



Position
Statement

3 Brindleyplace
Birmingham
B1 2JB

T: +44 (0)8449 02 03 04
F: +44 (0)121 609 8314

Gedling Local Planning Document Examination

Position Statement on behalf of
Northern Trust Limited

Ref. 9151009

Matter 3: Vision, Objectives and
Spatial Strategy

January 2017



Matter 3: Vision, Objectives and Spatial Strategy

Issue 3a: Accordance with the ACS

Question 2 – Does the Plan accord with the Spatial Strategy in the ACS, in particular with respect to:

ii) *the overall distribution of development between the main built up area of Arnold and Carlton, around Hucknall, the Key Settlements for Growth and Other Villages;*

- 1.1 The ACS Spatial Strategy is designed to achieve urban concentration and regeneration. Accordingly, it envisages most new development being located in or adjoining the main built up areas of Nottingham, with development adjacent to the Sub Regional Centre of Hucknall aimed at regeneration and supporting its role.
- 1.2 The ACS goes on to define a settlement hierarchy and to specify the minimum amount of new development that needs to be delivered in the plan period 2011-2028. Finally it states how this development should be accommodated spatially, before referring also to certain key pieces of infrastructure on which the ACS depends.
- 1.3 As far as distribution is concerned, the ACS makes the following key provisions:
- Approximately 4,045 dwellings in or adjoining the existing main built up area of Nottingham, including 830 homes at the strategic allocation of Teal Close and at least 500 homes at the 'Strategic Location' of the Gedling Colliery/Chase Farm site subject to funding of Gedling Access Road.
 - Approximately 1,300 homes adjoining Hucknall Sub Regional Centre, comprising of Sustainable Urban Extensions at North of Papplewick Lane (up to 300 homes); and Top Wighay Farm (1,000 homes).
 - Approximately 3,995 homes elsewhere in the ACS area, including up to 560 homes in or adjoining Bestwood Village; up to 1,055 homes in or adjoining Calverton; and up to 330 homes in or adjoining Ravenshead.
 - Up to 260 homes in other villages not specifically identified above, solely to meet local needs.

1.4 The LPD proposes a strategy and allocations that distributes development, as follows:

Table 1: Comparison of the distribution of housing for Gedling set out in the ACS and proposed in the LPD

	ACS Housing Distribution	LPD Housing Distribution	Difference
In or adjoining the Urban Area (Including Windfall)	Approximately 4,045	4,330	285
Adjoining Hucknall	Approximately 1,300	1,265	-35
Key Settlements	Up to 1,945	1,515	-430
Bestwood Village	Up to 560	525	-35
Calverton	Up to 1,055	740	-315
Ravenshead	Up to 330	250	-80
Other Villages	Up to 260	140	-120
TOTAL	7,550	7,250	-250

1.5 The Inspector will note that the ACS uses the words "*approximately*" and "*up to*".

1.6 Whilst the LPD does not provide for precisely the numbers specified in the ACS, it does provide for approximately 4,045 dwellings in or adjoining the existing main built up area of Nottingham. As a consequence, the direction of an increased number of dwellings and the distribution of development towards the urban area accords with the Spatial Strategy, in relation to housing needs in the urban area, set out in the ACS.

iii) *the quantum of development proposed, both in terms of housing and employment land; and*

1.7 Policy 2, Part 3 of the ACS states that a minimum of 30,550 new homes will be provided for in the plan period (2011 to 2028), distributed between the three authorities. It specifies a minimum housing requirement for Gedling Borough of 7,250 dwellings. However, as indicated above, the ACS actually plans for the delivery of approximately 7,550 homes (i.e. an additional 300 homes), in the Borough. The Inspector appointed to examine the ACS considered that the ACS needed this flexibility given the uncertainty surrounding some of Gedling's largest sites¹.

1.8 Draft Policy LPD 63 plans for the minimum of 7,250 homes and so does not build in the additional flexibility envisaged in the ACS.

