



Nottinghamshire
County Council

meeting Cabinet

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agenda item number 13

REPORT OF THE PORTFOLIO HOLDER FOR ENVIRONMENT AND SUSTAINABILITY

ALIGNED CORE STRATEGIES FOR ASHFIELD, BROXTOWE, EREWASH, GEDLING, NOTTINGHAM CITY AND RUSHCLIFFE CONSULTATION RESPONSE

Purpose of the Report

1. To seek Cabinet approval of the Council's comments in relation to the Aligned Core Strategies (ACS) for Ashfield, Broxtowe, Erewash, Gedling, Nottingham City and Rushcliffe (The Authorities) Consultation, as detailed in Appendix 1 to this report.

Introduction and Background

2. The councils of Broxtowe, Erewash, Gedling, Nottingham City and Rushcliffe have been working with Derbyshire and Nottinghamshire County Councils to prepare new Aligned Core Strategies for Greater Nottingham. They have also been working with Ashfield District Council to ensure alignment with the Hucknall part of Ashfield. Each of the Core Strategies is one of the Development Plan Documents (DPDs) which makes up the local development framework (LDF). The councils have agreed to cooperate and align the preparation and content of their Core Strategies to ensure that planning for the future of the area will be more consistent and the administrative boundaries of the local authorities (LAs) will not prevent coherent planning.
3. The first stage in the preparation of the Aligned Core Strategies (ACS), the Issues and Options document, was published for formal consultation in June 2009. The County Council's response was sent following approval by an all party Members' Working Group. The next stage, the 'Option for Consultation', was published for formal consultation in February 2010. The County Council's response to this was sent following approval by Cabinet on 24th March 2010.
4. The current consultation is comprised of four elements. Firstly, a 'Housing Provision Position Paper' which has been jointly published by Nottingham City Council and the Borough Councils of Broxtowe,

Erewash and Gedling. Secondly, The Authorities are also consulting on a refined policy on climate change. Thirdly, Gedling Borough Council has published a paper for consultation on its locally distinct housing issues. Fourthly, Broxtowe Borough Council is consulting on the inclusion of strategic sites for allocation in the Core Strategy and broad locations for future housing growth. The consultation period for the first three elements is from 25th July to 19th September 2011 and for the fourth element is from 25th July to 3rd October 2011.

5. Following the current consultation the next key stage in the preparation of the Aligned Core Strategies will be 'the Publication Draft' which is expected to be issued for consultation during the winter of 2011-2012.
6. This report draws together the comments of officers from across Nottinghamshire County Council to provide the response in relation to the current consultation documents.

The Housing Provision Position Paper

7. The Aligned Core Strategies 'Option for Consultation' set out, amongst other matters, the amount of new housing each Council would provide between 2009 and 2026, based on the East Midlands Regional Plan, 2009 (Regional Strategy). The Coalition Government has made it clear that Regional Strategies will be abolished when the Localism Bill is enacted, which is expected to be towards the end of 2011. In addition, the Government has now published new 2008-based Household Projections, which replace the 2004-based projections used in the preparation of the Regional Strategy.
8. Consequently, the Councils collectively decided to review the housing figures in the 'Option for Consultation' in order to assess whether they remain an appropriate basis for planning for housing. The Housing Provision Position Paper sets out the findings of that review, explains the approach being taken by Broxtowe, Erewash, Gedling Borough Councils and Nottingham City Council, the different approach being taken in Rushcliffe and sets out the next steps the Councils will take in progressing the Aligned Core Strategies. Ashfield District Council is separately considering housing options across the whole of its district and will be publishing the outcome of this work in due course.
9. Broxtowe, Erewash and Gedling Borough Councils and Nottingham City Council have decided that the housing figures set out in the 'Option for Consultation' continue to be the appropriate ones to plan for. Rushcliffe Borough Council is taking a different approach to determining housing figures, with a separate consultation, due to conclude in late summer.
10. The Housing Provision Position Paper explains the current position with regard to housing provision, describes the further work that the partner Councils commissioned to test those figures, and presents the findings of that work. The key findings were discussed at a councillor/stakeholder seminar in February 2011.

