

Examination of the Gedling Borough Local Planning Document Publication Draft (Part 2 Local Plan).

Position Statement of the Willow Farm Action Group - Reference LPD_pub_B/382

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1. Introduction

- 1.1 This statement has been prepared on behalf of the Willow Farm Action Group, for consideration at the Gedling Borough Local Plan 2016 Examination.
- 1.2 It relates to 'Matter 1 - Legal Compliance, including the Duty to Co-operate' ; issue 1b and the question of:

'Has the Plan been prepared in accordance with the Council's Statement of Community Involvement and met the minimum consultation requirements in the Regulations?'
- 1.3 This issue was included within our original response to the Local Plan and is recorded within the LPA's Report of Responses October 2016, on page 73.

2. W.F.A.G Position Statement

- 2.1 Regulation 18 of the Town & Country Planning (Local Planning) (England) Regulations 2012 sets out the requirement for the Local Planning Authority (LPA) to notify and invite specified persons and bodies it considers appropriate to make representations.
- 2.2 Regulation 22 requires the LPA to produce a statement setting out how the bodies and persons were invited to make representations under Regulation 18.
- 2.3 In May 2016 single A4 sized planning notices were placed at the ends of Green's Farm Lane and Grange View Road. These cul-de-sacs are designated as access roads for the H3 Willow Farm development within the Local Plan.
- 2.4 The Green's Farm Lane notice was placed at the entrance to the H3 site (see fig 1), which is private land and is secured with a gate. Local residents are not able to access this site and there is therefore no reason for them to visit the end of the road.

The Grange View Road notice was also similarly placed at the private entrance to the H3 Site, which is situated at the top end of the cul-de-sac.



[Figure 1 Greens Farm Lane](#)

- 2.5 Members of our Group raised concerns with the LPA as early as the 25th May 2016, pointing out that this approach would be ineffective in bringing the plan to the notice of those living in the vicinity of the H3 Willow Farm site.
- 2.6 The LPA's response was to inform us that a total of four notices were placed around the site and that letters were also sent to the properties which **immediately adjoin** the Willow Farm site. They informed us that notifications had also been placed in the media, leisure centres, Health Centres and libraries across the Borough and that the LPA's position was that it had exceeded the minimum requirement for consultation, as required by regulations.
- 2.7 Such was our level of concern that local residents would not be aware of the proposals, we produced and delivered 200 flyers and visited a large number of local residents to inform them personally of the Plan.
- 2.8 We maintain that the large public response to the Willow Farm development proposal was as a direct result of our actions and cannot be attributed to the steps taken by the LPA.
- 2.9 The LPA subsequently prepared a 'Report Of Consultation On The Local Planning Document', dated October 2016.
- 2.10 Paragraph 1.1 of the introduction to this report states that '**The Borough Council is required to submit a statement identifying who has been asked to participate in**

the preparation of the Local Planning Document'. Paragraph 1.9 then states '**More specifically for the formal publication stage, the Borough Council sent letters to people who live adjoining and near to the proposed sites.....** '

- 2.11 Given that this statement differed from the information we had been previously given, we contacted the LPA to seek an explanation. Their response was that '**This is a general statement applying to all sites. We wrote to properties which immediately adjoined the various sites. We also used our judgement in a small number of circumstances to write to other nearby properties. We therefore consider the reference in paragraph 1.9 to be accurate**'.
- 2.12 In response, we have pointed out that the report does not provide any further clarification or indeed any indication that this was only a 'general statement' and there is no suggestion that the LPA had exercised their 'judgement' in deciding which residents living near to the proposed sites would or would not receive letters of notification. We would also suggest that the phrase '**more specifically**' at paragraph 1.9 of the report, appears to contradict the explanation that this was only a 'general' statement.
- 2.13 We believe this statement is at best ambiguous and at worst misleading and we remain concerned that the Independent Planning Inspector may, understandably, make an assessment of the level of activity to consult with local residents undertaken by the LPA at the various sites, based upon this misleading and inaccurate statement.
- 2.14 We note that in the Inspector's Report into the Aligned Core Strategy 2014, at paragraph 15, the Inspector, Ms Kingaby stated '**There was considerable dissatisfaction expressed by interested persons, especially residents, Parish Councils and local amenity groups over the public consultation process**'.
- 2.15 There is a pattern emerging regarding the LPA's approach to public consultation, which fails to support the National Planning Policy Framework's guidance that planning should be a collective enterprise that includes rather than excludes people and communities.
- 2.16 As a direct result of the issues raised within this position statement, members of our Group had to spend a considerable amount of time and energy on matters of consultation which, we maintain, were the responsibility of the LPA. This acted as a barrier to our own individual ability to assess the large amount of information presented in support of the Local Plan within the timescales allowed.
- 2.17 In conclusion, we believe that the LPA has failed to positively engage in its duty to consult with the public which, in light of the previous feedback they have received, is disappointing and, in our view, demonstrates an unwillingness to recognise feedback as a genuine opportunity to improve systems and procedures.

1011 words.