



Our ref: 39726-4501

27<sup>th</sup> November 2017

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### **By email only**

Dear Sir or Madam,

### **RESPONSE TO CONSULTATION ON THE LOCAL PLAN PART 2: PREFERRED HOUSING SITES: LAND SOUTH AND EAST OF THE A52, GAMSTON, WEST BRIDGFORD, NOTTINGHAM**

We welcome the opportunity to submit representations on the Rushcliffe Local Plan Part 2: Preferred Housing Sites (RLP2) on behalf of Rockspring Barwood Gamston Ltd, Barwood Development Securities Ltd, the Parker family and Messrs Havenwood.

#### **The Site**

Our representations are made in relation to Land South and East of the A52, Gamston, West Bridgford, Nottingham ('the site'). The land is 149 hectares in area, as identified on the attached plan. It is bounded by the A52 to the north and west, the Grantham Canal to the south and Polser Brook to the east. It lies to the north of the Strategic Allocation East of Gamston/North of Tollerton covered by Policy 25 of the Local Plan Part 1: Rushcliffe Core Strategy.

#### **Summary of Representations**

In summary:

- we disagree with the text on page 11 of the consultation document; and
- we submit that the site which is the subject of this response is appropriate for development and its allocation in the Plan would result in a significant number of dwellings being delivered on the site within the period 2019 – 2024, for the reasons set out below.

#### **Housing Land Supply**

We note that even since the January 2016 Issues and Options consultation, it has become apparent that five of the six strategic housing allocations are not going to deliver at the rate or quantum of development previously envisaged. Consequently, residential allocations to support an approximate additional 2,000 – 2,500 dwellings are required. We support the Council's efforts to respond to changing circumstances by seeking to allocate additional land for residential development. However, we consider it is essential that the RLP2 builds in sufficient flexibility to respond to future changes to ensure the longevity of the plan, given that this recent additional requirement has only occurred within less than two years. Indeed,

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paragraph 14 of the National Planning Policy Framework (NPPF) makes very clear that for plan-making:

*'Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- specific policies in this Framework indicate development should be restricted.'*

We emphasise therefore that the site is capable of accommodating 2,000 – 2,500 dwellings to satisfy this additional need in a sustainable, well connected location backed by a credible developer and a consortium of willing landowners. It should be noted that this level of development can be accommodated on the site even taking into account that the net developable area is likely to be significantly below the total site area, to accommodate a substantial green buffer around Bassingfield, other appropriate green spaces and necessary infrastructure to support the development.

### **Relationship with Existing Strategic Allocations and Main Urban Area**

As noted above, the site lies north of the existing Strategic Allocation of East of Gamston/North of Tollerton. We note that the text on page 11 of the consultation document states the following:

*"Both the Issues and Options (January 2016) and Further Options (February 2017) consultations explored whether there would be merit in expanding any of these three strategic sites to address the housing shortfall. It is our conclusion that there would not. Doing so would not lead to more homes being built over the next few years than is already due to be delivered. Rather, any extra homes would be built further into the future at the very end of the development of these sites, thereby having no impact at all on the immediate housing shortfall situation"; and*

*"There are no other sites adjacent to the main urban area that have been put forward by landowners/developers which we believe are either appropriate for development and/or would be able to deliver homes soon enough to address the current housing shortfall."*

We take these points in turn. The consultation document is approaching this consideration on the basis of the identification of entirely new sites adjoining the main urban area. Clearly such further sites would involve substantial new incursions into the Green Belt and are likely to be more difficult to justify as 'exceptional circumstances' under paragraph 83 of the NPPF.

However, this site involves development adjoining an existing strategic allocation and which also has clearly defined and largely 'hard' boundaries. The allocation of the site for development would have a materially lesser impact against the purposes of the Green Belt in this context. Furthermore, it would constitute sustainable development in the main urban area of Nottingham, which is the main locational focus of development under the RLP Part 1 Policy 3: Spatial Strategy.

The consultation document also assumes that development adjacent to an existing strategic allocation will form an expansion of that existing allocation and cannot be developed in parallel. This is not the case here. The site, whilst proximate to the existing strategic allocation under Policy 25, is:

- deliverable independently and in the short term; and



- not reliant on the strategic allocation at land East of Gamston and North of Tollerton to the south for infrastructure. An independent highway access can be achieved by connecting into the existing A52 which bounds the site to the north and west, either through a new junction/access point or from the existing Gamston roundabout.

Whilst the Council is seeking to identify a range of smaller allocations under the RLP2 consultation document, to supplement the allocations previously identified in the 2016 Issues and Options consultation, we emphasise that this strategy is not immune from uncertainty. This will place reliance on the delivery of sites within numerous different ownerships and who may currently lack confirmed interest from a developer. It is therefore essential to consider whether there is a reasonable prospect of these sites being brought forward at the point envisaged. The principal tests over whether there is a reasonable prospect of the site coming forward are:

- that there is a willing landowner;
- that there are no unduly onerous restrictions or constraints to the delivery of the site; and
- whether a developer has an interest in or controls the site.