11. The Paper explores four different 'scenarios' of housing provision. These scenarios are not designed necessarily to be forecasts of 'likely' outcomes, but were chosen to set a context for a decision on the appropriate level of housing. The scenarios explore natural change in the existing population (i.e. just births and deaths), in and out migration in balance (net nil migration), maintaining the same level of jobs as in 2008 and continuing past house building rates.
12. At a Plan-wide level, the Paper concludes that the Regional Plan-based housing provision figures set out in the ACS 'Option for Consultation' remain appropriate. Providing the level of housing implied by the more recent Government's Household Projections would be nearly 20,000 or 25%, new homes above the ACS 'Option for Consultation' levels. This is not considered feasible in the light of current market conditions, or desirable in terms of the scale of greenfield development required and it would impact on the required infrastructure and supporting facilities. Such an approach would therefore demand a wholesale review of the evidence supporting the ACS, such as the Infrastructure Delivery Plan and the Sustainability Appraisal.
13. Of the four scenarios, housing provision associated with the balanced migration scenario is closest to the ACS 'Option for Consultation' figure of 52,000 additional dwellings and is higher than the level needed to maintain the 2008 labour force/jobs levels. It is also higher than the continuation of the last decade's house building rates.
14. The ACS 'Option for Consultation' housing figures are considered sufficient to allow for economic and job growth in line with The Authorities' wider aspirations and, given an early return to more favourable market conditions and a supply of readily available sites, the figures are considered to be achievable. Nevertheless, they will still be challenging to deliver as they represent a step change increase in housing delivery over past rates and will also require quite significant greenfield development.
15. The Paper also states that the distribution of housing as originally proposed through the ACS 'Option for Consultation' is supported by the available evidence and is an appropriate distribution to plan for. This approach is based on the previous work and consultation undertaken on the ACS 'Option for Consultation', including the 'Appraisal of Sustainable Urban Extensions Study' (2008) and the 'Greater Nottingham Sustainable Locations for Growth Study' (2010). As the origin of this distribution is the Regional Strategy, which at the time of writing is still part of the Statutory Development Plan, this approach is more likely to be found "sound" at Examination.
16. This approach results in the following housing numbers, updated to the period 2011-28 (excluding Rushcliffe and Hucknall):

	New Housing provision 2011-2028	Implied annual average delivery 2011-2028
Broxtowe Borough Council	6,126	360
Erewash Borough Council	6,214	366
Gedling Borough Council	7,268	428
Nottingham City Council	17,165	1,010
TOTAL	36,773	2,163

(Note: The ACS 'Option for Consultation' figure for Rushcliffe was 13,860 dwellings - 2009-26)

17. Finally, the Paper states that the ACS 'Option for Consultation' and Regional Strategy approach of urban concentration and regeneration will continue to apply but without the strict numerical breakdown, between the Principal Urban Area (PUA) and non-principal urban areas (non-PUA), imposed by the Regional Strategy and adhered to in the ACS 'Option for Consultation'.

Nottinghamshire County Council's Comments

18. The overall approach in the Housing Provision Position Paper is supported. It is well-founded in the evidence, which the County Council has supported, as part of its role in supporting strategic planning across the County and in the requirement for local authorities to co-operate with their neighbours.
19. The level of housing proposed, subject to the outcome of the work by Rushcliffe and Ashfield Councils, would maintain a level of population that would support a balance of migration (called 'nil-net migration') into and out of the ACS area¹. This balance would also maintain a population that would support a level of labour force to support job growth, as the Paper indicates.
20. Setting a higher housing figure, as the Housing Provision Position Paper indicates, would demand a wholesale review of the evidence supporting the ACS, such as the Infrastructure Delivery Plan. Most critically for the County Council this would include highway provision. It would also, again in relation to the County Council's responsibilities, require further Sustainability Appraisals and Habitats Regulations Appraisal.

¹ The Greater Nottingham Aligned Core Strategies are being prepared across an area also called the 'Nottingham Core Housing Market Area' in the Regional Plan. While this excludes Hucknall in Ashfield, Ashfield District Council, while not 'aligning' its Core Strategy, is also co-operating in the work.

