



Position
Statement

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Gedling Local Planning Document Examination

Position Statement on behalf of
Northern Trust Limited

Ref. 9151009

Matter 6: Housing Allocations

February 2017



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Issue 6a: General Questions

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?

- 1.1 Please see GVA's response to **Matter 5: Issue 5b: Question 16** which confirms that the Council's site selection process, for the urban area, which led to the identification of the Linden Grove site (Ref. H4) as a proposed housing allocation under Policy LPD 64, was robust and accords with the Spatial Strategy established in the ACS.

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

- 1.2 There are no significant factors that indicate that the Linden Grove site (Ref. H4) should not be allocated for housing. Please see GVA's responses to the questions under **Matter 7: Issue 7c** which confirm that the site is justified and deliverable.

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

- 1.3 Please see GVA's responses to the questions under **Matter 7: Issue 7c** which confirm that the Linden Grove site (Ref. H4) is considered justified and deliverable. There are no significant site conditions or constraints that might prevent development or make the development unviable or undeliverable.
- 1.4 As currently drafted Policy LPD 64 would prevent the delivery of housing on this otherwise deliverable site until the GAR is completed. We consider Policy LPD 64, as currently drafted, to be unsound and have proposed alternative wording¹ (see our representations to the Publication Draft LPD Ref. 9151009 in respect of Policy LPD 64 and Site H4).

¹ Northern Trust's proposed alternative wording for Policy LPD 64 is as follows: "Sites marked with a * will not be permitted to deliver homes prior to the completion of the Gedling Access Road, unless it can be demonstrated that the Sites could deliver housing in advance of the completion of the Gedling Access Road without severe highways impact on congestion or safety on the local highways network, accounting for any mitigation proposed."

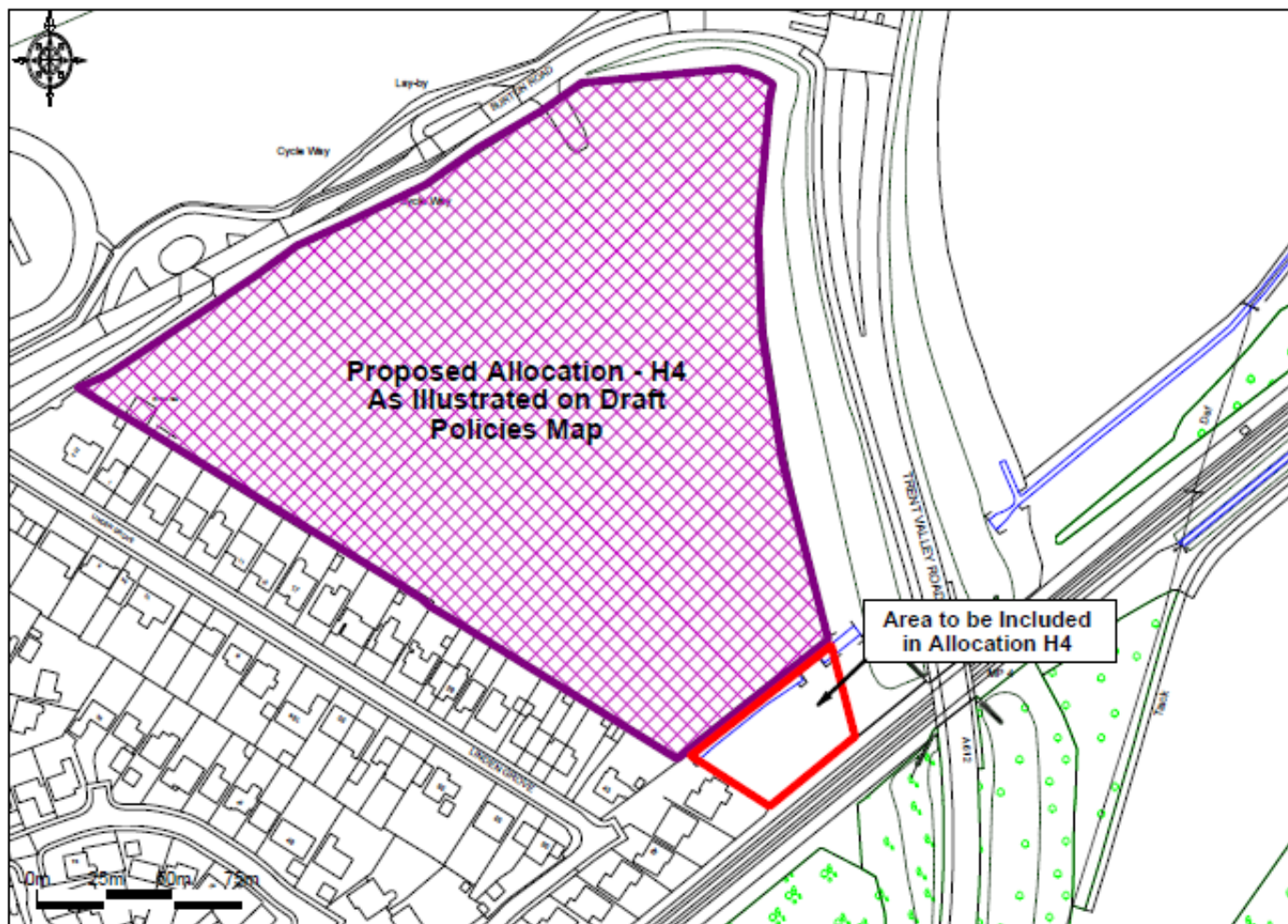
Q4. Are the allocated sites viable and deliverable, having regard to the provision of the necessary infrastructure, affordable housing and other facilities, and taking account of environmental constraints?

