

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. Is the overall level of housing provision and its distribution in the Plan consistent with the ACS? [Policy LPD 63]**

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
  - The main built up area of Nottingham;
  - Adjacent to the Sub Regional Centre of Hucknall; and
  - 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. Although the distribution of housing differs in the Plan to that set out in the ACS, would it accord with the Spatial Strategy of the ACS?**

10. For the reasons set out in our response to Question 1 above, it is considered that the distribution of housing within the Plan does not accord with the Spatial Strategy of the ACS.

**Q3. The figures in Policy LPD 63 include dwellings which have already been built since 2011, sites with extant planning permission and sites below the threshold for allocation. Does the Plan adequately demonstrate where these sites are and how many dwellings are included? Are all those that have not already been built expected to be constructed in the Plan period?**

11. The Plan does provide details of these, however it is considered that the Plan is overly optimistic in its assumption that these dwellings will all be delivered over the Plan period and no flexibility is required within the housing allocations in order to achieve the targets.
12. The policy should be changed so as to make greater provision of housing, taking account of a 5% lapse rate applied to existing planning permissions, as referred to in our representations to the Publication Draft Local Planning Document (ref lpd\_pub\_b/218).

**Q4. Although a planning application for the Gedling Colliery/Chase Farm site (H9) has been submitted and granted, subject to the signing of a Section 106 Agreement, would it still be necessary to plan for the total of 7,550 homes set out in the ACS (Policy 2) rather than the housing target of 7,250?**

13. As outlined in response to Q1 above, the S106 Legal Agreement has not yet been signed and so the site does not have planning permission (application ref 2015/1376).
14. Furthermore, the additional 300 dwellings identified in the ACS were not just required to provide flexibility in the event that H9 did not come forward as planned (para 9, above). As outlined within the Inspector's Report to the ACS (LPD/POL/07) this was also justified by the need for a range of small and large sites to ensure the speedy delivery of new homes.

**Q5. Would this provide sufficient flexibility if problems were to arise with sites coming forward, particularly given that 7,250 homes is a minimum requirement?**

15. The Plan does not allow for any flexibility with the delivery of allocated housing sites to achieve the minimum target of 7,250 new homes over the plan period. Given that the requirement of 7,250 homes is a minimum requirement, there is a substantial risk that the Local Planning Document would fail to deliver housing as required.

**Q6. Is the distribution of homes between the Key Settlements appropriate? How has this distribution evolved? Is it clear how and why the housing requirement has been reduced in the Key Settlements? [Policy LPD 63]**

16. No comment.

**Q7. If the provision of up to 260 homes in Other Villages referred to in the ACS (Policy 2) is solely to meet local needs, what evidence of local needs is there to support a requirement for 140 dwellings in the Other Villages? [Policy LPD 63]**

17. No comment.



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