

**REPRESENTATIONS TO THE LOCAL PLAN PART 2: LAND AND PLANNING POLICIES
(FURTHER OPTIONS) CONSULTATION March 2017
ON BEHALF OF DAVIDSONS DEVELOPMENTS LTD In Regard to**

This representation is in regard to land to the north of Abbey Lane, Aslockton.

The context is that the land in question for which a major house builder (the above company) holds an option and for which an appeal was dismissed for up to 65 dwellings on this site by the Planning Inspectorate in December 2016. (APP/P3040/W/16/3143126).

It is very important to note the conclusions of the Inspector to this appeal (IR para.46).

“It follows that the planning balance must be firmly against the scheme. For, although there would be environmental, social and economic benefits (as outlined above), particularly in providing 65 new houses that would contribute to the 5-year supply and providing a policy-compliant number of affordable homes, there would be serious serious economic, social and environmental consequences in departing fundamentally from a recently adopted Core Strategy and in failing to pursue the ‘golden thread’ of ‘sustainable development’. In my view, the substantial and significant harm to those policy objectives would not be outweighed by the provision of jobs, the spending power of new residents, a New Homes Bonus or the measures to be achieved through the suggested conditions and the section 106 Obligation.”

The Inspector went on to say in IR para. 47:

“I have found that this scheme would be contrary to the requirements of policy 3 and fundamentally at odds with the ‘spatial vision’ on which this recently adopted Core Strategy is based. That would confound an aim of the Framework that decisions should be plan-led and, since the Core Strategy has been designed and found to be sound on the basis that it would achieve a sustainable distribution of development across both Rushcliffe and the wider housing market area, undermine the sustainable rationale embedded in the Plan. The scheme would thus be unsustainable and entail harmful economic, social and environmental consequence. Although the 5-year supply of housing sites has progressively deteriorated since the adoption of the Core Strategy, the Council are making strenuous efforts (negotiating with developers, finding potential developers for landowners and securing grants to facilitate infrastructure and development) to redress the situation; those efforts are clearly bearing fruit. While current predictions indicate that problems are likely to persist at least until August 2018, the Plan embodies a very significant boost to the supply of housing and the evidence indicates that current achievements are ahead of schedule. Hence, I consider that the advantages of development would not outweigh the harmful consequences of pursuing such an unsustainable scheme.”

It is clear that the Inspector’s concerns about the development of this land turned on a fear of compromising the adopted Core Strategy and on that basis he found the site unsustainable. However, four months on from this appeal decision the Council has recognized that the Core Strategy and its accompanying spatial vision is beginning to fail and as confirmed at the above appeal the Council has at best a 3.43 years land supply (IR para. 16). The Council state on page 6 of the Further Options consultation document that five of the 6 large allocated sites are taking longer to get underway than previously expected and will likely fail to deliver the quantum of housing required both in the next five years and the lifetime of the Plan. Consequently, it has proactively introduced a further stage into the Local Plan Part 2 preparation process, and suggested new development sites in new locations.

The responses to the posed questions of the consultation need to be seen in this light.



Question 1: Do you agree with the Council's assessment of the present housing supply situation and that enough land will need to be identified by Local Plan Part 2 to accommodate around 2,000 new homes?

The Council's proactive response to the Borough's housing supply issues is welcomed and the need to accommodate more housing to meet the identified objectively assessed housing need by 2028 in light of the current shortfall in delivery is imperative. However, it is considered that the Council needs to look to accommodate more than the 2,000 homes currently identified.

The Further Issues and Options document states on page 7 that *"It should be noted that if there are any further delays to the delivery of new homes on those large sites already allocated for development, then this could cause the size of the housing land shortfall to increase further."* Given the significant infrastructure requirements and up front development costs associated with sustainable urban extensions, it is considered that continued delayed delivery on these large sites is likely.

Thus it is considered that the Council should be looking to accommodate more than 2,000 homes through the Local Plan Part 2 to ensure that it is flexible enough to deal with the changing circumstances that may occur through, for example, continued delay with housing delivery on the SUEs and/or an increase in the objectively assessed housing needs for the Borough.

Question 2: Do you agree with the Council's view that none of the three strategic allocations (Melton Road, Edwalton; South of Clifton; and East of Gamston/North of Tollerton) should be expanded as part of resolving the current shortfall in the amount of land that is available for housing development over the next few years?

The Council requires a wide range of sites in a variety of sizes and locations to deliver its housing requirements. This means that there is an important role for large strategic allocations as well as a significant part to be played by small and medium sized sites beyond the urban edge. In order to resolve the immediate delivery issues facing the Borough it is agreed that the Council should also be looking to bring forward housing on smaller sites in a variety of locations, including smaller rural settlements. Through identifying small and medium sized size sites in a wide mix of locations the Council will be able to offer realistic prospects of both increased housing land supply and delivery.

