

# **Gedling Local Planning Document (Part 2 Local Plan): Examination**

Hearing Position Statement in relation to  
Matter 6: Housing Allocations

Submitted on behalf of Northern Trust  
Company Ltd (Representor Number:  
9151009) in respect of Land at Flatts Lane,  
Calverton

February 2017

## Issue 6a: General Questions

**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?**

- 1.1 As set out in our Hearing Position Statement to Matter 4 (Green Belt), the Greater Nottingham Aligned Core Strategy (ACS) clearly establishes the principle of reviewing the boundaries of the Nottingham Derby Green Belt to inform the Part 2 Local Plans. Such an approach was informed by the evidence prepared by the Councils at that time, which demonstrated that there was insufficient land available within the existing urban area to meet identified development needs.
- 1.2 As a result, Policy 3 of the ACS confirms that existing boundaries will need to be reviewed to ensure that the “*other development land requirements*” of the ACS can be met; particularly in respect of the strategic locations and the Key Settlements for Growth (such as Calverton).
- 1.3 More recent evidence undertaken by GBC to inform the Local Planning Document (LPD) continues to demonstrate that there is insufficient land available within the existing built-up area to meet the housing requirement set out at Policy 2 of the ACS<sup>1</sup>. In the circumstances, Northern Trust maintains that ‘exceptional circumstances’ have been demonstrated to enable the removal of land from the Green Belt.
- 1.4 In relation to the site at Flatts Lane in Calverton specifically, it is considered that the ‘exceptional circumstances’ required to remove the site from the Green Belt have been demonstrated. In particular, GBC’s evidence base confirms that:
  - The level of housing need in the Borough remains broadly in accordance with the housing requirement set out at Policy 2 of the ACS, which should be seen as the minimum number of new dwellings required to meet identified needs over the plan period (see our Hearing Position Statements on Matters 3 and 5 for more detail on this point)<sup>1</sup>.
  - The spatial strategy of the ACS seeks to locate the majority of new housing development within and adjacent to the main urban area. Beyond the urban area, new development is focused towards the Key Settlements for Growth (Calverton, Bestwood Village and Ravenshead) and, to a lesser extent, the Other Villages. Calverton is identified as capable of accommodating the largest number of new dwellings of the three Key Settlements. Such an approach reflects the existing

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<sup>1</sup> Including the Housing Background Paper (Gedling Borough Council, May 2016) [LPD/BACK/01] and Local Housing Need (Gedling Borough Council, May 2016) [LPD/GRO/04]

size and the range of services and facilities on offer within the settlement<sup>2</sup> and remains appropriate and robust.

- GBC has demonstrated that there are insufficient sites available within the urban area to accommodate the level of housing growth required over the plan period<sup>3</sup>.
- The boundaries of the Nottingham Derby Green Belt were first established through the Nottinghamshire Green Belt Local Plan in 1989 and have been subject to limited change over the last three decades. Existing Green Belt boundaries are drawn very tightly around the built-up areas, as identified in the ACS (Paragraph 3.3.1). As a result, there is limited scope for new housing delivery on sites beyond the Green Belt.
- GBC has sought to adopt a sequential approach to guide site selection, which favours land within the main built up area of Nottingham, Key Settlements for Growth and Other Villages before other non-Green Belt (i.e. safeguarded land) and Green Belt land adjacent to existing settlement boundaries.
- The allocation of Safeguarded Land in the Gedling Borough is necessary in order to, *inter alia*, provide a degree of permanence to the Green Belt boundaries and minimise the need for future reviews and to provide flexibility and allow for the non-delivery of allocated sites to be addressed without a fundamental review of the Local Plan<sup>4</sup>.
- The compact character of Calverton and surrounding topography means that the settlement does not make an important contribution to the openness of the Green Belt<sup>5</sup>.
- Green Belt land to the west of Calverton (both south west and north west) is less valuable than land to the south east and south as it is further from the Conservation Area and includes a significant amount of encroachment (associated with the former Calverton Colliery site)<sup>6</sup>.
- Land to the north west of Calverton (which includes the Flatts Lane site) *“is distant from the historic core of Calverton”* and its development *“would not reduce the gap to another settlement”*<sup>7</sup>.

1.5 Northern Trust agrees with GBC that ‘exceptional circumstances’ exist to amend the existing Green Belt boundary around Calverton.

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<sup>2</sup> Paragraph 5.2, Local Planning Document: Publication Draft (Part 2 Local Plan) (Gedling Borough Council, May 2016) [LPD/REG/02]

<sup>3</sup> Housing Background Paper (Gedling Borough Council, May 2016) [LPD/BACK/01]

<sup>4</sup> Paragraph 2.2, Safeguarded Land (Gedling Borough Council, March 2016) [LPD/GRE/04]

<sup>5</sup> Paragraph 5.8, Green Belt Assessment (Gedling Borough Council, July 2015) [LPD/GRE/02]

<sup>6</sup> Paragraph 5.7, Green Belt Assessment (Gedling Borough Council, July 2015) [LPD/GRE/02]

<sup>7</sup> Table on Page 15, Green Belt Assessment (Gedling Borough Council, July 2015) [LPD/GRE/02]

- 1.6 In relation to the Flatts Lane site specifically, Northern Trust maintains that the site makes a minimal contribution to the five purposes of including land within the Green Belt, as explored below. This position has been accepted by GBC in choosing to allocate the site as part of a wider area of safeguarded land to the north west of Calverton.

