

## Position Statements for the Examination of the Gedling Local Planning Document

Matters 4, 5, 8 and 14

from Nottinghamshire Campaign to Protect Rural England

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For other Matters, we will rely on our July 2016 response to the LPD Publication Draft.

### **Matter 4: Green Belt**

#### ***Issue 4a: Protection of the Green Belt***

Q1. Does the Plan make appropriate provisions for the protection of the Green Belt in accordance with national policy? [Policies LPD 12 – LPD 17]

LPD 12 : see our July 2016 comments

LPD 15 is in accordance with NPPF paragraph 89 and a useful policy to facilitate much-needed affordable housing in villages as infill development of just a few housing units can make a real difference in small villages.

#### ***Issue 4c: Safeguarded Land***

Q4. Should Safeguarded Land be allocated in the Plan? If so, has sufficient Safeguarded Land been allocated?

In addition to the comments we made regarding safeguarded land in July 2016 submission, we also note that LPD 16 is neither necessary nor suitable for achieving the Council's policy aims due to paragraph 85 of the NPPF. One of the Council's policy aims LPD 16 is intended to achieve is to avoid onerous future reviews of Green Belt boundaries (see 6.6.2 of the May 2016 Gedling LPD Publication Draft). However, NPPF paragraph 85 specifies that

“when defining boundaries, local planning authorities should:

....

make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development”

This means that safeguarded land can only be allocated for development and planning permission only be granted after a review of the Local Plan - no less onerous than a review of Green Belt boundaries on its own.

Q10. Is it appropriate that some Safeguarded Land is protected from development as it is not suitable and/or available for development as suggested in proposed MM9? [Policy LPD 16]

No, it is not appropriate. If in the Council's own judgment, land is not suitable or available for development in the Plan period, they have not made the case for removing this land from the Green Belt and safeguarding it. The rationale (in so far as there is one - see our July 2016 comments) for safeguarding land is that it may be needed for development longer term. Clearly, if it is not available or suitable for development, the land concerned cannot meet this requirement. Land deemed unsuitable or unavailable for development should therefore not be removed from the Green Belt in the first place.

## **Matter 5: Housing**

### ***Issue 5b: Housing Supply in the Plan period***

Q29. Should the development of brownfield sites be undertaken prior to the use of greenfield sites? If so, how would this be achieved and what would be the implications for housing supply and deliverability?

Yes it should and prioritising brownfield sites - contrary to what is usually assumed - speeds up delivery compared to prioritising green field sites. Independent research commissioned by CPRE nationally concluded that the best way of speeding up construction is to concentrate development on brownfield sites. The research showed that buildings on brownfield sites were on average delivered over 6 months faster (from permission to completion) than greenfield ones, and a year faster for larger sites (50 or more units). The report, published in March 2016, can be found here

<http://www.cpre.org.uk/resources/housing-and-planning/housing/item/4261-brownfield-comes-first>

### ***Issue 5f: Affordable Housing***

see our July 2016 comments

Q40. Does the Plan make appropriate provision for affordable housing? [Policy LPD 36]

It is not clear whether the provision is adequate. The threshold of 15 dwellings for the requirement to provide a percentage of affordable housing is likely to discourage provision of such housing in smaller villages, especially those in which developers have an expectation that higher-priced houses will find buyers. This will make it less likely that the in itself very useful policy LPD15 facilitates affordable housing in villages. The blanket threshold also conflicts with the requirement in NPPF paragraph 50 that Local Planning Authorities should use housing policy to

“create sustainable, inclusive and mixed communities”.

## **Matter 8: Housing Allocations in Key Settlements for Growth**

### ***Issue 8b: Westhouse Farm (H12) [Policy LPD 65]***

Q3. Is the proposed allocation justified and appropriate in terms of the likely impacts of development?

This allocation should not be included in the LPD because it would have an adverse impact on a well-used Right of Way, the key walking link between different parts of Bestwood Country Park. The landscape which would be developed is a functional part of the country park (although technically outside its boundaries). We commented on this allocation in our July 2016 submission but by mistake called it 'H13', hence the inclusion of our 2016 comments here again.

## **Matter 14: Transport**

### ***Issue 14a: Promotion of Sustainable Transport Modes***

Q1. Do Policies LPD 57 to LPD 61 promote sustainable transport modes and ensure new developments would not have a severe impact upon highway safety in accordance with national policy?

It is difficult to say. As far as we are aware, there is no coherent, up to date transport plan for Gedling and adjacent areas. A number of feasibility studies have been commissioned and completed researching the potential for a 4th Trent road crossing but also for a tram alternative. An extension of the existing NET line beyond Hucknall would seem to be a logical and comparatively inexpensive step in the direction of more sustainable transport but there are no firm plans. This is in marked contrast to the approach taken by Broxtowe Borough Council, the HS2 East Midlands steering group and East Midlands Councils to proposed development around the proposed Toton HS2 hub. Transport plans for that area are at a stage at which particular alignments can be discussed.

### ***Issue 14b: Car Parking Requirements for New Developments***

We would like the opportunity to comment on this matter at the hearing session. We can also gather and present evidence from other relevant voluntary sector organizations at this session.

### ***Issue 14c: Local Transport Schemes***

Q10. Should the Plan include the provision of a park and ride site at Leapool Island? [Policies LPD 59 and LPD 60]

This needs a cautious approach. The justification for the inclusion of a Park & Ride site is that it will reduce road traffic and encourage greater use of public transport (see 14.4.1 of the LPD). However, independent research by Professot Graham Parkhurst, UWE Bristol, has shown that strategic Park&Ride sites can instead increase road traffic as users drive to the sites from a wide catchment area.