

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

**Inspector's Initial Questions for the Council dated 22nd November 2016
– Council's Response 9th December 2016**

Introduction

- 1. This note flags up some initial questions and requirements for further information that would benefit from early clarification. In answering these questions could the Council consider whether it might be necessary to advance any potential *Main Modifications* to the Plan?**

Following consideration of the initial questions raised by the Inspector a number of potential modifications to the Plan are proposed. These are listed in the separate document titled 'Schedule of Changes Made Post Submission (December 2016)'.

Proposed Changes

- 2. I note that the Council has suggested proposed changes to the Plan in response to some representations. Have these been consulted upon? If not, is the Council asking that these be considered as *Main Modifications* to the Plan?**

It is confirmed that the proposed changes to the Plan as listed in the document titled Schedule of Changes to Local Planning Document Publication Draft (October 2016) (LPD/REG05) have not been consulted on. It is requested that these be considered as Main Modifications to the Plan.

- 3. The Schedule of Changes to Local Planning Document Publication Draft (October 2016) (LPD/REG/05) sets out the proposed changes in detail. The final column sets out the reason for the particular change. Could the Council please include a more comprehensive reason for each change?**

A Revised Schedule of Changes to Local Planning Document Publication Draft (December 2016) is provided which includes a more comprehensive reason for each change as requested

Scope of the Local Plan Part 2

- 4. Does the scope of the Local Plan Part 2 reflect that set out in the Local Development Scheme?**

It is considered that the scope of the Local Plan Part 2 reflects that set out in the Local Development Scheme (LPD/POL/01) which states at Appendix 1 of that document that the role and content of the Local Planning Document is as follows:-

- Development Management - A suite of criteria based policies which are required to ensure that all development within the area meets the vision and strategy set out in the Aligned Core Strategy.*
- Site Specific Allocations - Identification of land for specific uses/policies and criteria based.*

Development management policies are included in Part A of the Local Planning Document (Policies LPD 1 – LPD 61) and site specific allocations are included in Part B of the Local Planning Document (Policies LPD 62 – LPD 70).

Duty to Co-operate

- 5. The Report of Consultation on the Local Planning Document (LPD/REG/07) includes a Duty to Co-operate Statement in Appendix 2 and a Summary of Consultation Stages in Appendix 3. In order to assess whether or not the Duty to Co-operate has been met, more details are required from the Council, including a comprehensive statement setting out in detail the arrangements for cross boundary working with each of its neighbouring local authorities. How is the planning work of the various planning authorities co-ordinated? Are there any standing arrangements/protocols/memorandums of understanding which are in place? What has been the nature and timing of co-operation, on which issues and how has it influenced the Plan? For ease of reference, it would be useful if the Council could provide me with a revised Duty to Co-operate Statement incorporating these details.**
- 6. Policy LPD 64 allocates a site for 120 homes at Hayden Lane (H10). When was this site first included in the Plan? Has the Duty to Co-operate been met in relation to the allocation of this site? If so, how has this been achieved? Please could the Council ensure that this matter is comprehensively covered in the revised Duty to Co-operate Statement?**

A revised version of the Duty to Co-operate Statement (currently provided as part of the Report of Consultation on the Local Planning Document (LPD/REG/07)) is provided titled 'Detailed Report on the Duty to Co-operate on the Local Planning Document (December 2016)' which includes:-

- A comprehensive statement setting out in detail the arrangements for cross boundary working with each of the neighbouring local authorities, how the planning work of the various planning authorities is co-ordinated and any standing arrangements/protocols/memorandums of understanding. A more*

detailed explanation of the nature and timing of co-operation and on which issues and how it has influenced the Plan is provided.

- *A detailed breakdown of the allocation of the Hayden Lane site (H10) in relation to the Duty to Cooperate is provided at Appendix 2 of the Detailed Report on the Duty to Co-operate on the Local Planning Document (December 2016).*

Affordable Housing

- 7. Policy LPD 36 refers to the provision of 10%, 20% or 30% of the dwellings provided for affordable housing depending on location, as set out in the Affordable Housing Supplementary Planning Document.**
- 8. Regard should be had to Regulations 5 and 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which prescribe, in effect, that the following is a Local Plan, rather than any form of supplementary planning document:**

'(a) any document prepared by a local planning authority ... which contains statements regarding one or more of the following –

- (i) the development and use of land which the local planning authority wish to encourage during any specified period;***
- (ii) the allocation of sites for a particular type of development or use;***
- (iii) any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i); and,***
- (iv) development management and site allocation policies, which are intended to guide the determination of applications for planning permission;***

(b) where a document mentioned in sub-paragraph (a) contains policies applying to sites or areas by reference to an Ordnance Survey map, any map which accompanies that document ...'

- 9. Paragraph 153 of the National Planning Policy Framework says that supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery. Paragraph 154 says that Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where.**
- 10. Policy LPD 36 defers important policy matters to the Affordable Housing SPD, by setting thresholds to geographical locations, which should be before the Examination for testing.**
- 11. How does the Council intend to identify in the Plan those locations where the provision of 10%, 20% or 30% of the dwellings provided for affordable housing would apply?**

In order to clarify the geographical locations to which Policy LPD36 applies, in accordance with Regulations 5 and 6 of the Town and County Planning (Local Planning)(England) Regulations 2012 and the National Planning Policy Framework (paragraphs 153 and 154), it is intended to include an additional appendix to the Local Planning Document. This additional appendix will incorporate Appendix 4 of the Affordable Housing Supplementary Planning Document December 2009 (LPD/HOU/07) which comprises a map showing the requirement for Affordable Housing. It is considered appropriate to provide the map as a separate appendix rather than adding the boundaries to the Policies Map in the interest of clarity and ease of reference.

It is noted that the locations where the provision of 10%, 20% or 30% of affordable housing would apply are intended to be broad locations rather than precisely defined. As such, the affordable housing requirement for a site on the border of two locations would be assessed on its merits.

The boundaries included on the map included in the new appendix have already been consulted on as part of the Affordable Housing Supplementary Document in 2009. In addition, the boundaries were used as the basis of the Residential Charging Zones which form part of the Community Infrastructure Levy Charging Schedule, as adopted July 2015 and which came into force in October 2015. As such, the boundaries have been the subject of examination.

12. Do these percentages apply to allocated sites and to unallocated sites which may come forward during the Plan period?

It is confirmed that the provision of 10%, 20% or 30% affordable housing applies to both allocated sites and to unallocated sites which may come forward during the Plan period. The supporting text to Policy LPD36 will be amended to clarify this.

Transport

13. Policy LPD 57 refers to residential development proposals meeting the requirement for parking provision set out in the *Parking Provision for Residential Development Supplementary Planning Document* and non-residential development proposals meeting the requirement for parking provision set out in the *6C's Design Guide*.

14. The Council should again have regard to Regulations 5 and 6 the 2012 Regulations and Paragraphs 153 and 154 of the National Planning Policy Framework.

15. Policy LPD 57 defers important policy matters to the *Parking Provision for Residential Development SPD* and the *6C's Design Guide*, namely the parking provision for residential and non-residential developments, which should be before the Examination for testing.

16. How does the Council intend to address this matter?

Policy LPD 57 refers to residential development proposals meeting the requirement for parking provision set out in the Parking Provision for Residential Development Supplementary Planning Document. The Policy also refers to non-residential development proposals meeting the requirement for parking provision set out in the 6C's Design Guide.

At the time of drafting, it was considered appropriate to cross refer to standards in other documents. For residential development proposals, there is an intention to review the Supplementary Planning Document in due course and as such the standards may change. For non-residential development proposals, it is noted that the 6C's Design Guide is a living document available only online and therefore subject to change.

In order to accord with Regulations 5 and 6 the 2012 Regulations and Paragraphs 153 and 154 of the National Planning Policy Framework, it is intended to include an additional appendix to the Local Planning Document. This appendix will set out the parking standards for residential and non-residential developments.

For residential standards, the appendix will include section 4 of the Supplementary Planning Document (Requirement for Parking Provision) plus the map attached as appendix C to the SPD (Map Identifying Rural and Urban Wards in Gedling Borough). For non-residential standards, the appendix will include Part 4 of the Leicestershire County Council design standard 'Highway Requirement for Development' which forms part of the 6C's Design Guide.

http://www.leics.gov.uk/highway_requirements_part_4-2.pdf

It is considered appropriate to provide the standards as a separate appendix rather than adding them to the policy, due to their length.

Gypsies, Travellers and Travelling Showpeople

17. Policy 9 of the Aligned Core Strategy (ACS) says that sufficient sites for Gypsy and Traveller, and Travelling Showpeople accommodation will be identified in line with a robust evidence base and that the allocation of sites will be made in Part 2 Local Plans in accordance with the evidence base. It also sets out the criteria to be used to identify suitable Gypsy and Traveller, and Travelling Showpeople sites and associated facilities, as well as being used in the case of speculative proposals.

18. The South Nottinghamshire Gypsy and Traveller Accommodation Assessment (January 2016) identifies a baseline need for a total of 3 additional pitches in Gedling Borough between 2014 and 2029. This need is not met in the Plan. Where there is an unmet need, sites must be allocated to meet that need. However, where a Council is

not meeting its own needs in full, it must ask adjoining authorities to meet the remaining need.

