

Greater Nottingham Planning Partnership



Greater Nottingham Strategic Plan
Publication Stage Representation Form

Ref:
(For official use only)

Please return by 5pm Monday 16th December 2024

You are advised to read the associated [Guidance Notes](#)

Part A – Your contact details (need only be completed once)

Personal Details

Agent's Details (if applicable)

Title	<input type="text"/>	Mr
First Name	<input type="text"/>	Anish
Last Name	c/o Agent	Jadav
Job Title	<input type="text"/>	Associate Director
(where relevant)		
Organisation	Havenwood Construction	Marrons
(where relevant)		
Address	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

Which council area(s) do you live in and/or have an interest in? Please tick.

- Broxtowe
- Gedling
- Nottingham City
- Rushcliffe



Part B – Your representation(s)

(Please use a separate form for each policy/site you are commenting on)
(You are advised to read the Guidance Notes)

1) To which part of the Strategic Plan does this representation relate?

Policy

Please see
accompanying
reps

Paragraph

Other

2) Do you consider the Strategic Plan:

a) is legally compliant

Yes

No

b) is sound

Yes

No

c) complies with the
Duty to Co-operate

Yes

No

3) Please give details of why you consider the Strategic Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Strategic Plan or its compliance with the duty to co-operate, please use this box to set out your comments.

Please see accompanying representations.

(Continue on a separate sheet /expand box if necessary)

4) What changes do you suggest to make the Strategic Plan legally compliant, sound or meet the duty to co-operate? Please be as precise as possible.

No – please see accompanying representations.

(Continue on a separate sheet /expand box if necessary)

Please note: *In your representation you should succinctly provide all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.***

5) If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I do not wish to participate in the hearing session(s)



Yes, I wish to participate in the hearing session(s)

6) If you have answered **Yes**, why do you feel it is necessary to participate in the examination hearing session(s)?

We wish to comment in further detail on various aspects of the emerging plan, including housing growth, housing numbers, the duty to cooperate, amongst others matters outlined in our representations.

(Continue on a separate sheet /expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

7) Please tick here if you do **not** wish to be notified about the submission for independent examination, the publication of the Planning Inspectorate's

recommendations and the adoption of the Greater Nottingham Strategic Plan:

Please return completed forms by 5pm on Monday 16th December 2024:

By email: contact@gnplan.org.uk

By post:
Planning Policy and Research Team,
Nottingham City Council, Loxley
House, Station Street, Nottingham
NG2 3NG

For assistance or more information:

Visit our website:

<https://www.gnplan.org.uk/consultations/>

Telephone:

Broxtowe Borough Council: 0115 917 3452

Gedling Borough Council: 0115 901 3733/3734

Nottingham City Council: 0115 876 4594

Rushcliffe Borough Council: 0115 981 9911

Data Protection

The comments you submit will be used to inform the Greater Nottingham Strategic Plan process and will be held for the lifetime of the Greater Nottingham Strategic Plan. Please note that your comments will not be treated as confidential and will be made available for public inspection. However, contact details will not be made public and will not be passed to external parties, apart from the Inspector, without permission.

Please tick to confirm you are happy for your comments to be made public

✓

Privacy Notice

By responding to the consultation, you will be added onto our joint consultation database and we will notify you when there is an update to the Greater Nottingham Strategic Plan. The council(s) that you have selected will also notify you when they are consulting on their own planning policy documents. Further details are provided in our privacy policy which is available at www.gedling.gov.uk/jointprivacynotice

Please tick to confirm you have read and understood the privacy notice

✓

Comments that are submitted without the above boxes being ticked will be treated anonymously and not added to our database

Greater Nottingham Strategic Plan Consultation

Regulation 19 Representations

On behalf of Havenwood Construction Ltd



QUALITY ASSURANCE

Project Name:	Greater Nottingham Strategic Plan ("GNSP") Publication Plan (Regulation 19) Consultation
Client Name:	Havenwood Construction Ltd
Prepared By:	S MacPherson MRTPI
Signed:	S MacPherson MRTPI
Date:	09/12/2024
Reviewer	A Gore MRTPI
Signed	A Gore MRTPI
Date:	13/12/2024

1. INTRODUCTION

BACKGROUND

1.1.1 These representations have been prepared by Marrons on behalf of Havenwood Construction Ltd to comment on the soundness and legal compliance of the Greater Nottingham Strategic Plan (“GNSP”) Publication Plan (Regulation 19) Consultation.