21. One reason for continuing to use the original ACS figure put forward by The Authorities, which would be supported, is that the period used for the latest Government projections reflects a time of particularly high in-migration (especially of students) which is unlikely to continue over the long term. Thus the Government's projections overstate the number of homes needed. Earlier periods, particularly in the late 1990s, when the County Council was preparing the Structure Plan and Joint Structure Plan (with Nottingham City), did experience the 'nil-net migration' that is anticipated by the proposed ACS level of housing.
22. It should also be pointed out that more recent analysis of the demographic trends in the area, as well as the country as a whole, indicate that household sizes are increasing. This is a more recent trend, due to a range of factors including the economic recession, the downturn in the housing market and availability of housing finance, and longer-term low levels of house building, not only in market housing, but by housing associations and other social providers.
23. The effects may be short-term, with household sizes reducing at previous rates once the economic situation changes, or they may represent a longer-term social and demographic trend of larger households, with more adults sharing housing (rather than more children in families).² The implications of the trend are two-fold. Firstly, it is an early sign of potential housing stress with the possibilities, within the figures, of overcrowding and lack of sufficient housing. As such the levels of house building should be maintained at current levels and the ACS provision is appropriate.
24. Secondly, certainly in the short-term, the implication is that population figures arising from the planned housing will be somewhat higher than previously forecast, with consequent effects upon service provision and demands, not least of which are education and provision for the elderly. The more positive effect is that the labour force to support economic growth may well be larger.
25. Consequently, the response to the ACS Councils should be agreement with the overall level of housing currently proposed in the Housing Provision Position Paper (subject to the outcome of Rushcliffe's work). It is soundly evidence-based and is an appropriate reaction to the Government's desire for planning more locally, whilst recognising the strategic, sub-regional nature of the Nottingham Core Housing Market Area. Support can also be given to the Paper's statement that the soundness of housing numbers is partly supported by the Regional Plan being currently part of the Development Plan. The effects of the planned housing provision and higher household sizes upon population levels should be investigated, as should the longer term implications, for population as well as housing.

² It may be that the trends are misleading, and the 2011 Census results (due in 2012-13) will be valuable in confirming household sizes.

26. It is agreed that the distribution the Paper sets out is valid, being based on the approach originally used for the ACS 'Option for Consultation' which is still appropriate. It was supported by the evidence base including the 'Appraisal of Sustainable Urban Extensions Study' (Tribal, 2008) and the 'Greater Nottingham Sustainable Locations for Growth Study' (Tribal, 2010) - work which the County Council supported as part of its strategic planning role.
27. Further flexibility in housing distribution within the Boroughs is also supported. Evidence in the 'Greater Nottingham Sustainable Locations for Growth Study' identifies numerous settlements outside of the Nottingham built-up area that are potentially suitable for more growth than the former rigid distribution between the PUA and non-PUA. It is noted that the Sustainability Appraisal for the ACS 'Option for Consultation' does not identify significant sustainability problems with higher housing levels than those set out in the ACS 'Option for Consultation' outside of the Principal Urban Area and the named Sustainable Urban Extensions. The County Council's own work on accessibility, which was used to inform the 'Greater Nottingham Sustainable Locations for Growth Study', supports those conclusions.

Locally Distinct Housing Issues for Gedling Borough Council

28. This paper, which should be read in conjunction with the Housing Provision Position Paper, looks at both the implications for the housing requirement for Gedling Borough and at how the housing requirement should be accommodated. In particular, the paper looks at a possible revised approach to the Gedling Colliery/Chase Farm site given concerns about the viability of bringing forward this site.
29. The major locations proposed in Gedling are at Gedling Colliery/Chase farm/Mapperley Golf Course, Top Wighay Farm and Papplewick Lane. A significant change from the earlier 'Option for Consultation' proposal is the addition of land at Mapperley Golf Course, which has now been proposed in order to ensure the delivery of the strategically important Gedling Colliery/Chase Farm site. The consultation document states: "Since the publication of the Option for Consultation document, concern has arisen over the deliverability of the Gedling Colliery/Chase Farm site. This site is considered to be a key strategic development site for the Borough as it offers the opportunity for the redevelopment and reuse of brownfield land for housing, a small element of employment land and the delivery of the Gedling Access Road".
30. Other sites previously proposed in the earlier consultation are now considered less suitable by Gedling Borough Council in that they will not assist delivery of the Gedling Colliery site and Gedling Access Road and potentially threaten it.
31. The paper concludes that the most appropriate approach is to secure the development potential of the Gedling Colliery/Chase Farm site with the support of additional land from Mapperley Golf Course, therefore Mapperley Golf Course should be identified in the next stage of the

Aligned Core Strategies ('the Publication Draft'), to allow certainty about the viability of the site. The paper recognises that the Golf Course, formerly considered for housing in an earlier draft local plan (in 1998), currently has protection unless equivalent alternative provision can be provided. It is safeguarded for future development in the current Gedling Replacement Local Plan (as saved) and thus is not within the Green Belt.

Strategic Sites and Broad Locations for Housing in Broxtowe

32. This consultation looks at the inclusion of strategic sites for allocation in the Core Strategy and broad locations for future housing growth in Broxtowe Borough. Broxtowe Borough Council's preferred strategic sites to be allocated in the Core Strategy are at Toton Lane, south of the A52 and Field Farm, north of Stapleford. In addition, it is likely that the Allocations Development Plan Document will need to make provision for a minimum of approximately 1770 new homes. To help inform this process and give sufficient steer towards appropriate locations in the Core Strategy views are being sought on how much new development should be directed towards the settlements of Eastwood, Kimberley/Watnall, Awsworth, Brinsley and Nuthall and where it should be located in, and adjacent to, these settlements.