19. How does the Council intend to ensure that the 3 additional pitches required within the Borough will be provided? What will the timescale be for this as the Council is required to have a 5 year supply of deliverable traveller sites? Your attention is drawn to paragraph 10 of Planning Policy for Traveller Sites (PPTS). Please explain whether you consider the submitted Plan accords with PPTS and, if not, how you intend to remedy this.

Section 11 of the Housing Background Paper (May 2016) (LPD/BACK/01) explains the approach that is being taken to Gypsy and Traveller Provision. For Gedling Borough the South Nottinghamshire Gypsy and Traveller Accommodation Assessment (January 2016) (LPD/HOU/03) identifies a need for three additional pitches over the period 2014 to 2029. Paragraph 11.4 of the Housing Background Paper explains that the methodology used for the Accommodation Assessment takes account of the 8 households identifying as being from the Gypsy and Traveller communities in the 2011 Census, all of which who were living in bricks and mortar accommodation at the time of the Census. This figure has been a significant factor in generating an identified need for 3 pitches in Gedling Borough.

Paragraph 11.5 of the Housing Background Paper sets out the local context which is that there is no current permanent provision in Gedling Borough. There has been minimal illegal encampment activity over the past 7-8 years and no evidence that illegal encampment is as a consequence of a lack of site provision. In addition, there have been no planning applications for Gypsy or Traveller sites since 2010 and no request for housing assistance from people identifying themselves from Gypsy or Traveller communities.

Given this context, it is concluded that it is not appropriate to identify specific sites in the Local Planning Document for the following reasons:-

- There is currently no on-site Gypsy and Traveller provision within Gedling Borough and there does not appear to be any qualitative evidence of need;*
- It is anticipated that any provision would be met by the private sector, as Gedling Borough Council is unlikely to develop a site in the short to medium term;*
- The modest level of need identified is such that it may present challenges with regards to the sustainability of the new site, as reflected by consultation with community representatives; and*
- Community representatives have indicated that there was no preference for the location of future provision based on local authority boundaries in South Nottinghamshire, subject to sites being conveniently located for amenities and services.*

The intention is therefore that future provision will be dealt with through responding to proposals as they come forward, assessing any small scale proposals that emerge against ACS Policy 9 and other relevant Local Plan policies. Notwithstanding the decision not to allocate a specific site within the Local Planning Document, consideration will be given as appropriate to working with neighbouring local authorities to provide a joint site, if a site accommodating three pitches is not deemed to be sustainable. In response to comments received on the Publication Draft Local Planning Document, a new paragraph (paragraph 11.1.5) is proposed to be included in the introduction to section 11 of the Local Planning Document to clarify the approach to be taken to Gypsy and Traveller provision.

Housing Distribution

20. Policy LPD 63 identifies 4,330 homes in or adjoining the main built up area of Arnold and Carlton. The Housing Background Paper identifies a total supply for the Urban Area as 4,097 dwellings, made up of completions (884), extant planning permissions, including the Teal Close Strategic Site, (1,148), deliverable sites below the threshold for allocation (265) and allocations H1 – H9 (1,800). Would the difference of 233 dwellings be made up from windfalls?

The Housing Background Paper (May 2016) ([LPD/BACK/01](#)) includes Table 1 (on page 9 of that document) which identifies the supply for the urban area as 4,097 dwellings and Table 2 (also on page 9) which shows that this figure has been rounded up to 4,100 homes. Paragraph 4.5 of the same document (page 10) sets out the justification for a windfall allowance for the last five years of the plan period of 230 homes and the paragraph states “it is continued to be assumed that all windfall will be delivered in the urban area”. This windfall allowance has therefore been added to the supply for the urban area of 4,100 homes. Thus the total supply (including windfall allowance) of 4,330 homes for the urban area is included in Policy LPD 63.

Paragraph 2.4 of the supporting text to Policy LPD63 will be amended to explain that the figure of 4,330 homes includes a windfall allowance.

21. I note the proposed change put forward by the Council to include an additional paragraph 2.4 which explains that the figures set out in Policy LPD 63 include dwellings which have already been built, granted planning permission and which could be built on sites which do not need a change in planning policy. Does this provide sufficient clarity in terms of the number of dwellings already built etc and the number of dwellings which the Plan must therefore seek to allocate to meet its target of 7,250 dwellings?

The figures in Policy LPD 63 include homes which have already been built since 2011, sites with extant planning permission, sites below the threshold for allocation

and sites allocated in the Aligned Core Strategy and Local Planning Document. Paragraph 2.4 will be amended for clarification. Paragraph 2.4 was added to the Local Planning Document in response to comments made by Ravenshead Parish Council seeking clarification on the housing figure for 250 homes in Ravenshead as they noted that the Housing Trajectory in Appendix A of the Local Planning Document Publication Draft showed 130 homes on allocated sites, 3 homes on sites below the threshold and 39 homes on sites with planning permission but were unclear where or how the remainder were accounted for. The remainder are those homes that have been completed since 2011.

Section 4 and Tables 1, 3, 8, 9, 10, 12, 13, 14 and 15 of the Housing Background Paper (May 2016) provide the information on the housing distribution across the Borough. For ease of reference, the information from the tables has been incorporated into a single table and attached as **Appendix 1 (Housing Supply 2011-2028)**. The new table includes homes which have already been built since 2011, sites with extant planning permission, sites below the threshold for allocation and sites allocated in the Aligned Core Strategy and Local Planning Document. For clarification, the windfall allowance of 230 homes has been added to the urban area figure. Please note the figures in the table are based on information as at 31 March 2015. The 2016 information will be provided in the forthcoming Housing Background Paper Addendum.

22. The distribution of housing differs in the Plan to that set out in the ACS. Why is this and does the distribution proposed in the Plan accord with the Spatial Strategy of the ACS? Where is the evidence base to support this divergence? Furthermore, has Policy LPD 63 been subject to a Sustainability Appraisal? If so, where can this information be found? If not, how does the Council intend to remedy this?

Section 4 of the Housing Background Paper (May 2016) (LPD/BACK/01) provides information on how the housing distribution proposed in the Local Planning Document accords with the spatial strategy of the Aligned Core Strategy. Table 15 in the document (on page 16) provides the difference between the figures in the Aligned Core Strategy and Local Planning Document.

Table 15 – Final Total			
	LPD Figure	ACS Figure	Difference
Urban Area	4,100	3,837	263
Around Hucknall	1,265	1,300	-35
Windfall	230	208	22
Key Settlements	1,515	1,945	-430
Other Villages	140	260	-120

Paragraphs 3.10 to 3.10¹ (on pages 7-8) of the Housing Background Paper explain that the housing distribution identified in Policy 2 of the Aligned Core Strategy was established using the information available at that time (March 2013) and acknowledges there are a number of factors which affect the number of homes that can now be delivered within or adjacent to the urban area or around Hucknall. The Aligned Core Strategy was drafted with the flexibility to allow an increase in the housing supply for the urban area. The housing figures for the key settlements and other villages in ACS Policy 2 are 'up to' figures allowing them to be reduced. If there were more homes within and adjacent to the urban area and around Hucknall a decision would need to be made as to where the reduction would be made. An overall decrease in the housing supply from the urban area and around Hucknall would require a fundamental review of the Aligned Core Strategy.

Paragraph 3.2 of the Housing Background Paper explains there was an opportunity to revise the housing distribution which arises from the need to update the base date for the housing supply from 31 March 2013 (used in preparing the Aligned Core Strategy) to 31 March 2015.

Paragraph 4.1 of the Housing Background Paper refers to Table 1 on page 9 which shows the housing supply for within and adjacent to the urban area. The housing supply, based on 2015 information, is 4,097 homes and this figure was rounded up to 4,100 as shown in Table 2. Table 2 shows that there are 263 more homes within and adjacent to the urban area than the number identified in the Aligned Core Strategy (3,837 homes²).

Paragraph 4.2 of the Housing Background Paper explains that the Inspector examining the Aligned Core Strategy recommended that the number of homes around Hucknall be limited to 1,300 homes due to infrastructure concerns (see the Planning Inspectorate Report on the Examination of the Greater Nottingham Aligned Core Strategies (LPD/POL/07). As part of the preparation of the Top Wighay Farm Development Brief (adoption anticipated 2nd February 2017) it was identified that the 1,000 homes allocated for the site in the Aligned Core Strategy could not be satisfactorily achieved but rather a figure of 845 homes was considered achievable. This is 155 fewer homes on site than anticipated in the Aligned Core Strategy. Paragraph 4.3 explains that consideration was given in the Site Selection Document Appendix A – Urban Area and Adjacent to Hucknall (LPD/GRO/06) to whether to increase the size of either of the two sites North of Papplewick Lane and Top Wighay Farm identified around Hucknall. It was concluded that allocating additional land at North of Papplewick Lane was the appropriate solution (see paragraphs 3.13 and 3.14 of the Site Selection Document) and site H10 Hayden Lane has therefore been allocated for 120 homes. In addition to the Top Wighay Farm site (845 homes) and

¹ Typos in paragraph numbering – this refers to paragraphs 3.10, 3.11, 3.9 and 3.10 respectively.

