

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

2. As outlined within the Representations made on behalf of our client in July 2016 (reference lpd\_pub\_b/218), it is considered that the housing figures within the Local Planning Document do not accord with the Objectives of the Aligned Core Strategy (ACS) in terms of the delivery of new housing.
3. Policy 2 'The Spatial Strategy' of the ACS outlines the settlement hierarchy to accommodate the required growth consists of
  - a) The main built up area of Nottingham;
  - b) Adjacent to the Sub Regional Centre of Hucknall; and
  - c) Key Settlements Identified for Growth.
4. As part of the strategy at (b) the ACS includes a specific Sustainable Urban Extension at North of Papplewick Lane (300 dwellings) and Top Wighay Farm (1000 dwellings), comprising a total of 1300 new dwellings in these two locations. However, as noted by the Council in their response to Question 22 of the Inspector's questions (EX-08), the capacity of these sites was deemed to be less than originally anticipated and Top Wighay Farm was concluded to be able to accommodate only 845 dwellings.
5. The Council have taken the decision to allocate a further site for residential development (Site H10) adjacent to Hucknall, which falls outside of the Sustainable Urban Extension identified in the ACS, rather than reverting back to the spatial strategy in order to determine the most appropriate location for additional housing. We would submit that allocation of sites adjacent to the main urban area would be more sustainable and would follow the spatial distribution set out in the ACS. The Sustainability Assessment and other Evidence Base documents prepared in respect of the Local Plan do not provide details of the justification for this decision.
6. The Council's response (EX-08) to Question 20 of the Inspector's Initial Questions indicates an assumption that the 230 windfalls included in the housing supply will all come forward within the main urban area. This assumption does not appear to be explained in any of the background documents. It does not seem reasonable to assume that all of the windfall will fall within the main urban area, rather than Key Settlements or other villages.
7. The Council in their response to the Inspector at Questions 22 and 23 (EX-08) focus largely on the change to the distribution of housing allocated to the Key Settlements. It does not consider the inconsistency between the housing allocations and the Spatial Hierarchy of the ACS, particularly with regard to the 'main built up area of Nottingham'.

8. Furthermore, and as identified by the Inspector at Question 25 and 26 (EX-08), the ACS identifies that 7,550 new homes should be the minimum that should be provided, and does in fact allocate 300 additional homes to allow for flexibility given the uncertainty over larger sites. The Council in their housing strategy have chosen to disregard this flexibility and consider only 7,250 new homes across the plan period.
9. In their response to the Inspector's question regarding a buffer at Question 26 (EX-08), the Council make a number of responses as to why this is not required. Having reviewed this it is noted that:
  - There are other sites identified through the Site Selection Process which could be allocated for housing without a significant impact upon the Green Belt. Policy 3 of the ACS does allow for the review of the Green Belt boundaries and states "Part 2 Local Plans will review Green Belt boundaries to meet the other development land requirements of the Aligned Core Strategies, in particular in respect of the strategic locations and the Key Settlements named in Policy 2."
  - Planning permission for Gedling Colliery/Chase Farm does not remove uncertainty that the site will be built out as predicted. A resolution to grant permission at Gedling Colliery/Chase Farm was passed in May 2016 for 1,050 dwellings, 506 of which were subject to full permission but no more than 315 could be constructed before the completion of the Gedling Access Road (currently programmed for Spring 2019). Planning permission has not yet been issued as it is pending the completion of a s106 agreement.
  - The Aligned Core Strategy Inspector's report (LPD/POL/07) was not just concerned with the deliverability of Gedling Colliery/Chase Farm in recommending that the 300 dwellings were included. The Inspector's Report (paragraph 91 – referred to in footnote 12 of the Housing Background Paper) states that '*given the uncertainty surrounding Gedling's largest sites which were identified in its earlier Local Plan but not progressed, the above locational factors [providing homes in a location close to the urban area, with less impact on Hucknall's infrastructure] and the need for a range of small and large sites to ensure speedy delivery of new homes*' one of the proposed modifications should not be made to reduce the number of dwellings. Therefore it was not just the uncertainty over delivery of Gedling Colliery/Chase Farm that warranted this housing provision being included; it was also justified by the need for a range of small and large sites to ensure the speedy delivery of new homes.

**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;**
- 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;**
- iii. **the quantum of development proposed, both in terms of housing and employment land; and,**
- iv. **the removal of land from the Green Belt?**

10. Please see response to Question 1.



Enterprise Centre, Bridge Street, Derby, DE1 3LD  
[www.chaveplanning.com](http://www.chaveplanning.com)