

# Statement of Consultation for the Broxtowe Borough, Gedling Borough and Nottingham City Aligned Core Strategies Publication Version (June 2012)

## Part 2

### *Summary of the Main Issues Raised by Representations on the Publication Version Aligned Core Strategies*

In accordance with Regulation 22(1)(c) of  
The Town and Country Planning (Local Development) (England)  
Regulations 2012

**February 2013**



## **Introduction**

The Councils of Broxtowe, Gedling and Nottingham City are working with Nottinghamshire County Council to prepare a new aligned and consistent planning strategy. This is known as the Aligned Core Strategies.

The Aligned Core Strategies will be the key strategic planning documents for Broxtowe, Gedling and Nottingham City part of Greater Nottingham and will perform the following functions:

- Define a spatial vision to 2028;
- Set out a number of spatial objectives to achieve the vision;
- Set out a spatial development strategy to meet these objectives;
- Set out strategic policies to guide and control the overall scale, type and location of new development (including identifying any particularly large or important sites) and infrastructure investment; and
- Indicate the numbers of new homes to be built over the plan period.

The Aligned Core Strategies Publication Version was published in June 2012 for a six week period to allow members of the public and interested organisations and business to have their say on the plan. In total Broxtowe received XXX respondents who made XXX, Gedling received 1397 respondents who made 15637 separate representations and Nottingham City received 215 respondents who made 557 separate representations. The responses made are formal representations on the Aligned Core Strategies and have been used to identify a series of changes to the Publication Version. Whilst all views are taken into account it is not possible to meet everyone's wishes and aspirations. Difficult choices have to be made to arrive at a strategy which meets all the needs of the area. The responses will also be considered by the independent Inspector appointed by the Secretary of State when examining whether the document is legal and sound. The Inspector will consider the appropriateness of these changes and may suggest further changes.

This document summarises the comments made on each of the policies and sites in the Publication Version as well as those made on the other parts of the Plan such as the introductory text, justification text and appendices. It has two purposes. Firstly, to provide the Inspector with information about the comments received and assist him/her them in identifying the issues they wish to explore through the examination process. Secondly, the document provides those who made the comments with information about how we have considered their comments.

The document does not attempt to include every individual comment made but does identify all the broad issues raised. We have endeavoured to summarise all the issues raised but reference should be made to the original representations for the full details. These can be obtained online or from the Councils directly. A list of those who have made responses can be found in Part 1 split down into Council area. In some instances the comments received on more than one policy have been combined due to similarities between the issues raised.

The document also includes the responses made on the background assessments (the Sustainability Appraisal, The Equality Impact Assessment and the Habitats Regulations Assessment).

The responses are broken down into those which are 'common issues' and will affect the three Councils jointly and 'council specific issues' which are only relevant to one of the Councils. For example 'the protection of valued landscapes' would be a common issue while 'protect the valued landscape around a particular village' would be a Council specific issue.

For Broxtowe and Gedling Boroughs the document also includes the responses made on the changes to the Proposals Map. No changes were proposed to the Proposals Map for Nottingham City and as such no consultation was required.

The document also pulls out the key issues from the included summaries. Key issues are those which go to the heart of the documents legality or soundness. Where an issue has been raised by a large number of people, even if this is not considered to be a key issue in terms of legality or soundness, it has been treated as a key issue. Each key issue includes a response from either the three Councils or an individual Council depending on whether the issue is 'common' or 'Council specific'. Details of the changes that are proposed to the Publication Version of the Aligned Core Strategies can be found in the 'Schedule of Changes' document (February 2013).

The comments are broken down into the following sections:

1. General comments on the whole document, Section 1, Section 2 and Key Diagram
2. Policy 1-19 (Policy 2 just focussed on strategy, settlement hierarchy, overall number and other general issues)
3. Sites & Key Settlements for Growth - principle, detail and site schedules (whether reps made on Policy 2, 4, 7, Appendix A or elsewhere)
4. Appendices and Glossary
5. Habitats Regulations Assessment (HRA)
6. Equalities Impact Assessment (EqIA)
7. Sustainability Appraisal (SA)
8. Changes to the Proposals Maps (Broxtowe & Gedling)

## **General Comments, Section 1, Section 2 and Key Diagram**

### Common Issues

A number of consultees considered that there was either no public consultation or that it was inadequate. They identified that the consultation period should have been longer and publicised more widely. Others found the document complex and the process for making responses cumbersome. A request that 'legal compliance' and 'soundness' be defined in the Glossary was also made.

The priority given to brownfield sites was also an issue which resulted in a large number of comments. Many members of the public and Parish Councils wanted to include a 'phasing policy' which would give priority to brownfield sites. This would ensure that brownfield sites in need of regeneration were developed prior to greenfield or Green Belt sites being released.

The approach to the distribution of development was also an issue raised by a number of consultees. Calverton Parish Council considered that there was no evidence to justify the abandonment of the Principle Urban Area (PUA)/Non-PUA split. This consultee also identified that more development should be accommodated on sites within or adjacent to the main urban area. This could include increasing densities on the sites or increasing their size. Other consultees considered that a more even distribution should be used to avoid focussing development on a small number of areas and that the Key Settlements should be identified as Strategic Locations for Growth on the Key Diagram.

There were three distinct issues raised by consultees in relation to the Duty-to-Cooperate. A number of consultees considered that there was insufficient cooperation with Ashfield District Council over the impacts of development proposed around Hucknall, and with Newark and Sherwood with regard to development at Ravenshead. Other consultees considered that there was a failure to cooperate fully as there is a shortfall against the Regional Strategy housing figures as a result of Rushcliffe Borough Council proposing lower housing figures.

The proposed housing figures were another area that resulted in a split between consultees. Members of the public and local community groups identified that the housing figures were too high or based on flawed assumptions. Consultees also pointed to the results of the 2011 Census which showed that population growth across the plan area was not consistent. However, developers considered that the housing figures in the Aligned Core Strategy were too low and should be increased in line with the 2008 household projections. Some consultees considered that the role of housing in the local economy should be more explicit in the Vision and Objectives.

Consultees also considered that the Vision should include reference to promoting sport and enhancing the natural environment. English Heritage identified that there should be improved reference to the historic environment and to non-designated heritage assets. There was concern from the University of Nottingham that there is no reference to the benefits of student areas or acknowledge the importance of the

two universities to the plan area. It was felt there was little strategic vision provided beyond the plan period.

Whilst there was some support for the principle of Alignment some consultees noted that only three of the original six authorities were now fully aligned. One consultee identified that there should be a commitment to an early review of the Aligned Core Strategies. The Home Builders Federation requested that the years covered by the plan should be clearer and stated on the front cover.

NHS Nottingham City recommended including more detail on health issues in the spatial portrait, and for specific health issues to be identified for each policy, where relevant.

#### Broxtowe Specific Issues

- One consultee identified that land at Toton should be identified as an allocated Sustainable Urban Extension on the Key Diagram.

#### Gedling Specific issues

- There was opposition to the specific sites identified in the Aligned Core Strategies
- Responses identified the lack of highway capacity especially for journeys into the city centre and around identified sites. One consultee also considered that growth in Gedling was focussed on areas with insufficient public transport.
- Many consultees considered that the development of Gedling Colliery (including Mapperley Golf Course) should be priority. They identified that there was no evidence provided as why the sites(s) can't be developed
- The expansion of the existing housing site at Teal Close into a strategic allocation or site was proposed by a landowner/developer

#### Nottingham City Specific Issues

- Two consultees considered the approach to minerals development and the City Council's role as a Minerals Planning Authority was inadequately covered.
- More recognition is required of the role of Universities and Higher Education Establishments as key employers/catalysts for development.
- The Spatial Vision should more adequately reflect the regional role of the City Centre, and the role of Broadmarsh and the Victoria Centres as being a key part of this.
- There should be more recognition of biodiversity/nature conservation assets in the City's spatial portrait.

## **Key Issues and Officer Response**

### **1. Whether the consultation was adequate and in accordance with the adopted SCIs?**

Consultation was undertaken in line with the Council's Statements of Community Involvement. There was widespread publicity in the local press, and consultation took place at Issues and Options (2009), Option for Consultation (2010), for the Housing Provision Position Paper and Climate Change Policy (2011), and at

Publication (2012). Councils used their best efforts to ensure all citizens were aware of proposals, for instance this included two separate rounds of leafleting the whole Borough of Broxtowe.

**2. Whether a brownfield phasing policy should be included?**

Brownfield sites are prioritised in the plan, through the strategy of urban concentration with regeneration, with most new development being located in or adjoining the main built up area of Nottingham, and through the identification of strategic sites which are brownfield, such as Boots. Policy 7 'Regeneration' also addresses this issue. However, the need for a phasing policy is not accepted as it would make it less likely that the housing provision as a whole is delivered, since it would put back delivery on some sites beyond the end of the plan period.

**3. Whether the Duty to Cooperate had been complied with?**

For Rushcliffe Borough Council, their approach to proposing a locally determined housing provision lower than that included in the Option for Consultation version of the Core Strategy reflects the Borough's failure to meet the Duty to Cooperate, and is not a failure of the aligned Councils. This unilateral decision was made without the agreement of Housing Market Area neighbouring Councils, and has not enabled an evidence based discussion between all five Councils on the appropriateness or otherwise of any reduction, and if appropriate, it being exclusively applied to Rushcliffe.

For Ashfield District Council, Gedling is working closely with the District Council to ensure any infrastructure requirements of nearby development are identified and suitably addressed, and ongoing dialogue will ensure the new development contributes adequately to the new infrastructure required as a result.

For Newark and Sherwood District Council, the Council was aware of the total quantum of development proposed in Gedling, and that Ravenshead was a key settlement identified for growth at the Option for Consultation stage, and no objections were raised. The level of development proposed is relatively modest (up to 446 homes) and the Infrastructure Delivery Plan has not identified any significant issues. Gedling is working closely with the District Council to ensure any infrastructure requirements which do emerge are identified and suitably addressed, and ongoing dialogue will ensure the new development contributes adequately to the new infrastructure required as a result.

**4. Whether development should be focussed on the urban area or more evenly distributed?**

This issue is addressed under Policy 2.

**5. Whether the proposed housing figures are too high or too low?**

This issue is addressed under Policy 2.

**6. Whether there should be a commitment to early review?**

This issue is addressed under Policy 2.

**7. Whether more detail should be included on health issues and implications for health for relevant policies?**

It is agreed that more detail should be included. Changes to the 'Character of Nottingham' section and to the justification text of relevant policies are proposed addressing this issue.

**8. Whether the issue of minerals development is adequately covered?**

Changes are proposed to set out the intended approach to dealing with minerals planning across the Plan area, clarifying that Nottinghamshire County Council will prepare a Development Plan Document covering Broxtowe and Gedling areas, and that the City Council will address minerals issues through its Land and Planning Policies Development Plan Document.

**9. Whether the vision and objectives adequately reflect role of Nottingham City Centre as a regional centre, sporting issues, and the natural and historic environment?**

Changes are proposed to address the role of Nottingham City Centre, whilst other proposed changes increase the recognition of sporting, natural environment and heritage issues.

DRAFT

## 1. Policies (1-19 – see separate section for site specific comments)

### Policy 1: Climate Change

#### Common Issues

The Home Builders Federation and a number of developers were concerned that the requirements of the Policy had not been tested for viability as required by paragraph 173 of the NPPF. It was recommended that an assessment of the cumulative impact of planning requirements, both local and national, should be carried out by the local planning authorities as the burden of proof should not rest with developers. Decisions which affect the viability of development should be included in the Aligned Core Strategy and not left for later Development Plan Documents. With regard to subsequent Development Plan Documents, the HBF considered that the guidance in the NPPF did not allow for them.

A number of consultees considered the policy as a whole and Policy 1.1 in particular to be long and unclear. Policy 1.1 was seen as imprecise as it does not indicate what constitutes “high levels of sustainability”. Consultees also questioned the need for this part of the Policy given that Building Regulations will require all homes to be built to ‘zero carbon’ standards from 2016 onwards although there was some support for homes built before 2016 to be built to this standard. One consultee also felt that Policy 1.2 was vague and arbitrary.

One specific element which resulted in a number of responses was the requirement in Policy 1.2a for planned water use to be no more than 105 litres per person per day. While this was supported by some consultees, including the Environment Agency who wished to see reference to non-residential development, it was opposed by a number of developers who considered that the requirement:

- was unenforceable;
- did not comply with Paragraph 95 of the NPPF; and
- was not shown to be viable.

Nottinghamshire County Council noted that the 105 litre figure related to Code 3 standard which is to be increased in 2013 to Code 4 which requires no more than 90 litres per person per day. One consultee considered that detailed assessment regarding this should not form part of outline planning applications.

Consultees, including Friends of the Earth (Nottingham) identified that specific references should be made to how the policies will reduce carbon emissions and contribute to the target for renewable energy generation. Responses also requested that targets for individual Councils be included and a more coherent and forceful commitment to developments in this area adopted.

However, one consultee considered that paragraph 96 of the NPPF made local targets, especially those in Policy 1.1 superfluous. In relation to renewable energy, there was opposition to the use of the ‘Merton Rule’ from one consultee who considered that it produced costly and unreliable devices. Others, including the



University of Nottingham identified that paragraph 3.1.11 should be amended to support additional forms of renewable energy including wind, solar, biomass, bio fuels and anaerobic digestion and the Policy should include a stronger commitment to sustainable design and construction.

Flooding was another issue which generated a number of responses. Whilst there was general support for the approach, consultees suggested a number of changes. These were:

- removal of “within the urban area” from Policy 1.8 as sites outside the urban area should also comply with the exception test;
- changes to Policy 1.10 to ensure that surface water is not discharged into the foul sewers;
- Amendments to the latter part of Paragraph 3.1.14 regarding surface water run-off; and
- Monitoring of the proportion of new developments that incorporate SUDs.

It was identified by Nottinghamshire County Council that the Local Flood Risk Management Strategy for the Nottinghamshire County area is in the early stages of preparation.

Other elements of Policy 1 which consultees supported were:

- The recognition in paragraph 3.1.7 of the need to weigh the harm caused to heritage assets by climate change related development against the wider benefits;
- The articulation of the aims regarding climate change in paragraph 3.1.5; and
- Reference to embodied carbon in Policy 1.3.

However, in relation to heritage issues, another consultee considered that these were not adequately addressed.

#### Broxtowe Specific Issues

To be added if required

#### Gedling Specific Issues.

- Papplewick Parish Council identified that consideration should be given to the impact of surface water run-off on the water quality of the River Leen; and
- The inclusion of Teal Close as a strategic allocation was supported by a developer/landowner as the site is inherently sustainable.

#### Nottingham City Specific Issues

None identified

## **Key Issues and Officer Response**

### **1. Whether an assessment of viability is required and specific requirements included?**

The Aligned Core Strategies preparation included an assessment of the viability of strategic allocations which are expected to deliver housing in the first 5 years of the plan period. With regard to Policy 1, these assessments take account of changing building regulations, as set out in the Infrastructure Delivery Plan, which states “*The*

*Core Strategies include policies which encourage carbon reduction, increased water efficiency and reduced flooding/surface water flooding. An additional £6,000 per unit has been added to the residential build costs for both Private and Affordable housing to reflect the additional cost of these measures. This £6,000 per dwelling is intended to reflect the extra over costs of achieving a level 4 credit rating as adopted in the Code for Sustainable Homes. An updated report for DCLG 6; the Cost of Building to the Code for Sustainable Homes (Aug 2011), indicates that the average additional cost of building to Code 4 is £7,418 and £4,154 to Code 3. £6,000 has therefore been adopted as a midway point to reflect the fact average base building costs quoted above will include some if not all elements of Code 3.”*

However, it should be noted that the main purpose of Policy 1 is to set the context for local policies included in subsequent DPDs (which could include local standards which would require viability testing during DPD preparation). Apart from those standards addressed through the IDP, it does not of itself introduce standards which impact on viability.

