

Gedling Local Planning Document (Part 2 Local Plan): Examination

Hearing Position Statement in relation to
Matter 3: Visions, Objectives and Spatial
Strategy

Submitted on behalf of Northern Trust
Company Ltd (Representor Number:
9151009) in respect of Land at Orchard
Close, Burton Joyce

January 2017

Issue 3a: Accordance with the ACS

Q1. Does the Plan accord with the Vision and Objectives set out in the ACS?

- 1.1 The Spatial Vision set out at Section 2.3 of the Greater Nottingham Aligned Core Strategies (ACS) establishes what the plan area could look like if the aspirations of the ACS are met. It seeks to ensure that, by 2028,

“...The area has experienced sustainable growth, with 30,550 new homes developed since 2011...

...In the more rural parts of the area, some identified settlements have developed to make the best of their accessibility to services, which have been sustained and enhanced, and their infrastructure capacity. Other towns and villages have experienced smaller levels of development in line with meeting local needs (especially affordable housing), supporting their communities, and maintaining their vitality, viability, and local distinctiveness...”

- 1.2 A series of 12 Spatial Objectives are proposed to help to deliver this vision. Spatial Objective ii relates ‘ high quality new housing’ and seeks to, *inter alia*:

“... manage an increase in the supply of housing to ensure local and regional housing needs are met, brownfield opportunities are maximised, regeneration aims are delivered, and to provide access to affordable and decent new homes...”

The Key Settlements of Awsworth, Bestwood Village, Brinsley, Calverton, Eastwood, Kimberley (including Nuthall and Watnall) and Ravenshead will be developed to make the best of their accessibility to services and infrastructure capacity.”

- 1.3 Our response to Q2 below, and Matter 5 (Housing), sets out Northern Trust’s position that insufficient housing land is identified in the LPD to ensure that the housing requirement set out within the ACS is met. The proposed distribution of housing sites in the LPD is also flawed as it will fail to ensure that needs are met within the local area where they arise; particularly within the Key Settlements and Other Villages. As a result, the LPD does not accord with the aspects of the Spatial Vision and Spatial Objectives provided above insofar as they relate to the Key Settlements and Other Villages.

Q2: 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;**

- 1.4 Northern Trust maintains that the proposed distribution of housing development to the Key Settlements and Other Villages within the LPD fails to accord with the Spatial Strategy in the ACS. The LPD effectively under-allocates sites in Calverton and the

Other Villages and will, therefore, fail to meet identified local needs within these settlements.

- 1.5 Whilst it is a sound planning principle to focus the majority of the new development required around the main urban area, the LPD also has to ensure that the pattern of development reflects need in order to be sustainable. GBC has produced up-to-date evidence that clearly demonstrates that the level of need for housing in the Key Settlements and Other Villages remains consistent with that identified during the preparation of the ACS. GBC's approach in reducing the proposed level of housing development directed towards the Key Settlements and Other Villages risks local needs arising within those settlements not being met within the plan period. As a result, the proposed distribution of housing development to the Key Settlements and Other Villages set out within the LPD fails to accord with the Spatial Strategy of the ACS.

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

- 1.6 Northern Trust maintains that insufficient sites have been identified within the LPD to ensure that the minimum level of housing growth required across the Borough will be delivered. In particular:

- The housing requirement within the ACS is clearly drafted as the minimum number of houses required in order to meet the needs identified at that time. More recent population projections indicate that the population of the Borough is expected to increase at a greater rate than previously anticipated. In the circumstances, the adopted housing requirement within the ACS should be seen as an absolute minimum for the Borough over the plan period.
- GBC fails to acknowledge that not all sites that are allocated will come forward in the plan period. Research undertaken by DCLG indicates that between 10-20% of planning permissions are not implemented, whilst a further 15-20% are subject to a revised application process which delays delivery¹. By failing to acknowledge that not all sites that are allocated come forward in a plan period and failing to include flexibility, the LPD includes a very high degree of risk that the minimum requirement will not be delivered.

- 1.7 As a result, the overall level of housing provision in the LPD is inconsistent with the Spatial Strategy of the ACS; particularly as needs arising within the Key Settlements and Other Villages will not be met (see our response to ii above).

iv. the removal of land from the Green Belt?

- 1.8 The ACS clearly establishes the principle of reviewing existing Green Belt boundaries through the Part 2 Local Plans. Such an approach was informed by evidence base documents prepared at that time, which indicated that there was insufficient land within the urban area to accommodate the identified development needs over the plan period. Indeed, the Inspector's Report on the Examination into the ACS confirmed that:

¹ DCLG Presentations to the HBF Planning Conference (September 2015)

“In order to meet the housing requirement of 30,550 new homes and achieve sustainable growth with supporting infrastructure, jobs and services, I accept the Councils’ judgment that future development will have to extend beyond Nottingham’s main built up area...

...The Green Belt boundaries are drawn tightly around Nottingham, and to promote development beyond the Green Belt’s outer edge would extend travel to work and for other purposes in an unsustainable fashion. Areas of safeguarded land exist in Gedling Borough, but these are unlikely to meet all the plan area’s development requirements outside the main built up area. I agree with the Councils that the exceptional circumstances required for alterations to Green Belt boundaries exist.”²

- 1.9 Gedling Borough Council (GBC) has undertaken a review of detailed Green Belt boundaries to inform the LPD. Such an approach is consistent with the Spatial Strategy of the ACS (i.e. Policy 2) and clearly demonstrates that there are areas within the Borough where existing Green Belt boundaries can be altered without causing significant harm to the purposes of including land within the Green Belt.
- 1.10 Northern Trust maintains that insufficient land within the Key Settlements and Other Villages has been proposed for allocation in the LPD, with direct implications for the extent of land to be removed from the Green Belt. As a result, insufficient land is proposed for release from the Green Belt.
- 1.11 Furthermore, insufficient Safeguarded Land has been identified in the LPD to provide sufficient flexibility to ensure that future housing needs arising beyond the current plan period can be accommodated without a further review of the Green Belt. The distribution of the Safeguarded Land proposed in the LPD does not provide any opportunity for future development needs arising in the Other Villages (including Burton Joyce) to be met. As a result, there is a very real risk that the Green Belt boundaries, as proposed to be amended through the LPD, will lack permanence, contrary to national planning policy³.
- 1.12 This position is considered further in our response to Matters 4 (Green Belt) and 5 (Housing).

² Paragraphs 110-111, Inspector’s Report on the Examination of the Greater Nottingham – Broxtowe Borough, Gedling Borough and Nottingham City – Aligned Core Strategies: Part 1 of the Local Plan (24 July 2014) [LPD/POL/07]

³ Paragraph 83, National Planning Policy Framework (DCLG, March 2012)

Turley Office
1 New York Street
Manchester
M1 4HD

T 0161 233 7676