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Our Ref: LP2/21.4
Your Ref:
Date: 6th February 2017

Ms Carmel Edwards (Programme Officer)
C/O Gedling Borough Council
Civic Centre
Arnot Hill Park
Arnold
Nottingham
NG5 6LU

Dear Ms Edwards,

FAO Karen Baker DipTP MA DipMP MRTPI

Re: Examination of the Gedling Local Planning Document Publication Draft (Part 2 Local Plan)

Matter 7h Hayden Lane (H10) [Policy LPD 64]

Q54. Would the allocation of land for housing on this site accord with the housing requirement for the area around Hucknall set out in the ACS?

- 1.1 ACS Policy ST2 sets out that 24,995 dwellings are required across the ACS area. Specifically for Gedling this is 4,045 dwellings within the plan period. The area within Gedling but adjoining Hucknall is identified to accommodate 1,300 dwellings; which is specified as up to 300 for North of Papplewick Lane and 1,000 for Top Wighay Farm. Both allocations are considered to be SUEs.
- 1.2 It is worth noting that the total development adjoining Hucknall is just over 32% of Gedling's housing requirement; 1,300 dwellings of a total of 4,045.
- 1.3 Within our response to Matter 1, we set out how the appointed ACS Inspector required the submitted Plan to be modified to ensure soundness. This modification reduced and restricted the quantum of development within Gedling and adjoining Hucknall to 1,300 dwellings (paragraph 1.8 of Matter 1 response).
- 1.4 The ACS establishes the principal of development within this area and limits it to 1,300 dwellings.

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- 1.5 The Hayden Lane proposed allocation, taken with the adopted ACS gives a total capacity of 1,420 dwellings as set out within our Matter 1 response (paragraph 1.6), equivalent to 35% of Gedling's requirement.
- 1.6 Therefore, the submitted plan and proposed allocation at Hayden Lane (H10) is not in conformity with the ACS as the total development capacity; that is specified with the proposed and adopted statutory development plans for Gedling will be exceeded by 120 dwellings. The ACS Inspector was clear within her report and the necessary modifications to ensure soundness that a total of 1,300 dwellings was to be a ceiling of development, not a minimum and not an approximate.
- 1.7 The proposed housing allocation at Hayden Lane is not sound; the divergence from the ACS is not justified with an appropriate evidence base and it is not effective as it the total quantum of development is not demonstrably sustainable.

Q55. Has full consideration been given to the development of this site, in addition to the Strategic Sites at Top Wighay Farm and North of Papplewick Lane, on the infrastructure in Hucknall?

- 1.8 It is not clear if consideration has been given to the cumulative impacts of the allocated Strategic Sites plus Hayden Lane. The Infrastructure Delivery Plan (IDP) which accompanies the submitted Plan deals only with the proposed allocations; it infers that these sites have been assessed on their own and not in conjunction with the strategic sites.
- 1.9 Section 7 of the IDP – Allocated Sites: Cumulative Impacts, lists proposed allocations within the submitted Plan, it does not list or appear to consider those sites already allocated in the ACS.
- 1.10 At paragraph 1.3 of the IDP it states that the ACS IDP and this IDP should be read in conjunction, however it is not made clear if the ACS IDP was taken into consideration when assessing the demand and impact upon infrastructure items.
- 1.11 Furthermore, we consider that to give **full consideration** to infrastructure in Hucknall, the proposed allocations within the Ashfield District Council Local Plan should have been included within Gedling's infrastructure work and also within the Sustainability Appraisal.
- 1.12 Appendix 1 to this representation sets out the proposed and extant housing allocations in and around Hucknall (in both Ashfield and Gedling).

Q57. Is the proposed allocation justified and appropriate in terms of the likely impacts of development?

- 1.13 There is no justification to the Hayden Lane allocation. The cumulative impacts are unknown and therefore have not been adequately assessed.

- 1.14 The SA of Hayden Lane (SA appendix H, page 29) sets out that the significant and likely negative effects of development will be a loss of Best and Most Versatile land, which we consider to be an accurate assessment. However, other scorings against the SA objectives are unclear.
- 1.15 The assessment of 'social' is unclear. A positive score is given, but it is clear there will be an increased demand upon local facilities: therefore this impact should be recognised and the appropriate mitigation is necessary is set out in the SA, such as contribution to new facilities, such as education and health care (GP).
- 1.16 In the baseline assessment contained within the SA scoping report, only the SHLAA is listed but not the emerging Ashfield Local Plan and the proposed allocations. A version of the Ashfield Local Plan which contains the allocations within around Hucknall was published before the publication version of the Gedling Plan. Therefore, this should have been taken into consideration.
- 1.17 We do not consider the proposed allocation (when considering the cumulative effects) is justified and appropriate as the likely impacts of development have not been fully assessed or understood.

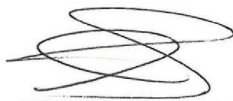
Q61. If the strategic site at Top Wighay Farm is developed for 1,000 homes, as set out in the ACS, are there any mechanisms in place to prevent the development of more than 1,300 dwellings on the edge of Hucknall, in particular Hayden Lane?

- 1.18 As already set out in our representation to Matter 1 we consider that the quantum of development adjoining Hucknall in this area, set out in the proposed and adopted plans, is 1,420 dwelling. There is a current mechanism to restrict development to 1,300 dwellings in the adopted plan; policy ST2 which sets the quantum of development at 1,300 and specifically the North of Papplewick Lane SUE states *up to 300 homes* (Policy ST2 b) i)).
- 1.19 Gedling Council's approach ignores policy ST2 b) i). To restrict the quantum of development the recently adopted Top Wighay SPD is used to limit that development to approximately 850 dwellings. We do not consider the SPD can legally limit the capacity of the allocation and only a Local Plan as defined by the 2012 regulations could do this.
- 1.20 It should be recalled the reasons for Planning Inspector restricting the quantum of development within the 'adjacent to Hucknall area' to ensure the ACS was found sound was to *ensure that development in this area should not have a seriously adverse impact on the future wellbeing of Hucknall*. This resulted in the SUE at North of Papplewick Lane being significantly reduced and restricted to 300 dwellings. The specific reasons for this restriction still remain and no evidence has been prepared to justify this increase.

Furthermore to delete and replace specific policy of the ACS would be beyond the current purpose of the Local Plan.

- 1.21 We consider that, taking into consideration the ACS, the ACS Inspector's report, the current evidence base, and the purpose of this submitted Local Plan, for this Plan to be sound, the allocation at Hayden Lane should be removed. If this results in an under-supply of housing to meet Gedling's need, this should be met elsewhere within Gedling and in accordance with the ACS strategy.

Yours faithfully

A handwritten signature in black ink, consisting of several overlapping loops and a horizontal line at the bottom.

C.M.Sarris
Corporate Planning and Building Control Manager