It is accepted that a broader reference to viability within the policy would be appropriate, rather than ‘onus on the developer’ and changes are proposed to reflect this.

**2. Whether more detail regarding specific requirements and targets for carbon reductions and renewable energy generation should be included?**

Whilst the Climate Change Act (2008) seeks reductions in greenhouse gas emissions and the Renewable Energy Directive sets a target of 15% energy to be provided from renewables by 2020, it is not the sole responsibility of planning policy to achieve these. Planning Policy is just one tool that can be used. The Core Strategy seeks to ensure development is designed to mitigate and adapt to Climate Change and reduce carbon emissions. Thus, it goes some way to meeting the provisions of the Act, Directive and the National Planning Policy Framework (NPPF). It is intended that more detailed guidance will be provided in subsequent Development Plan Documents.

**3. Whether the requirement of 105 litres per person per day should be included?**

The Greater Nottingham Watercycle Study (2010) identifies Greater Nottingham as an area of moderate water stress and puts forward the target of 105 litres is a minimum target. Therefore, it is not considered appropriate to remove this target.

**4. Whether the Policy adequately reflects heritage issues.**

Paragraph 3.1.7 reflects guidance in the NPPF on heritage assets and planning for climate change. It is not considered necessary to repeat this in the policy.

## Policy 2: The Spatial Strategy

There was some support for the strategy of 'urban concentration with regeneration' and the distribution of housing between the authorities. Derbyshire County Council noted the consistency with the Erewash Core Strategy and supported the broad strategy proposed. The decision to alter the PUA/Non-PUA split from that in the Regional Strategy was considered by Calverton Parish Council to have happened late in the day and that it has not been justified. One developer noted that the urban concentration strategy would require the Highways Authority to engage to find solutions to reduce demand and congestion. Another developer noted the fundamental difference in strategy between the Aligned Core Strategies and Rushcliffe Borough Council which has taken a 'rural dispersal' approach.

A number of consultees supported the overall level of housing but objected to the distribution between the authorities. Consultees variously saw Gedling as the least sustainable part of the conurbation or considered too much development had been allocated to the west (i.e. Broxtowe) due to the M1. A 'Nottinghamshire-wide' approach was suggested that would also take Mansfield into account.

The National Farmers Union considered that the approach in paragraph 3.2.24 would unduly restrict farm and rural diversification schemes.

A large number of the responses regarding general issues with the sites or areas identified came from local residents and local community groups who considered that there was no justification for the release of Greenbelt, greenfield or agricultural land. Brownfield sites should be developed first and an 'intra-district' phasing policy included to ensure that all brownfield land is developed before greenfield land is released. There was also a request for more detail on how sites are to be developed including layouts and the types of houses to be built. One local community group requested that the 'precautionary' approach taken to the prospective Special Protection Area be extended to both SSSIs and SINCs.

Developers, on the other hand, focussed on the viability and deliverability of sites especially brownfield land and the sites which are to be rolled forward from previous development plans. The reliance on all sites identified in the SHLAAs to be developed in order to meet the housing target was criticised as was the lack of a viability assessment considering the cumulative cost of development. One developer identified that there was the potential for boundaries and the number of houses on sites to change due to further technical work.

A high proportion of members of the public and local community groups considered that there was no justification, in terms of evidence of need or environmentally, for the housing target chosen. They considered that it was too high and should be reduced. This was due, in part, to the forthcoming revocation of Regional Strategies and the introduction of the concept of 'localism'. A number of Parish Councils identified that the Edge Analytics report had not taken account of the collapse of the funding mechanisms for Affordable Housing.

Treating Greater Nottingham as a whole was seen as incorrect by some members of the public who considered that each Council had its own individual needs. Others considered that, as shown by the 2011 Census, the need for housing arises mainly from Nottingham City and it is wrong to accommodate this need in Broxtowe and Gedling.

A number of the consultees considered that the target was not realistic given past rates of delivery, and that insufficient account had been taken of the possibility of bringing empty homes back into use and the contribution 'windfall' sites can make to achieving the housing target. There was also concern that sites of less than 500 homes, which are capable of delivering a significant contribution to the overall supply, had not been included.

In contrast to members of the public, developers generally considered the housing target too low and argued that it should be increased and also take account of longer term need. The use of the 2008 Household Projections as a basis was supported by a number of developers while one proposed the 'Chelmer Model' as the appropriate way. The use of either of these approaches would result in a housing figure of roughly between 70,000 and 75,000. A buffer of either 5% or 20% should also be applied in accordance with the NPPF. One developer identified that the track record of cumulative under delivery of housing had resulted in unsustainable patterns of growth with a high degree of in commuting and development 'leap-frogging' the Green Belt. The affordability issues in the plan area were also seen by developers as further evidence of need.

The Home Builders Federation and developers suggested that there is no evidence to suggest that a target of between 70,000 and 75,000 figure is unrealistic and this can be delivered if suitable sites are allocated. Obstacles, such as viability, should not be seen as a barrier to delivery nor used as reasons to reduce the housing target as suggested in paragraph 5.27 of the Housing Background Paper (2012).

The Home Builders Federation also criticised the process of selecting the housing target. They considered it "back to front" and that the evidence had been prepared to fit a target selected for political and administrative reasons. Assumptions made through the preparation of the evidence regarding the level of students and in migration were criticised as not being justified.

Developers also objected to the 'phasing' of housing as set out in Policy 2.3 and the associated table. They considered that this was not in accordance paragraph 47 of the NPPF and would not deliver a five year land supply. Weighting delivery towards the middle and back end of the plan period would not allow sufficient time for a response to any under delivery. A number of smaller sites may be capable of delivery in the short term and should not be held back. Developers also considered there was a need for consistency between the delivery of housing on the strategic locations and at the key settlements identified for growth.

The Duty to Cooperate was raised as an issue by several consultees. Developers argued that there was a failure to consider or address the shortfall in housing caused by Rushcliffe Borough Council. One consultee identified that if the level of housing required cannot be provided in the plan area it should be delivered elsewhere.

Rushcliffe Borough Council requested that the decision not allocate sites assessed in the SUE Study as suitable should be revisited as this would address the shortfall. Derbyshire County Council welcomed cross-boundary work but identified that any shortfall would have implications for the Derby Housing Market Area.

With regard to the employment and retail elements of the policy the following comments were made:

- The reference to “significant new employment development” is vague and lacks precision. A floor space threshold should be set to define this;
- Policy 2 should acknowledge that land will be required for employment purposes in locations other than those identified;
- Reference should be made to the Rolls Royce site in Hucknall which has a sub-regional employment role;
- Paragraphs 3.2.25 and 3.2.21 suggest different approaches are being taken to the release of Employment land by GBC and BBC. A consistent approach is needed and employment land will need to be released for other purposes.
- Reference should be made in Policy 2.5 to new retail development of an appropriate scale at the key settlements identified for growth;
- New retail could help in meeting existing deficiencies

A number of other issues were also raised by consultees:

- A clear annual housing target is needed for each Council;
- Further information is required for the sites and areas identified regarding the impact on the historic environment;
- Policy 2.2a should read “within or adjacent the main built up area of Nottingham”;
- Reference to High Speed 2 is misleading as the project will be delivered well beyond the ACS period;
- Reference should be made to Hucknall Town Centre Improvement Scheme at Policy 2.6c (and Policy 15.5);
- Paragraph 3.2.5 should refer to 3(c) and not 3(d); and
- Paragraph 3.2.10 – Rolls Royce should be referred to as a ‘strategic site’ not a ‘sustainable urban extension’.

#### Broxtowe issues (not specific sites)

- Sites at Field Farm and Boots/STW are unlikely to have significant impacts on Amber Valley and Erewash.

#### Gedling Borough issues (not specific sites)

- The sites allocated in Gedling Borough do not deliver urban concentration and will lead to an unsustainable pattern of development;
- Other sites within or adjacent to the urban areas of Gedling score better in sustainability terms;
- The Sustainability Appraisal has not taken a consistent approach or assessed policies and allocations thoroughly;
- Development should be smaller and more evenly spread around the Borough. Alternatively, more sites within or adjacent to the urban area should be allocated;
- The 2011 Census shows a lower need for housing in Gedling. This need is covered by existing permissions/unimplemented allocations;

- The housing target should be increased to 9208;
- The cumulative impact of housing at Ravenshead and Blidworth has not been fully assessed in accordance with the Duty-to-Cooperate; and
- A consultee questioned where the 260 homes identified in Policy 2.3d are located.

#### Nottingham City issues (not specific sites)

- Development of the Boots site is unlikely to have significant impacts on Amber Valley and Erewash Districts
- One consultee considered the housing provision in Nottingham City to be too low
- Many consultees objected to development at Clifton Pastures (adjacent to the Nottingham City boundary but within Rushcliffe Borough). They sought confirmation that the full housing needs for Nottingham City would be met within its boundaries.

## **Key Issues and Office Response**

### **1. Whether the Housing Target is correct and supported by appropriate evidence?**

It is considered that the Core Strategy meets the objectively assessed cross-boundary development needs of the area, as set out in the Housing Background Paper and Household Projections Background Paper (2012). An addendum to the Housing Background Paper has been prepared for submission to address some issues arising from the consultation on the Publication version of the plan.

The 2012 Edge Analytics and Derbyshire County Council work ("Forecasts of population and households for Nottinghamshire and Derbyshire authorities controlled to new dwelling figures – Information for the Greater Nottingham Districts (Nottingham Core Housing Market Area)") tested the housing provision being promoted in the Core Strategies using local more up to date information, in terms of the population and labour force outcomes, to determine whether the housing provision was appropriate to meet the needs of the area. This work used the 'Popgroup' model, which is used by most local authorities when projecting population and housing needs. It concluded the housing provision was sufficient to allow for continued inward migration, albeit at a lower level than that experienced over the period (2003-2008) used by the CLG Household Projections. It is therefore considered to be an appropriate approach to objectively assessing the housing needs of the area, taking account of more recent local information than was previously available.

Further work (see Housing Background Paper Addendum 2013) has now been undertaken since the publication of information from the 2011 census. This generally supports the councils' approach, although it indicates the HMA-wide level of housing provision allows for a slightly lower in migration figure than anticipated in the Household Projections Background Paper (2012).

If the Examination concludes that the housing provision of Greater Nottingham as a whole should be brought into line with the 'Option for Consultation' figure, then the view of the Councils is that by taking a locally determined approach to housing

provision, Rushcliffe Borough has not met its Duty to Cooperate, and any uplift in housing numbers should apply to the Rushcliffe Core Strategy. If the same level of in migration as anticipated in the Household Projections background Paper (2012) is to be allowed for, 2,800 further homes are required in the Borough to 2026.

So far as representations suggesting that the Core Strategies' housing provision has been suppressed due to the current lack of viability/delivery, the Councils' consider that the housing provision in the Core Strategies meets the objective assessment of housing need, and the delivery of this level of housing is considered challenging but achievable (see Housing Market and Economic Prospects Report, G L Hearn 2012). Viability is not considered to be an obstacle in meeting this housing provision, as the evidence suggests the Council's housing trajectories are challenging but achievable. The Councils do however consider that that housing provision above this level would be undeliverable over the timescale of the plan.

Representations were made suggesting that the level of need for affordable housing was such that a higher overall housing provision figure was merited to deliver more affordable housing. That there is a high need for affordable housing is a recognised fact across much of the Country, and the area is not unique in this regard. The housing provision allows for a significant contribution to meeting affordable housing need, balanced against viability considerations. Further housing provision to support the delivery of affordable housing would inevitably lead to further Green Belt land allocations. As it is considered that the housing provision in the Core Strategies meets the objective assessment of overall housing need, and the Councils' evidence concerning housing delivery (see Housing Market and Economic Prospects Report, G L Hearn 2012) suggests the current housing provision is challenging but achievable, additional delivery over and above that level is very unlikely to be delivered. Instead further housing provision would be likely to result in a redistribution of housing development from sustainable previously developed urban sites in favour of less sustainable Green Belt sites and would not increase housing development overall. As such, it would also not result in the delivery of more affordable housing, and would be counter to the sustainability objectives of the Plan. In particular it would not accord with several NPPF Core Principle including encouraging the effective use of land by reusing land that has been previously developed, protecting the Green Belt, conserving the natural environment, and focussing significant development in locations which are or can be made sustainable. It may be argued that housing delivery on Green Belt sites would be likely to deliver more affordable housing than development on brownfield sites due to better viability, however this is not considered to outweigh the sustainability factors mentioned above.

It should also be noted that affordable housing need reflects the circumstances prevailing at the time, and can change rapidly. For instance, the recent rise in affordable housing need is due largely to the wider market conditions restricting access to the housing market, so levels are expected to fall back again as the housing market recovers.

## **2. Whether the strategy and distribution is correct?**

The strategy envisages most development being accommodated in or adjoining the main built up area of Nottingham, with development of a lesser scale in or adjoining

the Sub Regional Centres. It is still considered to be the most appropriate strategy for the area, both in the light of the significant regeneration challenges faced by parts of the plan area, especially in the main built up area of Nottingham itself, where many of the brownfield development opportunities lie, and in the Sub Regional Centres of Ilkeston (in Erewash), and Hucknall (in Ashfield, but adjoining the plan area). It is also considered to be the most sustainable strategy (and therefore the most appropriate in comparison with reasonable alternatives), as indicated through the Sustainability Appraisal process.

The Regional Plan was highly prescriptive with regard to the level of development in and adjoining the main built up area, and that to be provided elsewhere. The Core Strategies maintain the same strategic approach of urban concentration with regeneration, but are less prescriptive because they take account of the difficulties experienced in delivering some sites on which the Regional Plan relied, and the specific development needs and potential of other parts of the plan area. The Regional Plan's preparation also resulted in the prescriptive approach becoming less deliverable as it increased the proportion of development in and adjacent to the main urban area in an arbitrary way.

The concentration of development in or adjoining the main built up area of Nottingham applies across the area, rather than to individual Council areas, so the proportion of growth in or adjoining the main built up area varies between the Councils.

### **3. Whether the approach to the phasing or timing of sites is correct?**

The annual housing requirement is clearly shown in the trajectories in Appendix C of the ACS. For each council an annualised figure is given in the 'PLAN annualised' column on each of the council's trajectory. It is proposed that this will be relabelled as 'Annual Housing Target' to clarify what it refers to. The figures are split down into three separate five year periods from 2013 and one two year period of expected delivery prior to this. For 2011-13 this is a realistic estimate of housing that is being delivered during this period. For 2013-18 clear evidence from GL Hearn (Housing Market and Economic Prospects paper, 2012) based on forecasts of industry experts that the housing market both locally and nationally will make a slow recovery during this period, with early indications that no upturn in completions can realistically be expected until 2015/16. Given this the realistic approach that has been followed is supported by this evidence. It is realistic to assume that allocations to be made in the various strategic locations listed in Policy 2 will not be delivering housing in significant numbers in this early period is a realistic approach to take. This is reflected in the trajectory.

For the 2018-23 period, it is expected that the strategic locations including some of the more difficult to deliver sites with major infrastructure requirements will start to deliver housing. Again this approach is supported by evidence and is realistic given infrastructure requirement evidenced in the IDP and on evidence of the likely speed of recovery in the housing market. This same pattern is continued for 2023-28. This does not amount to a 'phasing policy', because it does not control the delivery of land. A phasing policy would be a policy preventing development coming forward for policy reasons which could be previously developed land first or could be development in more central locations first. This is not what Policy 2 and the



trajectories in the appendix do. They both amount to a realistic appraisal of likely delivery based on evidence. If a site comes forward quicker (e.g. Boots or sites to be allocated in subsequent DPDs) then there is no policy mechanism to hold up delivery on these sites.

