments not related to this modification but concerning the inclusion of part of Lodge Farm Lane as safeguarded land (protected). The resident enquired as to how the decision was made and was unclear why this area was being treated differently to the H5 housing allocation which was suitable and available. Another local resident considered no land should be removed from the Green Belt.

MM13

No comments received.

MM14

No comments received.

MM15

No comments received.

MM16

3 comments received.

A local resident in Calverton noted that MM16 had been proposed in response to their original objection. However, the respondent considered that the wording of MM16 and application of Safeguarded Land designation over the previously developed areas of Warren Place is unsound. It was argued that the NPPF suggests the Council's approach to applying "relevant Green Belt policy" to an application for permanent development on a brownfield site within Safeguarded Land is not justified or sound. The respondent challenged how a planning application for a previously developed site removed from Green Belt can be tested against Green Belt policy.

The respondent referred to a number of approval decisions on previously developed sites located within Green Belt by the Council including Glebe Farm and Sunrise Farm. It was considered that the current wording of MM16 would lead to inefficient use of the site and prejudice development of previously developed land. Additionally it was considered the Council had been inconsistent in its treatment of Long Acre

Lodge, previously excluding it from safeguarded land when the site did have potential for development and now including it in new allocation X4.

The respondent went on to state that Warren Place had been removed from Green Belt and its development would not prejudice the future development of the Safeguarded Land and could contribute 9 dwellings. A detailed wording change was proposed.

Similarly a further respondent supporting development at Warren Place considered that safeguarded land was outside the Green Belt and exceptional circumstances had been demonstrated to remove it from the Green Belt and it would be unsound to sterilise previously developed land from forms of development otherwise acceptable.

The landowner of site H16 argued that the status afforded to safeguarded land should not replicate Green Belt. Permanent development on safeguarded land intended to meet future development growth may in certain circumstances be essential to support service or construction work associated with allocated land. A detailed wording change was suggested.

List of Respondents

Calverton Parish Council
Persimmon Homes NMID
Mr Colin Allen
Mr Hayden Lester
Ms Kat Sayers
Ms Doreen Seaton

Natural Environment

MM17

1 comment received.

Natural England acknowledged that the revised wording clarified the wording for designated sites but the policy would benefit from an introductory paragraph to emphasise the importance of providing net gains in biodiversity as follows:
All development proposals should seek to deliver a net gain in biodiversity and geodiversity and contribute to the Borough's ecological network.

MM18

1 comment received.

Whilst not related to the proposed modification, a local resident commented that there was a TPO (N0004) adjacent to the A60 on site H5. It was considered that the Borough Council should provide assurance that developers/landowners would be expected to comply with the TPO in particular considering access.

MM19

No comments received.

MM20

No comments received.

MM21

No comments received.

MM22

No comments received.

MM23

1 comment received.

A local resident referred to previous comments made in relation to H5 (Lodge Farm Lane) concerning the protection of bats and that bats were observed on this site. The comments made are related to site H5 and concerned ensuring that a bat survey was conducted on site H5 before the grant of planning permission.

MM24

1 comment received.

Natural England suggested that the modified paragraph should set out the concept of “biodiversity net gain” to replace the current wording which explains biodiversity offsetting. They commented that the pilot studies referred to in the modified paragraph were for offsite compensation and the current approach including the government’s 25 year Environment Plan commits to achieving net gain set out in Policy 1. The NPPF paragraphs 9, 109 and 152 also refer to net gain. Natural England provided a detailed paragraph wording change.

MM25

1 comment received.

The Willow Farm Action Group applauded the proposed modification but noted it was focussed on creating new habitat as opposed to maintaining existing habitat within the proposed development. The group considered that the issue was not covered by MM27 or MM33 either. Features such as ancient or historic woodland, field boundaries and hedgerows and ridge and farrow should be retained where possible. The group considered a stronger statement to this effect should be applied to Green Belt sites or other appropriate sites and proposed a form of wording to this effect.

MM26

No comments received.

MM27

No comments received.

MM28

No comments received.

List of Respondents
Natural England
Willow Farm Action Group
Ms Kat Sayers

Open Space and Recreational Facilities

MM29

1 comment received.