² 4,045 homes – 208 windfall allowance = 3,837 homes.

North of Papplewick Lane site (300 homes) this means a total of 1,265 homes for around Hucknall (as shown in Table 3 in the Housing Background Paper). This results in 35 homes fewer homes being allocated around Hucknall than the number identified in the Aligned Core Strategy (1,300 homes).

Paragraphs 4.4 and 4.5 of the Housing Background Paper explain the windfall allowance of 230 homes and why this differs from the windfall allowance assumed for the Aligned Core Strategy of 208 homes. The windfall allowance is assumed to come forward in the last five years of the plan period and to be delivered in the urban area. Table 6 of the Housing Background Paper compares the total housing supply figures for within and adjacent to the urban area (including windfall allowance) and around Hucknall between the Aligned Core Strategy and the Local Planning Document. Paragraph 4.7 states the total capacity is now 5,595 homes, which is 250 more than the number of homes identified in the Aligned Core Strategy.

Paragraphs 4.7 and 4.8 of the Housing Background Paper explain that, in response to the Inspectors recommendations, the Aligned Core Strategy distributes a total of 7,550 homes compared to 7,250 homes (ie an additional 300 homes) to provide flexibility given uncertainty over larger sites (see paragraph 91 of the Inspector's Report LPD/POL/07). It is not considered that this uncertainty exists any more, as a planning application for the Gedling Colliery/Chase site has been submitted³, such that there is no need to plan for substantial numbers of homes over and above the objectively assessed housing need of 7,250 homes. This means the total oversupply is 550 homes, comprised of 250 homes extra coming forward within and adjacent to the urban area and around Hucknall and 300 homes from the Inspector's recommendation.

Paragraph 4.9 of the Housing Background Paper states that the oversupply of 550 homes can be used to reduce the housing requirement at the key settlements or the other villages. This approach is supported by the Inspector's Report for the Aligned Core Strategy, which confirmed that whilst the overall housing number for the Borough is a minimum target, the use of 'up to' figures indicates that limits will be imposed on the amounts of new housing in these locations (see paragraph 95 of the Inspector's Report LPD/POL/07).

Paragraph 4.10 of the Housing Background paper explains that any oversupply should be used to reduce the housing requirement in the key settlements where growth is meeting wider needs, rather than the other villages. Paragraph 4.11 and 4.12 explain why the figure of 260 homes for the other villages as identified in the Aligned Core Strategy was reduced to 140 homes in the Local Planning Document. It has been assumed that the current allocation in the Gedling Borough Replacement

³ Planning application (2015/1376) for full permission for phase 1 (506 homes) and outline permission for subsequent phases. Since the publication of the Housing Background Paper, Planning Committee approved the planning application on 18 May 2016 subject to the signing of the s106.

Local Plan at Newstead for 80 homes (site H2 (b) Former Newstead Sports Ground) would be rolled forward. Uncertainty as to whether this site will deliver homes during the plan period has emerged since the Aligned Core Strategy was adopted. As explained in the Site Selection Document (LPD/GRO/13) access issues are not resolved for the site. Access would need to come from Tilford Road as Station Road is privately owned. Width and visibility are marginal and complicated by the nearby level crossing. Although this site is currently allocated in the Local Planning Document (site H22 Station Road), it is not considered appropriate to assume any homes will be delivered on this site within the plan period and this site does not contribute towards meeting the housing target. Thus the figure of 260 homes for the other villages is reduced by 120 homes to 140 homes. Paragraph 4.13 explains that the remaining oversupply of 430 homes (i.e. 550 homes – 120 homes) could be used to reduce the amount at the key settlements. This would mean the total at the three key settlements would be reduced from 1,945 homes⁴ as identified in the Aligned Core Strategy to 1,515 homes in the Local Planning Document. This means 430 homes fewer than the number identified in the Aligned Core Strategy.

Policy LPD 63 provides a housing distribution for the whole Borough which is based on updated information (and updated the housing distribution in Policy 2 of the Aligned Core Strategy) and includes site allocations in the Local Planning Document. Policies LPD 64 to LPD 70 provide site allocations for the urban area (LPD 64), Bestwood Village (LPD 65), Calverton (LPD 66), Ravenshead (LPD 67), Burton Joyce (LPD 68), Newstead (LPD 69) and Woodborough (LPD 70). Policy LPD 63 is purely for presentational purposes. Policy LPD 63 has not been subject to a Sustainability Appraisal as it was considered at the time that there was no need to undertake an assessment as the individual site allocation policies LPD 64 to 70 had been subject to a Sustainability Appraisal. Section 11 of the Sustainability Appraisal Publication Draft Main Report (May 2016) (LPD/REG/11) summarises the sustainability appraisal of the site allocation policies LPD 64 to LPD 70. While the site allocations policies contained in Part B of the Local Planning Document (i.e. Policies LPD 64 to LPD 70) have been subject to a Sustainability Appraisal, it is noted that the remainder of the policies in Part B i.e. Policy LPD 62: Comprehensive Development and Policy LPD 63: Housing Distribution have not been subject to a Sustainability Appraisal. For the sake of completeness, the Council has undertaken a Sustainability Appraisal of both policies LPD 62 and LPD 63 and the findings can be found in the Addendum 2 to the Sustainability Appraisal: Appraisal of Housing Distribution for Key Settlements and Policies LPD62 and LPD63 (December 2016).

23. Is the distribution of homes between the Key Settlements in the Plan appropriate? How has this distribution evolved, given that it differs to that in the ACS? Is it clear how and why the Council has reduced

⁴ Up to 560 homes in Bestwood Village, up to 1,055 homes in Calverton and up to 330 homes in Ravenshead.

the housing requirement in the Key Settlements? Has this approach been subject to a Sustainability Appraisal?

The Greater Nottingham Sustainable Locations for Growth Study (LPD/GRO/17) recommends 'medium suitability for growth' for the three key settlements and state there is potential for a low level of growth for Bestwood Village and a medium level of growth for Calverton and Ravenshead compared with other settlements in the Greater Nottingham sub region.

Paragraph 93 of the ACS Inspector's report (LPD/POL/07) confirmed that the key settlements of Bestwood Village, Calverton and Ravenshead had been quite rightly and appropriately identified as Key Settlements. However, in expanding these settlements the Inspector noted that regard should be had for the prospective Sherwood Forest Special Protection Area, the desire to maintain Main Road Ravenshead as a defensible northern boundary and to protect the landscape setting of Calverton. It was confirmed that these issues should be addressed in the designation of sites in Local Plans Part 2. It was recognised that housing development in or adjoining the Key Settlements would require the loss of Green Belt land but it was considered that there were exceptional circumstances required to amend the boundary of the Green Belt to allow residential development.

As part of the examination of the Aligned Core Strategy, an assessment of the various approaches to housing distribution took place in response to the Inspector's letter dated 22 November 2013 regarding the impact of development on Hucknall and considered whether including the Teal Close and Gedling Colliery/Chase Farm sites offered the opportunity to reduce development around Hucknall (Top Wighay Farm, North of Papplewick Lane and Bestwood Village) and/or at the two key settlements at Calverton and Ravenshead. The Council's response to the ACS Inspector's note dated 22nd November 2013 to the Councils following October/November Hearings is provided. This looked at the various scenarios for the distribution of housing between the Hucknall area and Calverton and Ravenshead. Appendix H of the Council's response provides a table setting out the various scenarios considered:

- (A) 100% of reduction around Hucknall area;*
- (B) a reduction at Top Wighay Farm site and Bestwood Village and proportional reductions at Calverton and Ravenshead⁵;*
- (C) 100% of proportional reductions from Calverton and Ravenshead⁶; and*
- (D) a reduction at North of Papplewick Lane and minimum Key Settlement for Growth housing figure for Bestwood Village (200 homes⁷) plus proportional reductions at Calverton and Ravenshead⁸.*

⁵ Proportional reductions based on the proportion of development ('new allocations') at each village as set out in the Aligned Core Strategy Publication Version. Calverton has been reduced by 80% of the potential reduction while Ravenshead has been reduced by 20%.

⁶ See footnote 5.

The various scenarios did not include proportional reductions between the three key settlements. The different scenarios have been subject to a Sustainability Appraisal and the findings can be found in the document titled ‘Sustainability Appraisal – Comments on scenarios tested as part of response to Inspector’s letter dated 22 November 2013’.