In terms of 5 year supply it is accepted that this is slightly more difficult to work out than if there was a flat trajectory but not much. Any shortfall (or overprovision) would be indicated with reference to the figures in the PLAN Annualised section (which is proposed to be relabelled – see above) in the trajectories. Any under (or over) provision would be averaged out for the remaining plan years in the same way that it is done now. The required supply would then be read forwards five years in this same column with under provision added plus a 5 % buffer.

The 5% buffer would comprise a combination of windfalls and allocations that can and realistically will be made before 2018. Ideally the trajectories would correspond with housing need, but this is not possible due to slow rates of delivery in the early years of the plan due to economic circumstances which are outside of the Council's abilities to address.

Evidence in the Housing Market and Economic Prospects report (GL Hearn 2012) shows the trajectories are 'challenging but achievable', and that there is scope to make up for sites stalled in the beginning of the plan period to be delivered later.

#### **4. Whether the Duty to Cooperate has been met?**

This issue is addressed under the 'General Comments, Section 1, Section 2 and Key Diagram' section.

#### **5. Whether there should be an early review?**

A reference to review of the Core Strategies is already made at para 3.2.7, where the trigger would be non delivery of sites identified in the Core Strategy. It is accepted that a further reference to ongoing monitoring and potential early review would be helpful, if the assumptions behind the housing provision figures are shown to be no longer appropriate.

#### **6. Whether the housing provision deals appropriately with student housing?**

Students are included in the migration assumptions of the government's household projections, and it is therefore relevant to include student housing in the housing provision figures. The Housing Background Paper Addendum (2013) explains how student housing has been taken into account. It highlights the current definition which now states that: "Communal establishments, i.e. establishments providing managed residential accommodation, are not counted in overall housing supply. These cover university and college student, hospital staff accommodation, hostels/homes, hotels/holiday complexes, defence establishments (not married quarters) and prisons. However, purpose-built (separate) homes (e.g. self-contained flats clustered into units with 4 to 6 bedrooms for students) should be included. Each self-contained unit should be counted as a dwelling."

## **Policy 3: The Green Belt**

Note: comments about specific sites are addressed in the section on sites

### Common Issues

A number of consultees supported the approach in the Policy, specifically the need to recast Green Belt boundaries to accommodate future growth. Others wanted this to go further and to identify the broad locations/ specific sites where revisions will take place. On the other hand one consultee objected to the revision of Green Belt boundaries to accommodate strategic sites while other boundaries are to be revised through later Development Plan Documents. They considered that the Aligned Core Strategy should only deal with the broad locations.

A key issue identified by many consultees is the approach taken to the review of the Green Belt. Many considered that the Aligned Core Strategy is flawed as it fails to undertake a comprehensive Green Belt review and does not provide information on timetables or which boundaries will be reviewed. Consultees felt that the 2006 Green Belt review to inform the preparation of the Regional Plan is inadequate.

There was also a degree of opposition from members of the public and local community groups to the principle of release of land from the Green Belt or considered that there was insufficient evidence that Green Belt land needed to be developed. However, one consultee considered that more land needed to be released from the Green Belt. Other consultees:

- Considered that the Policy is too restrictive to development on Farms;
- Questioned the need for the Green Belt to the north and east of Greater Nottingham;
- Requested that safeguarded land be identified to meet future growth needs

### Broxtowe Specific Issues

- Significant opposition to any green belt amendments with the most numerous relating to Field Farm in the south of Broxtowe, and in Brinsley and Greasley Parishes in the north of Broxtowe.

### Gedling Specific Issues.

- Release of Green Belt land at Brookfields Garden Centre and Teal Close was supported by landowners;
- Objection to the development at Top Wighay Farm and North of Papplewick Lane due to potential coalescence and impact on Hucknall;
- Release of Bestwood Business Park for housing to avoid the need to release Green Belt land was supported by the landowner.

### Nottingham City Specific Issues

1. Many consultees objected to the loss of Green Belt at Clifton Pastures (adjacent to the Nottingham City boundary but within Rushcliffe Borough).
2. One consultee suggests that there should be compensation for the loss of Green Belt at Clifton and Wilford.

## **Key Issues and Officer Response**

### **1. Whether there is a need for any Green Belt Review?**

Each of the ACS Council's have reviewed their SHLAAs on several occasions and objectively assessed needs cannot be accommodated entirely on existing urban sites, and therefore some review of existing Green Belt boundaries will be required. The necessity to meet this objectively assessed need in terms of planning positively to meet the development needs of the area amount to the very special circumstances necessary to review green belt boundaries.

## **2. Whether there is a need for a more comprehensive Green Belt Review?**

The Aligned Core Strategy covers 3 local planning authority areas, and is accordingly a high level strategic document, which guides and provides strategic direction for subsequent DPDs. The policy deals with Green Belt review so far as Strategic Allocations are concerned, but Green Belt review for strategic locations and smaller sites is more appropriately undertaken as part of site specific DPDs, when the precise scale and configuration of development at each location is known. This is not an 'ad hoc' approach as alleged by some consultees, but a two stage approach to undertaking a comprehensive review. The ACS clearly sets out the amount and location of new development in broad terms that is required to be delivered over the ACS time period and reconfirms the principle of safeguarded land within Gedling Borough. This approach conforms to the requirements in the NPPF to both plan positively to meet objectively assessed development needs and to protect the Green Belt. To undertake a full review at the Core Strategy stage could result in taking land out of the Green Belt unnecessarily, and result in a lengthy delay to Core Strategy preparation and adoption.

## **3. Whether the ACS should identify specific boundaries to be reviewed?**

The NPPF allows for the production of additional DPDs where appropriate, and the suggestion to undertake a comprehensive Green Belt review now would cause undue delay and is unnecessary. Each Council is committed to an early adoption of Allocations DPD.

## Policy 4: Employment Provision and Economic Development

### Common Issues

A number of consultees identified issues regarding the supply of office space and employment land. One consultee considered that the five year supply of office space should be assessed in the same way as that for housing land (i.e. on a Council by Council basis with other non-allocated protected sites being granted planning permission for office use if they comply with other policy requirements). Another consultee identified that the number of houses which would be delivered was below the level required to continue job growth. Whilst the broad quantum of office and industrial and warehousing development across the plan area was supported by one consultee, they felt there was no justification for the figures to be expressed as minimums.

Consultees also responded on the definitions used in the policy regarding 'employment uses'. One consultee supported the approach to recognise that retail was an important sector in creating jobs while another requested that we either replace 'employment uses' with 'employment generating uses' or include a definition in the glossary to that effect.

There were also concerns that clear definitions were needed to assess what were good employment sites and when poor employment sites could be released for housing. Others considered that clarification was needed on the 'strategic employment areas' referred to in the Policy. One consultee identified that no protection was needed for locally valuable sites and that the definition of 'good employment land' should include:

- Well located for access to the motorway;
- Have good public transport links;
- Have a critical mass of land and premises;
- Well located to a large workforce; and
- Free from operational constraints.

Another consultee considered that Greenfield sites should not be released until all brownfield sites had been developed.

A number of other issues were identified by consultees. These were:

- Support for diversifying the rural economy;
- Information on the impact of the sites on the historic environment should be included in the schedules in Appendix A;
- The role the Rolls-Royce site will play for Greater Nottingham should be recognised;
- The contingency arrangements for allocating further office floorspace in the event of less than a five year supply being available; and
- The Nottingham City Region Employment Land Study was considered to be flawed, in particular its assessments of existing employment sites.

### Broxtowe Specific Issues

To be added if required

### Gedling Specific Issues

- A developer considered more employment land should be allocated in Arnold and Carlton to accord with the strategy in Policy 2. A site at Leapool Island/Lime Lane should be identified as a 'strategic employment park'.
- A landowner identified that a more flexible approach should be taken to the Teal Close employment allocation including the mix of uses, boundaries and amount of land.

### Nottingham Specific Issues

- Economic development associated with the Universities was supported, but felt to be inadequately addressed.

## **Key Issues and Officer Response**

### **1. Whether the approach to the five year supply of office space is appropriate?**

There is no national guidance on providing for a five year supply of employment development (unlike for housing). The five year supply is a 'buffer' recommended by the evidence base, to ensure choice, flexibility and efficient market for land/premises. As the market for employment land covers the whole of Greater Nottingham (a functional economic area), an approach based on separate local authority areas is not considered appropriate.

It is accepted that as worded the policy is reactive, in that a review would not be initiated until supply fell below a 5 year provision. Wording changes to the policy are proposed to ensure it is more proactive. The fact that the employment land are expressed as minimum figure should also ensure adequate supply, and would enable further proposals which accord with other policy requirements to be permitted.

### **2. Whether the number of jobs is appropriate in terms of the proposed housing provision?**

The Employment Housing Background Paper (2012) and the Housing Projections Background Paper (2012) describe how the employment provision was derived, and how relates to the housing provision. This has been partially updated in the Housing Background Paper Addendum (2013). The number of jobs provided for by the Core Strategy is consistent with the housing provision, the resulting economically active population.

### **3. Whether the plan provides sufficient guidance on employment sites to be retained/released, and whether the approach to 'strategic employment sites' is adequate?**

Changes are proposed to provide some further guidance to what constitutes good quality employment land, including good access, being well located

**4. Whether the quantum of office floorspace and industrial and warehousing development should be minimums?**

The use of the term minimum is considered appropriate in terms of the Presumption in Favour of Sustainable Development inherent in the NPPF. In particular, its core principles include proactively driving and supporting sustainable economic development. It further states the government's commitment to the planning system doing all it can to support economic growth, and to do this, plans should be proactive. In this context, the use of the term 'minimum' is considered to be entirely appropriate.

**5. Whether the approach to economic development associated with the Universities is appropriate?**

Policy 3 (f) already clearly states encouraging the economic development associated with the universities will be encouraged. The proposed addition of 'Economic Development' to the glossary includes B Use Classes, public and community uses. In addition, proposed changes elsewhere in the plan refer to the wider role of Universities more explicitly.

**6. Whether the NCRELS Assessment of existing employment sites are flawed?**

It is considered that the NCRELS assessments are appropriate and broadly accurate. The Councils will keep the supply of employment sites under review through site specific allocation DPDs and release sites where this is supported by the evidence.

## Policy 5: Nottingham City Centre

Note: This Policy is only relevant to Nottingham City Council

Capital Shopping Centres (owners of the Victoria Centre and Broadmarsh Centre) support the intention to promote City Centre as the region's principal shopping, leisure and cultural destination and the removal of floorspace thresholds from previous draft of policy. Safeguarding Primary Shopping Frontages as the focus for City Centre retail development was supported by Capital Shopping Centres, but they consider that more specific references to the role these frontages play in reinforcing north-south and east-west shopping patterns and also linking the main retail destinations within the City are needed.

Capital Shopping Centres also consider that:

- Broadmarsh and Victoria Centre schemes are both required to deliver sustainable economic growth in the City Centre. The Aligned Core Strategy should allow these to come forward as the market dictates;
- the Greater Nottingham Retail Study (GNRS) is out of date and that the Victoria and Broadmarsh centres are likely to absorb comparison retail capacity within the City for foreseeable future, i.e. up to and beyond 2021;
- sufficient deliverable retail development opportunities have been identified in the City Centre to meet foreseeable needs, and there is no need to identify further opportunities within edge or out of centre locations; and
- reference to edge of centre sites is not appropriate, as these are only preferable where no sequentially preferable in centre sites are available, and there is no impact on vitality and viability.

Shell Pensions Trust (owners of the Exchange Arcade), although happy with much of this policy, consider there should be more flexible in relation to uses within Primary Shopping Frontages. They question whether the policy should require the creation of "suitable living conditions" for residents of the City Centre.

English Heritage welcomed the aspiration in 5.1e to improve access between key historic and cultural assets, which should be based on a thorough understanding using old maps and other sources. English Heritage also welcomed reference to the historic environment in 5.1.g, but considered this needs to reflect the wider importance of the historic environment to the city Centre.

## Key Issues and Officer Response

### 1. Whether more specific reference is given to the role of the Primary Shopping Frontages in reinforcing north-south and east-west shopping patterns and linking main retail destinations within the City?

It is agreed that more specific reference are required to the role of the Primary Shopping Frontages in reinforcing north-south and east-west shopping patterns and linking main retail destinations within the City. The proposed changes should address this issue. The reference in policy 2.5 to 'edge of City Centre' development is proposed for deletion, to ensure no contradiction between Policy 2 and Policy 5.

**2. Whether the Greater Nottingham Retail Study is out of date?**

Changes are proposed to clarify that economic circumstances have changed since the publication of the Greater Nottingham Retail Study, and that retail capacity projections will need to be updated and monitored. A review of the Greater Nottingham Retail Study will be a priority, with its findings informing the City Council's Land and Planning Policies Development Plan Document (and the site specific Development Plan Documents of other Councils).

**3. Whether the Core Strategy has identified sufficient deliverable retail development opportunities in the City Centre to meet foreseeable needs?**

It is agreed that Victoria and Broadmarsh as currently proposed are likely to absorb a significant element of available expenditure over the plan period. However, in order to provide flexibility should these proposals change, or not be implemented, or should new evidence emerge, proposed changes make it clear that any other alternative retail schemes should demonstrate sufficient expenditure capacity is available.

**4. Whether the uses within Primary Shopping Frontages should be more flexible?**

Promoting A1 uses within Primary Shopping Frontages is a long established and successful policy and it is not considered there is any evidence or reason to move away from this. The NPPF glossary states "Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods". The extent of the primary shopping frontage and further guidance on development associated with it will be included in the City Council's Land and Planning Policies DPD.

**5. Whether the policy should require the creation of "suitable living conditions" for city centre residents?**

Although those who choose to live within the city centre can expect different living conditions to those within more suburban settings, these living conditions should still be reasonable and comply with the criteria as set out in the policy.

**6. Whether the policy needs to reflect wider importance of historic environment to the city Centre?**

It is agreed that the policy needs to reflect wider importance of historic environment to the City Centre, and proposed changes should address this issue.



## **Policy 6: Role of Town and Local Centres**

### Common Issues

References in Policy 6 to the sequential test and impact assessment produced a number of responses. Consultees were concerned that references to the sequential assessment did not accord with the NPPF and should acknowledge that new retail proposals should include assessment of the ability to provide more choice and competition and that in centre, edge of centre and out of centre locations are all preferences in the NPPF. In relation to the impact assessment consultees noted that these should only measure impact against centres of commensurate scale and function to the proposed development and should only be requested for developments above 2,500 sq metres unless a locally set threshold has been set in a DPD. However, one consultee objected to the provision in Policy 6.6 to consider locally set thresholds as there is no justification and the threshold would be difficult to set.

Whilst the approach in Policy 6 towards retail as part of 'major residential led development' was supported by one consultee, the policy resulted in a number of responses. Nottinghamshire County Council considered that the last sentence of Policy 6.3 which deals with this issue should be separated out as a standalone policy as these centres may not be 'centres of neighbourhood importance'. Another consultee identified that the new centres which will result from the areas of significant growth should be included in the hierarchy of centres identified in Policy 6.1.

A response was also made to object to the inclusion of centres in Hucknall on the map. One consultee identified that Policy 6.2 should be amended to include reference to development plan documents identifying primary shopping areas and, where necessary, secondary shopping areas as well as boundaries.

A number of consultees identified that future updates will be required to the Greater Nottingham Retail Study (2007) to inform subsequent development plan documents and to provide more detail on overtrading, leakage and the ability to clawback.

### Broxtowe Specific Issues

To be added if required

### Gedling Specific Issues.

- No justification for the inclusion of Arnold as an underperforming centre
- No evidence to justify inclusion of Carlton Hill as a centre to be enhanced
- No strategy to bring Gedling Colliery forward.

### Nottingham City Specific Issues

- Policy 6 (edge of and out of centre development) should apply to all main town centre uses, not just retail and leisure.
- A local threshold for impact assessments of 1,000 sq m should apply.
- Bobbers Mill employment site should be allocated as a Local Centre.
- It was identified that the centre at Clifton would be helped by not sprawling.