- 1.5 The Linden Grove site (Ref. H4) is viable and deliverable having regard to the provision of the necessary infrastructure, affordable housing and other facilities, and taking account of environmental constraints. This is confirmed in GVA's responses to the questions under **Matter 7: Issue 7c** which confirm that the allocation of the site is justified and deliverable. There are no infrastructure or other matters that threaten its viability.

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?

- 1.6 See GVA's response to **Matter 5: Issue 5b: Question 16** which confirms that Northern Trust has commissioned a range of technical reports to confirm that there are no significant constraints to development.
- 1.7 The requirements for the Linden Grove site (Ref. H4) set out in the Infrastructure Delivery Plan (IDP) Addendum (2016) are clear. However, the IDP suggests that development of the site should avoid Flood Zone 2. Work undertaken by Waterman demonstrates that the EA's online flood mapping is inaccurate and the site is at low risk of flooding². This comment appears to be erroneous and should be corrected.
- 1.8 Site constraints, development mix and viability considerations have been adequately addressed in respect of the Linden Grove site (Ref. H4). (See GVA's response to **Matter 7: Issue 7c: Question 17** for further detail).
- 1.9 The boundary for the Linden Grove site (Ref. H4), as illustrated on the Draft LPD Proposals Map, is inaccurate. GVA notes that a small area of land to the south (south of the watercourse), is excluded from the Draft Allocation. This land was included within the red-line boundary shown on the Site Location Plan submitted in response to consultation on the Council's SHLAA, and the Draft Illustrative Development Framework (Drawing No. 6097-L-02 rev B) submitted in response to previous rounds of consultation on the LPD. It is assumed that this is a drawing error. There is no policy, technical or other reason why the land should not be included in the allocated site. Accordingly, Northern Trust Limited ask that the allocation boundary is amended to include the small area of land immediately to the south of site Ref. H4 (as currently illustrated) as shown on the Plan overleaf.

² Please see **Matter 5: Issue 5B: Question 16** for further details.



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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?

1.10 GVA is satisfied that there are exceptional circumstances justifying the release of land from the Green Belt for development and, more specifically, that there are exceptional circumstances which justify the release of the Linden Grove site.

Harm

1.11 The starting point when assessing any case for a change to the Green Belt boundary is the quantification of the harm that would be caused by the proposed development, having regard, first and foremost, to the role that the subject land plays in satisfying the purposes of the Green Belt as set out in Paragraph 80 of the NPPF. In this instance, harm must be assessed in the light of the following key points:

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- a) the development of the site would not result directly in, or lead to the unrestricted sprawl of the Nottingham urban area. The development would, as a matter of fact result in the urban area being extended eastwards but (i) this outward expansion would be very modest indeed (extending less than 260 metres out from the existing urban edge); (ii) the expansion of the urban area is necessary in order to meet the Borough's housing needs; and (iii) development in this location would not be unrestricted – it would be firmly checked by the CLR which provides a clear, recognisable and permanent boundary;
- b) since the Green Belt was designated the character of this site has changed dramatically with the completion of the CLR and the site now clearly has a much stronger physical and visual relationship with the urban area than it does with the Green Belt land and the wider countryside to the east;
- c) it is not necessary to keep this site open to prevent neighbouring towns from merging. There is no physical or visual connection between the Linden Grove site and Burton Joyce and the development of the site would not result either in physical coalescence or any perceived coalescence. Moreover, the proposed development would not extend any closer to main built up part of Burton Joyce than existing development to the south east and north west and, even if the site is developed, a very substantial gap would remain between Nottingham and the main built up part of the village (a gap exceeding 800m). Finally, and as indicated in our Statement on **Matter 7: Issue 7c: Question 24**, the sensitive part of the gap between Nottingham and Burton Joyce is to the east of the Linden Grove site and the development would have no impact on this land;
- d) the Linden Grove site is remote from the countryside to the east and, as such, it plays no obvious countryside role;
- e) the site serves no purpose in preserving the setting and special character of a historic town;
- f) the Borough Council has assessed its ability to accommodate the housing that it needs on previously developed land in the urban area and has concluded that 'urban regeneration' will not address its development requirements. Whilst the ACS and LPD make provision for development in the urban area it is necessary to release land from the Green Belt in order to satisfy the development needs of the Borough. The release of the Linden Grove site would therefore accord with the strategy established in the ACS; and
- g) the CLR has had a significant visual and urbanising effect on this part of the Green Belt and the development of the Linden Grove site must be assessed in this context.

Overall, we conclude that the development of the Linden Grove site would cause only limited harm to the purposes of the Green Belt.

Benefits

- 1.12 Against this harm must be weighed the benefits of the proposals, together with other relevant factors. These are:
- a) the Borough needs to accommodate a minimum of 7,250 new dwellings in the period 2011 – 2028 with approximately 4,045 dwellings to be accommodated in or adjoining the urban area. The Council's various assessments, including its Green Belt Assessment (2015), confirm that it is not possible for this level of growth to be accommodated on land beyond the Green Belt;
 - b) this has been the agreed and accepted position for some time. It was debated at the examination of the ACS and the Inspector in that case concluded that exceptional circumstances existed for alterations to be made to the Green Belt as the Green Belt boundaries are drawn tightly around Nottingham and it was unlikely that development needs could be met on land outside the Green Belt. The Inspector, therefore, agreed with the application of a sequential approach to site selection which favours development on non-Green Belt land but enables alterations to be made to the Green Belt boundary where the urban capacity is exceeded and candidate sites have good sustainability credentials;
 - c) in the plan-making context, a significant unmet need for housing is sufficient by itself to constitute exceptional circumstances justifying alterations to the Green Belt Boundary;
 - d) Paragraph 85 of the NPPF makes it clear that land should not be included in the Green Belt that it is unnecessary to keep permanently open. It is clearly not necessary to keep the Linden Grove site permanently open (for the reasons explained above);
 - e) the site is suitable, available and achievable and would make a positive contribution to achieving sustainable growth; and
 - f) the development of the site would generate a range of significant social, economic and environmental benefits including:
 - job creation (direct, on site, during the construction period and in the supply chain);
 - increased local spend on services and facilities;
 - additions to the local employment pool, assisting with economic growth;

- the delivery of much needed housing and a range of dwellings, including a Policy compliant level of affordable housing;
- the provision of quality on site public open space and landscaping;
- improvements to pedestrian connectivity in a sustainable, accessible location;
- the use of sustainable urban drainage systems;
- new homes bonus; and
- contributions to local infrastructure through CIL and appropriate site specific planning obligations.

Approach taken to Assessing Green Belt Sites

- 1.13 GVA has examined the approach that the Council has taken to determining which sites should be released from the Green Belt, focussing on sites that have been assessed on the edge of the urban area. As described in GVA's response to **Matter 4: Issue 4b: Question 2** it is considered that the Council considered Green Belt sites, in and adjoining the urban area, against clear criteria through the Green Belt Assessment (2015).
- 1.14 The Green Belt Assessment (2015) included a two stage assessment of: 1) 'broad areas' of land along the edge of the urban area; then 2) specific parcels of land within the broad areas which were identified from the pool of reasonable alternative identified through the sieve of SHLAA sites as set out in the Council's Site Selection Paper (2016). All broad areas and sites were assessed against a clear set of criteria based around the five purposes of the Green Belt set out at paragraph 80 of the NPPF.

GVA on behalf of Northern Trust