A local resident from Papplewick made comments not related to the proposed modification which are summarised under 'General Comments'.

MM30

No comments received.

MM31

No comments received.

List of Respondents

Mr Paul May

Historic Environment

MM32

No comments received.

MM33

No comments received.

MM34

No comments received.

Design

MM35

No comments received.

MM36

1 comment received.

A local resident from Papplewick made comments not related to the proposed modification which are summarised under 'General Comments'.

List of Respondents

Mr Paul May

Homes

MM37

No comments received.

MM38

No comments received.

MM39

2 comments received.

The agent acting on behalf of the landowner noted the proposed modification to Policy LPD 36 stated that in other areas (i.e. areas not falling within a defined sub market on the map) the percentage requirement would be determined having regard to the requirement for adjacent areas and on viability. It was not considered appropriate to use a map that had gaps which would lead to unnecessary debate. The Linden Grove site (site H4) adjoins the Carlton sub market (20% target) and also Gedling Rural South (30% target) and it was considered that it was not clear which target would apply. The supporting text to the Linden Grove site refers to 20% affordable housing but this should be in policy.

A local resident from Papplewick made comments not related to the proposed modification which are summarised under 'General Comments'.

MM40

1 comment received.

Persimmon Homes stated the Borough Council did not provide sufficient evidence to support National Space Standards and the late insertion noting the importance of national space standards had no planning weight so therefore should be removed.

MM41

1 comment received.

A local Papplewick resident commented that there should be no provision for gypsies and travellers made in the Papplewick area.

MM42

No comments received.

MM43

No comments received.

List of Respondents

Northern Trust Limited

Persimmon Homes NMID
Mr Paul May

Employment

MM44

No comments received.

MM45

No comments received.

MM46

No comments received.

MM47

No comments received.

MM48

No comments received.

MM49

No comments received.

Retail and Community Facilities

MM50

No comments received.

MM51

No comments received.

MM52

4 comments received.

A Director of Public Health at Nottingham City Council and Nottingham City Health and Wellbeing Board Sponsor for healthy environment, the NHS Nottingham City CCG and the NHS Nottingham North and East CCG objected to the deletion of Policy LPD 54 which is at odds with a Greater Nottingham aspiration to tackle childhood obesity which includes aligning Local Plan Parts 1 and 2 policies in order to have a consistent approach across the region to balancing health and well-being objectives for children with the need to minimise impacts on local businesses in line with national policy. Policy LPD 54 was founded on compelling evidence derived from national and local data. The Healthier Happier Lives: Nottingham City Joint Health and Wellbeing Strategy 2016-2020 was agreed at the Nottingham City Health and Wellbeing Board in July 2016. The Strategy aims to increase healthy life expectancy and make Nottingham City one of the healthiest big cities. As part of the delivery of the Strategy, Nottingham City Health and Wellbeing Board has supported

the control of hot food takeaways near schools. There is a link between the density of food outlets within deprived areas and childhood obesity and reference was made to the ward level action in places such as Gateshead

(<https://www.gateshead.gov.uk/DocumentLibrary/Building/PlanningPolicy/SPD/Hot-Food-Takeaway-SPD-2015.pdf>) where any new A5 licences would not be awarded within 400m of locations where children and young people congregate or in a ward where greater than 10% of Year 6 pupils are classified as obese. Gedling's obesity rate in Year 6 is 17.1%. According to the latest available data, 26% of children aged 4-5 years and 40% of children aged 10-11 years in Nottingham City have excess weight and a significant proportion of children resident to Nottingham City attend schools in the surrounding Boroughs, including Gedling Borough. A conurbation-wide approach is necessary in the approach to effectively tackling obesity.

Kentucky Fried Chicken Limited welcomed the removal of the policy and would continue to support restrictions on over-concentration of hot food takeaways as set out in Policy LPD 49 as a proportionate response to the limited evidence on this.

List of Respondents

NHS Nottingham City CCG

NHS Nottingham North and East CCG

Nottingham City Council

Kentucky Fried Chicken (Great Britain) Limited

Transport

MM53

No comments received.

MM54

1 comment received.

