

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 2 - Sustainability Appraisal', issue 2a and the questions of:

'Does it test reasonable alternatives? Has the Sustainability Appraisal been robustly prepared with a comparative and equal assessment undertaken of each reasonable alternative?'

'Is the Sustainability Appraisal decision making and scoring robust, justified and transparent?'

1.3 This statement outlines an area of concern regarding the Sustainability Appraisal undertaken for the H3 Willow Farm site. This issue was included within our original response to the Local Plan and is recorded within the Report of Responses October 2016, on page 72.

2. W.F.A.G Position Statement

2.1 The SA Draft Report on page 169, paragraph 11.10 outlines the additional information that was used during the Sustainability Appraisal.

2.2 These information sources included **'some of the information collected as part of the Infrastructure Delivery Plan process for the Local Planning Document was also fed into the SA assessment'**. We also note that advice was sought from the Environmental Agency and Local Lead Flood Authority, which was used to inform the SA Objective 9 - Flooding.

2.3 The H3 Willow Farm specific Sustainability Assessments are contained within the Draft Main Report on page 136 and 170, with the detailed assessments contained within SA Appendix H page 19.

- 2.4 Within the main report and detailed Appendix H assessments, H3 Willow Farm is assessed as neutral / not relevant for Objective 9 - Flooding.
- 2.5 The Infrastructure Delivery Plan and Addendum Oct 2016, also assesses the H3 Willow Farm site on page 67 and ,against the heading Flood Risk, states **'the surface water flood risk map indicates there is a thin flow of high risk surface water flooding that runs across the site'**. The table then indicates that **'further discussion with the EA and LLFA as part of the planning application process'**.
- 2.6 Local residents have experienced the high level of surface water run-off from the H3 Willow Farm site and therefore raised this specific objection within our responses to the proposal.
- 2.7 This risk was not mentioned by the LPA in its Report of Responses document 2016, in which it outlined its response to the concerns raised by the Willow Farm respondents regarding surface water flood risk.
- 2.8 Other sites (6/18, 6/25, 6/455 and 6/462) have all been assessed as a major negative against objective 9 Flooding, because **'the sites have surface water flooding issues'**. Sites H9 and E1, which are included within the Carlton Site allocations, are assessed as a minor negative because **'the surface water flood map indicates that there is low risk of surface water flooding'**.
- 2.9 We cannot therefore understand why H3 Willow Farm has been assessed for flood risk as neutral / not relevant when clearly, according to the LPA's own Infrastructure Delivery Report 2016 and the surface water flood risk map, the site has in fact a high risk surface water flooding issues. When comparing the LPA's assessment of other sites, the correct assessment of H3 Willow Farm, under Objective 9 - Flooding, should be a major negative.
- 2.10 In our opinion, this apparent inconsistency undermines the credibility and robustness of the Sustainability Appraisal process carried out on the H3 Willow Farm site and demonstrates an unequal assessment between sites.
- 2.11 This is a matter of particular concern because, as outlined within the Planning Inspectorate's own guidance document, it is this report that is likely to be the basis for the Inspector's identification and focus on the main issues that are fundamental to the soundness of the plan.
- 2.12 In September 2014, following independent Examination, the Gedling Borough Aligned Core Strategy was adopted. The Inspector supported the LPA's policy of urban concentration, which was 'considered to be the most sustainable location for new homes', however at paragraph 118 of the Inspector's report, the Inspector, Ms

Kingaby, pointed out that 'sites to be released from the Green Belt must have good sustainability credentials'.

- 2.13 The only positive aspect of the Sustainability Appraisal undertaken on the H3 Willow Farm site was against Objective 1 - Housing and we believe that the inclusion of the correct assessment for Objective 9 - Flooding, based upon the the surface water flood risk, when combined with the other negative elements of the original site appraisal, would have fundamentally changed the justification for releasing it from the Green Belt, because the site does not have 'good sustainability credentials'.

793 words.