Nottinghamshire County Council's Comments

33. An important part of the evidence base, and the basis for a strategic view of the local issues consultations by Gedling and Broxtowe Borough Councils, are the 'Appraisal of Sustainable Urban Extensions Study' (Tribal, 2008) and the 'Sustainable Locations for Growth Study' (Tribal, 2010) mentioned above. These are more fully described in Appendix 2.
34. The 'Appraisal of Sustainable Urban Extensions Study' identified a number of possible locations for housing development setting out the pros and cons of each site and included a table of sites that are considered appropriate for sustainable development. It was used to inform the ACS 'Option for Consultation'.
35. The 'Sustainable Locations for Growth Study' provided an objective technical assessment for the growth of smaller and rural settlements across the ACS area. It concluded that there are a number of settlements that could accommodate further growth up to 2026, many of which have much to gain from doing so – such as supporting regeneration. It also found that substantial growth would not be appropriate in some settlements and development should be avoided in rural locations outside villages.
36. Where such locations are found to be suitable, it is the concern of the appropriate district council to decide between such locations, and the County Council's views are limited to its particular planning and transport functions, service delivery and land ownership concerns.

Gedling

37. In strategic planning terms the case presented by Gedling Borough Council to add Mapperley Golf Course to the Gedling Colliery/Chase farm location depends upon the robustness of the evidence to support it. The Gedling Housing Issues Paper justifies the decision on the basis that it is necessary to ensure the delivery of the important strategic site of Gedling Colliery and thus supports the objectives of the Aligned Core Strategies.
38. This reason for the change is balanced against the status of the Golf Course, which is safeguarded for future development if it is needed to meet the Borough's housing requirement. Whether that is the case depends upon whether it is a more sustainable choice than alternative sites. Those sites are land at New Farm, Arnold and at Top Wighay Farm, Hucknall. The Gedling Housing Issues Paper indicates that there are unresolved access issues at New Farm, which is in the Green Belt, and that Top Wighay Farm is a location that 'would not accord with the strategic context' of locating development adjoining Arnold and Carlton. Neither of these sites would assist the delivery of Gedling Colliery/Chase Farm.
39. While finely balanced, the case put in the Gedling Housing Issues Paper is accepted, although the County Council would wish to emphasise two points. Firstly, that the value of the Golf Course includes its contribution to green infrastructure in the vicinity, particularly for visual and ecological reasons, and this should be recognised. Secondly, strong policies should be put in place to ensure that accessibility to sports provision (i.e. a golf course) is not diminished, as that is an important element of the sustainability of the Plan.
40. The 'Appraisal of Sustainable Urban Extensions Study' assessed Top Wighay Farm as having the potential to be a sustainable urban extension for over 1,000 dwellings in addition to the allocation of 500 dwellings currently proposed. The County Council is the landowner of part of the larger Top Wighay Farm site and in that role is keen to ensure that the value of that site is maximised.
41. It is therefore recommended that a larger Top Wighay Farm site is supported for development within the range assessed by the 'Appraisal of Sustainable Urban Extensions Study'. Work is on-going to gather evidence and justification relating to this site, jointly between landowners, including the County Council, and Ashfield and Gedling Borough Councils. This work includes a Habitats Regulations Appraisal associated with the prospective Sherwood Forest Special Protection Area. Furthermore, the Top Wighay Farm site is more certain of being deliverable than any of the alternative sites presented by Gedling Borough Council and should be identified as the favoured alternative site should Gedling Colliery/Chase Farm /Mapperley Golf Course not come forward as anticipated. This should include the retention of the safeguarding of the land to the north of the current allocation.

Broxtowe

42. Two strategic sites adjoining the built-up area have been put forward: Field Farm, north of Stapleford and Land at Toton Lane, south of the A52. They were both recommended (amongst others) in the 'Appraisal of Sustainable Urban Extensions Study'. In both instances, while the general area is important for Green Belt purposes (principally in preventing the coalescence of Nottingham and Derby), the Study noted that these sites would not raise significant concerns with regard to coalescence and both could be developed recognising defensible Green Belt boundaries. Broxtowe Borough Council's report on potential Sustainable Urban Extensions (SUEs) sites concurred with this conclusion, hence proposing these two locations. In particular, the Toton Lane site could offer strong sustainable transport options.
43. With regard to the broad locations for housing beyond the edge of the built-up area, there are important Green Belt coalescence issues in Broxtowe, especially around Nuthall (the 'Appraisal of Sustainable Urban Extensions Study' ruled out a SUE in this location). The 'Sustainable Locations for Growth Study' identified locations around Kimberley and Eastwood that could be sustainable locations for development. The study also identified locations around Brinsley and Awsworth that could be suitable for small-scale development. In Green Belt terms Brinsley and Awsworth would be suitable only for small scale 'rounding off' type development.