To help the Council identify which sites should be developed at Bestwood Village, Calverton and Ravenshead in 2013 the Borough Council commissioned consultants to work with local communities and analyse technical evidence. The masterplanning reports form part of the evidence base for the Local Planning Document:-

- *Masterplanning for Key Settlements Final Report - Bestwood Village (LPD/GRO/01);*
- *Masterplanning for Key Settlements Final Report – Calverton (LPD/GRO/02); and*
- *Masterplanning for Key Settlements Final Report – Ravenshead (LPD/GRO/03)*

The Housing Background Paper (May 2016) (LPD/BACK/01) explains why and how the Council reduced the housing the number of homes allocated in the key settlements. Paragraphs 4.8 and 4.9 explain the oversupply of housing (550 homes) in the urban area that could be used to reduce the housing requirement at the key settlements or the other villages. Paragraphs 4.10 to 4.12 explain why the figure of 260 for the other villages was reduced by 120 homes to 140 homes. Paragraph 4.13 explains that the remaining oversupply of 430 homes (i.e. 550 homes – 120 homes) could be used to reduce the amount at the key settlements. This would mean the total at the three key settlements would be reduced from 1,945 homes as set out in Policy 2: Spatial Strategy of the Aligned Core Strategy⁹ to 1,515 homes. Paragraph 4.13 of the Housing Background Paper states “It is considered that the most appropriate starting point for decisions on how to divide the remaining over supply between the three key settlements is to pro-rata it between them, based on their share of the housing figure identified in the Aligned Core Strategy”. As such the figures for the Key Settlements are no longer up to figures but are expressed as approximate minimum figures. Table 7 in the Housing Background Paper shows the outcome of the pro-rated calculation.

Table 7 – Revised Targets for key settlements

	<i>Aligned Core Strategy Figure</i>	<i>Share of remaining over supply</i>	<i>Revised LPD Target (rounded¹⁰)</i>

⁷ This does not include those with planning commitment (which was 29 dwellings at the time).

⁸ See footnote 5.

⁹ Comprising up to 560 homes in Bestwood Village, up to 1,055 homes in Calverton and up to 330 homes in Ravenshead.

¹⁰ The figures have been rounded to the nearest 5.

<i>Bestwood Village</i>	<i>560 (29%)</i>	<i>125 (29%)</i>	<i>435</i>
<i>Calverton</i>	<i>1,055 (54%)</i>	<i>232 (54%)</i>	<i>825</i>
<i>Ravenshead</i>	<i>330 (17%)</i>	<i>73 (17%)</i>	<i>255</i>
Total	1,945 (100%)	430 (100%)	1,515

The pro-rated approach had not been subject to a Sustainability Appraisal as it was considered that there were no reasonable alternative options to apportioning the remaining oversupply between the three key settlements. The preparation of the Site Selection Document provided the opportunity to weigh the evidence presented against the availability of sites and constraints to development.

Options considered and discounted at the time included:-

- the reduction of the total oversupply of 430 homes (100%) from either one of the three key settlements; and*
- splitting the oversupply of 430 homes equally between the three key settlements (i.e. a reduction of 143 homes each).*

The options, including the pro-rated option, have now been subject to a Sustainability Appraisal and the findings can be found in the attached Addendum 2 to the Sustainability Appraisal: Appraisal of Housing Distribution for Key Settlements and Policies LPD62 and LPD63 (December 2016).

At the time of preparing the Publication Draft Local Planning Document, two of the three site allocations in Bestwood Village were already in the planning system. Site H11 (the Sycamores) was granted full permission for 25 homes in June 2012 and site H13 (Bestwood Business Park) was granted outline permission for up to 220 homes in March 2015. As such 245 homes with planning permission in addition to 10 homes with extant planning permissions and 52 homes built since 2011 (ie totalling 307 homes) were already in the planning system. In addition, part of site H12 (Westhouse Farm) had been granted planning permission subject to the signing of the S106 agreement. Once allocated, it is not normally possible to reduce these figures even if further additional sites were found in the urban area.

To reduce all 430 homes from the figure of 560 homes for Bestwood Village in the Aligned Core Strategy would mean only 130 homes would be required and this figure was significantly exceeded by the number of homes with extant planning permission and those built since 2011 (307 homes). The ACS Inspector recognised that Bestwood Village was in need of regeneration (see paragraph 91 of LPD/POL/07) and para 4.14 of the Housing Background Paper confirms that a new primary school is required at Bestwood Village as a priority. Additional homes at Bestwood Village would help to ensure that there is sufficient s106 money generated to make a significant contribution to the school.

To reduce all 430 homes from the figure of 1,055 homes for Calverton in the Aligned Core Strategy would mean only 625 homes would be required, taking account of the number of homes with extant planning permission and those built since 2011 (294 homes). However, the lack of defensible boundaries to the north of Park Road has meant that a large area of land up to the Oxton Road is being taken out of the Green Belt, with the remainder being identified as safeguarded land. Any reduction in the area of land allocated for development in this location would result in a consequential increase in the area of safeguarded land, which may be disproportionate. A further impact of a significant reduction in the number of homes required at Calverton might be a reduction in the number of sites allocated for development reducing from two to one. Reliance on a single allocation to provide new housing for Calverton is considered to be a riskier approach in terms of housing delivery for the settlement and would also be less likely to deliver new homes within the first five years.

For Ravenshead, the housing requirement of 330 homes includes 186 homes that are already in the planning system (77 completions and 109 homes with planning permission). There is therefore no scope to reduce all 430 homes from Ravenshead and this would be contrary to the identification of the settlement as a Key Settlement for Growth in the Aligned Core Strategy.

Paragraphs 4.14 to 4.16 of the Housing Background Paper explain changes to the distribution once the oversupply had been pro-rata'd. It has been identified that a new primary school is required at Bestwood Village as a priority. Additional homes at Bestwood Village would help ensure that there is sufficient s106 money generated to make a significant contribution to the school. As such it is considered that an additional 90 homes should be added to the target for Bestwood Village; the numbers at Calverton and Ravenshead could then be reduced accordingly. It was considered that of the additional 90 homes at Bestwood Village, 85 homes should be used to reduce the housing target for Calverton and 5 homes to reduce the housing number for Ravenshead. While this is not a mathematical approach, it is considered justified based on the specific sites being considered for allocation in the Site Selection Document and the relative scale of housing at these settlements.

The revised targets for the three key settlements are as follows:-

- Bestwood Village – 525 homes;*
- Calverton – 740 homes;*
- Ravenshead – 250 homes.*

Paragraph 4.16 confirms these revised housing targets will be met from completions, sites with planning permission, sites below the threshold for allocation and allocations. Once allocated, it is not normally possible to de-allocate a site; therefore, these figures will not be reduced if further sites are found in the urban area. As such

the figures for the key settlements are no longer 'up to' figures (as in the ACS) but are expressed as approximate minimum figures.

24.If the provision of up to 260 homes in other villages referred to in the ACS (Policy 2) is solely to meet local needs, what evidence of local needs does the Council have to support its requirement of 140 homes in the other villages? Indeed, I note that the target for Burton Joyce is less than the identified housing need and the requirement in Woodborough is at the lower end of the housing need.

The Local Housing Need document (May 2016) (LPD/GRO/04) draws together information from a variety of sources, including the 2011 Census, to inform decisions about the number, type, size and tenure of new homes to be built in the other villages. Based on a range of information, the document makes recommendations about the number and type of new homes needed in the other villages.

The Housing Background Paper (May 2016) (LPD/BACK/01) includes information on local needs. Paragraphs 4.10 to 4.12 explain the reduction of the housing requirement from 260 homes to 140 homes in the other villages. It is recognised that the housing figure for the other villages differs from the housing figures for the key settlements in that it is solely intended to meet local needs rather than to also accommodate additional need from the Borough as a whole. Any oversupply in housing provision should therefore be used to reduce the housing requirement in the Key Settlements where growth is meeting wider needs, rather than the other villages. Nevertheless there is still a need for communities to be sustainable and the importance of considering existing residents and their needs as well as ensuring a community is balanced.

In determining the figure of 260 homes for the other villages it had been assumed that the current allocation in the Gedling Borough Replacement Local Plan at Newstead for 80 homes (Former Sport Ground - site H2(b)) would be rolled forward. As outlined above, uncertainty as to whether this site will deliver homes during the plan period due to issues over access has emerged since the Aligned Core Strategy was adopted. Although this site is currently allocated in the Local Planning Document (H22 Station Road), it is not considered appropriate to assume that any homes will be delivered on this site within the plan period and as such the site does not contribute towards meeting the housing target. It was therefore recommended that the figure of 260 homes for the other villages was reduced 80 homes to reflect the loss of the Newstead site and a further 40 homes to reflect specific constraints at some of the other villages, in particular Lambley, Linby, Papplewick and Stoke Bardolph. The review of green belt boundaries and consideration of the reasonable alternative sites in conjunction with infrastructure providers as part of the preparation

of the Publication Draft Local Planning Document established that there was more limited scope to allocate land for development in these locations than had previously been anticipated. As such, the figure of 260 homes for the other villages was reduced from 260 to 140 homes for the plan period.

Paragraphs 4.21 to 4.25 of the Housing Background Paper explain that, in distributing the 140 homes between the villages, it has been decided to focus development on Burton Joyce and Woodborough. The land around Linby and Papplewick is considered to make an important contribution to the Green Belt, whilst Stoke Bardolph is highly vulnerable to flooding. The reasonable alternative sites at Lambley are not considered suitable for allocation due to a variety of factors including impact on landscape, heritage and poor access. The existing allocation at Newstead is currently allocated but does not contribute towards meeting the housing target and alternative sites in Newstead are not considered suitable for development. The approach to these settlements is supported by the small number of completions and extant planning permissions at these settlements (28 homes in total) compared to those at Burton Joyce (18 homes) and Woodborough (38 homes). Taking account of the 28 homes already within the planning system at Linby, Papplewick, Stoke Bardolph, Lambley and Newstead, there remains 112 homes to distribute between Burton Joyce and Woodborough. It has been decided to distribute these homes based on the housing need in the two villages, constraints to development and the supply of suitable sites.