1.1.2 Havenwood Construction Ltd is promoting land at Simkins Farm, Adbolton Lane, Nottingham for residential development, which is shown below at Figure 1:

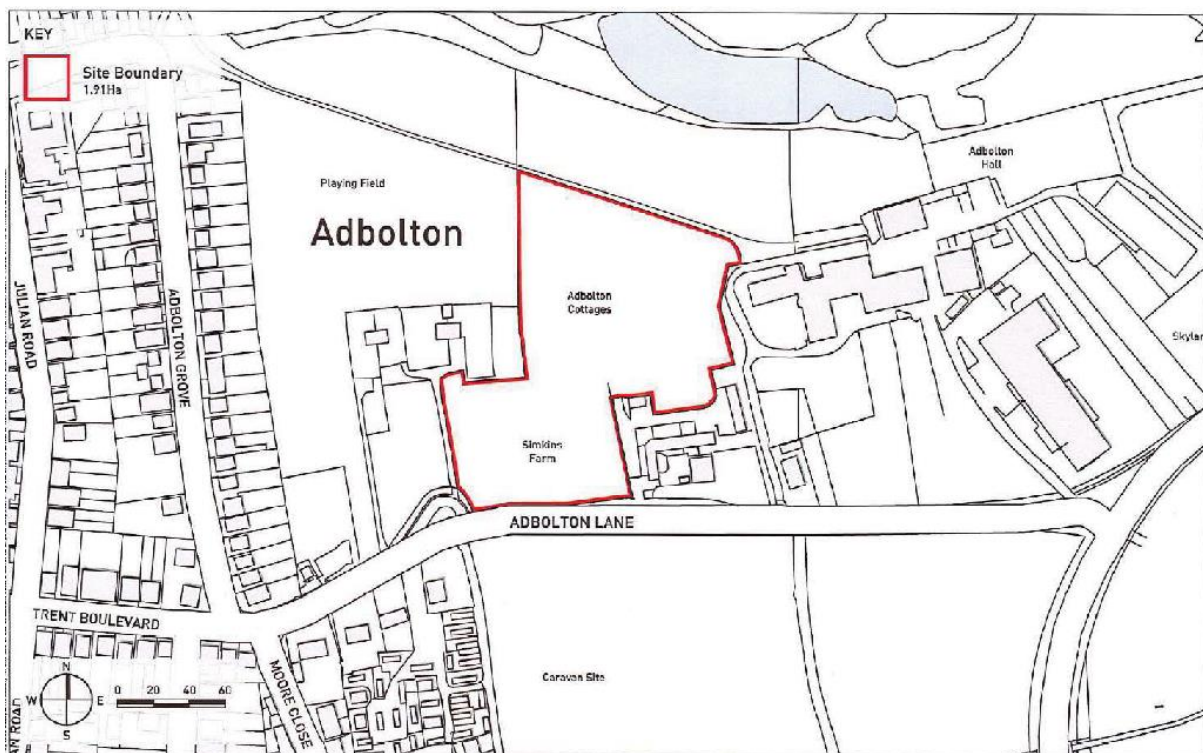


Figure 1: Land at Simkins Farm, Adbolton Lane, Nottingham

1.1.3 The GNSP is advanced as a joint strategic plan which is intended to cover the administrative areas of the boroughs of Broxtowe, Gedling, Rushcliffe and the city of Nottingham. The current consultation in respect of the GNSP seeks views on the publication version of the GNSP and the technical evidence base underpinning it to identify a strategy for delivering growth between 2023 and 2041.

1.2.1 As the Plan has reached Publication (Regulation 19) stage, it is the intention for this version of the Plan to be submitted to the Secretary of State for Examination by the Planning

Inspectorate. Accordingly, these representations will focus on assessing each relevant policy against the tests of soundness, currently articulated in paragraph 35 of the National Planning Policy Framework (“the Framework”) of December 2023. The Framework states that Plans are sound where they are positively prepared, justified, effective and consistent with national policy.

1.2.2 The Framework puts the presumption in favour of sustainable development at the heart of the planning system. According to Paragraph 11 of the Framework, for plan-making, this means promoting a sustainable pattern of development and, as a minimum, providing for objectively assessed needs for housing and other uses, unless the NPPF itself indicates that there is a strong reason for restricting the scale, type and distribution of development within the plan area; or if any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole.