## Key Issues and Officer Response

**1. Whether the approaches to the sequential and impact assessments are in accordance with the NPPF, and should apply to all main town centre uses?**

In relation to the sequential assessment it is agreed that the wording could be clearer and changes are proposed to the policy and justification text to bring them into line with the NPPF, acknowledging that the policy applies to all main town centre uses.

**2. Whether the approach to local thresholds for impact assessments is appropriate?**

The reference to local thresholds for impact assessments has been clarified to ensure it is clear they will be established through site specific Development Plan Documents as they are a local matter which need to reflect local evidence, including for the City Council area, where a 1,000 sq m threshold already operates.

**3. Whether the scale of development at specified locations in Policy 6.3 is appropriate and whether the retail element of 'major residential led development' should be included as a separate sub-policy?**

A change is proposed to reflect the scale of retail development at Gedling Colliery. It is also agreed that a separate sub policy for retail development in other major residential led development schemes is appropriate. It is not appropriate to include this in the list of centres, as Gedling Colliery is a contingency site which may not be developed during the plan period, and designation of Centres of Neighbourhood Importance is a matter for site specific Development Plan Documents.

**4. Whether future updates of the Greater Nottingham Retail Study are needed?**

It is agreed that the Greater Nottingham Retail Study will need to be monitored and updated. Proposed changes to policy 6 justification text reflect this, and the Policy 5 City Centre justification text indicates that this will be a priority for the councils.

## Policy 7: Regeneration

Note: comments about specific sites are addressed under the section on 'Sites'

### Common Issues

Only two comments were received that did not relate to the sites and areas identified in the Policy. These were:

- That the impact of the sites on the historic environment and specific heritage assets should be addressed through Appendix A; and
- That a sentence regarding sustainable remediation should be incorporated in the Policy.

### Broxtowe Specific Issues

To be added if required

### Gedling Specific Issues:

- The development of Gedling Colliery should be a priority and a strategy be put in place to develop the site.

### Nottingham City Specific Issues

- Policy 7 needs to allow for the early delivery of the bus depot on London Road.
- Canal and River Trust supports the inclusion of the Waterside Regeneration Zone.

## Key Issues and Officer Response

None Identified

## **Policy 8: Housing Size, Mix and Choice**

### Common Issues

Whilst there was support for the use of Strategic Housing Market Assessments (SHMAs) consultees considered that the SHMA prepared for the ACS is out of date and in need of updating.

Viability was a key concern of many responses on Policy 8. A number of developers considered that evidence of the viability of the Affordable Housing requirements was either not provided or out of date. The Home Builders Federation and developers also considered that the onus should be on the local planning authority to demonstrate viability through a cumulative assessment rather than developers to challenge the requirements on a site-by-site basis and that decisions which affect viability should not be left to later DPDs or SPDs.

The proposal in Policy 8.7 to relook at affordable housing requirements for large sites was considered inappropriate and the mechanism should be identified in the ACS. There were also comments regarding the use of government grant and rural exception sites to assist with the delivery of affordable housing. Consultees noted that while paragraph 3.8.10 refers to viability assessments including all potential sources of funding this potential funding may not become actual funding. Consultees also considered that Policy 8.8 should be reworded to allow an element of market housing on rural exception sites to facilitate scheme viability.

There was support for the use of local variations of the affordable housing figures given that viability is different in different parts of the plan area. The Conservative Group at Gedling Borough Council also identified that the need for affordable housing should be considered based on the need in local areas, such as villages, rather than looking exclusively at viability.

Another issue which resulted in a number of comments was the design and type of Affordable Housing. One consultee considered that affordable housing should be appropriately designed for its context and should include provision for people who wish to downsize. Another consultee identified that the reference in Policy 8.1 to lifetime homes was vague and not in accordance with paragraph 96 of the NPPF.

### Broxtowe Specific Issues

To be added if required

### Gedling Specific Issues:

- The landowner/developer identified that the allocation of a site for over 500 dwellings at Teal Close would deliver a significant number of affordable homes

### Nottingham Specific Issues

The University of Nottingham and the Residential Landlord's Association raised concerns over the approach to diversifying the housing mix in areas of concentrations of student housing. The University wants greater recognition of the advantages of Students to the City, the paragraph implies either that student

accommodation is in itself viewed negatively, or areas dominated by student housing in particular would benefit from a rebalancing. While not questioning the general principle and the general point, singling out student housing in this manner is unhelpful. The Residential Landlords Association feels the policy is inappropriate and should be deleted, considering that Policies restricting Houses in Multiple Occupation (HMOs) must be about “mixed communities”, ie a mix of tenure, type and range of properties, not about “balance”, ie the people that live in them. They comment that restricting HMOs only justifiable where residential amenity is impacted on, not due to concentrations in themselves. They note the policy is framed only in terms of students, not in terms of HMOs which may be occupied by non students.

## **Key Issues and Officer Response**

### **1. Whether the Strategic Housing Market Assessment is out of date?**

The SHMA was undertaken in 2006 with updates for the ‘needs’ element in 2009 and 2012. Other aspects of the SHMA have been reviewed in the additional work commissioned by the Councils on population and households based on the most recent Government statistics. The Councils also considered they have undertaken an objective assessment of housing needs. Further details can be found in the Housing Background Paper (2012), the Household Projection Background Paper (2012) and the Housing Background Paper Addendum (2013).

### **2. Whether the Policy takes adequate account of affordable housing viability issues?**

The Core Strategy strategic allocations (the strategic sites expected to deliver housing within the first 5 years of the plan period) have been subject to viability testing, which takes account affordable housing requirements within each council. For clarity, details of this will be included at Appendix B the Infrastructure Delivery Plan, which will be updated for Submission.

The proportions of affordable housing in Policy 8 for each council are based on viability testing undertaken in 2009. Whilst it is acknowledged that this took place prior to the current recession, the Core Strategy covers the period to 2028, and must plan for market conditions over the whole plan period, which may cover several economic cycles. Subsequent DPDs will be supported by viability assessments which test the cumulative viability implications of affordable housing and any other relevant local standards. The policy is of course subject to flexibility on the grounds of viability, and in these circumstances, individual site assessments may continue to be appropriate.

### **3. Whether the Aligned Core Strategy should include details of the design and/or type of affordable housing to be provided?**

It is not appropriate for the ACS to deal with these matters. Other local development documents will be updated or prepared at the local level which will address these issues.

### **4. Whether the proposal to relook at Affordable Housing over the lifetime of large ‘multi-phase’ developments is appropriate?**

The approach proposed in Policy 8.7 is based on examples of good practice taken from around the country. Given the changes which can occur in the economy and

society over the lifetime of large developments it is appropriate to adopt a flexible approach to affordable housing requirements in terms of the level of contributions and the type of contribution sought. The approach will be put into practice through appropriately drafted S106 agreements on a site by site basis.

**5. Whether the approach to diversifying the housing mix in areas of concentrations of students is appropriate?**

It is not accepted that NPPF does not recognise the concept of balance - it refers to delivering a wide choice of high quality homes, widening opportunities for home ownership and creating sustainable, inclusive and mixed communities. However, proposed changes to Policy 8.1 to reflect paragraph 50 of the NPPF and the requirement to deliver sustainable, inclusive and mixed communities. It is not considered appropriate to delete policy criteria 8.4e). However, it is accepted that the policy could more correctly refer to student households and houses in multiple occupation. Proposed changes to para 3.8.8 will modify the justification text to reflect the policy change, and to highlight more clearly amenity issues.

DRAFT

## **Policy 9: Gypsies, Travellers and Travelling Showpeople**

### Common Issues

While there was support for elements of this policy, notably 9.3a and 9.3e, two developers identified that the inclusion of Gypsy and Traveller sites as part of Sustainable Urban Extensions may not be deliverable due to viability issues and landowner reluctance.

### Broxtowe Specific Issues

To be added if required

### Gedling Specific Issues:

None

### Nottingham Specific Issues

None

## **Key Issues and Officer Response**

### **1. Whether Gypsy & Traveller sites should be included as part of SUEs?**

Policy 9 gives appropriate guidance for the preparation of subsequent DPDs and provides guidance for determining planning applications. Where Gypsy and Traveller provision is expected as part of Sustainable Urban Extensions, this will need to be set out in DPDs, SPD, or Masterplans.

## **Policy 10: Design and Enhancing Local Identity**

### Common Issues

Elements of the Policy which were supported included Policy 10.1c on 'garden grabbing' and paragraphs 3.10.2 and 3.10.3 on the use of local evidence and the importance of heritage to local distinctiveness. However, one consultee noted that protection of the historic environment may not always be compatible with adapting to climate change and promoting safer living environments.

Both Nottinghamshire County Council and the Coal Authority raised issues regarding contamination and land stability. The Coal Authority recommended that the Aligned Core Strategy reflect the NPPF and PPG14 by addressing potential safety issues and the history of coal mining in the plan area.

The approach to local design standards was criticised by the Home Builders Federation who considered it unsound to leave matters of detailed guidance to later documents. They argued that precise local standards should be included in the Aligned Core Strategy and subjected to viability assessment. In terms of specific standards, one consultee requested that a policy for lighting and light pollution be included while another wanted paragraph 3.10.5 to include clarification that Buildings for Life is only one potential approach to determining design quality.

### Broxtowe Specific Issues

To be added if required

### Gedling Specific Issues.

- Any design for the Teal Close site, which will be demonstrated through vision, design and masterplanning, can enhance local identity
- Landscape around Linby and Papplewick should be protected.

### Nottingham City Specific Issues

None

## **Key Issues and Officer Response**

### **1. Whether contamination/land stability have been addressed?**

Agreed that further clarification should be provided to make it clear how contamination/land stability will be addressed. The proposed changes should address this issue.

### **2. Whether detailed guidance can be deferred to subsequent documents?**

Policy 10.3 does not of itself include local standards, rather it sets the context for subsequent Development Plan Documents to include more detailed policies including standards on design if they are considered appropriate. These DPDs will set out the required level of performance and the viability impacts of these will be tested during preparation in line with national guidance.

Light and light pollution will be a matter for subsequent DPDs to consider.



**3. Whether the objective of protecting historic buildings and townscapes can be compatible with the objectives of design to adapt to future climate change and features to reduce opportunities for crime and the fear of crime, disorder and anti-social behaviour, and promotion of safer living environments?**

Policy 11 and policy 10 should be read alongside each other. Weighing policies (or criteria within policies) against each other is normal planning practice, and it is not considered there is any conflict between policy 10 and 11, or between policy 10 criteria g and i. Also, Core Strategy para 3.10.2 explains that new design should relate positively to important local features. Furthermore, Para 3.1.7 of the justification text to Policy 1 partly addresses this issue.

DRAFT

## **Policy 11: The Historic Environment**

### Common Issues

Whilst there was support for the policy and monitoring arrangements from English Heritage a number of consultees considered that the Aligned Core Strategy made no provision for retaining the settings and safeguarding existing heritage assets and historical monuments.

Both English Heritage and Nottinghamshire County Council made a number of suggestions to strengthen the policy or clarify certain elements. Suggested changes were:

- An amendment to paragraph 3.11.3 to identify that there may be many more elements of the historic environment that are particularly important;
- Policy 11.1 should be made more proactive and the words 'in line with' should be replaced by 'with regard to';
- Policy 11.2 implies that Sherwood Forest was all woodland and the word 'other' should be deleted from bullet point c. Additionally, 'and scheduled ancient monuments' should be added after 'prominent listed buildings' to bullet point e;
- Changes to bullet point e to better reflect paragraph 169 of the NPPF. The second sentence of this bullet point should be separated out as its own bullet point.
- References to 'historic parks and gardens' should be amended to 'registered parks and gardens';
- Reword paragraph 3.11.4 to clarify that some archaeological sites are not yet known;
- Reword paragraph 3.11.6 to clarify that options for viable reuse should also be considered for non-designated heritage assets along with listed buildings;
- Reword the last sentence of paragraph 3.11.9 to more accurately reflect the degree of loss of the historic environment.

### Broxtowe Specific Issues

To be added if required

### Gedling Specific Issues:

- English Heritage have made a number of comments regarding references to non-designated heritage assets in relation to specific sites, but these comments are addressed elsewhere in this report.

### Nottingham City Specific Issues

- The non-inclusion of Grade II listed buildings on the City Council's Risk Register was noted.
- There was support for the recognition of canals as Heritage Assets
- One consultee noted that the policy was not as supportive of development as the justification text, and also felt the policy was long and repetitive, particularly citing criteria 1 and 3.

## Key Issues and Officer Response

### 1. Whether to amend the policy and justification text as requested?

With regard to the point that many more elements of the historic environment are particularly important, this is acknowledged. However, the purpose of Policy 11 is to identify those elements of the historic environment which are of particular importance to the plan area as a whole. There will be other elements of the historic environment which are of particular value to a more localised area, and these are to be identified in subsequent Development Plan Documents.

Minor proposed changes should address most issues raised, although it is not accepted that the policy is long and repetitive, and it is considered the policy is suitably positively worded.

DRAFT

## **Policy 12: Local Services and Healthy Lifestyles**

### Common Issues

Policy 12.1 was supported by one consultee who also identified that new or improved community facilities should only be required as part of major new residential development where there is evidence of need.

### Broxtowe Specific Issues

To be added if required

### Gedling Specific Issues:

None

### Nottingham City Specific Issues

None

## **Key Issues and Officer Response**

### **1. Whether new or improved community facilities should only be required as part of major new residential development where there is evidence of need?**

It is accepted that contributions towards new or improved community facilities should only be requested where there is evidence of need and amendments are proposed to reflect this.

## **Policy 13: Culture, Tourism and Sport**

### Common Issues

There was general support from Sport England and the Theatres Trust to this Policy, especially in relation to sports and theatres.

### Broxtowe Specific Issues

To be added if required

### Gedling Specific Issues:

- Sport England identified that the 2004 Recreational Open Space Assessment and 2003 Playing Pitch Strategy and Assessment are out of date and should be updated.

### Nottingham City Specific Issues

- A consultee identified that there are areas where sports facilities and associated development should be restricted
- Sport England identified that the 2009 Open Space Audit and Playing Pitch Strategy are almost three years old. Normally such evidence would be considered out of date, if the document has not been updated in the three year period.

## **Key Issues and Officer Response**

### **1. Whether the Open Space Assessments are up to date?**

Work is currently underway to update the Gedling and Nottingham City's Open Space Assessments with work programmed to be complete in early 2013. Broxtowe's open space assessment was adopted in 2009 and is likely to be reviewed in 2014.

## **Policy 14: Managing Travel Demand**

### Common Issues

The Highways Agency (HA) and Nottinghamshire County Council point out the necessary transport modelling required to identify packages of measures has yet to be concluded. The HA consider that without this work being concluded there is uncertainty over the sufficiency of committed transport measures on their own to accommodate the cumulative impacts arising from the development proposals in the plan area and adjoining districts. Consequently further additional transport infrastructure, including Strategic Road Network (SRN) infrastructure, as yet undetermined may be required which may need to be funded through CIL. The County Council consider that in the absence of the acceptable conclusion of this work the ACS is unsound.

The HA identify the following further issues-

- The SRN within the plan area is already under pressure;
- They do not consider that peak period problems can be addressed through; simply increasing road capacity but would seek an approach to encourage use of sustainable modes whilst identifying development pressures which give rise to traffic impacts which need to be addressed through road improvements;
- They fully support measures to reduce reliance on the car via development in accessible locations and provision of sustainable transport measures;
- They support the hierarchical approach to ensuring the delivery of sustainable urban extensions and that highway capacity enhancements will be necessary to deal with residual car demand;
- SRN infrastructure may be required in the form of junction modification and/or traffic management schemes for key M1 and A52 junctions; and
- Policy 14 could be modified to better reflect the significance of the SRN

Other consultees raised the following issues;

- Stapleford Town Council consider it to be a major omission in Policy 14 that no consideration had been given to public transport infrastructure to cover cross/inter borough transport services;
- A developer questioned whether the County Council and Highways Authority had signed up to the Policy. Both organisations should engage to find solutions to the issues raised by the Policy;
- One developer welcomed the hierarchical approach but considered that the policy did not accord with the final bullet of paragraph 32 of the NPPF; and
- Papplewick Parish Council considered that Policy 14 should look to reduce the use of vehicles of business purposes and should consider destinations other than the City Centre.