Paragraph 4.24 of the Housing Background Paper refers to the Local Housing Need document (May 2016) document which identifies a housing need of 70-90 homes in Burton Joyce. A housing target of 55 homes is proposed for Burton Joyce. It is acknowledged that this figure is less than the identified housing need, because Burton Joyce is significantly affected by flood risk and topography.

Paragraph 4.25 states a housing target of 55 homes is proposed for Woodborough. It is acknowledged this is at the lower end of the housing need identified in the Local Housing Need (May 2016) document, due to the fact that Woodborough has a Conservation Area and has experienced flooding in the past.

Paragraph 12.1 of the Local Housing Need document (May 2016) recognises that establishing future housing need is not an exact science and the information informing the document has been used to make a judgement on housing need for each village, resulting in a range rather than a precise figure. Paragraph 12.2 recognises that the level of housing need identified in the document does not take account of the availability of sites or any planning constraints to the delivery of sites, but rather that it is a matter for the Site Selection Document to weigh the information presented on housing need against the availability of sites and constraints to development.

Housing Supply during the Plan period

25. The provision of 7,250 homes is the minimum that should be provided in the Plan period as set out in the ACS. Does the Council consider that sufficient sites have been allocated to meet this target? Where is the evidence for this?

It is considered that sufficient sites have been allocated to meet the target of 7,250 homes. *Appendix 1 provides the full breakdown of housing supply to meet the 7,250 homes.*

Appendix A of the Housing Background Paper (May 2016) (LPD/BACK/01) refers to the sources of sites that have the potential to deliver housing. The sources of sites that make up the housing supply are:-

- *Strategic sites allocated in the Aligned Core Strategy;*
- *Site allocations in the Local Planning Document;*
- *Sites with planning permission; and*
- *Sites below the threshold for allocation, without planning permission. This excludes residential gardens.*

All sites have been identified through the Council's Strategic Housing Land Availability Assessment (SHLAA). The latest information in the SHLAA database is based on the 2015 assessment. The Council is currently updating the SHLAA to 2016 based on new information.

While Appendix B of the Housing Background Paper (May 2016) provides the list of sites that make up the five year supply, it is recognised that the evidence for the whole plan period has not been provided. This evidence will be provided when the Housing Background Paper Addendum is published to include an update of the housing trajectory (attached as Appendix A to the Local Planning Document) and an update of the five year land supply assessment against the Local Planning Document to reflect SHLAA update 2016.

26. Although a planning application for the Gedling Colliery/Chase Farm site (H9) has been submitted to the Council, why does the Council consider that it would not now be necessary to plan for the total of 7,550 homes set out in the ACS (Policy 2) compared to the housing target of 7,250? Would this provide sufficient flexibility if any problems were to arise with sites coming forward, particularly given that 7,250 is a minimum requirement? Why is there no buffer? If the Council considers that there is no need for a buffer, why is this?

Paragraph 91 and footnote 22 of the ACS Inspector's report LPD/POL/07 noted uncertainty over the largest sites which were identified in the earlier Local Plan but

not progressed (i.e. Top Wighay Farm and Gedling Colliery / Chase Farm) and the need for a range of small and large sites to ensure the speedy delivery of new homes. As such, she provided for a further 300 homes at Bestwood Village over and above the requirement of 7,250 to provide flexibility.

However, paragraph 4.7 of the Housing Background Paper explains that it is not considered that uncertainty over the Gedling Colliery site exists any more as a planning application has been submitted and granted subject to the signing of a S106 agreement. Progress is similarly being made on the Top Wighay Farm site in that regular Programme Group meetings are taking place with landowners and others with an interest in the site to help bring forward the site and a revised development brief is close to adoption.

It is not considered that there is a need for a buffer for the following reasons:-

- 1. It is considered that the delivery of the sites identified in the housing supply is feasible. The NPPF includes a range of policy matters and require the plan to be realistic, to take account of relevant market and economic signals and be effective and deliverable. A significant increase in the supply of sites through a buffer would not necessarily enhance delivery but would require the release of additional Green Belt land contrary to national policy and could delay progress on some of the more challenging regeneration sites. The Council are seeking to ensure through positive planning that the objectively assessed housing needs target of 7,250 will be met.*
- 2. The Housing Implementation Strategy (LPD/HOU/01) considers the risks to delivery of the allocated housing sites and what action would be taken if monitoring indicates that the Borough Council is not meeting its housing targets. Issues relating to specific sites have been discussed in detail with developers through two rounds of meetings with landowners and developers following consultation on the Publication Draft Local Planning Document.*
- 3. The Council has stated in the Report of Responses document (LPD/REG/04) that 'flexibility is provided through a variety of sources, including the allocation of land at Newstead (but not assuming the site will contribute to meeting the housing requirement), taking a cautious approach to windfall and to delivery on the Gedling Colliery site and through the identification of safeguarded land. It is considered that the need for flexibility through the allocation of land over and above the housing requirement needs to be balanced against the fact that any additional allocations would be most likely met through land which is in the Green Belt'. In relation to delivery on the Gedling Colliery site, planning permission has been granted for 1,050 homes but it is only assumed that 660 of these will be delivered within the plan period. A windfall allowance of 230 homes has been made for the last five years only.*

27.Does the Council expect all the dwellings identified in the extant planning permissions to be built? If so, what evidence is there to support this?

The Council does not expect all of the dwellings identified in the extant planning permissions to be built. Each year, developers of all sites with extant planning permission (and others) are asked to provide information on the delivery of their sites through the SHLAA process. Appendix A of the Housing Background Paper (May 2016) (LPD/BACK/01) explains that sites that are unlikely to be developed based on up-to-date information provided by developers or where a more recent planning permission has been granted for non-residential development are assessed as 'non-deliverable' and are therefore excluded from the housing trajectory and five year housing land supply.

The Council is currently updating the SHLAA based on 2016 information and additional information to explain the delivery of individual sites will be included within the Housing Background Paper Addendum.

28.What evidence is there to support individual sites with planning permission being excluded/included within the Council's supply calculations?

Each site has been considered individually and on its merits. It is anticipated that those sites with planning permission that have been included within the Council's supply calculations will be developed. Sites with planning permission where information from developers indicate will not be delivered are excluded in the Council's supply calculations.

The assessment is based on information provided by developers through the SHLAA process.

29.Does the Council anticipate that all the dwellings identified on the 'deliverable sites below the threshold for allocation' will be built? If so, what evidence is there to support this?

Each site has been considered individually and on its merits and it is therefore anticipated that those dwellings identified as 'deliverable sites below the threshold for allocation' will all be built where this is supported by information provided by developers through the SHLAA process. The Council's supply calculations exclude sites which are residential gardens (in accordance with the NPPF), site in unsustainable isolated locations and sites which developers are no longer intending to develop.

Tables 1, 8 and 10 in the Housing Background Paper (May 2016) (LPD/BACK/01) provide the number of homes on sites below the threshold in the urban area (265

homes), Bestwood Village (7 homes) and Ravenshead (3 homes) respectively. The threshold for allocation will depend on whereabouts a site is located, i.e. in the urban or rural area. **Appendix 2** provides a complete list of sites below the threshold for allocation and a description of each site. Please note the list of sites is based on the SHLAA 2015 information. The Council is currently updating the SHLAA based on 2016 information and the list of sites below the threshold for allocation will be updated and included within the Housing Background Paper Addendum.

30.Has a lapse rate been included in the Council's calculations?

A lapse rate has not been included in the Council's calculations as each site with planning permission has been considered individually and on its merits. If a site has been lapsed for five years or more and no information has been provided by the developer through the SHLAA process to indicate that the site is likely to come forward for development in the future, then it has been assumed that the site is not deliverable and has therefore excluded from the housing trajectory and five year housing land supply.

31.If there is uncertainty that the housing site at Newstead (H22) will come forward during the Plan period, although the Council has not included it as a site which would contribute towards meeting the housing target, why has it been included in the Plan at all?

The housing site at Newstead has been allocated for development but does not contribute towards meeting the housing target as a result of uncertainty as to whether it will deliver new homes within the plan period. There are unresolved difficulties regarding the access to the site that have prevented the site coming forward. In particular, access would need to come from Tilford Road as Station Road is privately owned. Width and visibility are marginal and are complicated by the nearby level crossing. The site was allocated in both the 1990 Gedling Local Plan and the 2005 Gedling Borough Replacement Local Plan. The supporting text to Policy LPD69 explains at paragraph 8.4 that there is a recognised need for homes in Newstead and the Borough Council is keen to support and encourage the regeneration of the village.