STRUCTURE OF REPRESENTATIONS

1.2.3 These representations raise matters in relation to the substantive content of the emerging Local Plan drawing on elements of the evidence base where appropriate and have been broadly structured as follows:

- Housing Requirement, Land Supply and Delivery
- Spatial Strategy
- Land at Simkins Farm, Adbolton Lane, Nottingham

2. HOUSING REQUIREMENT, LAND SUPPLY AND DELIVERY

2.1.1 Within the GNSP, Draft Policy 3 plans for a minimum of 54,670 homes between 2023 and 2041 across the Plan Area equating to an annual average of 3,037 dwellings per annum (dpa), which is distributed across each local authority area. However, application of the Standard Method produces an annual housing requirement across the Plan Area of 3,298 dpa. Therefore, over the Plan period (2023 – 2041), the minimum number of homes required in Greater Nottingham is 59,364. In other words, the housing requirement within the GNSP amounts to a shortfall of some 4,694 dwellings against the Plan Area's LHN.

2.1.2 The PPG clarifies that use of the Standard Method for strategic policy making purposes is not mandatory, but that there is an expectation that any other method will only be used in exceptional circumstances.¹ There is no cogent explanation within the Plan or its evidence base as to why exceptional circumstances within Greater Nottingham exist to deviate from the Standard Method. Whilst it is plain from the comments in the Housing Background Paper (2024) that the plan-makers do not agree with the urban uplift, it is part of the Standard Method and therefore intrinsic in establishing the Plan area's unconstrained assessment of housing need. Whilst alternative methods could be used in exceptional circumstances, the approach which underpins the GNSP is not an alternative method nor is it advanced as such. Instead, it is the result of the councils having confused the distinct process of establishing unconstrained housing needs with matters of land availability, precisely contrary to the expectations of the PPG.

2.1.3 Notwithstanding the above, we are not aware of any local planning authorities within the Housing Market Area (HMA) or the wider sub-region where exceptional circumstances to depart from the Standard Method have been claimed, let alone successfully argued through Examination. Other local planning authorities in the same HMA such as Ashfield District and Erewash Borough councils, both of which have local plans at examination as of the time of writing, have not claimed exceptional circumstances to depart from the Standard Method, nor have any of the other authorities in the neighbouring HMAs of Leicester and Leicestershire or Derby. Akin to Nottingham, both Leicester and Derby are subject to the urban uplift. The

¹ Paragraph: 003 Reference ID: 2a-003-20190220

urban uplift is part of the Standard Method. It is not open to plan-makers to simply ignore the urban uplift without establishing exceptional circumstances and putting forward a coherent, alternative methodology. The draft GNSP and its evidence base fails to do both.

2.1.4 Paragraph 62 of the Framework states that the urban uplift should be accommodated in cities and urban centres themselves, except where there are voluntary redistribution agreements in place, or where it would conflict with the policies in the Framework. The Housing Background Paper does not address the second limb of paragraph 62, but this is fundamental to the question of what happens when the urban uplift cannot be accommodated within the urban centres. The Framework does not say that any element of the urban uplift that cannot be met within the urban centres should not be met at all. In fact, paragraph 11 of the Framework states that strategic policies should meet objectively assessed needs for housing, as well as any needs that cannot be met within neighbouring areas. Therefore, to not meet the urban uplift and to not even consider meeting it in neighbouring areas is plainly a conflict with other policies of the Framework, in this case paragraph 11, and the legal Duty to Cooperate (“DtC”).

2.1.5 As the urban uplift is part of the formula for establishing objectively assessed needs for housing, there is a clear expectation within the Framework that where this cannot be met, it is incumbent upon Nottingham City Council to cooperate with its neighbouring authorities to try to ensure that it is. This is also reflected in the statutory DtC within the Planning and Compulsory Purchase Act 2004 (as amended). In the context of the GNSP, which is progressed as a joint statutory development plan between Nottingham City Council and its neighbours, the re-apportionment of Nottingham’s unmet need should be a key issue to address through plan perpetration, but it has not been.

2.1.6 Additionally, the new Standard Method, published on 12th December 2024, and its implications for the Plan area should be addressed. In particular regard to the urban uplift, the Housing Background Paper correctly points out that the new Standard Method removes it. The intention is to progress the GNSP under transitional arrangement, meaning it will be examined under the 2023 Framework rather than future versions. As a result, the new Standard Method’s deletion of the urban uplift is simply not relevant.

