

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. 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. Was the site selection process robust? Was an appropriate selection of potential sites assessed? Were appropriate criteria taken into account in deciding which sites to select and was the assessment against these criteria robust?**

2. It is considered that the Council, as part of the preparation of the Gedling Local Plan Part 2 ("Local Plan"), did assess an appropriate selection of sites as part of the evidence base and Sustainability Appraisal ("SA") process.
3. However, as outlined in earlier representations, the decision making process by which the final sites were selected for inclusion within the Local Plan is not clear.
4. The Council's Sustainability Appraisal ("SA") in respect of the Local Plan was issued on May 2016. A further update was prepared by the Council and issued in October 2016 [LPD/REG/20], alongside a Site Selection Document Addendum (October 2016) (LPD/GRO/14). It should be noted that the October 2016 update only related to three additional sites put forward as potential housing sites. The work undertaken in the original SA was not revisited as part of this process.
5. A further Addendum to the SA was produced in December 2016 [EX-12] and this revisited Stage B of the SA process. However this document does not provide any further details on the decision making process regarding the selection of sites following the completion of their assessment.
6. The Council in their response to the Inspectors Questions (EX-08) states with regards to Question 39 that Section 4 of the Site Selection Main Report (2016) explains the decision making and Section 5 looks at the recommendations of site allocations for housing in the Local Planning Document. However this Report, and the documents prepared since, do not provide details of the process of selection between differing sites.
7. We therefore maintain that, as outlined in the Representations made on behalf of our client in July 2016 (lpd\_pub\_b/221), the process relating to the SA and assessment of the housing allocation sites remains unsound. Despite our client's site, Site 6/778, scoring equally and in some instances better than Site H5 (Lodge Farm Lane) in the SA, there is no justification set out within the SA, its Addendum, or any other documentation as to the process of selection of Site H5 over Site 6/778.
8. Furthermore these documents, including the updated reports, do not provide any justification for the allocation of an additional site (Site H10) at Hucknall rather than the allocation of a second site adjacent to the Urban Area, which would have been preferable in terms of the Housing Distribution Strategy outlined in Policy 2 of the ACS.

9. It is therefore considered that the Plan is, as currently drafted, unjustified and is therefore unsound. It can only be made sound by revisiting the Sustainability Appraisal and site selection process to make a justified selection of site allocations.
10. Site 6/778 offers a deliverable development of 150 dwellings, as evidenced by the brochure submitted with representations made to the Publication stage of the Local Planning Document (reference lpd\_pub\_b/218 and lpd\_pub\_b/221). The site would be accessed from the A60 through a brownfield site formerly occupied by Metallifacure. The Metallifacure site has had planning consent for residential development previously and is currently subject of a revised application for 72 dwellings (reference 2016/0854). This application is anticipated to be recommended for approval to planning committee in the next few months. The owners of site 6/778 have a legal agreement with the owners of the Metallifacure site for access to be provided.

**Q2. Are there any significant factors that indicate that any sites should not have been allocated?**

11. As outlined above it is considered that the additional allocation (Site H10) at Hucknall, which is not adjacent to the Urban Area, should not have been included since there is a site adjacent to the Urban Area (6/778) which is preferable in terms of the Housing Distribution Strategy outlined in Policy 2 of the ACS.
12. Furthermore, site allocation H5 (Lodge Farm Lane) is not justified by the SA, which would indicate that site 6/778 should be allocated as it achieves higher scores in the SA.

**Q3. Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery?**

13. No comment.

**Q4. Are the allocated sites viable and deliverable, having regard to the provision of the necessary infrastructure, affordable housing and other facilities, and taking account of environmental constraints?**

14. No comment.

**Q5. Are the detailed requirements for each of the allocations clear and justified? Have site constraints, development mix and viability considerations been adequately addressed? Are the boundaries and extent of the sites correctly defined?**

15. No comment

**Q6. For those sites that have been removed from the Green Belt, have exceptional circumstances been demonstrated to enable the alteration of existing Green Belt boundaries? Have all potential sites in the Green Belt been considered for inclusion based on clear criteria?**

16. No comment.

**Q7. Has full consideration been given to the Human Rights Act when allocating sites in the Plan?**

17. No comment



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