It is recognised that the housing site at Station Road can come forward for development whether or not it is allocated in the Local Planning Document, given that it is located within the boundary of the settlement. It is recognised that the deletion of the allocation is unlikely to have a significant impact on whether the site is brought forward for development but it's allocation is a useful recognition of the Council's support for development in this location and is helpful in providing potential flexibility for meeting the Council's housing requirement.

5 Year Housing Land Supply

32.The Council has assessed the housing completions over an 11 year period (2004/05 – 2014/15). However, since the start of the Plan period net residential completions have only met the ACS target in one of the last 4 years, resulting in a shortfall of 246 homes. The estimated completions for 2015/16 also indicate a shortfall against the ACS target, which would result in a shortfall of 457 homes in the first 5 years of the Plan. In these circumstances, does the Council still consider that a 5% buffer would be appropriate when calculating its 5 year housing land supply? If a 20% buffer is applied, does the Council have a 5 year supply of deliverable housing land?

The five year housing land supply is based on information provided through the SHLAA. The current land supply assessment is based on 2015 information. The Council is currently updating the SHLAA based on 2016 information. The Housing Background Paper Addendum will be published to include an update of the five year land supply assessment against the Local Planning Document to reflect the 2016 SHLAA update. The updated five year land supply assessment will reconsider whether a 5% or 20% buffer is appropriate, based on past performance.

33.In terms of the Council's calculation of the 5 year supply of deliverable housing land, the Housing Background Paper (LPD/BACK/01) indicates that the Council can demonstrate a supply of 5.33 years. The housing requirement set out in the ACS for the 5 year period (2016 to 2021) is 2,320 homes and the shortfall is 457 homes, which gives a 5 year housing requirement of 2,777 homes. Once the 5% buffer is added, this gives a total 5 year requirement of 2,916 homes. The Council has identified a housing supply for this 5 year period of 2,961 homes. This would give a housing land supply of 5.08 years. Why does the Council carry out the calculation using a 5 year requirement of 2,777 homes (555 homes pa) and then refer to having a supply of 5.33 years (against the requirement for a supply of 5.25 years)?

The difference between the two approaches is purely presentational. It is noted that the Inspector has included the 5% buffer in the calculations whereas the Council has not. The Inspector has divided the housing supply of 2,961 homes by the annual requirement including the 5% buffer (583 homes) which gives a housing supply of 5.08 years. The Council has taken a different approach and divided the housing supply of 2,961 homes by the annual requirement excluding the 5% buffer (555 homes) which gives a housing supply of 5.33 years which has then been compared to the target plus 5% buffer which is 5.25 years. Both calculations show that the housing supply has an oversupply of 0.08 years supply against the 5 years supply target. An update of the five year land supply assessment against the Local Planning Document in the Housing Background Paper Addendum will use the

calculations as advised by Planning Advisory Service (PAS) which support the approach adopted by the Inspector.

As advised in our letter dated 17 October 2016, an Addendum to the Housing Background Paper will be published which will include an update of the five year land supply assessment against the Local Planning Document to reflect the SHLAA update undertaken in 2016.

34. What evidence is there to support the projected completions on the sites expected to deliver homes within the 5 year period 2016 – 2021, in particular on allocated sites which do not currently have planning permission?

Information on projected completions for specific sites expected to deliver homes within the 5 year period comes from the SHLAA assessment. Appendix B of the Housing Background Paper (May 2016) (LPD/BACK/01) includes a list of sites that make up the housing supply for the five year period. However, it is acknowledged that the appendix does not provide information on the source of the delivery information for each site. The evidence will therefore be included in the Housing Background Paper Addendum which is being prepared.

35. What evidence is there to support build out rates for each site, in particular larger sites?

The build out rates are based on information provided by developers and landowners through the SHLAA process wherever possible.

If a response is not received from a developer/landowner, then the Council's assumptions are applied, as explained in Appendix A of the Housing Background Paper (May 2016) (LPD/BACK/01). The assumptions have been used for the five year supply assessments in past years and the Council has received no objections to the assumptions used. The assumptions were initially drawn up with input from the development industry and have since been confirmed based on past information from Building Control and comparison against the national picture.

The assumptions used on build out rates are as follows:-

- On sites up to 10 homes, the completion rate is 5 per year;*
- On sites up to 250 homes, the completion rate is 20 per year;*
- On sites up to 1,000 homes, the completion rate is 40 per year; and*
- On sites over 1,000 homes, the completion rate is 100 per year.*

Assumptions about when a site will start to be developed are made based on the strength of the sub-market area within which the site is located. Market strength is reviewed each year and is a professional judgement based on an assessment of

past completions data, viability information and local knowledge. Sites in strong market areas are more likely to come forward before other sites in moderate and weak market areas. In Appendix A of the Housing Background Paper, Table A1 provides the assumptions about when sites that are already in the planning system will start to be developed (i.e. sites allocated in the Aligned Core Strategy and Local Planning Document and sites with planning permission) and Table A2 provides the assumptions for sites not in the planning system (i.e. sites below the threshold for allocation without planning permission). Both tables are included below.

Table A1: Assumptions for sites in the planning system

Market Strength	Site	Assumed year development will start
Weak (Colwick/Netherfield, Newstead)	Up to 10 homes Up to 250 homes Up to 1,000 homes Over 1,000 homes	2020/21 (Year 5) 2022/23 (Year 6) 2023/24 (Year 7) 2024/25 (Year 8)
Moderate (Arnold/Bestwood, Bestwood St.Albans, Calverton, Carlton, Gedling Rural South)	Up to 10 homes Up to 250 homes Up to 1,000 homes Over 1,000 homes	2019/20 (Year 4) 2020/21 (Year 5) 2022/23 (Year 6) 2023/24 (Year 7)
Strong (Arnold/Mapperley, Gedling Rural North)	Up to 10 homes Up to 250 homes Up to 1,000 homes Over 1,000 homes	2018/19 (Year 3) 2019/20 (Year 4) 2020/21 (Year 5) 2022/23 (Year 6)

Table A2: Assumptions for sites not in the planning system

Market Strength	Site	Assumed year development will start
Weak (Colwick/Netherfield, Newstead)	Up to 10 homes Up to 250 homes Up to 1,000 homes Over 1,000 homes	2023/24 (Year 7) 2024/25 (Year 8) 2016/27 (Year 9) 2018/29 (Year 10)
Moderate (Arnold/Bestwood, Bestwood St.Albans, Calverton, Carlton, Gedling Rural South)	Up to 10 homes Up to 250 homes Up to 1,000 homes Over 1,000 homes	2022/23 (Year 6) 2023/24 (Year 7) 2024/25 (Year 8) 2016/27 (Year 9)
Strong (Arnold/Mapperley, Gedling Rural North)	Up to 10 homes Up to 250 homes Up to 1,000 homes Over 1,000 homes	2020/21 (Year 5) 2022/23 (Year 6) 2023/24 (Year 7) 2024/25 (Year 8)

Employment Land Supply

36. Policy 2 of the ACS allocates employment land at Top Wighay Farm (8.5ha) and Teal Close (7ha) in these Strategic Allocations. The ACS also identifies Gedling Colliery/Chase Farm as a strategic location where at least 2ha of employment land should be provided. The Plan

allocates 5ha of employment land at Gedling Colliery (E1) and 1ha of employment land at Hillcrest Park (E2).

- 37. Policy 4 b) of the ACS requires the provision of a minimum of 23,000sqm of new office and research development floorspace (2011 to 2028); Policy 4 d) requires the provision of a minimum of 10ha for new and relocating industrial and warehouse uses (B1(c), B2 and B8) in Part 2 Local Plans; and Policy 4 e) promotes significant new economic development as part of Sustainable Urban Extensions at Top Wighay Farm, Teal Close and Gedling Colliery/Chase Farm.**
- 38. Is the requirement in Policy 4 b) and d) of the ACS in addition to the employment land allocated on the Strategic Sites at Top Wighay Farm and Teal Close and the strategic location at Gedling Colliery/Chase Farm in Policy 2 (4) of the ACS and referred to separately in Policy 4 e)? If so, would the provision of employment land in the Plan accord with the requirement set out in Policy 4 (b) and (d) of the ACS?**

The employment land and office requirements in ACS Policy 4 b) and 4 d) are not additional to the employment land allocated on the strategic site sites at Top Wighay Farm, at Teal Close and the strategic location at Gedling Colliery/Chase Farm. The purpose of Policy 2.4 c), 2.4 d) and 2.4 e) is to ensure that the strategic allocations and strategic locations provide for a mix of housing and employment uses. ACS Policy 4 b) sets out the quantitative need for office floorspace for each aligned Council which is a total of 23,000 sq. m for Gedling Borough 2011 – 2028. ACS Policy 4 d) sets out the quantity of B1, B2 and B8 land for each aligned Council amounting to 10 hectares for Gedling Borough 2011 – 2028.

The Employment Background Paper (LPD/BACK/02) sets out the basis for the quantity of employment land to be allocated and employment site selection in the Local Planning Document. Section 3 of the Employment Background Paper explains that the Nottingham Core and Outer HMA Councils commissioned Nathaniel Lichfield to produce the Employment Land Forecasting Study (LPD/EMP/03) as the earlier Nottingham City Region Employment Land Study (LPD/EMP/05) underpinning the ACS was considered to be getting out of date. The findings of the Employment Land Forecasting Study led the Nottingham Core HMA Councils to reconsider the distribution of employment land and office floorspace which is covered by the Strategic Distribution of Employment Requirements Background Paper (LPD/BACK/03).

