

# **Examination of the Gedling Borough Local Planning Document Publication Draft (Part 2 Local Plan).**

## **Position Statement of the Willow Farm Action Group - Reference LPD\_pub\_B/382**

**Chair & Coordinator -**

**Mrs Hannah Barrs**

**Research & Communications -**

**Mr Philip Oddie**

### **1. Introduction**

1.1 This statement has been prepared on behalf of the Willow Farm Action Group, for consideration at the Gedling Borough Local Plan 2016 Examination.

1.2 It relates to Matter 7: Housing Allocations in/adjacent to the Urban Area, Issue 7b: Willow Farm (H3) [Policy LPD 64] and the questions of:

*Q9.* Is the proposed allocation justified and appropriate in terms of the likely impacts of development?

*Q10.* Is the proposed allocation deliverable? In particular, is it:

b. supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?

c. deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

*Q11.* What are the exceptional circumstances which justify the removal of this site from the Green Belt?

*Q14.* Would the development of the site reduce the green corridor between Gedling and Lambley and Burton Joyce?

*Q15.* Should the land allocated be extended up to the proposed Gedling Access Road?

*Q16.* Would the cumulative impact of the development of this site, along with the Gedling Colliery/Chase Farm site (H9) and the Gedling Access Road be acceptable?

1.3 This issue focuses on the proposed Willow Farm development, which generated a large number of objections from local residents. The issues raised by respondents are outlined within the Report of Responses October 2016.

## **2. W.F.A.G Position Statement - Question 9**

2.1 Respondents to the H3 Willow Farm proposal remain opposed to the impact that the development will have on the character and residential amenity of their area and also believe that the additional demand generated by the development will have a negative impact on the availability of local school places and health services, to the detriment of existing residents and their families.

2.2 There is no indication that the Local Planning Authority (LPA) has appropriately balanced the need to meet housing targets against the negative impact of the development on existing residents or identified a sound plan for ensuring the necessary community infrastructure will be in place at the appropriate time to support the development.

2.3 The LPA response within their Report of Responses fails to adequately address these concerns and is based upon an over reliance on its 'professional judgement', rather than on a sound evidential basis.

2.4 The submission of Langridge Homes indicates that the construction phase of development will last approximately 30 months. Due to the layout of existing roads, there will be approximately 32 homes immediately adjoining the site and a much larger number within its immediate vicinity. The impact of this development will therefore be felt by hundreds of local residents.

2.5 The proposed access route to the site will be via the residential roads of Gedling Village, including the cul-de-sacs of Green's Farm Lane and / or Grange View Road.

2.6 The suggestion by the LPA that the impact of this development can be mitigated by a Constructive Environmental Management Plan is, in our opinion, unrealistic and implausible. The fact remains that Langridge Homes will require the delivery of vast quantities of construction material to build 110 new homes, the roads and utilities. This will necessitate Heavy Goods Vehicles and other large vehicles being routed along quiet residential roads. Construction will also generate high levels of noise and disturbance. The impact of this on the surrounding homes will be profound and detrimental to the peaceful enjoyment of our homes and surroundings over an extended period of time.

2.7 Large sections of the H3 Willow Farm site are on high ground (see Fig 1 below). This will result in the development dominating its surroundings and posing a 'threat' to existing homes from being overshadowed and overlooked which will be detrimental to the residents' enjoyment of their homes and to their privacy.



H3 Willow Farm -  
High Ground

Figure One

- 2.8 To illustrate this point, the ground level of the homes on Oak Tree Drive, which are immediately adjacent to the development, are 1.7m lower than the edge of the site, which runs alongside the bottom of their gardens. The site then runs steeply uphill to a high point on the ridge line indicated in Figure 1, which is about 20m higher than the existing homes (source OS map). The residents of Grange View Road and Grange Crescent will be in a similar position.
- 2.9 We note that the submission by Langridge Homes recognises that the site has **'undulating topography'** and that due to this **'the site is well contained by strong ridgelines and is thus visually concealed from the wider landscape to the north and east'**. This however, is not the issue of concern to local residents, it is the fact that the undulating topography will lead to the new development completely dominating the existing homes to the south of the development.

### 3. W.F.A.G Position Statement - Question 10b

- 3.1 Many respondents to the H3 Willow Farm proposal believe that the development will have a detrimental impact upon highway safety. In the Report of Responses, the LPA state **'County Highways considers that the development can be satisfactorily accessed and the proposed accesses from Green's Farm Lane and Grange View Road are suitable'**.
- 3.2 This response fails to adequately address our concerns, because it is only based upon a 'consideration' rather than on a sound evidential basis.
- 3.3 As outlined at paragraph 2.4, the construction phase for this development will last for 30 months. The volume of journeys and type of vehicles necessary to deliver the

vast amount of material required will access the site via residential streets that are, in our opinion, totally unsuitable for this purpose. The 'engineering' limitations that are apparent in the existing road layout will also necessitate these vehicles being routed towards the Willow Farm Primary School.

