
Independent Examination of the Gedling Local Plan Planning Document (Part 2 Local Plan)

Matter 6: Housing Allocations

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 criteria robust?

The site selection process has been very comprehensive, and it would appear that all sites put forward through the SHLAA process have been assessed. However, of the potential sites which have been assessed in some detail there is often little to choose between those sites which have been allocated and those which have been omitted. Having regard to the assessment of reasonable alternative options for housing it seems that the many sites score positively against the assessment criteria with major or minor positive effects, and in some cases minor negative effects. Few sites are recorded as having major negative effects for particular criteria. As such it is difficult to appreciate how the Council has arrived at its final selection of proposed allocation sites. This particularly applies to a number of sites adjoining the edge of the main built up area, where the Inspector to the ACS Public Examination recommended that the Borough Council should seek to increase the overall supply of housing.

The assessment criteria appear to have two glaring omissions – potential land stability and potential contamination. Given that Gedling was once a major coal mining area with several collieries located adjoining the urban area (eg Gedling Colliery) and at the Key Settlements for Growth (eg Calverton Colliery), it is likely that sites which have been allocated on former coal mining land may suffer from land instability, and also may include areas of potentially contaminated land. Also allocated sites in the Trent Valley on land close to the Stoke Bardolph Treatment Works (ie Teal Close and Linden Grove) may suffer from contamination caused by the spreading of sewage sludge. These factors may undermine the suitability of the sites for development and affect viability. These factors should have been identified at the SA Site Assessment stage.

Also, there has been no weighting of the assessment criteria. Some criteria might be considered to be more important than others. Also, it appears that information for some sites upon which the criteria have been assessed is not clear or is assumed. In other cases simple mitigation measures could easily result in a site scoring a higher assessment score.

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

Yes - Refer response to Question 1.

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

Yes - Refer response to Question 1.

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

We have particular concerns about the deliverability and viability of the major site allocations – Top Wighay, Teal Close, Gedling Colliery and Chase Close and Park Road, Calverton. These sites will require significant up front on site and off site infrastructure and further investment infrastructure at different phases of development, and these costs may result in the overall costs of development exceeding the required return on investment which shareholders of the national and large regional house-builders will demand. This is a growing concern across the region in other parts of South Notts and Leicestershire where large schemes including SUEs are being delayed indefinitely (refer also response to Matter 5), primarily on grounds of viability, high costs of up front infrastructure works and the availability of better and easier to develop sites in stronger market demand areas. At the moment National and Regional house-builders are in a position where they can pick and choose when and where to build to meet investor expectations.

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 adequately defined?

I have prepared separate responses on this matter with respect to sites being promoted by Langridge Homes Ltd under Matters 7 and 8.

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?

The Inspector to the ACS public examination confirmed that the test of exceptional circumstances to require Green Belt changes had been met in order to meet the housing requirements of Gedling and also the other ACS authorities, and to ensure a sustainable pattern of development.

The Inspector also stated that Gedling should aim to rebalance its housing land supply in favour of sustainable sites located within and adjoining the main built up area of Nottingham. Gedling Borough Council have gone some way to meeting this recommendation, but I consider that a number of opportunities have been missed.

The more detailed work on identifying housing land allocations sites in this Part 2 Local Plan has reaffirmed that there is insufficient land within the built up areas outside the Green Belt to meet Gedling's objectively assessed housing needs.

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

No comment.