The Employment Background Paper provides more details on the forecasts of the Employment Land Forecasting Study (LPD/EMP/03). The Strategic Distribution of Employment Requirements Background Paper (LPD/BACK/03) sets out how the forecasts of the Employment Land Forecasting Study have been used to justify a modest redistribution of employment land and office floorspace between the Nottingham Core HMA Councils to that set out in the ACS Policy 4. The relevant

table from the Strategic Distribution of Employment Requirements Background Paper is set out below:

Council	Policy on		Proposed distribution		ACS provisions		ACS comparison	
	<i>I+W ha</i>	<i>Office (rounded) sq. m</i>	<i>I+W ha</i>	<i>Office Sq. m</i>	<i>I+W ha</i>	<i>Office Sq. m</i>	<i>I+W ha</i>	<i>Office Sq. m</i>
<i>Broxtowe</i>	37	49,800	15	34,000	15	34,000	same	same
<i>Erewash</i>	4	19,500	10	42,900	10	42,900	same	same
<i>Gedling</i>	11	5,800	19	10,000	10	23,000	+ 9	- 13,000
<i>Nottingham City</i>	35	245,100	25	253,000	12	253,000	+ 13	same
<i>Rushcliffe</i>	41	83,900	50	80,000	20	67,900	+ 30	+12,100
<i>Core HMA</i>	128	404,100	119	419,900	67	420,800	+52	-900

For Gedling Borough the revised distribution set out in the Strategic Distribution of Employment Requirements Background Paper (LPD/BACK/03) is for 19 hectares of industrial and warehousing land and 10,000 sq. m of office floorspace. In comparison, ACS Policy 4 provided for 10 ha of industrial and warehousing land and 23,000 sq. m of office floorspace.

The Employment Background Paper (LPD/BACK/02) provides the basis for the allocations in the Local Planning Document. The Paper notes that the industrial and warehousing target is 19 hectares and assumes that 10,000 sq. m of office floorspace would occupy about 2.5 ha of B1 (based on 40% plot coverage). The total requirement is therefore 21.5 hectares. No specific allocations for office floorspace are made in the Local Planning Document as it is expected this floorspace will be accommodated on the employment land allocations and in Arnold Town Centre. The following table clarifies how the employment land and office floorspace requirement is being met in both the ACS and the Local Planning Document.

Site/Location	Land (ha)	Comment
ACS Strategic allocation		
• Top Wighay Farm	8.5	Potential for office development
• Teal Close	7	Permission for up to 1,500 sq. m of B1 office
Sub total	15.5	
Local Planning Document		
• Gedling Colliery	5	Potential for small scale office development
• Hillcrest Park	1	
Sub total	6	

Total identified	21.5	
Requirement	21.5	

Sustainability Appraisal

39.Has the Sustainability Appraisal been robustly prepared with a comparative and equal assessment undertaken of each reasonable alternative? Does it represent the only site selection methodology or has the Council used any other process?

It is considered that the Sustainability Appraisal has been robustly prepared with a comparative and equal assessment undertaken of each reasonable alternative site. Section 5 of the Sustainability Appraisal Publication Draft Main Report (LPD/REG/11) explains that a new SA Matrix was created and used for the assessment of the sites for consistency purposes to address the comments received on the Sustainability Appraisal for the Aligned Core Strategy (see paragraphs 5.4 to 5.6 of that document). The SA Matrix is included in the Sustainability Appraisal Publication Draft Appendix A: Scoping Report Update (LPD/REG/12).

Paragraphs 10.15 to 10.26 of the Sustainability Appraisal Publication Draft Main Report explain the information used to assess each reasonable alternative site against the SA objectives. The information includes assessments undertaken by consultants, such as the Impact of Possible Development Sites on Heritages Assets in Gedling Borough Council (2015) (LPD/HIS/01), the Landscape and Visual Analysis of Potential Development Sites (2014) (LPD/NAT/01¹¹) and its Addendum (2015) (LPD/NAT/02¹²). These assessments alongside the Sustainability Appraisal were part of the site selection methodology exercise to identify reasonable alternative sites for site allocations. Paragraph 11.1 of the Sustainability Appraisal Publication Draft Main Report notes that the Site Selection Document Main Report (2016) (LPD/GRO/05) explains how the allocated housing sites have been chosen from the 114 reasonable alternative housing sites and the Employment Background and Site Selection Paper (2016) (LPD/BACK/02) explains how the employment allocated sites have been chosen from the 4 reasonable alternative employment sites.

For the housing sites, section 3 of the Site Selection Document Main Report (2016) explains the approach to assessing the reasonable alternative sites. Section 4 explains the decision making and section 5 looks at the recommendations of site allocations for housing in the Local Planning Document. For the employment sites, section 4 of the Employment Background and Site Selection Paper (2016) explains the approach to assessing the reasonable alternative sites and recommendations for site allocations for employment in the Local Planning Document.

¹¹ Report excluding the appendices only available online.

¹² See footnote 11.

40.How has the Sustainability Appraisal process given appropriate consideration to minerals and coal mining issues?

It is accepted that the sustainability appraisal process did not give appropriate consideration to minerals and coal mining issues. This is an issue that came to light during the consultation on the Local Planning Document Publication Draft.

Representations were made by the County Council as Minerals Planning Authority, who raised concerns about the impact of certain housing site allocations north east of Arnold with the minerals safeguarding area identified in the emerging Minerals Local Plan (LPD/MIN/01). The Borough Council has since met with the County Minerals Planning Team and a form of wording is proposed by way of a modification which is satisfactory to the Minerals Planning Authority. Both parties also agreed that minerals safeguarding issues should be addressed early on in the planning process through the sustainability appraisal and Gedling Borough Council undertakes to adopt this approach in future. For clarity, the Coal Authority has not raised any objections to the Local Planning Document.

Conclusion

41.If you require clarification on any of the matters raised, I would be happy to respond. I will shortly begin to formulate the matters and issues to be discussed at the Hearings and no doubt formulate a comprehensive set of questions for you to respond to. A copy of this note and the Council's response should be placed on the Examination website.

42.An early response to the above queries would be appreciated. I am keen that the above matters are resolved, in so far as they can be, promptly in order to ensure that the Examination is not unduly delayed. I therefore request a response by close of play on Friday 9 December 2016. If the Council considers that it is unlikely to meet this target, then please let me know as soon as possible.

**Karen Baker
Inspector
22 November 2016**

Appendices

<i>Appendix 1</i>	<i>Housing Supply 2011-2028</i>
<i>Appendix 2</i>	<i>Deliverable sites below the threshold for allocation</i>

Appendix 1: Housing Supply 2011-2028

Urban Area	Completions 2011 to 2015	884
	Extant Planning Permissions (at 31 March 2015) ¹³	1,148
	Sites Below Threshold	265
	Site Allocations	
	H1 Rolleston Drive	90
	H2 Brookfields Garden Centre	105
	H3 Willow Farm	110
	H4 Linden Grove	115
	H5 Lodge Farm Lane	150
	H6 Spring Lane ¹⁴	150
	H7 Howbeck Road/Mapperley Plain	205
	H8 Killisick Lane	215
	H9 Gedling Colliery/Chase Farm ¹⁵	660
	Total	4,097
	Total rounded	4,100
	Windfall Allowance	230
	Urban Area Total Proposed	4,330
Hucknall	Completions 2011 to 2015	0
	Extant Planning Permissions (at 31 March 2015)	0
	Sites Below Threshold	0
	Site Allocations	
	Top Wighay Farm ¹⁶	845
	North of Papplewick Lane ¹⁷	300
	H10 Hayden Lane	120
	Total	1,265
	Hucknall Total Proposed	1,265
Bestwood Village	Completions 2011 to 2015	52
	Extant Planning Permissions (at 31 March 2015) ¹⁸	255
	Sites Below Threshold	7
	Site Allocations	
	H12 Westhouse Farm ¹⁹	210
	Total	524

¹³ Figure includes the planning permission granted for the Teal Close site (830 homes) which is allocated for development in the Aligned Core Strategy.

¹⁴ Planning permission was granted in May 2015.

¹⁵ Gedling Colliery/Chase Farm site will deliver a total of 1,050 homes. However, as set out in the planning application, only 660 homes are expected to be built in the plan period 2011-2028. Those built after 2028 cannot contribute to the housing supply for the plan period.

¹⁶ Planning permission was granted in April 2015 for 38 homes on part of the Top Wighay Farm site which is allocated for development in the Aligned Core Strategy.

¹⁷ Planning permission was granted in October 2015 for 300 homes on this site which is allocated for development in the Aligned Core Strategy.

¹⁸ Figure includes two planning permissions granted for site H11 The Sycamores (25 homes) and site H13 Bestwood Business Park (220 homes).

¹⁹ Planning Committee resolved to approve a planning application for 101 homes on part of this site; the s106 agreement is being finalised.

