

1. These comments are made on behalf of M F Strawson Ltd, promoter of land west of the A60, Redhill, for 150 dwellings. The site is assessed as site 6/778 in the Sustainability Appraisal of Reasonable Alternative Sites (LPD/REG/14). This Position Statement follows on from representations made to the Publication stage of the Local Planning Document, reference lpd_pub_b/218 and lpd_pub_b/221.

Q1. Is the Plan based on a sound process of Sustainability Appraisal?

2. The Council's Sustainability Appraisal ("SA") in respect of the Gedling Local Plan Part 2 ("Local Plan) was issued on May 2016. A further update was prepared by the Council and issued in October 2016 [LPD/REG/20], alongside a Site Selection Document Addendum (October 2016) (LPD/GRO/14). It should be noted that the October 2016 update only related to three additional sites put forward as potential housing sites. The work undertaken in the original SA was not revisited as part of this process.
3. A further Addendum to the SA was produced in December 2016 [EX-12] and this revisited Stage B of the SA process. However this document does not provide any further details on the decision making process regarding the selection of sites following the completion of their assessment.
4. The Council in their response to the Inspectors Questions (EX-08) states with regards to Question 39 that Section 4 of the Site Selection Main Report (2016) explains the decision making and Section 5 looks at the recommendations of site allocations for housing in the Local Planning Document. However this Report, and the documents prepared since, do not provide details of the process of selection between differing sites.
5. We therefore maintain that, as outlined in the Representations made on behalf of our client in July 2016 (lpd_pub_b/221), the process relating to the SA and assessment of the housing allocation sites remains unsound. Despite our client's site, Site 6/778, scoring equally and in some instances better than Site H5 (Lodge Farm Lane) in the SA, there is no justification set out within the SA, its Addendum, or any other documentation as to the process of selection of Site H5 over Site 6/778.
6. Furthermore these documents, including the updated reports, do not provide any justification for the allocation of an additional site (Site H10) at Hucknall rather than the allocation of a second site adjacent to the Urban Area, which would have been preferable in terms of the Housing Distribution Strategy outlined in Policy 2 of the ACS.
7. It is therefore considered that the Plan is, as currently drafted, unjustified and is therefore unsound. It can only be made sound by revisiting the Sustainability Appraisal and site selection process to make justified selection of site allocations.

Q2. Has the Sustainability Appraisal been undertaken at each stage of the Plan's preparation to clearly justify the Council's policy choices?

8. No comment.

Q3. Does the Sustainability Appraisal process represent the only site selection methodology or has the Council used any other process?

9. No comment.

Q4. Does it test reasonable alternatives? Has the Sustainability Appraisal been robustly prepared with a comparative and equal assessment undertaken of each reasonable alternative?

10. Please see response to Q1.

Q5. Is the Sustainability Appraisal decision making and scoring robust, justified and transparent?

11. Please see response to Q1.

Q6. How has the Sustainability Appraisal process given appropriate consideration to minerals and coal mining issues? Has the Sustainability Appraisal taken into account the presence of, and implications of, Minerals Safeguarding and Consultations Areas?

12. No comment

Q7. Does it represent the most appropriate strategy in the circumstances?

13. Please see response to Q1.

Q8. Does the final report set out the reasons for rejecting earlier options?

14. Please see response to Q1.



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