We confirm that the identified site satisfies all three of these tests, having willing landowners, no substantive legal or technical constraints and being backed by a regional developer with proven experience of taking forward sites of this scale and nature. For these reasons, we confirm that the site will be capable of being developed in the short term, should the Council take it forward as an allocation in the LP2 document.

### **Part 1 and 2A Green Belt Review**

The November 2013 Green Belt Review (GBR) considered the potential broad areas around the Nottingham Principal Urban Area within Rushcliffe. Area 5 - East of Gamston and North of Tollerton is assessed on pages 28 and 29. However it should be noted that the extent of this broad area – albeit shown as a deliberately ‘fuzzy’ area on page 19 – also includes this site within the assessment. We note that against the first Green Belt purpose of checking unrestricted sprawl of large built up areas, the GBR notes that:

*‘Development would leap the defensible Green Belt Boundary of the A52; however development needs have necessitated revisiting this area. Whilst not as strong, there are other potential defensible boundaries within the area, such as the Polser Brook, the Grantham Canal and Tollerton Lane’*

The strategic allocation of East of Gamston and North of Tollerton has already established the principle of developing on the east side of the A52, given the pressing housing needs that must be addressed. Therefore, further development north of the strategic allocation in this location will not materially alter the level of urban expansion already incurred under Policy 25. Indeed, the Green Belt assessment recognises that the site contains the defensible boundaries to provide natural containment.

Under the Green Belt purpose of preventing neighbouring towns merging into one another, the GBR states that *‘care is required to prevent coalescence with Bassingfield and Tollerton’*. As the site extends to approximately 149ha, this allows ample opportunity to avoid coalescence with Bassingfield through the provision of a substantial green buffer to the eastern portion of the site.

We therefore consider that the allocation of this site is already substantively supported by the Council’s GBR, and the existing strategic allocation has established the principle for development in this sustainable location adjacent to the Nottingham main urban area.



## Strategic Housing Land Availability Assessment (SHLAA) Update 2016

We note that this site has been considered within the Council's 2016 SHLAA update as part of a more substantial site (ref. 696) which includes a large tract of land to the North of the A52. Currently site 696 has been classified as not currently deliverable due to its location within the Green Belt, concerns about coalescence with Bassingfield, and areas of flood risk on the area north of the A52. Whilst noting these observations relate to the wider site, we nevertheless take these in turn.

- **Green Belt** – As discussed above the removal of this site from the Green Belt is supported by the Council's current evidence base and would lead to the introduction of defensible boundaries as recognised in the GBR;
- **Coalescence with Bassingfield** – As previously identified, a substantial green buffer within the eastern area of the site is capable of being introduced, to prevent any perceived coalescence; and
- **Flood Risk** – The vast majority of the site falls within Flood Zone 1, with a small contained area falling within Flood Zone 2 and 3 around Polser Brook. The main concern around flood risk identified in the 2016 SHLAA is in relation to the land north of the A52 which predominantly falls within Flood Zone 3. The site is entirely separate from this.

We therefore consider that the site should be assessed on its own. This separate assessment will therefore address the previous concerns identified under the wider site (696) as no flood risk exists, a substantial green buffer can be achieved adjoining Bassingfield, and the harm to the Green Belt purposes is significantly minimised given the site's close proximity to an existing strategic allocation.

### Conclusions

We consider that Land South and East of the A52, Gamston should be taken forward as an allocation in RLP2 as it is capable of meeting the required additional housing requirements including appropriate additional flexibility. We reiterate that:

- This site is deliverable independently in the short term and is not reliant on the strategic allocation at land East of Gamston and North of Tollerton to the south for infrastructure;
- The site can achieve its own independent access from the A52 or the roundabout to the north-west of the site;
- The site does not contain the areas of flood risk present in the wider SHLAA site 696;
- Within the period 2019 – 2024 the land could provide a significant proportion of the 2,000 – 2,500 dwellings being sought by the Council in their consultation document (up from the 1,100 homes previously identified in the earlier Issues and Options document);
- Development here would include a substantial 'green buffer' around Bassingfield. This will address concerns expressed in the SHLAA commentary that Bassingfield would be subsumed by development if this site came forward; and



- Consequently, this site should be removed from the Green Belt as the justifications in the Council's 2013 GBR supporting the strategic allocation at land East of Gamston and North of Tollerton, remain equally applicable to this site.

I would be grateful if you could confirm receipt of these representations. Should you wish to discuss any aspect of our representations further, please do not hesitate to get in touch.

Yours faithfully

**Tim Coleby**  
**Senior Associate Planner**  
For and on behalf of  
**PETER BRETT ASSOCIATES LLP**

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