Ecological Issues

44. With regard to the proposed addition of land at Mapperley Golf Course in Gedling and strategic sites at Toton and Field Farm, Stapleford in Broxtowe, these sites do not have any nature conservation designations but do have the potential to support features of nature conservation value, including both habitats and species. Some level of ecological assessment of these sites should therefore be required to determine their suitability for development from a nature conservation perspective. Should these sites be deemed appropriate for development, opportunities to enhance their biodiversity value should be taken. These may include the retention of established areas of habitat and the creation of new areas of habitat as part of the sites' open space provision and creation of new multi-functional wetland areas as part of sustainable drainage schemes.
45. In respect of the broad locations for development in Broxtowe, development should avoid sites of significant nature conservation value, including designated sites and areas of UK Biodiversity Action Plan or Local Biodiversity Action Plan habitat. Development in these broad locations should also be used to deliver green infrastructure.

Landscape Issues

46. The Greater Nottingham Landscape Character Assessment (GNLCA) should have been used to inform the 'Sustainable Locations for Growth

Study' and it is not clear whether this was the case. It therefore needs to be confirmed either that this was the case or, if not, that different conclusions about the suitability of sites would not have been reached had the GNLCA work been taken into account.

Transport

47. Any changes to the 'Option for Consultation' sites, such as the inclusion of Mapperley Golf Course within the Gedling Colliery/Chase Farm allocation, will need to be tested by updating the Greater Nottingham Transport Model.

Education

48. The County Council has a responsibility to deliver educational facilities associated with new development proposed in these consultations and is involved in ongoing discussions with the relevant Borough and District Councils in relation to those sites which are likely to be delivered early in the ACS period. As the housing allocations cover the period up to 2028 and pupil projection data is based on 5 year forecasts the education infrastructure requirements which are based on current provision will change. The need for additional education provision generated by housing development that cannot be accommodated in existing schools must be funded by the developer. This may include the extension of existing schools or the provision of new schools and sites.

Draft Policy 1 'Climate Change'

49. In response to the consultation on the 'Option for Consultation' a number of comments were received by The Authorities regarding Policy 1 'Climate Change'. As a result this policy has been substantially rewritten and is the subject of the current consultation. Comments received on the current consultation will help to inform the version of this policy which will be included in the 'Publication Draft' of the Aligned Core Strategies.

Nottinghamshire County Council's Comments

50. The County Council, in its response to the 'Option for Consultation', welcomed the fact that the importance of climate change was being recognised by being addressed in the first policy in the document. However, it was suggested that the policy could be improved through attention to some matters of detail and emphasis.
51. It is considered that the redrafted policy, together with the expanded justification section following the policy, have adequately addressed the comments made by the County Council at the 'Option for Consultation' stage. The approach of the revised policy is therefore supported.

Conclusions

52. Overall, subject to the provisos set out in paragraphs 33-48 above, the proposals set out in the current Aligned Core Strategies consultation are supported.
53. The County Council is the landowner of Top Wighay Farm and in that role is keen to ensure that the value of that site is maximised. Consequently, as the Top Wighay Farm site is more certain of being deliverable than any of the alternative sites put forward by Gedling Borough Council, it should be identified as the favoured alternative site should Gedling Colliery/Chase Farm/Mapperley Golf Course not come forward as anticipated.
54. This report and the comments set out in Appendix 1 form the basis of the County Council's response to this consultation.

Recommendation

55. It is recommended that the Report be approved and that it, together with the comments set out in Appendix 1, form the basis of the Council's formal response to the Aligned Core Strategies consultation.

COUNCILLOR RICHARD BUTLER - PORTFOLIO HOLDER FOR ENVIRONMENT AND SUSTAINABILITY

Legal Services Comments

This decision falls within the delegation to Cabinet. [SSR 23.8.2011]

Comments of the Service Director – Finance

The contents of this report are duly noted; there are no financial implications. [DJK 26.08.11]

Background Papers Available for Inspection

Greater Nottingham Aligned Core Strategies consultation documents (July 2011)

County Electoral Divisions Affected

All

Appendix 1

Representations on the Aligned Core Strategies Consultation July 2011

HPPP1- HOUSING PROVISION POSITION PAPER:

1. Do you support the proposed approach to housing numbers as set out in section 6 of the Housing Provision Position Paper?