### Broxtowe Specific Issues

- Numerous consultees identify the lack of transport infrastructure/ highway capacity and public transport provision as obstacles to new housing growth
- Some consultees consider that the spatial strategy is incompatible with this Policy in terms of directing too much development to less accessible locations

in particular key settlements for growth compared to the main built up area of Nottingham

#### Gedling Specific Issues.

- The distribution of growth in Gedling Borough is at odds with the need to reduce travel and the approach to encourage development at sustainable locations
- Sites at Teal Close and New Farm are sustainably located in terms of transport and should be allocated.

#### Nottingham City Specific Issues

None

### **Key Issues and Officer Response**

- 1. Whether the traffic modelling to inform the ACS has successfully identified that there are no 'showstoppers' to delivering the Core Strategies, and to identify the critical strategic infrastructure required to ensure the overall Core Strategy growth can be delivered without serious compromise to the performance of the transport network?**

The traffic modelling to inform the ACS has now been completed to the satisfaction of both the HA and the Highways Authorities as reported in the Transport Background Paper. It concludes that there are no 'show stoppers', however site specific assessments are required to address site specific impacts.

- 2. Whether the ACS in terms of Broxtowe and Gedling have an appropriate spatial distribution of development?**

This issue is addressed under Policy 2.

- 3. The need to undertake further work in site specific allocations DPDs to ensure maximum use is made of sustainable modes of transport in order to minimise pressure on the strategic and local highway networks?**

It is appropriate to undertake more detailed work as part of each Council's Allocations DPD.

## Policy 15: Transport Infrastructure Priorities

### Common Issues

Nottinghamshire County Council notes the reliance on the IDP as the evidence base detailing the additional transport infrastructure needed to support new development and point out that the IDP does not provide the necessary detail at this point in time, since the transport modelling is still work in progress. They have concerns that Policy 15 (3) does not establish the additional transport infrastructure required to support the ACS spatial strategy in Policy 2.

The Highways Agency supports partnership working with infrastructure providers as set out in the plan and considers that the existing planned transport schemes listed under Policy 15 will provide a significant contribution to transport networks and enhance their ability to meet further pressures arising from proposed growth. With regard to the A453 widening, the agency confirms that the Government has announced that this is planned to commence in the fourth quarter of 2012/13.

Stapleford and Trowell Rural Action Group were concerned that the listed schemes are outside of Broxtowe and that no consideration had been given to public transport infrastructure to cover cross/inter borough transport services. A developer considered there was no mention of improvements to bus services or the provision of additional park and ride services.

### Broxtowe Specific Issues

- Numerous consultees identify the lack of transport infrastructure/ highway capacity and public transport provision as obstacles to new housing growth

### Gedling Specific Issues.

- No transport improvements identified for Calverton
- No strategy to deliver the Gedling Access Road

### Nottingham City Specific Issues

None

## Key Issues and Officer Response

- 1. Whether the traffic modelling to inform the ACS has successfully identified that there are no 'showstoppers' to delivering the Core Strategies, and to identify the critical strategic infrastructure required to ensure the overall Core Strategy growth can be delivered without serious compromise to the performance of the transport network?**

The traffic modelling to inform the ACS has now been completed to the satisfaction of both the HA and the Highways Authorities as reported in the Transport Background Paper. It concludes that there are no 'show stoppers', however site specific assessments are required to address site specific impacts.

- 2. The need to undertake further work in site specific allocations DPDs to ensure maximum use is made of sustainable modes of transport in order to minimise pressure on the strategic and local highway networks?**

It is appropriate to undertake more detailed work as part of each Council's allocations DPD.



## **Policy 16: Green Infrastructure, Parks and Open Space**

### Common Issues

There was general support for the Policy, the provision of green infrastructure, the priority given to it and in particular references to:

- The historic environment;
- The multifunction nature of Green Infrastructure corridors;
- The protection and enhancement of the natural environment;
- The use of landscape character assessments;
- Allowing the migration of species; and
- Making provision for biodiversity.

However, one member of the public noted that Green Infrastructure can cause impingement and access issues.

There were concerns from both Sport England and English Heritage regarding the approach in Policy 16.4 to the potential development of open space that is “underused or undervalued”. This should not be the overriding factor in the loss of the open space and that the assessment of whether it is “underused or undervalued” may not fully address potential historic qualities.

There was also a concern from Nottinghamshire Wildlife Trust regarding the reference in paragraph 3.16.3 to the potential for “energy production” within Green Infrastructure corridors. They identified that hydro power and wind turbines are “very damaging” to biodiversity interests. Stapleford & Trowell Rural Action Group raised concerns regarding the inconsistencies between the approach to Green Infrastructure and the approach to the Green Belt.

A number of additions were sought to the policy. These included:

- Reference to Landscape & Visual Impact Assessments;
- The retention of Mature Landscape Areas;
- The involvement of local communities in planning for Green Infrastructure;
- The protection of agriculture from urbanisation;
- Reference to the provision of open space as part of new developments;
- The maintenance and enhancement of water courses as Green Infrastructure; and
- Clarification that only strategic allocations would be required to contribute to the strategic Green Infrastructure network.

In terms of monitoring, consultees requested that the quality of open space be monitored by whether there was a management plan in place as this would cover sites other than council managed parks and open space. The use of Natural England’s Accessible Greenspace Targets for monitoring the accessibility of Green Infrastructure was also supported.

### Broxtowe Specific Issues

To be added if required

### Gedling Specific Issues

- Sport England identified that the 2004 Recreational Open Space Assessment and 2003 Playing Pitch Strategy and Assessment are out of date and should be updated.

### Nottingham City Specific Issues

- Sport England identified that the 2009 Open Space Audit and Playing Pitch Strategy are almost three years old. Normally such evidence would be considered out of date, if the document has not been updated in the three year period.

## **Key Issues and Officer Response**

### **1. Whether the approach in Policy 16.4 to “underused or undervalued” parks and open space is correct?**

Whether an area of open space is undervalued or underused is not the overriding factor when determining whether an area of open space can be developed. Para 3.16.7 confirms that these areas will only be considered if they are identified as surplus to requirements through open space assessments or local studies. In addition, NPPF para 74 makes reference to the fact that a loss may be replaced by equivalent or better provision in a suitable location which will be addressed by a revision to the justification text. The value of parks as heritage assets would be considered as part of any assessments undertaken and is covered by Policy 11.1.

### **2. Whether green corridors are appropriate locations for energy production?**

The river corridors provide opportunities for the creation of multi functional green spaces and also opportunities for energy production which can help tackle climate change in locations that would be acceptable subject to appropriate mitigation as necessary.

Adopting a precautionary approach towards siting energy installations would rule out a number of areas along river corridors with potential for renewable energy which would otherwise be acceptable. Sensitive wildlife areas should be avoided and Policy 17 specifically covers development affecting wildlife corridors with biodiversity value and would permit energy projects where there is an overriding need and subject to adequate mitigation.

### **3. Whether reference should be made to the provision of open space as part of new developments?**

The Aligned Core Strategies are strategic documents. For strategic sites, Appendix A addresses open space constraints and requirements. For other sites, subsequent Development Plan Documents will address the provision of open space.

### **4. Whether only strategic allocations will contribute to the strategic Green Infrastructure network?**

The enhancement of strategic green infrastructure is a local priority. It may be appropriate that smaller sites (i.e. those not allocated through the Aligned Core Strategies) contribute to the strategic green infrastructure.

**5. Whether the Open Space Assessments are up to date?**

Work is currently underway to update the Gedling and Nottingham City's Open Space Assessments with work programmed to be complete in early 2013. Broxtowe's open space assessment was adopted in 2009 and is likely to be reviewed in 2014.

DRAFT

## **Policy 17: Biodiversity**

### Common Issues

Elements of the policy that were supported included:

- The commitment to increase levels of biodiversity;
- The precautionary approach to the prospective Special Protection Area (see also comments made on the Habitats Regulations Assessment); and
- The support for maintaining and enhancing biodiversity.

A number of consultees, mainly developers, sought changes to amend elements they saw as overly restrictive or beyond the intention in the NPPF. These included the approach to non-designated sites and the requirement for the consideration of alternative locations. A review of all national and local designation and the removal of local designations from the Plan were also requested.

Questions were raised regarding the sequential approach and the approach to the hierarchy of sites. There were concerns that mitigation and compensation were seen as equivalent where in fact compensation should be seen as a last resort. Nottinghamshire Wildlife Trust considered that the 'Sites of Importance to Nature Conservation' (SINC) designation was devalued by giving more protection to national and international sites. This consultee also questioned how the designation of further sites was to be pursued given the level of resources available.

A number of changes were sought to strengthen the policy. These included:

- The protection of hedgerow and established trees;
- Consideration of the ecological value of brownfield sites including those allocated for development;
- Recognition that the fragmentation of habitats should generally be avoided not just "wherever possible" as stated at Policy 17.1b;
- Addition of 'minimising impacts on biodiversity' to Policy 17.1;
- Amendments at Policy 17.1a and paragraph 3.17.5 to bring the text in line with paragraph 117 of the NPPF;
- A link should be provided in the text to Natural England and local advice; and
- Reference to biodiversity at a landscape scale.

Amendments to the monitoring arrangements were also suggested:

- Monitor the number of SINCs lost or affected by development rather than number of unmitigated loss of SINC;
- Monitor where land management advice has been given; and
- Monitor the number of SINCs under positive conservation management.

### Broxtowe Specific Issues

- Nottinghamshire Wildlife Trust considered that a significant buffer of green infrastructure should be provided between the Field Farm site and Stapleford Hills Local Nature Reserve. There should also be a significant GI element included within the development and contributions made to mitigate the increase in use and disturbance that this development, its residents and pets will have on the surrounding LNRs

### Gedling Specific Issues

- Definition of the development boundary for Ravenshead as west of the A60 and north of Ricket Lane/Main Road

### Nottingham City Specific Issues

## **Key issues and Officer Response**

### **1. Whether the policy is overly restrictive in terms of non-designated and local sites?**

While it is considered that the policy is not overly restrictive, a number of changes are proposed to clarify the approach and to reflect how local sites are treated in the hierarchy.

### **2. Whether the sequential approach and hierarchy have been interpreted correctly?**

The text of the policy is proposed to be amended to clarify that mitigation and compensation are not equivalent. The sequential approach is consistent with the paragraph 118 of the NPPF.

DRAFT

## **Policy 18: Infrastructure and Policy 19: Developer Contributions**

Note: These policies are being address together as there are strong links between the two and similar issues have been raised on both.

### **Summary of Representations**

#### Common Issues

A key concern of developers was the need to ensure, prior to the introduction of the Community Infrastructure Levy (CIL), that obligations were only sought when they passed the three tests in S122 of the CIL Regulations (2012). The three tests are:

- a. Necessary to make the development acceptable in planning terms;
- b. Directly related to the development; and
- c. Fairly and reasonable related in scale and kind to the development.

There was also concern that the policies were not flexible enough to take account of changes in viability over time.

There was support for the introduction of CIL although one consultee considered it should not apply to residential extensions or 'self-builders'.

While consultees noted the Infrastructure Delivery Plan in Appendix B, there were concerns that they lack detail (especially on education and open space) as not all the critical infrastructure was identified or was to be identified through other local development documents or masterplanning work. There were also concerns that costs are unknown at this stage. Additionally, there was also a 'holding objection' as the transport evidence base was not complete.

#### Broxtowe Specific Issues

To be added if required

#### Gedling Specific Issues:

- One consultee noted that the Plan did not include a strategy for the use of CIL to fund work on the Gedling Access Road.

#### Nottingham City Specific Issues

### **Key Issues and Officer Response**

#### **1. Whether the ACS needs to make reference to the tests in the CIL Regulations?**

The justification text includes reference to making the development acceptable in planning terms and being fairly and reasonable related to the scheme. As the three tests are taken from the Regulations and included in the NPPF it is not necessary to repeat them in the Policies.

#### **2. Whether more include detail on CIL should be included?**

Detail on CIL will be set out in Charging Schedules which will be subjected to public consultation and independent examination. It is not appropriate to provide details in the Aligned Core Strategies.

**3. Whether there are any gaps in the IDP or transport evidence?**

Since publication of the Publication Version of the Aligned Core Strategies, work on the Transport Assessment has been completed and has been signed off by both the Nottingham City Council and Nottinghamshire County Council as Highways Authority and by the Highways Agency. The Infrastructure Delivery Plan is an evolving piece of work which is intended to identify any infrastructure requirements which would potentially stop a site or area from being developed. Detailed assessments will be undertaken through the masterplanning work and when planning applications are submitted.

DRAFT

## **2. Sites**

### **Broxtowe Sites**

To be added

### **Gedling Sites**

#### **Top Wighay Farm**

Many of the responses regarding the proposals at Top Wighay Farm were from local residents or Linby Parish Council who objected to the decision to identify the site for development. Calverton Parish Council requested that the site be allocated for 1500 dwellings.

One of the key objections is that the site is not sustainable and does not accord with the NPPF. There are poor links to the rest of Gedling Borough and development will create 'island communities' which would not contribute to community health, social and cultural needs or protect the vitality and viability of Hucknall Town Centre. The employment element was similarly criticised by Ashfield District Council for being distant from areas of job need in Arnold and Carlton.

Consultees also considered that there were brownfield sites or sites in or adjacent to Arnold and Carlton which should be developed before Top Wighay Farm, especially given the importance of the site in Green Belt terms.

Concerns were raised regarding the nature of the development and its impact on the surrounding area. The impact on infrastructure, especially roads, health facilities, sports facilities and open space, was a key concern. Consultees considered that the impact would not be addressed by S106 obligations and it would be left to Ashfield District Council to provide the necessary services. Local residents were of the view that the development would be 'executive' houses and would not be affordable. The proposed density of the site was also seen as too high by a number of consultees.

Objection was raised to the requirement for 30% affordable housing for the site, as set out in the site schedules (attached as Appendix A to the Aligned Core Strategy), on the basis that there is no evidence of need in this area and the percentage required fails to take account of provision in Hucknall or where tenants want to live. It was suggested that the affordable housing provision should be tied to Ashfield Council's letting programme. Ashfield District Council identified a number of concerns regarding the viability assessment and the assumption made for it. It was also identified by a local resident that the mitigation required due to the impact on the prospective Special Protection Area might also impact on the viability of the site.

With regards to biodiversity, residents were also concerned with the impact on Local Nature Reserves, Sites of Importance for Nature Conservation (SINCs) and Sites of Special Scientific Interest (SSSIs) in the area. English Heritage also identified a number of heritage assets in the area, including Conservation Areas, Scheduled



Ancient Monuments and Registered Parks and Gardens, and raised concerns with the impact of the site on them.

### **Officer Response**

Following the allocation of the site in the Aligned Core Strategies, detailed masterplanning work will be undertaken which will look to ensure close links between the development site and the existing built up area of Hucknall. This will enable the new residents to integrate with the existing community and make use of nearby facilities and infrastructure. This work will also ensure that there is a mix of housing types on site and that an appropriate level of affordable housing is provided.

Part of the site is currently allocated for housing with the remainder of the site identified as 'safeguarded land' in the Gedling Borough Replacement Local Plan, which removed the site from the Green Belt for consideration for future development needs. The site does not involve the release of Green Belt land for development.

