

Gedling Local Plan Examination
Revised Hearing Date Tuesday 27 June 2017

We have queries about figures and underlying assumptions in both papers.

1 Revised Housing Background Paper Addendum Ex/104

- 1.1 **Appendix A** shows an expected delivery figure of 22 greater than the target of 80 for Burton Joyce. The revised figures in the table however, total 3 less than the target figure, at 77. How is the 22 excess figure derived?
- 1.2 If the correct figure is 3 fewer than target, what impact does this have on any of the plans for Burton Joyce?
- 1.3 **Appendix E:** The 77 homes are all delivered in the 2011 – 2022 period. The target of 80 is for the period 2011 – 2028. Is the Council expecting that the delivery for Burton Joyce, 2022 – 2028, other than windfall development, will be 3 houses? Are these figures consistent with the 5 year supply calculations?
- 1.4 **Needs Analysis:** The Council's policy is that development in the 'other villages' will be to meet local need. The needs analysis background paper gives a housing need for Burton Joyce as 70 – 90 for 2011 – 2018. How is the needs analysis projected through to 2022 or 2028 and influencing forward plans?
- 2 **LPD 63/64 Ex105A:** How do these various figures and timescales reconcile, in terms of the plan and expectations for housing development in Burton Joyce?
- 3 **Specific Assumptions for Mill Field Close and Burton Joyce:** It is our position that the assumption of 23 houses on the site at Mill Field Close, is too high, and is based on inconsistent and thus flawed information which has been used in the various planning documents and also the formal outline planning decision for the site. This flaw is carried through into the 5 year trajectories, thus making them either unsound in respect of Burton Joyce, or dependent on consolidating the flawed background information into planning decisions. The argument is set out below.
 - 3.1 The revised documents do not change the policy on housing density, which is 20dph for Burton Joyce, as one of the 'other villages'. The urban density rate is given as 30dph and 25 dph for the intermediate settlements. (See LPD33).
 - 3.2 The Aligned Core strategy allocates 20 dwellings for the Mill Field Close site. LPD 68, now revised to LPD 69, gives the size of the allocation for housing as 20 dwellings on the site and gives the size of the site as 0.78 ha, and says that these values equates to 26 dph. However, the site is listed in the landowner's planning application of 2015, and in the Council's own committee reports of February and November 2016, as 0.74 ha. So there are already inconsistencies in the criteria used to assess the site and an apparent error in LPD 68/69.

- 3.3 The application for outline planning permission was submitted in May 2015; this, and both reports to the Planning Committee (Feb and Nov 2016), state that the applicant assessed the site on the basis of 20 dwellings, (*ie consistent with the ACS*) but that the Council believed that 23 would be an appropriate number. The Council report for the November 2016 Planning Committee, states that this number of 23, is based on the convention of 30 dph, applied to the size of the site, which is 0.74 hectares; this shows that the Council applied the urban density rate. We therefore have yet another inconsistency applied to the scale of development for the site and the public information effectively implies that it was the Council that encouraged the increase from the 20 stated in the ACS.
- 3.4 In response to a question raised by a Councillor, as to the housing density in the surrounding area, at the February 2016 meeting, the Committee was advised that the officer did not know, but that he was sure it would be around the 30 dph level. We wrote to the Chairman after the meeting, to point out that this was a great exaggeration of the actual figure, giving example maps showing this to be the case. The written response from the Chairman of the Committee, was that the figure of 23 gives an approximate density rate of 30 dph and that the actual level of development would be considered at the detailed planning stage. Consequently, the Chairman confirmed that this urban rate was applied.
- 3.5 LPD 33 states that higher density rates are allowed for, provided that this reflects local characteristics and does not harm local character. We recognise that the density rate figure (*ie 20dph in BJ's case*), is to be a minimum consideration unless there are circumstances that suggest otherwise. On that basis, we believe that it is reasonable that the Planning Committee should have been given the correct figures, fully advised of its own policies and had discussion about why, or whether, the approved build figure should be higher than the minimum. There was no such discussion at the Planning Committee nor was any such set of arguments set out explicitly in the report to the committee
- 3.6 The Committee report also states that the actual level of housing, will be considered at the detailed planning stage and that the character of the local area will be a consideration. The above history makes it clear that the Council decision is already underpinned by inconsistencies and errors, and that the local character has not featured in the decision thus far, contrary to its own policy.
- 3.7 At a previous hearing session, the Council indicated that the Mill Field Close site will now be sold, with the outline planning permission, of 23 houses. None of the documents under consideration through this hearing process, refer to a caveat of 'up to 23' houses.
- 3.8 The conclusion must be that the Council has not applied its own policy criteria in its decision making. We must also conclude that the Council, in effect, is responsible for increasing and agreeing the number of houses applied for, apparently beyond the applicant's original thinking, beyond the ACS figure and beyond the LPD 33 policy rate of 20dph.
- 3.9 The inconsistent application of the Council's own policies, and the subsequent flawed decision is therefore being compounded and consolidated into the forward policies (Housing Background Paper and LPD 63/64), that will be used to determine the detailed planning application for Mill Field Close, the trajectories

for Burton Joyce and potentially, any future planning decisions, for development in the village.

4 Summary

4.1 Our reading of the needs analysis (LPD/GRO/04), Housing Background Paper (Ex104A) and LPD 63/64 (Ex 105A), raises questions about the accuracy of some of the figures used for Burton Joyce and how the various timelines and figures reconcile, into the forward plan for Burton Joyce, and in turn, the overall plan for Gedling.

4.2 We believe that there are significant inconsistencies and hence, errors, in the history of the application of policy criteria to the considerations of the Mill Field Close site. These inconsistencies have been compounded into the formal decision for outline planning permission and also into the assumptions underpinning the Housing Background Paper (Ex104A) and LPD 63/64.

4.3 The key issues in our view, are that the wrong housing density rate has been applied to considerations of Mill Field Close (ie 30 or 26 has been used instead of 20dph), and local character has not been considered in the outline planning decision.

4.4 We believe that as a consequence, and coupled with the pressure on the Council, to deliver against the target numbers for the village and Borough, the assumed level of build on the Mill Field Close site is too high and that this will be carried through into the future detailed planning decision for the site, unless revised through this Examination process.

4.5 With this background, it is difficult for residents to be confident on how the Council is applying, and will apply its own policy criteria in the future, to developments in Burton Joyce.

4.6 We therefore ask that in respect of Burton Joyce, the Council revisits the information underpinning the documents being considered through this hearing and in association, revisits the criteria which should be applied to the planning decision for the specific site of Mill Field Close, ensuring that forward decision properly reflect the Council's planning framework.

4.7 We believe that the numbers for the site at Mill Field Close should be reduced, to comply with LPD 33 and local character. The starting point for consideration should be 14 or 15 dwellings, to be consistent with 20dph. In consequence, the total for Burton Joyce in the forward planning documents would also reduce. Whilst these numbers may seem small, in the overall scheme of things across the Borough as a whole, even small numbers can have a big impact to the village of Burton Joyce and its residents.

Mill Field Close Residents, June 2017