Yes

2. Do you have any comments?

The overall approach in the Housing Provision Position Paper is supported by the County Council. It is soundly evidence-based and is an appropriate response to the Government's desire for planning more locally, whilst recognising the strategic, sub-regional nature of the Nottingham Core housing market area.

Support can also be given to the Paper's statement that the soundness of housing numbers is partly supported by the Regional Plan being currently part of the Development Plan.

The effects of the planned housing provision and higher household sizes upon population levels should be investigated, as should the longer term implications, for population as well as housing.

3. Do you support the proposed approach to distributing housing within the councils' areas as set out in Section 7 of the Housing Provision Position Paper?

Yes

4. Do you have any comments?

It is agreed that the distribution the Paper sets out is valid, being based on the approach originally used for the ACS 'Option for Consultation' which is still appropriate.

Further flexibility in housing distribution within the Boroughs is also supported. Evidence in the 'Greater Nottingham Sustainable Locations for Growth Study' identifies numerous settlements outside of the Nottingham built-up area that are potentially suitable for more growth than the former rigid distribution. It is noted that the Sustainability Appraisal for the ACS 'Option for Consultation' does not identify significant sustainability problems with higher housing levels than those set out in the ACS 'Option for Consultation' outside of the Principal Urban Area and the named Sustainable Urban Extensions. The County Council's own work on accessibility, which was used to inform the 'Greater Nottingham Sustainable Locations for Growth Study', supports those conclusions.

GBC- LOCALLY DISTINCT HOUSING ISSUES FOR GEDLING BOROUGH

1. Do you support the proposed approach as set out in section 5?

Yes, but with provisos (see response to Question 2)

2. Do you have any comments?

The larger Top Wighay Farm site, i.e. that assessed in the 'Appraisal of Sustainable Urban Extensions Study', is supported for development. Work is on-going to gather evidence and justification relating to this site, jointly between landowners, including the County Council, and Ashfield and Gedling Borough Councils. This work includes a Habitats Regulations Appraisal associated with the prospective Sherwood Forest Special Protection Area. Furthermore, the Top Wighay Farm site is more certain of being deliverable than any of the alternative sites presented by Gedling Borough Council and should at least be identified as the favoured alternative site should Gedling Colliery/Chase Farm not come forward as anticipated. This should include the retention of the safeguarding of the land to the north of the current allocation.

The County Council would wish to emphasise two points in respect of Mapperley Golf Course. Firstly, that the value of the Golf Course includes its contribution to green infrastructure in the vicinity, particularly for visual and ecological reasons, and this should be recognised. Secondly, strong policies should be put in place to ensure that accessibility to sports provision (i.e. a golf course) is not diminished, as that is an important element of the sustainability of the Plan.

The Greater Nottingham Landscape Character Assessment (GNLCA) should have been used to inform the 'Sustainable Locations for Growth Study' and it is not clear whether this was the case. It therefore needs to be confirmed either that this was the case or, if not, that different conclusions about the suitability of sites would not have been reached had the GNLCA work been taken into account.

Any changes to the 'Option for Consultation' sites, such as the inclusion of Mapperley Golf Course within the Gedling Colliery/Chase Farm allocation, will need to be tested by updating the Greater Nottingham Transport Model.

As the housing allocations cover the period up to 2028 and pupil projection data is based on 5 year forecasts the education infrastructure requirements which are based on current provision will change. The need for additional education provision generated by housing development that cannot be accommodated in existing schools must be funded by the developer. This may include the extension of existing schools or the provision of new schools and sites.

Mapperley Golf Course does not carry any nature conservation designations, although it has the potential to support features of nature

conservation value, including both habitats and species. It is suggested that some level of ecological assessment of the site is required to determine its suitability for development from a nature conservation perspective.

Should the site be deemed appropriate for development, opportunities to enhance it for biodiversity should be taken. These may include the retention of established areas of woodland, the creation of new areas of open habitat as part of the site's open space provision and the reinstatement of the watercourse that crosses the site (perhaps as part of a SUDS scheme).

BBC1- STRATEGIC SITES AND BROAD LOCATIONS FOR GROWTH:

1. Do you support the allocation of a strategic housing site west of Toton Lane in the Greater Nottingham Aligned Core Strategies?