- 3.4 A key objective of the Gedling Access Road (GAR) is to **'remove significant levels of through traffic, including Heavy Goods Vehicles currently using Arnold Lane / Shearing Hill'**. The purpose of the GAR and the access arrangements for the H3 Willow Farm development are contradictory, because the construction phase will generate significant numbers of Heavy Goods Vehicle journeys using Arnold Lane / Shearing Hill and, once complete, the development will then increase the amount of 'normal' traffic on these roads.
- 3.4 Our residents have serious concerns regarding the additional road safety risks posed by this development, which are based upon their knowledge of the road layout and actual driving conditions. We believe that it is for the LPA and Local Highways Authority to provide sound evidence to support their view that the existing plans do provide safe and appropriate access for all road users, both during and after the extended construction phase of this development. There is no evidence provided to support their 'consideration' of this issue.

#### **4. W.F.A.G Position Statement - Question 10c**

- 4.1 Respondents to the H3 Willow Farm proposal expressed their concern regarding the lack of infrastructure in place to support this development; in particular they made reference to a lack of school places and doctors surgeries.
- 4.2 Our Position Statement for 'Matter 6 - Housing Allocations', issue 6a, question 4, sets out our belief that the LPA plan is not viable because of the lack of existing infrastructure in place to support the Gedling based housing developments and that the pace of building and resultant population growth will outstrip the current plans to build the additional capacity in time to meet this demand.
- 4.3 Neither do we believe that the plan meets the requirements of Policy 18 of the Aligned Core Strategy, which states that new development **MUST** be supported by the required infrastructure at the right stage of development.
- 4.4 The H3 Willow Farm development will, when complete, generate additional demand for school places and health services.
- 4.5 The Infrastructure Delivery Plan and Addendum 2016, identifies that the development is expected to generate demand for 23 Primary and 18 Secondary places and that primary schools within one mile of the Gedling Colliery/Chase Farm site are oversubscribed. The Carlton Academy is in the same position.

- 4.6 Utilising the formula provided by the LPA for identifying the demand for primary care health provision, which is based upon 2.5 people per household, there will be an additional 275 people from this development seeking local provision.
- 4.7 The LPA themselves identified within the Chase Farm Planning Application 2015 that **'The majority of local practices are operating at full capacity and therefore additional patients caused by the development will require additional new space to accommodate their health needs'**.
- 4.8 In conclusion, the WFAG's position is that the measures proposed by the LPA to address the shortfall in capacity will not be in place **'at the right stage of development'** and at best there will be a considerable gap between the completion of the H3 Willow Farm development and the availability of school places and primary health services and at worst no plans in place to meet this demand at all.

## 5. W.F.A.G Position Statement - Question 11

- 5.1 Respondents objected to the loss of Green Belt for the H3 Willow Farm development and pointed out that the LPA had failed to identify the exceptional circumstances to justify the removal of its protected status.
- 5.2 In the Report of Responses the LPA highlight the report of the Planning Inspector, who in examining the Aligned Core Strategy agreed that the use of Green Belt would be required to meet the need for housing.
- 5.3 We accept that in September 2014, following independent Examination, the Gedling Borough Aligned Core Strategy was adopted. We note that the Inspector supported the LPA's policy of urban concentration, which was **'considered to be the most sustainable location for new homes'** however, it is also clear that the Inspector was not providing an unfettered approval to build on the Green Belt by identifying an important condition at paragraph 118 of her report that **'sites to be released from the Green Belt must have good sustainability credentials'**.
- 5.4 The National Planning Policy Framework sets out a requirement that there should be **'a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking'**.
- 5.5 The H3 Willow Farm Sustainability Assessments are within the Draft Main Report on page 136 and 170, with the detailed assessments contained within Sustainability Assessment Appendix H page 19.

- 5.6 Our position is that the Sustainability Assessment undertaken by the LPA fails to demonstrate that H3 Willow Farm meets the requirement for **'good sustainability credentials'**.
- 5.7 Based upon the LPA assessments, this site is the least sustainable of the four housing developments within the Carlton Allocation.
- 5.8 The only **'positive'** area of the assessment is against objective 1 - 'Housing', with the LPA appraising the site as a **'minor negative'** in the areas of 'Health', 'Social', 'Landscape', 'Natural Resources', 'Waste' and 'Transport'. Objective 6 - 'Environment, Biodiversity and Green Infrastructure' is assessed as a **'major negative'**.
- 5.9 Within our Position Statement in response to 'Matter 2 - Sustainability Appraisal', issue 2a, we have identified our belief that the LPA assessment of the H3 Willow Farm is inaccurate in assessing Objective 9 - Flooding as **'neutral / not relevant'**, because the Infrastructure Delivery Plan and Addendum Oct 2016 assessment of the site identifies that **'the surface water flood risk map indicates there is a thin flow of high risk surface water flooding that runs across the site'**. Other sites have been assessed as a **'major negative'** because of this risk.
- 5.10 The Sustainability Assessment Draft Report 2016 assessment of H3 Willow Farm, against Objective 2 Health, which includes access to existing GP surgeries, is a **'minor negative'** because the nearest bus service is currently in excess of 400 m from the site.
- 5.11 The LPA's mitigation is to indicate that **'transport improvements would be sought'** to **'ensure that there is connectivity to existing bus services'**. Given that the provision of bus services is a commercial enterprise, how does the Borough intend to realistically deliver this mitigation measure? Our concern is that offering solutions in a report is one thing, but the likelihood is that this will not translate into an operational reality.
- 5.12 The lack of capacity in local primary health care and school places will further exacerbate this issue, because residents are likely to have to travel further to access these services and will be reliant on private transport to do so, which runs contrary to the principles of sustainable development.
- 5.13 The Sustainability Assessment of H3 Willow Farm as a **'minor negative'** against Objective 8 - Natural Resources is based on the fact that it **'would involve the loss of agricultural land grade 3'** and states that **'It is not known whether these sites comprise best and most versatile (BMV) land i.e. grade 3a'**. The assessment then recognises that an Agricultural Land Classification survey will be required to confirm whether it is best and most versatile land.