***Purpose 1: To check unrestricted sprawl***

- 1.7 A key purpose of the Green Belt is to "...check the unrestricted sprawl of large built-up areas..."<sup>8</sup>. The intention of this is not to prevent future growth requirements from being met, but to limit the amount of piecemeal development which takes place.
- 1.8 The Flatts Lane site does not perform a strategic Green Belt function and the boundaries to the land, notably the existing built up areas to the south and east, Flatts Lane and Oxtan Road to the north and existing vegetation to the west effectively enclose the site. It forms a logical extension to Calverton and is deemed to be a suitable location for an effectively and carefully controlled Green Belt release.

***Purposes 2 and 3: To prevent neighbouring towns merging into one another and to safeguard the countryside from encroachment***

- 1.9 There is an extensive amount of open Green Belt land between Calverton and Oxtan, the nearest other settlement approximately 1.9km to the north east of the site. The proposed development on the Flatts Lane site will not result in any merging issues or loss of separation between these settlements.
- 1.10 GBC has also recently accepted that the land does "not make a valuable contribution to the openness of the Green Belt" and does "not contribute significantly to the purposes of the Green Belt and development would not result in a significant visual or landscape impact"<sup>9</sup>.
- 1.11 There are strong defensible boundaries for the site and it will form a natural arc which will relate well to the existing centre.

***Purpose 4: To preserve historic towns***

- 1.12 The site is located to the south of two heritage assets, though GBC has previously accepted that the development of the site will have no impact on the setting or character of these assets<sup>10</sup>. The purpose of Green Belts being necessary to preserve the setting and character of historic towns does therefore not apply to this site.

***Purpose 5: To assist in urban regeneration***

- 1.13 One of the key purposes of the Green Belt is to encourage urban regeneration and the re-use of derelict and other urban land. GBC has recognised that opportunities for new development on brownfield land will be maximised where possible, though Green Belt boundaries will need to be amended for strategic and non-strategic sites to ensure that the Objectively Assessed Housing Need for the Borough can be met.
- 1.14 Northern Trust agrees with GBC that the release of the Oxtan Road / Flatts Lane site from the Green Belt is an appropriate and justified approach, which is consistent with

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<sup>8</sup> Paragraph 80, National Planning Policy Framework (DCLG, March 2012)

<sup>9</sup> Site Selection Document (Gedling Borough Council, May 2016) [LPD/GRO/05]

<sup>10</sup> Site Selection Document (Gedling Borough Council, May 2016) [LPD/GRO/05]

numerous evidence base documents<sup>11</sup>. However, Northern Trust maintains that Land at Flatts Lane should be allocated for housing development within the current plan period; rather than allocated as safeguarded land to help meet development needs beyond the plan period, for the following reasons:

- National planning policy requires LPAs to allocate sufficient sites to ensure that development needs are met, with sufficient flexibility to adapt to changes in the market. The level of housing proposed in Calverton in the LPD fails to respond to this requirement and is, therefore, not consistent with national policy, not positively prepared and will not be effective in delivering the level of housing required in Calverton.
- As a result, additional development should be directed to Calverton as part of the overall increase required for the following reasons:
  - Calverton is a suitable location for new housing growth as it provides “a good range of facilities compared to other similar sized settlements”<sup>12</sup>.
  - The settlement is a legacy of its coal mining past; the regeneration of which is “ongoing and remains a priority for the Borough”<sup>13</sup>.
  - The settlement has the highest proportion of residents who are unable to afford rent in the Borough. As a result, there is a need for 81 (net) additional affordable homes in Calverton over the plan period<sup>14</sup>.
- Calverton should be the focus for additional development in the Key Settlements and further land should be allocated for development in the LPD. Such an approach would reflect the sustainability of the settlement and its ability to accommodate housing growth.

1.15 Further detail on this position is provided within our Hearing Position Statement in respect of Matter 5.

1.16 In response to the second part of Q6, Northern Trust is content that all potential sites in the Green Belt have been considered. However, insufficient sites have been identified to ensure that the minimum housing requirements set out in the ACS and identified local needs are met over the plan period (and beyond); as set out in our Hearing Position Statement in respect of Matters 3 and 5.

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<sup>11</sup> Including the Green Belt Assessment (Gedling Borough Council, July 2015) [LPD/GRE/02] and the Site Selection Document (Gedling Borough Council, May 2016) [LPD/GRO/05]

<sup>12</sup> Paragraph 5.2, Gedling Local Planning Document Publication Draft (Gedling Borough Council, May 2016) [LPD/REG/02]

<sup>13</sup> Paragraph 2.85, Greater Nottingham Aligned Core Strategies – Part 1 Local Plan (September 2014) [LPD/REG/01]

<sup>14</sup> Paragraph 4.3, Local Housing Need (Gedling Borough Council, May 2016) [LPD/GRO/04]

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