Yes

2. Do you have any comments?

The two strategic sites adjoining the built-up area were both recommended (amongst others) in the 'Appraisal of Sustainable Urban Extensions Study'. In both instances, while the general area is important for Green Belt purposes (principally in preventing the coalescence of Nottingham and Derby), the Study noted that these two sites would not raise significant concerns with regard to coalescence and both could be developed recognising defensible Green Belt boundaries. The County Council would concur with this conclusion and support these two locations. In particular, the Toton Lane site could offer strong sustainable transport options.

The Toton Lane site does not have any nature conservation designations, although it has the potential to support features of nature conservation value, including both habitats and species. It is suggested that some level of ecological assessment of the site is required to determine its suitability for development from a nature conservation perspective.

Should the site be deemed appropriate for development, opportunities to enhance its biodiversity value should be taken. These may include the retention of established areas of habitat and the creation of new areas of habitat as part of the site's open space provision, and creation of new multi-functional wetland areas as part of a SUDS scheme. At Toton, opportunities to enhance the wildlife corridor provided by the River Erewash and the Toton sidings area should be explored, including habitat and access linkages through to the Toton Fields Local Nature Reserve. Such issues should be examined through a Green Infrastructure plan.

The following comments relate to all of questions 2, 4, 6, 8, 10, 12, & 14.

The Greater Nottingham Landscape Character Assessment (GNLCA) should have been used to inform the 'Sustainable Locations for Growth Study' and it is not clear whether this was the case. It therefore needs to be confirmed either that this was the case or, if not, that different conclusions about the suitability of sites would not have been reached had the GNCLA work been taken into account.

Any changes to the 'Option for Consultation' sites will need to be tested by updating the Greater Nottingham Transport Model.

As the housing allocations cover the period up to 2028 and pupil projection data is based on 5 year forecasts the education infrastructure requirements which are based on current provision will change. The need for additional education provision generated by housing development that cannot be accommodated in existing schools must be funded by the developer. This may include the extension of existing schools or the provision of new schools and sites.

3. *Do you support the allocation of a strategic housing site north of Ilkeston Road at Field Farm, Stapleford in the Greater Nottingham Aligned Core Strategies?*

Yes

4. *Do you have any comments?*

The two strategic sites adjoining the built-up area were both recommended (amongst others) in the Appraisal of Sustainable Urban Extensions Study. In both instances, while the general area is important for Green Belt purposes (principally in preventing the coalescence of Nottingham and Derby), the Study noted that these two sites would not raise significant concerns with regard to coalescence and both could be developed recognising defensible Green Belt boundaries. The County Council would concur with this conclusion and support these two locations.

The Field Farm site does not have any nature conservation designations, although it has the potential to support features of nature conservation value, including both habitats and species. It is suggested that some level of ecological assessment of the site is required to determine its suitability for development from a nature conservation perspective.

Should the site be deemed appropriate for development, opportunities to enhance its biodiversity value should be taken. These may include the retention of established areas of habitat and the creation of new areas of habitat as part of the site's open space provision, and creation of new multi-functional wetland areas as part of a SUDS scheme. At Field Farm, opportunities to enhance the wildlife corridor provided by the Nottingham Canal should be explored, along with habitat and access linkages through

to Stapleford Hills Wood Local Nature Reserve. Such issues should be examined through a Green Infrastructure plan.

5. Do you support the identification of Eastwood including adjoining greenfield sites as an appropriate broad area for future housing growth?

Yes

6. Do you have any comments?

The 'Sustainable Locations for Growth Study' identified locations around Eastwood that could be sustainable locations for development. The recommendations of that study should be followed.

The following comments relate to all of questions 6, 8, 10, 12, & 14.

In general terms, development should avoid sites of significant nature conservation value, be they designated sites (such as SINC's) or areas of UKBAP/LBAP habitat. Development should also avoid increasing the fragmentation and isolation of retained sites of nature conservation value.

Development in such areas should be used to deliver green infrastructure, including by improving linkages between existing habitats, and by addressing local shortages of high-value wildlife habitat.

7. Do you support the identification of Kimberley/Watnall including adjoining greenfield sites as an appropriate broad area for future housing growth?

Yes

8. Do you have any comments?

The 'Sustainable Locations for Growth Study' identified locations around Kimberley/Watnall that could be sustainable locations for development. The recommendations of that study should be followed.

9. Do you support the identification of Awsworth including adjoining greenfield sites as an appropriate broad area for future housing growth?