With regards to impacts arising from the proposed development, the cumulative transport impacts of the proposed development in conjunction with other nearby developments have been the subject of extensive modelling work. This work has concluded that appropriate mitigation measures can be put in place to address transport impacts. It is noted that no specific infrastructure was identified in Appendix B to the Aligned Core Strategy (which identifies only critical infrastructure), but full details of other infrastructure requirements are listed in the Infrastructure Delivery Plan.

The requirement for 30% affordable housing for the site is set by the Affordable Housing Supplementary Planning Document, adopted by Gedling Borough Council in 2009. The most appropriate approach to meeting this requirement will be considered through more detailed masterplanning or the planning application for the site.

Regarding the viability assessment for the site:-

- The assumed values are consistent with recent viability work undertaken by HEB for Gedling Borough Council's emerging Community Infrastructure Levy.
- The mix of units is not fixed and will be subject to further discussion.
- The requirement for 30% affordable housing accords with the Council's Supplementary Planning Document, but the final figure will be a matter for negotiation and relate to the overall viability of the site. The appraisal includes scenarios for different levels of affordable housing.
- The appraisals enable broad indicative conclusions on the likely overall viability under a number of scenarios.
- Costs include all normal development costs associated with delivering a 'standard' development including access to the site but not including (for example) major transport interventions.
- The Council are also intending to introduce a Community Infrastructure Levy to support infrastructure requirements across the Borough.

With regards to the request to increase the number of dwellings provided in this location, the figure of 1000 was considered to be appropriate taking account of highways impacts and the prospective Special Protection Area designation.

## **North of Papplewick Lane**

The majority of comments regarding the North of Papplewick Lane sites were made by residents of Linby, Papplewick and Hucknall, and Ashfield District Council.

It was considered that the site has poor links to the rest of Gedling Borough and that development in this location would create an isolated 'island' community. Objectors commented that the site had not been allocated to date. The Green Belt is important in this area in order to preserve the gap between Linby and Hucknall.

With regards to impacts arising from the proposed development, concern was expressed that the development would impact on existing infrastructure (in particular in terms of highway capacity and primary school provision). It was noted that no specific infrastructure was identified in the list of 'critical infrastructure requirements' attached as Appendix B to the Aligned Core Strategies. There were concerns about the impact on wildlife, and pollution in the River Leen. There were also concerns about the impact on Moor Pond Wood from consultees who considered that the proposed development would undermine the hard work of Friends of Moor Pond Wood.

It was considered that the capacity of the site (which Policy 2 states as 600 dwellings) was too high and the site should only accommodate 400 dwellings. Comments were put forward by one of the landowners of the site suggesting that the boundary of the site should be indicative at this stage.

Objection was raised to the requirement for 30% affordable housing for the site, as set out in the site schedules (attached as Appendix A to the Aligned Core Strategy), on the basis that there is no evidence of need in this area and the percentage required fails to take account of provision in Hucknall or where tenants want to live. It was suggested that the affordable housing provision should be tied to Ashfield Council's letting programme.

Two other comments were made by Ashfield District Council in response to the site schedules at Appendix A, raising a number of queries regarding the viability assessment undertaken for the site and commenting on the specified number of landowners of the site.

### **Officer Response**

Following the allocation of the site in the Aligned Core Strategies, detailed masterplanning work will be undertaken which will look to ensure close links between the development site and the existing built up area of Hucknall. This will enable the new residents to integrate with the existing community and make use of nearby facilities and infrastructure.

The site is identified as 'safeguarded land' in the Gedling Borough Replacement Local Plan, which removed the site from the Green Belt for consideration for future development needs. The site does not involve the release of Green Belt land for development. The site was identified for development in the Option for Consultation

stage of the Aligned Core Strategies (2010) and then the Publication Version Aligned Core Strategies (2012).

With regards to impacts arising from the proposed development, the cumulative transport impacts of the proposed development in conjunction with other nearby developments have been the subject of extensive modelling work. This work has concluded that appropriate mitigation measures can be put in place to address transport impacts. It is noted that no specific infrastructure was identified in Appendix B to the Aligned Core Strategy (which identifies only critical infrastructure), but full details of other infrastructure requirements are listed in the Infrastructure Delivery Plan.

In terms of the impact on Moor Pond Wood, the strategic site schedule at Appendix A identifies that significant green infrastructure assets are on the proposed development site and there are opportunities to protect and enhance this on the eastern part of the site adjoining the River Leen and Moor Pond Wood. It will be suggested that any developer involves the Friends of Moor Pond Wood at an early stage in this enhancement work.

The indicative capacity of the site reflects the conclusions of the Sustainable Urban Extension Study (June 2008). The capacity of all allocated sites will be reviewed as more detailed work is undertaken which will identify specific site constraints and opportunities. Given specific issues with the capacity of this site it is proposed to amend the reference to the site capacity to 'up to 600 homes'. Any shortfall would need to be accommodated elsewhere in the Borough.

The requirement for 30% affordable housing for the site is set by the Affordable Housing Supplementary Planning Document, adopted by Gedling Borough Council in 2009. The most appropriate approach to meeting this requirement will be considered through more detailed masterplanning or the planning application for the site.

Regarding the viability assessment for the site:-

- The assumed values are consistent with recent viability work undertaken by HEB for Gedling Borough Council's emerging Community Infrastructure Levy.
- The mix of units is not fixed and will be subject to further discussion.
- The requirement for 30% affordable housing accords with the Council's Supplementary Planning Document, but the final figure will be a matter for negotiation and relate to the overall viability of the site. The appraisal includes scenarios for different levels of affordable housing.
- The appraisals enable broad indicative conclusions on the likely overall viability under a number of scenarios.
- Costs include all normal development costs associated with delivering a 'standard' development including access to the site but not including (for example) major transport interventions.
- The Council are also intending to introduce a Community Infrastructure Levy to support infrastructure requirements across the Borough.

It is recognised that the site is owned by three separate landowners.

In response to the request that the boundary of the site should be indicative at this stage, the site is being considered as an allocation in the Aligned Core Strategies and as such precise boundaries must be identified.

## **Bestwood Village**

The majority of comments regarding Bestwood Village as one of the key settlements for growth were made by residents of the village. Concerns were expressed about the scale of growth proposed and that further development could lead to a loss of community identity. Comments referred to the village doubling in size in the past 30 years and to significant new housing developments occurring in the recent past. Some residents expressed views that the scale of development should be meaningful, relate to local needs and help the village thrive. One respondent commented that the type of housing to be provided should be flats with allotments and courtyards.

Ashfield District Council commented that the Tribal Study had indicated that low levels of growth could be supported at Bestwood and felt that the 66% increase in the housing stock was inconsistent with this study.

Representations from developers/landowners supported Bestwood as a key settlement for growth. One of these consultees considered the housing figure should be increased to 650 homes and that Bestwood Business Park should be developed for housing. One developer also considered that specific sites especially Westhouse Farm should be identified as strategic allocations in the aligned Core Strategy. There were a number of objections opposing potential development sites including at Broad Valley Farm and Keepers Close.

A number of consultees considered that the development would impact on local infrastructure and that there was a lack of existing services and facilities such as shops and public transport. In particular consultees raised concerns about development impacting on:

- Traffic (including on Moor Road);
- Parking problems;
- Sewers, drains and water;
- Schools (primary and secondary); and
- Leisure facilities.

Consultees also objected to the loss of Green Belt land and also to the loss of agricultural land. Flood risk issues were also raised in the context that development could give rise to increased flood risk. The impact on the historic environment was also identified by English Heritage with reference to the Bestwood Conservation Area and the Winding House and Headstocks at the former Bestwood Colliery which is a listed building and Scheduled Ancient Monument.

The Environment Agency identified that there were no Pollution Prevention Control site issues but there are various waste licences issued in the area and the Bestwood Landfill site is located just within the area where there could be issues relating to gas emissions.

### **Officer Response**

Bestwood Village is considered a sustainable settlement for growth and relates well to the principal urban area of Nottingham. There is potential to extend the village to the north and north-east which would not lead to any risk of coalescence with Hucknall. With respect to the point made by Ashfield District Council, the Aligned Core Strategies expresses the housing provision at Bestwood Village as a maximum amount and the exact scale of development will need to be fully assessed through the preparation of the more detailed site specific development plan. Any shortfall would need to be addressed elsewhere in the Borough.

It is not necessary to allocate sites around Bestwood including Westhouse Farm as strategic site allocations in the Aligned Core Strategy as they are not considered central to the delivery of the core strategy. Smaller sites will be subject to site selection process as part of the preparation of the Site Specific Development Plan Document which will be used to allocate sites in consultation with the local community and other key stakeholders including adjoining Councils. In this context, arguments for and against specific sites are a matter for a later stage of the planning process. The site specific development plan will also be augmented through detailed masterplans prepared in consultation with local residents to ensure that the future development is integrated fully with the existing community.

Policy 8 of the Aligned Core Strategy refers to housing size, mix and choice. The policy states that future residential development should maintain, provide and contribute to a mix of housing tenures, types and sizes in order to create mixed and balanced communities.

Appendix A of the Aligned Core Strategy sets out the infrastructure requirements for Bestwood (these are set out in more detail in the Infrastructure Delivery Plan). This indicates that some upsizing of sewers is likely to be required. A Transport Assessment has been carried out which has taken into account the transport impacts arising from the Bestwood Village proposals together with other development proposed in the area and concludes that appropriate mitigation measures can be put in place to address traffic impacts.

Policy 11 of the Aligned Core Strategy identifies Conservation Areas and listed buildings as important historical assets which are to be conserved and enhanced. Masterplanning will ensure proposals are designed to avoid any adverse impacts on the historic environment including the Bestwood Conservation Area and where appropriate seek opportunities for the enhancement of these historic assets.

The River Leen is located to the west of the village and flood risk is considered low. However, further discussions with the Environment Agency will take place during the masterplanning phase as more detailed proposals emerge.

Whilst there are no abnormal contamination requirements, any issues relating to gas emissions from the former Bestwood Landfill site will be addressed through the forthcoming Site Allocations Development Plan Document.

## Calverton

Many of the comments regarding the proposals at Calverton were received from local residents. Comments from Calverton Parish Council considered that the proposal is a late reactionary change and is less sustainable than other options such as increasing the scale of growth at Top Wighay Farm. It was viewed that the proposal at Calverton was not consistent with the National Planning Policy Framework. There was support from others for the identification of Calverton as a key settlement.

A number of comments requested a reduction of the housing figure for Calverton. It was considered that the numbers are disproportionate to local need, that the village has already had its fair share of development and that the views of locals have been ignored. It was not viewed that there was a specific regeneration need within the village. There were objections to development to the south-west of village in the Georges Lane/Hollinwood Lane area.

Concerns were expressed that the sense of community and the rural nature of the area will be lost and that it will become dormitory village for Nottingham.

Other residents commented that there is existing development unsold in the village and that 1300 new dwellings is unrealistic as developers will not want to build that many in Calverton. It was viewed that the figure purely related to Strategic Housing Land Availability Assessment and not to infrastructure capacity.

With regards to the impacts arising from the proposed development, concern was expressed that there was no reference to phasing of development or how it would impact on existing infrastructure. In particular, it was considered that there was insufficient highway capacity to accommodate the proposed growth. Consultees raised particular concerns about development impacting on:

- Health (GP and dentists);
- Education;
- Car parking;
- Jobs/employment opportunities;
- Water, drainage and sewage system; and
- Shops and community facilities.

It was commented that developer contributions for infrastructure in Calverton should be used to remediate brownfield sites and that brownfield sites should be developed first.

Consultees also objected to the loss of green belt land, countryside and agricultural land. Increased flood risk was also raised. The Environment Agency confirmed that the village is approximately one km west of Burnstump Landfill with an operational Household Waste Centre and there are various waste licences issued in the area.

Comments were also made concerning the impact on recreational amenity, the natural environment and biodiversity and natural habitats. It was viewed that a more conservative approach was needed for the Special Protection Area and that

mitigation needed as a result of the Special Protection Area means sites may not be viable.

English Heritage confirmed the presence of the Conservation Area and three Scheduled Ancient Monuments.

### **Officer Response**

Calverton is viewed a sustainable settlement for growth and relates well to the principal urban area of Nottingham. The proposed housing distribution is supported by available evidence and the approach is based on previous work and consultation undertaken. The Greater Nottingham Sustainable Locations for Growth report February 2010 identifies that there is potential for growth towards the northwest, west, southwest, south and east of the village. Constraints to growth such as flood risk to the north east, Grade 2 agricultural land and local risks of coalescence have all been taken into consideration.

The views of local communities together with national policy, green belt, sustainability, land availability and delivery issues were all considered before development at Calverton was proposed. The Sustainability Appraisal for the Aligned Core Strategy whilst favouring a strategy of urban concentration does not identify significant sustainability problems with higher levels of growth outside the main built up area. Directing growth to this area will facilitate further investment on regeneration grounds, provide support for local facilities and help meet the objectively assessed housing need.

The Strategic Housing Land Availability Assessment has established the amount of land available in the Borough that is potentially suitable, available and achievable for development. This includes an assessment of brownfield land. The Aligned Core Strategies identifies only the strategic sites. The smaller sites that are needed in addition to these to meet the housing requirement, including those around Calverton, will need to be formally identified and consulted on through subsequent Development Plan Documents.

Appendix A of the Aligned Core Strategy sets out the infrastructure requirements for Calverton (these are set out in more detail in the Infrastructure Delivery Plan). No major infrastructure constraints to development are identified. The location of the prospective Special Protection Area near to Calverton will require careful management, including mitigation measures as set out in the Habitats Regulation Assessment Screening Report (February 2012). Phasing of development and contributions relating to school provision will be particularly important to ensure capacity meets development need. Further assessment of transport impacts and mitigation measures is required including dialogue with all infrastructure/service providers as more detailed proposals emerge.

The Sustainability Appraisal appendices will be updated to refer to Scheduled Ancient Monuments and Listed Buildings in the vicinity of Calverton.

## **Ravenshead**

The majority of comments regarding Ravenshead as one of the key settlements for growth were made by residents of the village. It was felt that the level of development here did not accord with the strategy of urban concentration. Brownfield and urban fringe sites should be developed first and that the limit of expansion of the village has been reached. Many consultees felt that Ravenshead has had its fair share of development and cannot accommodate any more houses.

One consultee considered that development to the north is beyond the natural boundary of the village and development to the south is too far from the village centre. Ravenshead Parish Council suggested that the boundary of development should be defined as west of the A60 and North of Ricket Lane and Main Road.

Newark and Sherwood District Council stated that the cumulative impact of the proposed development on Blidworth should be considered.

It was identified that the proposed development at Ravenshead was distant from employment opportunities in Nottingham City and that there is a lack of employment in the village.

Consultees considered that there is lack of funding from Gedling Borough Council to support the community and that new infrastructure should be in place before new development occurs. A number of consultees raised the impact on local infrastructure such as:-

- Highways and public transport (Larch Farm junction and Milton Court identified as specific areas of concern);
- Local schools and youth services;
- Health facilities specifically doctors;
- Parking in the village centre; and
- Recreation and leisure spaces.

One consultee stated there is a lack of housing need in Ravenshead as shown by the 2011 Census while another consultee considered that there is a need for bungalows, low density family housing and elderly accommodation. One consultee would like to see a reduction in the housing number to 216 (100 new dwellings plus 116 commitments).

Environmental issues were raised. Consultees were concerned with the loss of rural lifestyle and impact on the character of the village. English Heritage identified that there are few designated heritage assets but Newstead Abbey Park borders the west of the village.

### **Officer Response**

The Borough remains committed to the long term policy of urban concentration and regeneration. Development will be focused, where possible, in or adjoining the existing built up area of Nottingham, then adjoining the Hucknall Sub Regional Centre, and then in or adjoining the identified Key Settlements. The Site Specific Allocations Development Plan Document will allocate non-strategic sites and identify settlement boundaries. There will be public consultation on this document.