A local resident from Papplewick made comments not related to the proposed modification which are summarised under 'General Comments'.

List of Respondents

Mr Paul May

Part B: Site Allocations

Comprehensive Development

MM55

2 comments received.

A respondent supporting development of Warren Place supported the proposed modification.

A local resident from Papplewick made comments not related to the proposed modification which are summarised under 'General Comments'.

List of Respondents

Mr Hayden Lester

Mr Paul May

Housing Distribution

MM56

No comments received.

MM57

No comments received.

MM58

No comments received.

MM59

No comments received.

Housing Allocations

MM60

3 comments received.

The landowner for Glebe Farm, Burton Joyce raised representations to MM60, MM61, MM63, MM65, MM66 and MM87. Firstly the proposed housing trajectory presented at Appendix A provides overly ambitious and unrealistic housing delivery assumptions. It was considered the main modifications introduced concern about delivery of certain sites including sites H2, H5, H7 and H8 in relation to clay extraction where the representor considered that clarity will only come forward through the planning application process and raised concerns over potential delays due to the need for clay extraction affecting delivery. Reference was also made to

delays due to the need to deliver the Gedling Access Road. The modified text relating to reviewing the plan was considered vague and ambiguous. It was considered that a more balanced portfolio of housing allocations was needed. The plan was considered insufficiently flexible to adapt to rapid change; was not positively prepared as it was unlikely to meet the OAHN; it disregarded the reasonable alternative of allocating additional sites within other villages; and there was doubt it could deliver its housing requirement over the plan period and was not effective.

The landowner (M F Strawson Ltd) supported the allocation of their site X3. At the resumed examination on 29th November 2017, there were discussions regarding the access to site X3 and whether there would be any technical conflict with access proposed to site H5 on the opposite side of the A60. M F Strawson Ltd confirmed a transport consultant for site X3 had been liaising with the transport consultant for site H5 and they would continue to co-operate on access proposals for both sites. They agreed with the highways authority that a satisfactory combined access solution would be possible. The northernmost field within site X3 is owned by a third party, however M F Strawson Ltd confirmed that they were not proposing housing development on the third party land and it would remain as a landscape buffer. It was not considered necessary to carry out planting in the area. It was considered that the third party ownership of part of site X3 did not therefore impact on the delivery of housing.

A local resident objected to the addition of another 120 houses on the outskirts of Hucknall on Hayden Lane.

MM61

1 comment received.

The landowner for Glebe Farm made representations on the proposed modification which are summarised under **MM60**.

MM62

No comments received.

MM63

1 comment received.

The landowner for Glebe Farm made representations on the proposed modification which are summarised under **MM60**.

MM64

No comments received.

MM65

1 comment received.

The landowner for Glebe Farm made representations on the proposed modification which are summarised under **MM60**.

MM66

3 comments received.

The landowner for Glebe Farm made representations on the proposed modification which are summarised under **MM60**.

The landowners of the Killisick Lane site supported the modification and referred to positive discussions between all landowners. A meeting of the Killisick Lane Working Group (which comprises officers from Gedling Borough Council, Nottinghamshire County Council (as Minerals Planning Authority), Ibstock Brick Limited and the landowners) took place on 13th February 2018 which confirmed that a phased approach to the development of the site as proposed by MM66 is supported by all parties. It was anticipated that a planning application would be submitted to Gedling Borough Council in Autumn/Winter 2018.

One of the three landowners, in a separate representation, confirmed that all landowners are committed to the delivery of the Killisick Lane site.

MM67

No comments received.

MM68

1 comment received.

Northern Trust welcomed the proposed modification as it recognised the potential implications for housing delivery in the Borough of the GAR being delayed or abandoned. However, on the basis that the additional text proposed provided an important mechanism and trigger for a review of the Local Plan, it was considered that it should be incorporated into Policy LPD64 rather than supporting text. The proposed trigger for the review of the Local Plan should also be clarified so that there was no doubt that a review of the Local Plan would be triggered immediately if construction work on the GAR had not commenced by the end of December 2018. This was considered to be essential to ensure that:-

- the Council is obliged to undertake a review of the Local Plan if construction work on the GAR has not commenced by the end of December 2018;
- the plan is “positively prepared” and provides the necessary flexibility to adapt to change; and
- the minimum housing requirement identified in the adopted Core Strategy is met in the plan-period.