Yes, but with provisos

10. Do you have any comments?

The 'Sustainable Locations for Growth Study' identified locations around Awsworth that could be suitable for small-scale development. In Green Belt terms Awsworth would be suitable only for small scale 'rounding off' type development.

11. Do you support the identification of Brinsley including adjoining greenfield sites as an appropriate broad area for future housing growth?

Yes, but with provisos.

12. Do you have any comments?

The 'Sustainable Locations for Growth Study' identified locations around Brinsley that could be suitable for small-scale development. In Green Belt terms Brinsley would be suitable only for small scale 'rounding off' type development.

13. Do you support the identification of Nuthall including adjoining greenfield sites as an appropriate broad area for future housing growth?

No.

14. Do you have any comments?

There are important Green Belt coalescence issues around Nuthall (the 'Appraisal of Sustainable Urban Extensions Study' ruled out a SUE in this location).

CC- CLIMATE CHANGE POLICY:

1. Do you support the approach with this policy?

Yes.

2. Do you have any comments?

The revised policy on climate change is supported as it is now set out more clearly and the target percentages are now included within the policy rather than only in the justification.

However as part (a) of the policy covers a range of issues, it is suggested that it would aid further clarity if it were to be split into two parts as follows:

- (a) How it makes effective use of sustainably sourced resources and materials;
- (b) How it minimises waste, carbon dioxide emissions and water use. For residential development, water use should be in accordance with level 3 or higher of the Code for Sustainable Homes;

The additional text in the justification is welcomed as it provides a fuller explanation of the approach taken in the policy.

In paragraph 3.1.13 of the justification 'Towards a Sustainable Energy Policy for Nottingham' should read 'Towards a Sustainable Energy Policy for Nottingham**shire**'.

Appendix 2

Description of the Studies into potential growth locations in and around Nottingham

Both reports were jointly commissioned by all the local councils in the area: Ashfield District, Broxtowe Borough, Gedling Borough, Nottingham City, Rushcliffe Borough and Erewash Borough, together with Nottinghamshire County Council.

They were intended to provide an independent and comprehensive assessment of potential locations for growth to inform later decision-making by the authorities.

Appraisal of Sustainable Urban Extensions Study

This study was used to inform the 'Preferred Option' ACS reported to Cabinet in March 2010.

The consultants looked at the whole area and identified a number of possible locations for housing development setting out the pros and cons of each site.

The consultants firstly, in Part A, identified 'Directions for Growth' all around the conurbation. From these, they identified areas that had some (or no) potential for further investigation.

Each Direction for Growth was assessed against criteria to establish suitability for development. The consultants used a wide factual evidence base that was fully referenced and sourced. The results were checked with the responsible bodies, for example the Environment and Highways Agencies.

The criterion first established was to eliminate land that was environmentally not suitable for development no matter what the remaining criteria indicated (e.g. flood risk). The rest below were applied to all remaining areas:

- Infrastructure capacity and potential
- Geoenvironmental considerations
- Transport and accessibility
- Housing affordability
- Economic development
- Regeneration potential
- Green Belt and/or strategic policy.

From this, Part B used a similar process to define the most suitable sites for development within each Direction for Growth, adding more site-specific issues to be taken into account. In Part B, information from site visits by the consultant team is included for the first time. Other useful sources include the various local planning documents that cover each site, including local plans, and Inspectors' reports. In order to maintain neutrality of the study, information submitted by developers, landowners, and local authorities,

whether seeking to promote their own sites or discounting alternative sites, was not used.

The study recommends that some areas are ruled out for reasons such as environmental sensitivity, heritage, risk of flooding and transport and congestion. The result is a comprehensive analysis of the area, with robust and traceable reasoning for the resulting table of sites that are considered appropriate for sustainable development.

Sustainable Locations for Growth Study

This study provides an objective technical assessment for the growth of smaller and rural settlements across the ACS area. The report sets out that any decisions regarding future locations for growth are very clearly matters for the formal plan making process with full public consultation.

The report provides a useful starting point to consider the impact and constraints to the growth of the settlements and villages around the Nottingham Core HMA.

The information used to assess each settlement included environmental, infrastructure, transport and accessibility, economic development and regeneration, Green Belt and strategic policy and the conclusions of the Nottinghamshire County Council's Accessible Settlements Study. Consultation was carried out with utilities providers, transport providers, statutory environmental bodies and education and health providers including the County Council.

The report concludes that there are a number of settlements that could accommodate further growth up to 2026, many of which have much to gain from doing so – such as supporting regeneration. The report has also found that growth above that needed to support local needs would not be appropriate in some settlements, and should be avoided in most rural (non-village) greenfield locations.