Appendix A of the Aligned Core Strategy lists out the infrastructure requirements for Ravenshead (and set out in more detail in the Infrastructure Delivery Plan). This will be revisited when specific sites are known to ensure that new or improved infrastructure is provided to ensure the impacts of new development are acceptable and there will be further dialogue with infrastructure providers. In addition, it is proposed to work closely with Newark & Sherwood District Council to better understand the potential impacts on Blidworth and how these can be addressed.

Policy 8 of the Aligned Core Strategy refers to housing size, mix and choice. The policy states that future residential development should maintain, provide and contribute to a mix of housing tenures, types and sizes in order to create mixed and balanced communities. The site specific development plan document will ensure that the new houses take into account the housing requirements of Ravenshead.

### **Gedling Colliery/Chase Farm and Mapperley Golf Course**

A number of comments were made regarding the Gedling Colliery/Chase Farm site, the majority from residents objecting to other sites allocated for development in the Aligned Core Strategies.

In particular, it was noted that Gedling Colliery is a brownfield site in need of regeneration. It should, therefore, be built before green field sites are developed. There should be a clear strategy for bringing the site forward and consultees asked what number of houses could be achieved prior to constructing the Gedling Access Road.

Objectors sought more detailed evidence to demonstrate the viability of the site. With regards to the proposal previously put forward by the Council to bring forward Mapperley Golf Course in conjunction with the Gedling Colliery/Chase Farm site to improve the viability of the scheme, comments were received both welcoming the decision to no longer develop the Mapperley Golf Course site and suggesting that the Golf Course should continue to be identified for development.

It was suggested that the Community Infrastructure Levy, being introduced by the Council, should be used to help fund the Gedling Access Road and therefore assist the deliverability of the site within the plan period.

#### **Officer Response**

The Council fully recognises the merits of the Gedling Colliery/Chase Farm site as a key regeneration site on the urban edge of Nottingham. This is why the site remains included in the Aligned Core Strategies albeit not identified for development within the plan period. In order to identify the site for development within the plan period, the Council must be able to demonstrate that development is achievable. The current economic difficulties mean that comprehensive development is not considered achievable at present but the site remains available and suitable.

Recent financial appraisals undertaken by the promoters of the Gedling Colliery site have assessed a combined Gedling Colliery/Chase Farm/Mapperley Golf Course scheme as being potentially viable but subject to significant risks and that the

Council would have to accept far more houses than desirable on the Golf Course and a smaller proportion of affordable homes. The appraisal also showed that there was a significant up front funding gap (around £10m) relating to the Gedling Access Road for which there was not an identified source of funding. The risks of development mean that without alternative public funding the site is not considered deliverable.

With regards to setting out a clear strategy for bringing forward the Gedling Colliery/Chase Farm site, extensive work has been undertaken on how the site should be developed through the planning application submitted previously. However, the key issue remains viability and, as such, the Council will continue to explore potential sources of public funding and alternative approaches to improving the viability of the scheme.

Whilst it is technically possible that a number of dwellings could be brought forward in the short term in advance of the Gedling Access Road, this approach would undermine the delivery of the comprehensive scheme as those dwellings would not be able to make a financial contribution to the long term road scheme. It may be that this position can be reviewed once the Council has adopted its Community Infrastructure Levy, but any additional development in this location would need to have an acceptable highways impact.

### **New Farm / Redhill**

Two property development companies felt that consideration should be given to the New Farm/Redhill site. The allocation of New Farm/Redhill site as a strategic location for 428 dwellings and a strategic employment park at Leapool Island would accord with the concentration strategy in Policy 2, can be accessed from Mansfield Road (A60) and a holistic approach to traffic management which could lead to a reduction in traffic congestion.

The site was not identified in the ACS due to lack of access to the A60 and air quality. Gedling Borough Council Conservative Group stated that residents at Top Wighay Farm and North of Papplewick Lane sites would use the A60 because they do not have access to public transport.

### **Officer Response**

The Appraisal of Sustainable Urban Extensions study (2008) noted that access to the site relies on a connection to Mansfield Road. The study also stated that to improve accessibility, new bus routes would be needed into the site, providing direct links to Arnold centre and Nottingham City Centre via Mansfield Road.

The difficulties of being able to provide access to the site without further compromising the movement of vehicles on Mansfield Road, mean that this site would be difficult to deliver without significant highway improvements. Discussions have been ongoing with the County Council over many years to identify possible solutions but the layout of the current road network is such that no solutions have been identified and it is concluded that no solutions are likely to be forthcoming in the plan period.

The impact on air quality from more standing vehicles is also important. An area of Mansfield Road in the Arnold/Daybrook area has been identified as an Air Quality Management Area. Given the air quality and highway capacity issues the site was not recommended for allocation in the Aligned Core Strategies.

## **Teal Close**

Comments were promoting a major mixed use development opportunity at Teal Close. The development site proposed includes existing housing and employment allocations, the safeguarded land allocation and an additional area of Green Belt.

The comments note that the site accords with the strategy of urban concentration. Identifying land at Teal Close for development would enable there to be less reliance on locations further from the main Nottingham conurbation including the more rural villages, which are considered to be less sustainable and will have a proportionally greater impact on the locality than a site on the edge of the main urban conurbation.

There are no known constraints to development other than the existing planning policies for the site. It is envisaged that development could commence within 5 years if the site were to be included as a Strategic Allocation.

The proposal could comprise a mixed use scheme, which might include retail uses, homes (including 10 – 30% affordable housing), employment (B1b and B1c), a hotel and a care home. The scheme could provide low skilled flexible shift work (within the retail and C2 type use) to meet local needs in Netherfield and Colwick and include start up/grown on space in order to continue Gedling's offer for small scale firms.

### **Officer Response**

The sustainability of development in this part of the Borough has long been recognised by the Council, and led to the allocation of land for housing (400 dwellings) and employment uses through the 2005 Gedling Borough Replacement Local Plan. It is acknowledged that development in this area accords well with the spatial strategy of urban concentration with regeneration set out in the Aligned Core Strategy, being located on the edge of the main Nottingham conurbation.

It is understood that the proposals being put forward include the existing Local Plan allocations but also look to revisit the employment allocations (in terms of size and location), safeguarded land and an area of adjoining Green Belt.

In order to bring forward development in this location, sufficient evidence would need to be provided in order to demonstrate that the site could be delivered within the plan period and the extent of evidence required would depend on whether the site would be brought forward within the first five years (as a strategic allocation) or later in the plan period (as a strategic location). This would reflect the approach taken for other sites included in the Aligned Core Strategy (and summarised in Appendix A). In addition to the capacity of local infrastructure to be assessed (in terms of utilities, health and community facilities, schools etc), there are a number of specific issues relating to this location, as follows:-

- Highways – in order to assess the highway impacts of the site both in isolation and in conjunction with other sites being proposed in the Aligned Core Strategy.
- Flooding – the site is affected by flood risk until the Left Bank Flood Alleviation Scheme is in place. A detailed flood risk assessment would be required to address this issue.

Whilst the Borough Council recognise the benefits of the site there are a number of issues which remain to be addressed. It is understood that these cannot be addressed before the Aligned Core Strategies are to be submitted to the Secretary of State. Given this, it is considered that the site is unable to be included in the Aligned Core Strategies.

### **Daybrook Laundry/Brookfields Garden Centre/Willow Farm**

A site at Willow Farm, Gedling for up to 200 homes was identified for inclusion in the Aligned Core Strategies. The site developer considered it could potentially contribute financially to the Gedling Access Road although it could be accessed based on the current highway capacity. They considered that the site is not agriculturally valuable or affected by nature conservation designations and the loss of a small part of the mature landscape area is justified.

Other sites identified for inclusion in the Aligned Core Strategies were:

- Daybrook Laundry; and
- Brookfields Garden Centre

### **Officer Response**

These sites are below the threshold for inclusion in the Aligned Core Strategies. Their allocation will be considered through the Site Specific Allocations Development Plan Document. It should be noted that Daybrook Laundry already has planning permission for 115 homes while the Brookfields Garden Centre site has been previously considered for development through the Replacement Local Plan.

### **Nottingham City Sites**

- There were a large number of responses critical of development south of Clifton (in Rushcliffe Borough).
- The Environment Agency recommended that in the Waterside Regeneration Zone, the area around Eastcroft and the energy from waste facility should not be developed for residential purposes, whilst English Heritage raised concerns that development in the Regeneration Zones may impact on conservation objectives.
- The Environment Agency were concerned that there may be existing developments at the north end of the Boots site which would impact on residential amenity should residential development go ahead
- A respondent considered that the riverscape proximity to Boots site should not be impinged upon.
- A respondent was critical of development at Broxtowe Country Park and of land off Woodhouse Way

- Landowners and developers considered that Basford Gasworks, the Bus Depot, Land off Woodhouse Way and Woodyard Lane should be allocated.
- Graham Allen MP considered that the City has little informal open sites; perhaps some if not all of Stanton Tip could be re-designated, to part compensate for any Green Belt lost further out.
- One resposdee considered that the consultation regarding Stanton Tip was not efficient and not effective.
- Additionally, there were several omission sites put forward which are located in the surrounding local authorities.

### Key Issues

#### **1. Whether residential development within parts of strategic sites should be precluded for residential amenity reasons?**

The strategic sites will be subject to more detailed development briefs/masterplans, and the disposition of uses within then is a matter for these subsequent documents.

#### **2. Whether sites identified by representations should be excluded or included.**

New sites proposed within Nottingham City's area are too small to be considered strategic, and are therefore more appropriately considered as part of the City Council's Land and Planning Polices DPD. Development at Broxtowe Country Park, and at Nottingham Business Park west of Woodhouse Way were included in the Issues and Options of the Land and Planning Policies DPD, and are not a matter for the Core Strategy. The Strategic Site at Stanton Tip is a longstanding Local Plan development allocation, and has been subject to considerable consultation. Constraints within and adjacent to the site mean that significant open space will need to be provided as part of the development. Development south of Clifton is a matter for the Rushcliffe Core Strategy.

### 3. Appendices and Glossary

#### **Appendix A: Strategic Site Schedules and Plans**

Note: Only 'common' issues are included here. Comments about specific sites are addressed under 'Sites'

- The Transport Assessment should be updated;
- Shortfall in health provision should be addressed alongside proposed development;
- If Carbon Zero homes can't be achieved the number of dwellings should be reduced;
- Affordable Housing should be flexible and include a mix of tenures
- No evidence on how percentages for Affordable Housing has been arrived at;
- Draft masterplans should be produced to demonstrate allocations proposed are realistic and deliverable;
- Ensure a consistent approach to site costs;
- Western Power Distribution would normally expect:
  - Developers to pay to divert circuits operating a 11kVs or below; and
  - The position of strategic electricity circuits (33kVs – 132kVs) to be retained.
- Western Power Distribution should be consulted at an early stage, especially where there is a substation on site. There is generally no restriction on the type of development provided statutory minimum clearances and access can be maintained.
- English Heritage requested that information regarding the heritage assets in close proximity to sites or locations for growth be included in the site schedules.

#### **Appendix B: Critical Infrastructure Requirements**

The Highways Agency noted that Appendix B principally includes highway infrastructure that is already committed. There is limited reference to the need for any other highway infrastructure that is required within the plan area to support growth. It is possible that further highway infrastructure requirements will be identified through on-going preparation of the transport evidence base by the authorities or by master planning work and preparation of transport assessments in conjunction with the planning process.

#### **Appendix C: Housing Trajectories**

##### Common Issues

- The trajectory does not accord with the NPPF and should be reissued based on the policies of the ACS and the need to have a five year land supply;
- Sites under 500 houses should be fully addressed and smaller sites allocated;
- A buffer of either 5% or 20% should be included.

##### Broxtowe Specific Issues

To be added if required

##### Gedling Specific Issues

- There are inconsistencies over the start dates of a number of sites
- Evidence should be provided regarding the Windfall allowance

- Sites in Ravenshead are able to deliver in the first five years and should not be shown as coming forward after 2018

#### Nottingham City Specific Issues

None

#### Key Issues and Officer Response

##### **1. Does the Trajectory accord with the NPPF**

A new paragraph 3.2.10 has been added to better explain the approach to the trajectory and table in Policy 2.3. The addendum to the Housing Background Paper will be produced to expand on this as well.

##### **2. Whether the Councils have a five year land supply including a buffer of either 5% or 20%.**

This is addressed under Policy 2.

#### **Appendix D:**

##### Broxtowe Specific Issues

To be added if required

##### Gedling Specific Issues

None

##### Nottingham City Specific Issues

NHS Nottingham City stated that other policy areas should be ticked against the Healthy Nottingham priority as they are also determinants of the health targets within the Sustainable Communities Strategy.

#### **Appendix E: Saved Policies from Adopted Local Plans**

##### Broxtowe Specific Issues

- The relationship between the MLAs and the Landscape Character Assessment will need to be examined at a later date. The means of replacing the MLA policy is not clear;

##### Gedling Specific Issues

- The relationship between the MLAs and the Landscape Character Assessment will need to be examined at a later date. The means of replacing the MLA policy is not clear;
- ENV14 should be saved as it makes specific reference to the use of buildings;
- ENV15 should be saved as it provides detailed guidance on important open areas.

##### Nottingham City Specific Issues

None

#### **Glossary**

- The definition of 'economic development' from the NPPF should be included;
- The definition of 'primary shopping frontages' should be amended as it is unnecessarily constraining;

- A definition of 'primary shopping areas' should be included;
- The use of 'town centres' as both a specific and generic term is potentially confusing.

Officer Response.

The NPPF definitions of 'economic development' and 'primary shopping areas' will be included. The definitions of 'primary shopping frontages' and 'town centres' are taken directly from the NPPF. As such it is not appropriate to change them.

DRAFT



## 4. Habitats Regulations Assessment

### Summary of Representations

#### Common Issues

There was objection to proposals to develop on farmland as this is needed to produce food and supports wildlife. Natural England considered that the document appeared to draw reasonable conclusions and the Aligned Core Strategies had responded to the process and the findings.

#### Broxtowe Specific Issues

##### Gedling Specific Issues:

Ashfield District Council raised a number of issues related to the 'in combination' assessment of the impact on the prospective Special Protection Area. They are concerned that account has not been taken of the sites proposed for development in the Hucknall area including the Rolls Royce site.

#### Nottingham Specific Issues

### Key Issues and Officer Response

#### **1. Whether all appropriate sites have been included as part of the 'in combination' assessment.**

##### Officer Response

At the time the HRA was undertaken Ashfield District Council advised the consultant undertaking the assessment that details of sites was not available. Ashfield District Council have now progressed work on their sites to a point where they are able to be assessed as part of the HRA. Discussions are ongoing with Natural England to establish whether the potential affect of development promoted through the Aligned Core Strategies in combination with proposals within Ashfield District Council would result in an adverse effect on the prospective Special Protection Area. If this is the case, then an addendum to the HRA would be prepared.

In general terms, Natural England is satisfied that Gedling's risk based approach has followed their advice using a process similar to that used in HRA, to test the policies and allocations within the Aligned Core Strategy to see if they could result in a significant effect on the prospective SPA. The assessment has taken a precautionary approach, including an assessment of 'in combination' effects and where risks have been identified measures to mitigate for any adverse effects have been built into the plan.

## 4. Equalities Impact Assessment

### Common Issues

None

### Broxtowe Specific Issues

To be added if required

### Gedling Specific Issues:

Consultees noted that no assessment had been made of the impact on lower income households of being some distance from Gedling's urban area and Councils services. Protected characteristics may feature disproportionately in lower income households and be more vulnerable or reliant on Council services.

### Nottingham Specific Issues

None

## Key Issues and Officer Response

### **1. Whether some protected characteristics will be disadvantaged by being located away from the main urban areas of Gedling and access to Council services?**

There is no evidence that lower income groups will be located away from the main urban areas of Gedling as the type of housing has not yet been determined. While affordable housing is usually delivered on site, the Affordable Housing SPD (2009) allows for off-site contributions in certain circumstances such as where there is less evidence of need in the immediate locality and the contribution could better used elsewhere in the Borough where a need has been identified.