The landowner suggested proposed wording.

MM69

No comments received.

MM70

No comments received.

MM71

No comments received.

MM72

No comments received.

MM73

No comments received.

MM74

No comments received.

MM75

1 comment received.

The developer commented that in accordance with developer led consultations with residents and the Parish Council and their proposed application would deliver the Neighbourhood Plan goal of a safe access from Oxtan Road. There were no plans to make a connection via North Green in recognition of North Green residents' wishes to retain privacy.

MM76

No comments received.

MM77

1 comment received.

One landowner considered the map in annex 4 illustrating Policy LPD 66 unsoundly excluded the 1.6 ha site north of site H16 and the exclusion of the site went against the Council's own evidence. There have been numerous changes to boundaries as a result of the hearing sessions and the debate on the extent of H16 focussed only on the extension to the Oxtan Road despite the Council's previous response to the Inspector that the 1.6 ha omission was considered the only suitable area for development. It was considered that reliance on written representations had been prejudiced and no justification had been provided for the omission.

The respondent acknowledged that the Inspector may not be able to recommend modifications to the policy maps but considered the Council could be challenged on the map associated with Policy LPD 66 as the justification and reasoning for excluding the 1.16 ha site was against the evidence on which the plan relies. In addition, it was considered that the Council's response to it not meeting 5 year supply was a retrospective argument when the site should have been included initially and inconsistent with extending H8.

The respondent sought to change the map in Annex 4 (Policy LPD 66 / site H16) to include the 1.16 ha site and considered the current H16 boundary failed the test of soundness. It was also considered that there was a material change to site H14 with a proposed 18 home reduction from 72 homes to 54 (planning application reference 2017/1263).

MM78

4 comments received.

The Executors of Anne Nightingale (of site X5) supported the main modification.

Local residents referred to concerns raised as part of an earlier consultation about housing allocations H17, H18, H19, X5 and X6 including densities being too high, impact on traffic and lack of infrastructure.

A local resident in Ravenshead, who previously promoted his land as suitable and immediately available for housing land throughout the Local Plan process to date, objected to the inclusion of sites X5 and X6 as they were not considered to represent a logical extension of the built-up area.

MM79

No comments received.

MM80

1 comment received.

A local resident commented that there was already a huge problem with water runoff from the fields above Orchard Close and evidence of the damage of water runoff is evidenced by the dreadful state of the road surface of Orchard Close. The works to engineer out these increased risks would cause huge disruption and misery to residents.

MM81

2 comments received.

Local residents raised concerns previously raised as part of earlier consultation on the Publication Draft including loss of Green Belt, visual impact, topography, surface water runoff, site access and traffic.

MM82

No comments received.

MM83

No comments received.

MM84

No comments received.

List of Respondents

Executors of Anne Nightingale

Gedling Borough Council, Mr Norman Foster and the Trustees of Constable's Field Foundation

M F Strawson Ltd

Northern Trust Limited

Persimmon Homes NMID

Troyal Farms Limited

Ms Susan Cohen
Mr Leonard Elston
Mr Norman Foster
Mr David Gorham
Mrs Margaret Kerr
Mr Martello
Dr Roberts
Ms Doreen Seaton
Mr David Tatham

Employment Allocations

MM85

2 comments received.

Nottinghamshire County Council noted the last sentence of the third paragraph of the supporting text to the Gedling Colliery site which states that the site “will have direct access to the new road making the site highly accessible”. Whilst this is true once Gedling Access Road (GAR) is open, the County Council stated it needed to be acknowledged that the Gedling Colliery employment site was entirely dependent upon the prior construction and opening to traffic of the GAR. Access to the Gedling Colliery employment site from the former Gedling Colliery access road in advance of the completion of GAR would not be appropriate or acceptable to the local highway authority.