Smaller sites are generally less complex to deliver and are therefore likely to improve the housing supply situation in the short to medium term. The need to identify such smaller sites is a significant and pressing requirement given the projected delayed delivery of the SUEs; the fact that the programme for the Local Plan Part 2 does not anticipate adoption for at least another year; and, the acknowledged 5 year housing land shortfall.

The answers to the following two questions are interrelated and to achieve a comprehensive rather than a partial response I have addressed these in one representation.



Question 16: Do you agree that, apart from the site to the south of Abbey Road, Aslockton with planning permission for up to 75 new homes, Local Plan Part 2 should not allocate greenfield land for housing development at Aslockton and Whatton in the plan period (up to 2028)?

Question 17: Should Local Plan Part 2 identify the following ‘other’ villages as suitable for a limited level of housing growth on greenfield sites?

The villages which we have identified as potentially suitable to accommodate a limited level of housing development on greenfield sites are as follows:

- Cropwell Bishop;**
- East Bridgford;**
- Gotham;**
- Sutton Bonington; and**
- Tollerton**

These particular villages have been identified because, while they do not provide for a full range of facilities as is the case at West Bridgford and the key settlements, the basic level of facilities (e.g. schools; doctors’ surgery) that are available are deemed capable of potentially supporting a relatively limited level of housing growth without compromising the strategy set out in Local Plan Part 1 (Core Strategy) for the distribution of new housing.

In the preparation of the Rushcliffe Core Strategy two substantial documents were used by the Council to evaluate the relative merits of villages for development in terms of sustainability. As no studies of a comparable depth have been undertaken since, these can be taken as the best quasi-independent source of review of this issue available and valuable evidence.

The first is the **Accessible Settlements Study for Greater Nottingham (Feb 2010)**. The aim of the Study was to help “ensure that new development takes place at the appropriate scale in the most sustainable settlements.” (P4). To help identify the locations it developed a complex system of evaluating each location based upon accessibility, facilities and weightings. The outcome was a ranking: the higher the score the more sustainable the settlement. The following scores were obtained for the settlements listed in the consultation:

Aslockton:	186.2 (Whatton: 175.2)
Cropwell Bishop:	135.5
East Bridgeford:	179.6
Gotham:	217.3
Sutton Bonington;	175.0
Tollerton:	194.4

The second study is the **Greater Nottingham Sustainable Locations for Growth Study (Feb 2010)**. The purpose of this study was to act as a useful starting point to consider the impact and constraints to growth of smaller settlements and villages. This Study combines Aslockton with Whatton as the two settlements are physically linked and share facilities, such as a railway station. Page 33



specifically evaluates this location. It draws out that there is scope for a medium to low level of growth compared with other settlements in the Greater Nottingham Sub region. It is particularly remarked that the village is part of the Nottingham-Aslockton corridor (note the railway station, which is one of only 4 in the whole Borough) with opportunities to concentrate growth and share infrastructure.

The supporting text for Question 16 states that it is the view of the authors that Aslockton is not sustainable: *"in our view it would not be sustainable, based on existing service and infrastructure provision, for any further greenfield sites to be identified for housing development at Aslockton or Whatton. We would be interested to know whether you support this view or not?"*

Firstly, it is clear from the first study above that if one is allocating development in the "other villages" that Aslockton is as equally sustainable as the comparable five settlements listed in Question 17, being positioned 3rd out of 6.

Secondly, as highlighted in the second study, unlike the other five settlements, Aslockton with its adjoining settlement of Whatton is part of a defined transport corridor with potential for growth. This means that both bus and rail improvements can be most easily be achieved if growth is focused in this corridor.

Furthermore of the 6 settlements only Sutton Bonnington, which scores lower in sustainability than Aslockton, and Aslockton are **NOT** in the green belt. Housing development is defined in the The Framework (NPPF) para. 89, as inappropriate development in the green belt. And as paras. 87 & 88 of the NPPF state:

"87.inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

88. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations."

Given the relative sustainability merit of Aslockton and Whatton; its location on a transport corridor; and, its location outside of the green belt, it makes no sense to exclude the settlement from consideration for housing development in addition to the 75 already approved on the outskirts of the village.

The clear answer to Question 16 should be **"Don't agree, should allocate site(s) in Aslockton with Whatton"** if suitable sites are available. And in the case of Question 17 **Aslockton with Whatton should be added to the list**, because there are clear reasons (sustainability score and not in the green belt) that the settlement should be the most favoured of this list.

As remarked at the beginning of this representation the Land North of Abbey Lane is under option to a major house builder and site issues identified by the Inspector at the appeal are relatively minor and can be overcome with careful design. The site is well embedded in the village and very close to all local facilities. The site is readily available and can be easily delivered with in 5 years.

