

## **Gedling Borough Council**

### **Response to Matter 3**

#### **Vision, Objectives and Spatial Strategy**

##### ***Issue 3a: Accordance with the ACS***

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

3.1 The Council considers that the LPD accords with the Vision and Objectives set out in the ACS. Chapter 3 of the LPD explains that the Vision for the LPD has been rolled forward from the ACS and that the Spatial Objectives to achieve this Vision as set out in the ACS apply equally to the LPD. The table included in Chapter 3 of the LPD explains how the LPD addresses each of the twelve Spatial Objectives.

##### **Q2. Does the Plan accord with the Spatial Strategy in the ACS, in particular with respect to:**

##### **i. the identification and assessment of reasonable alternatives;**

3.2 Section 2 of the Site Selection Document - Main Report (May 2016) (LPD/GRO/05) explains how 'reasonable alternative sites' were identified. The table attached at paragraph 2.3 explains that all sites identified through the 2015 SHLAA process were considered as 'reasonable alternative sites for allocation' apart from those which did not meet the following criteria:-

- Location – sites were only excluded if they were in an isolated location, i.e. not close to the locations identified in the ACS (i.e. the existing built up area of Nottingham, a Key Settlement for Growth or Other Village).
- Size – sites were only excluded if they were below the threshold for allocation, i.e. 50 dwellings in the urban area and 10 dwellings in the rural area. However, deliverable sites below the threshold for allocation have still been considered as a source of supply as explained in the Council response to initial questions (EX/08) – see pages 20-21.
- Planning status – sites were only excluded if development was substantially completed.
- SHLAA assessment – sites were only excluded if it was unlikely that any constraints could be overcome by further work or if the benefits of developing the site were unlikely to outweigh the impact of the constraint.

3.3 All criteria were applied flexibly and sites which partially met a criterion were included as a reasonable alternative. In terms of geographical location, sites were only rejected if they did not accord with the Spatial Strategy in the ACS and, as such, it is considered that the identification and assessment of reasonable alternative sites accords with the Spatial Strategy in the ACS.

3.4 In terms of how the reasonable alternative sites were assessed, the table attached at paragraph 3.4 of the Site Selection Document - Main Report (May 2016) explains the information used to inform site schedules prepared for each of the reasonable alternative sites, the reason it has been used and its source. Where appropriate, reference has been made to evidence informing the preparation of the ACS and policies contained within the ACS. One of the sources of information included on the site schedules is compliance with the ACS (including Policy 2 (Spatial Strategy) and Policy 3 (Green Belt)).

**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;**

3.5 Yes, it is considered that the overall distribution of development accords with the Spatial Strategy in the ACS as it focuses growth on the main built up area of Nottingham in accordance with the strategy of urban concentration with regeneration. This question has been raised in the Inspector's Initial Questions (**EX/01**) – see paragraphs 22 and 23 on page 4. The Council's response is provided in the Council response to initial questions (**EX/08**) – see pages 8-16.

3.6 The approach taken to the distribution of development around Gedling Borough is explained in the Housing Background Paper (**LPD/BACK/01**).

3.7 Appendix A of the Site Selection Document (May 2016) (**LPD/GRO/06**) considers sites within and adjoining the urban area and adjoining Hucknall. Section 1 of Appendix A refers to Policy 2 of the ACS and explains at paragraph 1.2 that decisions about the sites to be allocated in or adjacent to the urban area are not restricted by an upper number and sites are not in direct competition with one another. Paragraph 1.5 explains that decisions about the sites to be allocated adjacent to Hucknall should reflect that the number of homes around Hucknall was limited in the ACS to 1300 due to the impacts on infrastructure within Hucknall.

3.8 Appendices B, C and D of the Site Selection Document (May 2016) (**LPD/GRO/07**, **08** and **09**) consider sites adjoining the Key Settlements of Bestwood, Calverton and Ravenshead respectively. Chapter 1 entitled 'Number of Homes' for each document explains that sites will be allocated to meet the figure for that settlement (which is less than the figure set out in the Aligned Core Strategy, as explained in the Housing Background Paper). Paragraph 1.3 in both Appendices B (Bestwood) and D (Ravenshead) explain that where Green Belt sites are available, these will be allocated where possible in accordance with Policy 3 of the ACS.