	Bestwood Village Total Proposed (rounded)	525
Calverton	Completions 2011 to 2015	93
	Extant Planning Permissions (at 31 March 2015) ²⁰	201
	Sites Below Threshold	0
	Site Allocations	
	H15 Main Street	75
	H16 Park Road	390
	Total	759
	Calverton Total Proposed (rounded) ²¹	740
Ravenshead	Completions 2011 to 2015	77
	Extant Planning Permissions (at 31 March 2015) ²²	109
	Sites Below Threshold	3
	Site Allocations	
	H17 Longdale Lane A	30
	H18 Longdale Lane B ²³	30
	Total	249
	Ravenshead Total Proposed (rounded)	250
Other Villages		
Burton Joyce	Completions 2011 to 2015	3
	Extant Planning Permissions (at 31 March 2015)	15
	Sites Below Threshold	0
	Site Allocations	
	H20 Millfield Close	20
	H21 Orchard Close	15
	Total	53
	Burton Joyce Total Proposed (rounded)	55
Woodborough	Completions 2011 to 2015	8
	Extant Planning Permissions (at 31 March 2015) ²⁴	30
	Sites Below Threshold	0
	Site Allocations	
	H24 Broad Close	15
	Total	53
	Woodborough Total Proposed (rounded)	55
Lambley	Completions 2011 to 2015	10
	Extant Planning Permissions (at 31 March 2015)	7
Linby	Completions 2011 to 2015	3
	Extant Planning Permissions (at 31 March 2015)	1

²⁰ Figure includes planning permission granted for site H14 Dark Lane (72 homes).

²¹ Paragraph 4.19 of the Housing Background Paper (May 2016) acknowledges “the proposals at Calverton will exceed the target by 19 homes. Given the size of the settlement this is not considered to be significant, provided appropriate contributions to infrastructure are made.”

²² Figure includes planning permission granted for site H19 Longdale Lane C (70 homes).

²³ Table 10 in the Housing Background Paper incorrectly refers to H19 Longdale Lane C. It should read H18 Longdale Lane B. A planning application (2014/0273) for 31 homes on H18 Longdale Lane B is currently being determined.

²⁴ Figure includes planning permission granted for site H23 Ash Grove (12 homes).

Newstead	Completions 2011 to 2015	1
	Extant Planning Permissions (at 31 March 2015)	1
Papplewick	Completions 2011 to 2015	3
	Extant Planning Permissions (at 31 March 2015)	2
Stoke Bardolph	Completions 2011 to 2015	0
	Extant Planning Permissions (at 31 March 2015)	0
	Total	28
	Other Villages Total Proposed (rounded)	140
Policy LPD 63		
Urban Area	(including windfall allowance of 230 homes)	4,330
Hucknall		1,265
Key Settlements		1,515
	(Bestwood Village)	(525)
	(Calverton)	(740)
	(Ravenshead)	(250)
Other Villages		140
	(Burton Joyce)	(55)
	(Woodborough)	(55)
Total		7,250

Appendix 2: Deliverable sites below the threshold for allocation

Urban area

Ref	Site Name	2015 SHLAA conclusion	Type	Dwellings
6/768	B and Q Unit Mansfield Road	The site is located within the urban area and will be sustainable. Issues of flooding, highway capacity and the AQMA to be considered but are not thought to be significant. Due to the existing retail units on site it is assumed that the site will come forward during Years 6-10.	Brownfield land - retail use	60
6/479	Metallifacur e Ltd	Planning permission (2011/1055) lapsed in November 2014. The site is considered to be suitable for development and is assumed to be deliverable in Years 6-10.	Brownfield land – industry use	40
6/477	Daybrook Laundry	Part of the site has been built for a retail unit (2012/1373). The planning report for 2012/1373 states "details of a potential residential development scheme on the remainder of the site has been provided". An illustration in the Design and Access Statement shows 46 dwellings on the remainder of the site. Assume residential development come forward within Years 6-10.	Brownfield land – industry use	40
6/137	Wood Lane	This site has been allocated for residential development in the Gedling Borough Replacement Local Plan (July 2005). As such the site is classed as suitable and deliverable. The owner indicates that developers will shortly be in place to deliver the site.	Greenfield land	20

Ref	Site Name	2015 SHLAA conclusion	Type	Dwellings
6/7	Meadow Road Industrial Site	Over 50% of the site is at risk of flooding. As the site is previously developed it will be suitable for residential development providing it does not increase the level of run off and appropriate measures are taken to reduce the impact of flooding. The level of contamination will also need to be established. County Highways have no objection in principle but have put forward a number of improvements to surrounding roads they think are likely to be needed. Assumed available in the third five year period.	Brownfield land - industry use	35
6/229	Westdale Lane East (72-74)	Planning permission (2010/0200) lapsed in May 2013. Assume site still suitable and will be developed in Years 6-10	Brownfield land - industry use	15
6/162	Briarbank Avenue (Land North)	Planning permission (2009/0034) lapsed in April 2012. No information from SHLAA 2014 consultation. Assume site come forward in Years 6-10.	Brownfield land - residential use	14
6/666	Lambley Lane land adj to 46	The site is within the urban area and suitable for residential development. Achievability of the site dependent on market conditions.	Greenfield land	10
6/555	Oxclose Lane (143-143A)	Planning permission (2009/0459) lapsed in July 2012. Assume site developed in Years 6-10.	Brownfield land - retail use	4
6/71	Standhill Avenue	Site is an underused brownfield site within the PUA and is suitable for residential development. Owner indicates plans to be submitted in 3 to 4 years. Assume built in second five year period.	Brownfield land - storage/ warehouse use	4
6/863	Calverton Road (Rear of 1 and 3 Ashington Drive)	Current use of site unknown but no significant issues. Landowner indicates developed in second five year period.	Greenfield land	4
6/168	Carlton Hill (257 & 257a)	Unauthorised development. Work has commenced on this site and enforcement action is underway regarding an additional dwelling (0124/2009 - not yet resolved). Only those dwellings with planning permission will be marked as deliverable.	Brownfield land - residential use	3

Ref	Site Name	2015 SHLAA conclusion	Type	Dwellings
6/851	Kenneth Road	No significant constraints. The site has extant planning permission. Owner indicates will develop in Years 6-10.	Greenfield land	3
6/688	Deabill Street (57)	Planning permission (2012/0043) lapsed in March 2015. Assume site developed in years 6-10	Brownfield land - retail use	2
6/189	Ashe Close (19, Land Adj To)	Planning permission (2009/0418) lapsed in July 2012. No information from SHLAA 2015 consultation. Assume site come forward in Year 5 and beyond.	Greenfield land	2
6/674	Front Street (55)	Planning permission (2011/0471) lapsed in July 2014. Assume site to be developed in Years 6-10.	Brownfield land - leisure use	1
6/582	High Street (24)	Planning permission (2010/0046) lapsed in March 2013. No information from SHLAA 2015 consultation. Assume site come forward in Year 5 and beyond.	Brownfield land - office use	1
6/559	Carlton Hill (381)	Planning permission (2009/0586) lapsed in September 2012. Assume site developed in years 6-10	Brownfield land - office use	1
6/606	Emmanuel Avenue (2)	Planning permission (2010/0120) lapsed in April 2013. No information from SHLAA 2015 consultation. Assume site come forward in Year 5 and beyond.	Brownfield land - residential use	1
6/305	Carlton Hill (346)	Planning permission (2007/1049) lapsed in February 2011. Assume site come forward in Years 6-10.	Brownfield land - retail use	1
6/180	Victoria Road (15)	Planning permission (2005/0375) lapsed in May 2010. Assume site to come forward in Years 6-10.	Brownfield land - retail use	1
6/89	Ashington Drive (Plot 15)	Planning permission (89/0723) lapsed in May 1994. Information from SHLAA 2015 consultation states that the applicant intends to build plot in 2017/18.	Greenfield land	1
6/172	Burton Avenue (6A)	Planning permission (2005/0233) lapsed in 2008. Information from SHLAA 2015 consultation states that the applicant intends to build plot in first five year period	Greenfield land	1
6/848	Green's Farm Lane (27)	Site has extant planning permission. Owner intends to develop in Years 6-10	Greenfield land	1
Urban Area Total				265

Bestwood Village

Ref	Site Name	2015 SHLAA conclusion	Type	Dwellings
6/125	Broad Valley Drive (1-3, Land South)	No significant constraints to development subject to loss of amenity space being acceptable. Owner understood to be promoting development - assume developable in the second five year period.	Greenfield land	4
6/877	Broad Valley Drive (land south 2A)	There are no specific policies or significant constraint to development. The site is suitable for development subject loss of amenity space being acceptable and to a satisfactory planning application.	Greenfield land	3
Bestwood Village Total				7

Ravenshead

Ref	Site Name	2015 SHLAA conclusion	Type	Dwellings
6/620	The Sherwood Ranger	Planning permission (2010/0504) lapsed in August 2013. Assume site developed in Year 5 and beyond.	Brownfield land	2
6/522	Milton Court (8)	Planning permission (2008/0283) lapsed in May 2011. Assume site developed in Year 5 and beyond.	Brownfield land	1
Ravenshead Total				3