1.9 The Council's Housing Background Paper (May 2016) and the Council's Responses to the Inspector's Initial Questions (December 2016) state that, in the Council's view, there is no longer a need to plan for "*a substantial number of homes over and above the objectively*

¹ Paragraph 91, Footnote 22 of the of the Inspector's Report on the Aligned Core Strategies.

assessed housing need"² and allow for a buffer as the uncertainty regarding the delivery of large sites identified, in the previous Local Plan (i.e. Top Wighay Farm and the Gedling Colliery site), is no longer considered to exist. The Council has reached this conclusion on the basis that:

- the Gedling Colliery development has a resolution to grant planning permission, subject to the completion of a Section 106 agreement; and
- progress is being made on the Top Wighay Farm site.

1.10 In addition, the Council considers that flexibility is provided through:

- the allocation of land at Newstead (although it assumes that this will not contribute to meeting the Borough's housing requirement);
- the "*cautious approach*" taken towards "*windfall and delivery on the Gedling Colliery site*"³; and
- the designation of safeguarded land (under Draft Policy LPD 16) to meet long-term development needs beyond the plan period.

1.11 Nonetheless, the LPD only plans for the minimum housing requirement of 7,250 homes and it does not build in additional flexibility envisaged in the ACS. As a result, insufficient flexibility is built into the LPD to ensure that it meets the "*objectively assessed needs, with sufficient flexibility to adapt to rapid change*", in accordance with paragraph 14 of the NPPF. Therefore, the LPD is not "*consistent with national policy*" and consideration should be given to the allocation of additional land in the Borough, in order to make the LPD sound.

iv) The Removal of Land from the Green Belt

1.12 Paragraph 111 of the Inspector's Report in to the examination of the ACS confirms her agreement that it was unlikely that the development requirements of the areas could be accommodated on areas of safeguarded land in Gedling and that 'exceptional circumstances' existed for the alteration of green belt boundaries. The Inspector confirms that this was on the basis that the Green Belt boundaries are drawn tightly around Nottingham and to promote development beyond the Green Belt's outer edge would be considered unsustainable.

1.13 Paragraph 3.2.10 of the supporting text to Policy 3 of the ACS also acknowledges the need for the release of land in the Green Belt to meet development needs.

² Paragraph 4.6 of the Housing Background Paper (May 2016).

³ The Council's response to Question 26 of the Inspector's Initial Questions to the Council dated 22 November 2016.

- 1.14 Policy 3 of the ACS, which relates specifically to the Green Belt, confirms that whilst the principle of the Nottingham Derby Green Belt will be retained the Part 2 Local Plans for each authority will review Green Belt boundaries to meet the development land requirements of the ACS.
- 1.15 Part 2 of Policy 3 states that, in reviewing the Green Belt boundaries to deliver the distribution of development in Policy 2, Part 2 Local Plans will use a sequential approach to guide site selection, as follows:
- a. Firstly, land within the development boundaries of the main built up area of Nottingham, Key Settlements for growth, and other villages.
 - b. Secondly, other land not within the Green Belt (safeguarded land).
 - c. Thirdly, Green Belt land adjacent to the development boundaries of the main built up area of Nottingham, Key Settlements for growth, and other villages.
- 1.16 Part 3 of Policy 3 confirms that in reviewing Green Belt boundaries, consideration will be given to:
- a. the statutory purposes of the Green Belt, in particular the need to maintain the openness and prevent coalescence between Nottingham, Derby and the other surrounding settlements;
 - b. establishing a permanent boundary which allows for development in line with the settlement hierarchy and / or to meet local needs;
 - c. the appropriateness of defining safeguarded land to allow for longer term development needs; and
 - d. retaining or creating defensible boundaries.
- 1.17 This provides a considered framework for the release of land from the Green Belt to meet the Borough's development needs.
- 1.18 We consider the principle of removing land from the Green Belt and whether the approach taken to the release of Green Belt land deviates from the principles set out in the ACS under **Matter 4: Issue 4b: Q2** but are satisfied that the ACS provides for Green Belt releases as part of the Spatial Strategy.

GVA on behalf of Northern Trust Limited