The landowners supported the proposed modification which allocates Gedling Colliery as an employment led mixed-use development site (E1). An outline planning application (2017/1571) for site E1 was submitted in December 2017 for B1, B2 and B8 uses, a pub/restaurant and a drive thru (Class A3) which has been developed to fully accord with the requirements of new Policy LPD (new) Site E1. The landowner discussed and agreed the proposed main modification with Gedling Borough in recognition that a wider range of employment uses were required to facilitate the development of the site and the site’s location adjacent to the new Country Park has presented new opportunities for visitor facilities. The submitted outline application fully accords with the proposed modification to site E1 and was therefore supported.

MM86

No comments received.

List of Respondents

Harworth Group PLC
Nottinghamshire County Council

Part D: Appendices

MM87

2 comments received.

The landowner for Glebe Farm made representations on the proposed modification which are summarised under **MM60**. They argued that the proposed housing trajectory presented at Appendix A provides overly ambitious and unrealistic housing delivery assumptions.

A local resident objected to the changes in the Housing Trajectory and noted the number of dwellings above the cumulative housing target had now grown to 849 and there were significant increases in the number of houses allocated on Green Belt land. It was noted that the Site Selection Document Addendum 3 explained the need to allocate additional housing sites due to the lack of five year land supply rather than overall supply over the plan period. Reference was made to the Planning Practice Guidance which states “Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development on a site within the Green Belt”. Green Belt sites allocated on the grounds of ‘very special circumstances’ should not be granted simply to satisfy the five year land supply requirement. It was considered that no exceptional circumstances have been given to site H5.

MM88

No comments received.

MM89

No comments received.

MM90

No comments received.

List of Respondents

Troyal Farms Limited

Mr David Fletcher

Sustainability Appraisal

General Comments

No comments received.

Housing site H3

3 comments received on the SA assessment on the Willow Farm site (site H3).

SA 6: Environment, Biodiversity and Green Infrastructure

The Willow Farm Action Group and a local resident noted that Table 6 (on page 40) shows the site H3 was scored as a minor negative against SA Objective 6, although the amber box contains two minus signs. They noted that the score for the site H3 in the SA assessment in Appendix C (on page 104) was marked as a major negative with two minus signs within a red box and it was considered that there were discrepancies between the two scores. The site should be scored as a major negative. A local resident noted this alters the outcome making the site with the largest number of minor negatives and the second largest number of major negatives giving an overall highest score of negatives for all the proposed developments.

Note from the Council: The two minus signs are correct in Table 6 and the box colour should be red, not amber.

SA 9: Flooding

The Willow Farm Action Group believed that the SA assessment on site H3 should be revisited to reflect the proposed Main Modification MM5. The SA Matrix for Site Assessment in Appendix A stated a score of 0 would be applied to sites not within flood zone 2 or 3 or to those that are within an area of very low risk of surface water run-off. The Willow Farm Action Group believed the SA Matrix should have taken into account the proposed Main Modification MM5 which seeks to introduce a wider and more effective approach to flood risk assessment with the objective of ensuring that developers take into account the connectivity issues between catchment areas. The surface water flood risk map (EX/48) provided by the Council during the examination confirmed that the streets below site H3 are within high / medium risk of surface water flooding. These streets are within the 'area' of the proposed development and as parts of the H3 site were within 150 metres uphill of streets with high risk surface water flooding, the Willow Farm Action Group argued that the correct SA assessment for the H3 site should be a major negative, not a 0 score.

SA 12: Transport

A local resident measured and found that the distances to a bus from Greens Farm Lane and Grange View Road were at least 400 metres. It was considered that the SA score should be a major negative (not a minor negative) as the distances made it obvious that the whole H3 site would be dependent on vehicular access for everyday movements.

SA Matrix

1 comment received.

The Willow Farm Action Group believed that the SA objective and criteria in both the SA Framework and SA Matrix should be revisited to reflect the proposed main modification MM5 in order to promote the shared responsibility of the Council and the developers to deliver the policy aims and objectives proposed by MM5 from the early stages of preparation to the completion of the development.

List of Respondents

Willow Farm Action Group

Miss Samantha Gregory

Mr Peter Lindsay

Habitats Regulations Assessment

General Comments

No comments received.

Equality Impact Assessment

General Comments

No comments received.