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

3.9 Yes, it is considered that the quantum of housing and employment land proposed accords with the Spatial Strategy in the ACS. In relation to housing

land, this question has been raised in the Inspector's Initial Questions (**EX/01**) – see paragraph 25 on page 4. The Council's response is provided in the Council response to initial questions (**EX/08**) – see page 18. In terms of whether a buffer should be provided, this question has been raised in the Inspector's Initial Questions – see paragraph 26 on page 4. The Council's response is provided in the Council response to initial questions (**EX/08**) – see pages 18-19.

- 3.10 In relation to employment land, this question has been raised in the Inspector's Initial Questions (**EX/01**) – see paragraph 38 on page 5. The Council's response is provided in the Council response to initial questions (**EX/08**) – see pages 25-27.

#### **iv. the removal of land from the Green Belt**

- 3.11 The Green Belt Assessment (July 2015) (**LPD/GRE/02**) explains at paragraph 1.2 that as part of the ACS process, the independent Planning Inspector appointed to examine the plan agreed that there were exceptional circumstances to, where necessary, amend the Green Belt for the strategic sites and also undertake a review of the Green Belt in order to allocate non-strategic sites. It was shown that the Objectively Assessed Housing Need could not be met without the removal of land from the Green Belt and that a lower amount of housing was not sustainable when considering environmental, social and economic factors.
- 3.12 Paragraph 2.7 of the Green Belt Assessment refers to Policy 3 of the ACS which retains the principle of the Green Belt but provides for a review of boundaries to ensure that development requirements are met. The Policy sets out a sequential approach to guide the selection of sites to allocate. This gives preference to land within the development boundaries of settlements and other non-Green Belt land before Green Belt sites adjacent to the settlements are allocated.
- 3.13 Section 6 of the Green Belt Assessment explains that the results of the Assessment will be used to inform the preparation of the Local Planning Document, to both establish the boundaries of the Green Belt for the period up to 2028 and to remove land from the Green Belt to allow for development.
- 3.14 See also the Council's statement in response to Matter 4 (Green Belt).
- 3.15 The purpose of removing land from the Green Belt is therefore two-fold. Paragraph 1.4 of the Green Belt Assessment explains that the LPD will establish the boundaries of the Green Belt for the period up to 2028 based on the conclusions of the Green Belt Assessment which considers how well parts of the Green Belt are performing its purpose. The LPD also considers whether there are the exceptional circumstances to remove the least valuable sites from the Green Belt either to allow development or to be designated as Safeguarded Land. This does not automatically mean that the least valuable parts will be allocated for development. Whilst substantial weight should be given to the harm to the Green Belt, other factors such as flooding, landscape

or the deliverability of sites may mean that more valuable parts of the Green Belt are ultimately allocated (as set out in the Site Selection Document).

- 3.16 The Site Selection Document (**LPD/GRO/05-13**) uses the conclusions of the Green Belt Assessment as one of the sources of information to inform the site schedules prepared for each for the reasonable alternative sites. As explained above, the Site Selection Document uses a number of sources of information, including compliance with Policy 2 (Spatial Strategy) of the ACS.
- 3.17 The Safeguarded Land document (**LPD/GRE/04**) explains the approach taken to the designation of safeguarded land within Gedling Borough. Paragraph 2.3 makes reference to paragraph 117 of the ACS Inspector's report (**LPD/POL/07**) which states that it would be appropriate for the Councils to identify safeguarded land in their Part 2 Local Plans'. Paragraph 3.3.6 of the ACS provides further guidance on safeguarded land within Gedling Borough.

## **Conclusion**

- 3.18 It is considered that the LPD accords with the vision and objectives set out in the ACS. It is also considered that the LPD accords with the spatial strategy set out in the ACS with respect to:-
- the identification and assessment of reasonable alternatives;
  - the overall distribution of development;
  - the quantum of development; and
  - the removal of land from the Green Belt.

## **Further Proposed Changes**

- 3.19 No further proposed changes are being put forward at this stage.