New or improved services will be provided through the Aligned Core Strategy (see Policy 12.1) particularly to support major new residential development. The most appropriate way to provide Borough Council services to the areas of major residential development will need to be identified. In other instances a flexible approach has been taken to the provision of services, for example, the provision of refuse collection in Bulcote by Gedling Borough Council on behalf of Newark & Sherwood District Council and the Nottinghamshire County Council Contact Point in the Civic Centre.

## 5. Sustainability Appraisal

### Common Issues

Natural England considered that the SA sets out the stages in the process, draw reasonable conclusions and the plan has responded to the process and findings.

However, a number of concerns have been raised by consultees on the SA process and the outcomes, these are:

- § signs that the process has been used as a post hoc justification for decisions and that it has not been an integral part of the planning making process.
- § concerns about the SA objectives chosen and that more weight should have been given to environmental considerations.
- § criticism that the colour coding scheme that is used is arbitrary.
- § criticism that the team producing the SA was not sufficiently independent of the policy writing process.
- § concerns were also raised that insufficient clarification is given on some of the alternative growth options such as medium and low growth option.
- § an assessment of a phasing policy should also have been included.
- § an assessment of alternative growth strategies including the more flexible approach to PUA/Non PUA should have been included
- § SHLAA sites should have been assessed as part of the SA.
- § concerns about the consistency of the site appraisals were also raised

### Broxtowe Specific Issues

To be added if required

### Gedling Specific Issues:

Ashfield District Council and a group of local residents raised a number of issues with the Gedling element of the Sustainability Appraisal. These were:

- A lack of consistency between assessment and objectives;
- The failure to assess alternative sites including those in or adjacent the main urban area and those available at the time the deliverability of Gedling Colliery was identified as an issue;
- The assessment of the 'low growth' and 'high growth' scenarios and the scores for crime, heritage and employment;
- The assessment of the Sustainable Urban Extensions have not taken into account a number of issues:
  - The impact on health and community services;
  - The extension of the NET and public transport schemes;
  - Social implications;
  - Lack of school provision to the north of Hucknall;
- No explanation as to why North of Redhill, East of Lambley Lane and Gedling Colliery have been rejected;
- Issues with the assessments of the Key Settlements:
  - Infrastructure issues;
  - Loss of agricultural land;
  - Increased size of the villages; and

- Three Scheduled Ancient Monuments in the Calverton area but not identified in the SA.

### Nottingham Specific Issues

None

## **Key Issues and Officer Response**

### **1. Whether the SA has been undertaken in accordance with SA/SEA requirements?**

The SA has been an integral part of the plan making process as set out in paragraphs 2.25-2.33 of the SA Publication Version report which shows the various stages of the SA process.

The objectives (criteria) used are made up of five social, five environmental and four economic objectives and used across Nottinghamshire. The five Environmental objectives are

- 1) Environmental, Biodiversity and Green Infrastructure;
- 2) Landscape;
- 3) Natural Resources and Flooding;
- 4) Waste; and
- 5) Energy and Climate Change.

Public consultation was held on the SA Framework at the Scoping Stage in 2009. The objectives (criteria) were adjusted as a result of feedback from consultees at the Scoping Stage, as well as the Option for Consultation stage.

Appendix 5 of A Practice Guide to SEA (2005) states that objectives (criteria) can be expressed so that they are measurable. The achievement of objectives is measured by using indicators. Furthermore, the Appendix states that some objectives may be more important than others and it may be worthwhile to give a rough ranking of objectives or highlight those which are judged to be particularly important (for instance because current conditions are problematic or because they are of particular concern to the public) to help focus the later stages of the SEA. However, in response to the criticisms about weighting objectives, it was not considered appropriate to give environmental criteria greater weight than another as the SA process is looking to ensure that the ACS is balanced in sustainability terms against the three themes; social, economic and environmental.

In any event, the objectives/criteria are only meant to give a representation of the outcomes, ie a tool to inform the decision making process, rather than a decision making tool in its own right.

Paragraph 2.20 of A Practice Guide to SEA (2005) states that the Directive does not prescribe who is to carry out an SEA, but normally it is the task of the Responsible Authority, i.e. the body which prepares and/or adopts the plan. Paragraph 2.21 states that it is helpful to involve people, either within the Responsible Authority or outside, who are not directly concerned in producing the plan or programme and can contribute expertise or a detached and independent view. Paragraphs 2.29-2.33 of the SA Publication Version report describe the SA process.

Workshop 1 consisted of planning officers and other stakeholders with SA expertise, for example, a transport and accessibility planner and an ecologist. Workshop 2 involved a wider group of people to ensure there was a balance of environmental, economic and social views. Workshop 3 again involved a cross section of professional officers from different organisations including Derbyshire County Council and the Environment Agency.

Those involved in producing the SA were not directly involved in policy word drafting but it was also important that officers who know the issues and sites were also involved to ensure credible assessments could be made.

The colour coding is a simplified representation of the SA outcome for illustrative purposes and needs to be read alongside the text of each appraisal which sets out the findings in more detail. Tables such as this, and the approach to the SA generally, were supported by the Council's nationally recognised consultant (Levett-Therivel), and used in other adopted Core Strategies.

## **2. Whether further alternative strategies (phasing, alternative growth strategy) should have been undertaken?**

The guidance is clear that the SA should help to show that the plan is the most appropriate given the reasonable alternatives available. Paragraphs 7.20-23 of the SA Publication Version report specifically examine the impact of going for different spatial strategies including the proposed strategy of urban concentration with regeneration and an alternative more dispersed development strategy.

One consultee felt that the SA should examine a phasing policy. The plan does not have a phasing policy. The reason for this is that a range of sites for development need to be available across the plan area to meet both the short term and long term requirements. To include a phasing policy would slow housing delivery and therefore not accord with government policy. It cannot therefore be a 'reasonable alternative option' and a SA appraisal of this is not required.

Paragraphs 8.1-8.2 of the SA Publication Version report explain the process of identifying strategic sustainable sites and locations. The SUE Study (2008) provided advice on the most suitable location or locations for the development of Sustainable Urban Extensions (SUEs) adjacent to the PUA, as well as the Sub-Regional Centres of Hucknall and Ilkeston. All strategic sites identified in the SUE Study (i.e. potentially suitable sites and potentially unsuitable sites) were appraised, as well as other sites suggested by consultees. The Sustainable Locations for Growth Study (2010) provided information on the pros and cons of accommodating growth in different areas outside the PUA. During the Issues & Options and Option for Consultation stages, consultees were given opportunities to comment on identified sites or suggest alternative sites. Further details can be found in the Councils' Statement of Consultation documents.

It should be noted that several of the strategic sites identified in the ACS have previously been included as allocations in adopted Local Plans and are rolled forward as such (see paragraph 3.2.13 of the ACS) or were designated as safeguarded land for future development.

The sustainability of the overarching strategy, the strategic sites which have been allocated and the strategic locations have all been assessed as part of the SA process. Alternatives to each of these have also been assessed. Sites which do not fall under one of these categories due to size do not need to be assessed as part of the SA on the Aligned Core Strategies.

It is important to note that subsequent Development Plan Documents will identify smaller housing sites (mainly made up of SHLAA sites) and will also be subject to a Sustainability Appraisal process. These documents will also identify the specific sites which will be allocated as part of the 'strategic locations'. Paragraph 3.2.13 of the Aligned Core Strategies provides further detail on this issue.

### **3. Whether the appraisals are consistent across the plan area?**

While individual Councils took the same approach to appraise their sites and settlements, using the SA Framework and advice from other stakeholders, it is acknowledged that there are differences between the assessments done by each Council as there are different issues in each of the Districts and different issues with the sites and locations although there may be similarities between them. It was considered that the SA process would be more robust if officers with local knowledge were involved in the appraisal process. This is considered to be a strength, giving more credible results. As a consequence, comparison between sites within different Council areas is less straight forward than might otherwise be the case, however overall the results are generally consistent.

It should also be noted that the SA is just part of the plan making process, and should not be seen as the only reason to choose or disregard alternative options or sites. Much wider issues also have a role to play in determining the choice of sites and these need to be taken into account, including the extensive evidence base.

### **4. Whether sufficient clarification is given on some of the alternative growth strategies?**

The medium growth option is the level of growth that is proposed in the Publication Version. At paragraph 7.26 of the SA Publication Version report, it explains that this equates to the Aligned Core Strategies 'Option for Consultation' scenario of circa 52,000 (including Rushcliffe) dwellings which is roughly equivalent to the RS growth figure. This level of growth is the objectively assessed housing need for the plan area (i.e. not including Rushcliffe Borough), as set out in the document and background papers (Housing Background Paper June 2012 & Household Projections Background Paper June 2012). The SA measures the sustainable outcomes of each alternative option/site. Its role is not to make an assessment of the objectively assessed housing needs of the plan in its own right.

The assessment of the growth options set out in paragraphs 7.7-7.11 of the SA Publication Version report should be read as a whole and sets out the impact of the three different growth options considered against all of the SA objectives. In particular paragraph 7.11 sets out the impact of the low growth option and how this would not meet the needs of the local population (using the 2008 based household

projections) and that out migration would be likely as there would be insufficient housing.

#### **5. Whether the SA for Gedling Borough is appropriate?**

Paragraphs 8.1-8.2 of the SA Publication Version report explain the process of identifying strategic sustainable sites and locations. The Sustainable Urban Extensions (SUEs) Study (2008) provided advice on the most suitable location or locations for the development of SUEs adjacent to the Principal Urban Area (PUA), as well as the Sub-Regional Centres of Hucknall and Ilkeston. All strategic sites identified in the SUE Study (i.e. potentially suitable sites and potentially unsuitable sites) were appraised, as well as other sites suggested by consultees. The Sustainable Locations for Growth Study (2010) provided information on the pros and cons of accommodating growth in different areas outside the PUA. During the Issues & Options and Option for Consultation stages, consultees were given opportunities to comment on identified sites or suggest alternative sites. Further details can be found in the Borough Councils' Statement of Consultation document.

It should be noted that several of the strategic sites identified in the ACS have previously been included as allocations in adopted Local Plans and are rolled forward as such (see paragraph 3.2.13 of the ACS) or were designated as safeguarded land for future development.

The sustainability of the overarching strategy, the strategic sites which have been allocated and the strategic locations have all been assessed as part of the SA process. Alternatives to each of these have also been assessed. Sites which do not fall under one of these categories due to size do not need to be assessed as part of the SA on the Aligned Core Strategies.

The findings of the appraisals of the ACS growth option are summarised in paragraphs 11.7-11.37 of the SA Publication Version report. Paragraphs 11.4 and 11.5 looked at high and low growth scenarios for comparison purposes.

The requirement for all new development to be built according to 'Designing Out Crime' standards will be noted in the appraisals for low and high scenarios. Scores for heritage will be reflect the commentary in the appraisals. The score for the employment objective for the low growth scenario will be corrected. However, the revisions would not change the overall conclusions of the high and low growth appraisals for Gedling.

The appraisals for Top Wighay Farm and North of Papplewick Lane sites states that Hucknall has good transport links. Appendix A of the ACS states that an integrated transport/ walking and cycling package will be required including potential link buses to Hucknall NET/train station. A Transport Assessment will be required as part of a planning application and contributions will be agreed as part of S106/CIL discussions. The final Transport Modelling is now available and does not change the results of the appraisals for these two sites. Table 8.9 of the IDP states that public transport is not identified as a major constraint to delivery for the Top Wighay Farm site so it is not included in Tables 8.3, 8.4 and 8.5. The Rolls Royce site has been taken into account in the Transport Modelling work.

Paragraph 4.2.20 of the SUE study indicates that Top Wighay Farm would be better linked to Hucknall Town Centre if an extension to the NET was provided. This point is acknowledged, but much wider issues (for the Top Wighay Farm site these include viability of the NET extension and availability of alternative sites) also have a role to play in determining the choice of sites and these need to be taken into account, including the extensive evidence base. Nottinghamshire County Highway and modelling work confirm the site can be developed for 1000 dwellings without a NET extension.

For health services, contributions will be agreed as part of S106/CIL discussions and information on the capacity of local health facilities is awaited from Nottinghamshire PCT. For school capacity, County Education have confirmed that new primary school should be provided for each site and there is capacity to expand existing secondary schools. Assessments of health, transport and education have been explored through the Infrastructure Delivery Plan outside the SA appraisals (see Appendix A of the Aligned Core Strategies).

With regard to the other sites located within or adjacent to the urban area of Gedling, paragraphs 11.24-11.25 of the SA Publication Version report explains the situation with the Access Road for Gedling Colliery/Chase Farm site. There are reasons why other urban sites should not come forward in the ACS which are explained in the report. See paragraph 11.27 for Gedling Colliery/Chase Farm/Mapperley Golf site, paragraph 11.20 for North of Redhill site and paragraph 11.22 for East of Lambley Lane site.

The scores for social, natural resources and waste objectives for Top Wighay Farm, North of Papplewick Lane, North of Redhill, East of Lambley Lane sites (as well as Gedling Colliery/Chase Farm site) will be amended to ensure a consistent approach. However, this does not change the conclusion of the appraisals.

It should also be noted that the SA is just part of the plan making process, and should not be seen as the only reason to choose or disregard a possible alternative option or site. Much wider issues also have a role to play in determining the choices of sites and these need to be taken into account, including the extensive evidence base.

Although the Gedling Colliery/Chase Farm/Mapperley Golf Course site scores better against some objectives compared with the Hucknall sites, paragraph 11.27 of the SA Publication Version report clearly states that the site was rejected because it was "marginally viable but unlikely to be delivered". Although the site has potential to improve green infrastructure, biodiversity and the environment and landscape on the former Colliery, there would also be a significant loss through the loss of the existing golf course, mature trees, network of footpaths and local wildlife as a result of the development.

The SA appendices will be updated to refer to Scheduled Ancient Monuments and Listed Buildings in the vicinities of Calverton, Bestwood Village and Ravenshead. However, this does not change the conclusion of the appraisals.



When it became clear that the Gedling Colliery/Chase Farm site could not be delivered the SHLAA was used to identify alternative sites. Sites in and adjoining the urban area (in accorded with the strategy of urban concentration) were variously not suitable, available or achievable. Therefore other sites needed to be considered. Consideration was first given to sites adjoining the sub-regional centre of Hucknall and then to sites in or adjacent to the key settlements identified for growth. Paragraphs 11.35 of the SA Publication Version explains that, following the decision relating to the Gedling Colliery/Chase Farm site, further appraisal was undertaken which confirmed that Calverton has the potential to sustain new growth of the scale identified in the Publication Version.

DRAFT

## 6. Changes to the Proposals Maps (Broxtowe & Gedling)

### Broxtowe Borough Publication Version Proposals Map

To be added if required.

### Gedling Borough Publication Version Proposals Map

- The description of safeguarded land is potentially confusing as it refers to safeguarded from development.
- Legends and text should refer to 'indicative site boundaries' to ensure flexibility.
- The proposed boundary for Gedling Colliery appears to cut across playing fields. Any loss of playing fields would be opposed without appropriate mitigation measures.

### Officer Response

It is agreed that the definition of safeguarded land should be clearer. Safeguarded land is land that is excluded from the Green belt but safeguarded from development until a future Local Plan is adopted that proposes it for development.

In terms of boundaries, the precise site boundaries of the strategic allocations must be shown on the Proposals Map. The boundaries of the area for future development at Gedling Colliery/Chase Farm should follow the existing housing (H3) and employment allocations (E1 (c)) for the Gedling Colliery/Chase Farm site as set out in the adopted proposals map to the Gedling Borough Replacement Local Plan 2005. The recreation ground designated as protected open space off Lambley Lane as shown on the aforementioned proposals map is not included.