- 5.14 In the Report into the Examination of the Aligned Core Strategy in 2014, the Inspector observed that **'more detailed assessments of landscape value and loss of high quality agricultural land might have featured'** and that **'more detailed and localised impacts can be fully assessed when specific sites are proposed in Part 2 Local Planning Document'**.
- 5.15 Given the comments of the Inspector, we are surprised that the assessment of the value of the H3 Willow Farm agricultural land has not been undertaken, because this information should have been available for the Part 2 Plan.
- 5.16 We dispute the Langridge Homes assessment that the **'majority of the land is fallow and consists of rough grassland'**. Our residents have seen the farming activity take place on large areas of the proposed site over many years and observed the crops grown.
- 5.16 In conclusion, we do not accept that the removal of the H3 Willow Farm site from the Green Belt is justified because the site does not demonstrate **'good sustainability credentials'**.

## **6 W.F.A.G Position Statement - Question 10b**

- 6.1 Respondents objecting to the loss of Green Belt proposed for H3 Willow Farm also expressed their concern that this would lead to urban sprawl and the closing of the gap between Gedling, Burton Joyce and Lambley.
- 6.2 We note that the LPA reject this concern within their Report of responses, on the basis that the new development will be no closer than existing houses to other settlements, however, the fact remains that the section of land between the settlements will be narrowed by this development.

## **7 W.F.A.G Position Statement - Question 15**

- 7.1 We strongly oppose any suggestion that the current H3 Willow Farm site be extended to the line of the GAR.
- 7.2 The objections raised by respondents to the H3 Willow Farm proposal are also relevant to this proposal.
- 7.3 This proposal has not been subject of any specific consultation with the public or those local residents who live in the vicinity of the larger footprint of the extended site.
- 7.4 The additional 180 homes will add considerably to the demand placed upon primary health and school services, when it has already been acknowledged that there is insufficient capacity to meet the demand generated by the existing proposals.

- 7.5 The significant loss of the Green Belt and the complete change to the character of the area in which we live is completely unacceptable to local residents and will lead to urban sprawl, with a considerable narrowing of the gap between Lambley and Burton Joyce. It will also represent a prominent intrusion into the countryside.
- 7.6 We do not accept that the GAR should be used as an excuse to remove this large section of land from the Green Belt.
- 7.7 The impact of the development will be considerable. The building phase will last for seven years, to the detriment of existing residents, and will follow the two year construction phase of the GAR.

## **8 W.F.A.G Position Statement - Question 16**

- 8.1 As outlined in our response to Question 9, many respondents to the H3 Willow Farm development raised concerns regarding the impact of this proposal on their residential amenity.
- 8.2 There can be no doubt that the proximity, size and scale of this development will generate a significant increase in the level of activity, including traffic, within the locality and this will be particularly acute during the 30 month construction phase.
- 8.3 However, this is not the only 'burden' that local residents are being asked to carry. The 15 year Chase Farm / Gedling Colliery development, which is less than a mile from our homes, will start in 2017. The 2 year GAR construction will commence in March 2018 and, subject to approval, will be closely followed by the 30 month H3 Willow Farm construction phase. The combined impact from noise and dust generated by the construction will have a negative impact on the amenity of local residents for an extended period of time and we do not find this acceptable.
- 8.4 In addition, the indication from the LPA that, subject to further examination, the GAR will become the new line of defence for the Green Belt, is highly likely to result in the approval of the Langridge Homes proposal for an extended development at the time of the next Green Belt Review. This would extend the construction phase of this development by a further 5 years.
- 8.5 The National Planning Policy Framework states that planning must be a creative exercise in finding ways to improve the places in which we live our lives. The local residents we represent feel under siege from road building and house building projects, which are set to transform our green landscape and inflict many years of noise and disturbance on us, to the detriment of our quality of life. This is unfair and unacceptable.

**3000 words**