2.1.7 That said, if the urban uplift and the previous Standard Method were as methodologically flawed as the councils appear to believe, then it begs to the question as to

why they have decided to attempt to continue preparation of the GNSP under the previous Standard Method rather than the new Standard Method.

2.1.8 In terms of housing land supply, the approach of the GNSP is considered to be flawed in several areas. Firstly, the overreliance on windfall development, which is presented as providing over 10,000 dwellings over the plan period, at a rate of 650 dpa, following a lead-in period of lower delivery for the first three years. However, there is no clear indication of why the councils expected the much shorter term trend to endure throughout the Plan period, particularly given the high numbers already assumed from the SHLAA. There is similarly no robust information to demonstrate that the figures provided over that period are net of sites forecast within the SHLAA.

2.1.9 The GNSP is underpinned by an assumption about the capacity of Nottingham City to accommodate development over the Plan period to 2041 in the amount of about 26,000 dwellings. A large proportion of that number (7,612) is expected from unallocated sites identified in the SHLAA. Surprisingly, the SHLAA has not been included within the evidence base currently subject to consultation. In addition, there is no clear breakdown of how the SHLAA has been used to inform the housing trajectory identified in the Housing Background Paper and the Plan. From a review of Nottingham City Council's January 2024 SHLAA, it includes Local Plan sites, but there is a separate category within the housing trajectory for allocated sites. It is not clear how the SHLAA has been sifted to avoid double-counting with other sources of supply, such as allocations.

2.1.10 On the topic of allocations, in particular within Broxtowe Borough, we would raise concern with the carrying-forward of the Toton and Chetwynd Barracks Allocation which benefits from an extant allocation in the Part 2 Local Plan for Broxtowe. During the examination of the Part 2 Local Plan in 2019, concern was raised about whether the site could realistically deliver 100 homes per year from 2023 onwards and given the GNSP is now predicting first completions by 2026/2027, these concerns were clearly justified. Likewise, Toton was anticipated to commence in 2019/2020, yet still has not done so.

2.1.11 The failure of this site to come forward despite a long-standing allocation is significant because the housing trajectory for Broxtowe shows even a modest slip in the delivery timeline for the site beyond that currently anticipated will push significant housing numbers (forecast

at 200 dpa for most of the Plan period) beyond the GNSP's end date, leaving a substantial gap in the Plans' overall housing provision.

2.1.12 In spite of the above, we note the lack of any clear and objective assessment within the GNSP or its evidence base underpinning the anticipated delivery timescales or rates. Intervening events since the adoption of the Part 2 Local Plan for Broxtowe should also give cause for concern, namely the reduction in the scope of the HS2 project, the Ministry of Defence delaying closure of the barracks until 2026 (having done so at least once before) and Nottinghamshire County Council's failed bid for funding to support delivery of a link road required to mitigate the strategic transport impacts of the project.

2.1.13 Whilst the site may be retained as a long-standing aspiration for growth, there is virtually no evidence that it will yield housing completions by 2026/2027 and the available information suggests that most of the capacity on this site is undeliverable within the current Plan period.

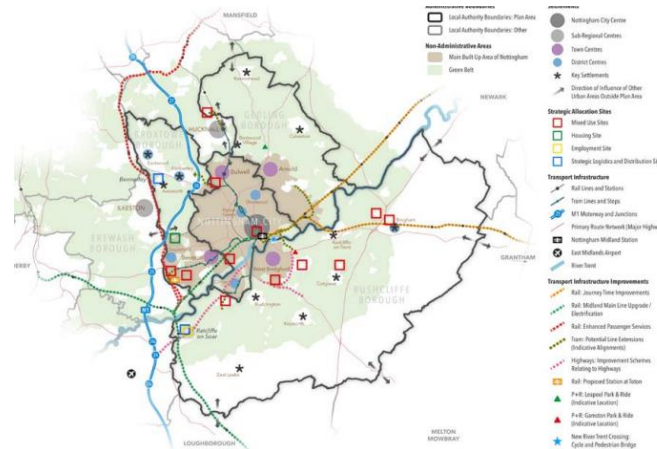
3. SPATIAL STRATEGY

3.1.1 In preparing the GNSP, a spatial strategy has been advanced in Policy 2 whereby development is apportioned and located in accordance with the settlement hierarchy. By and large, this is unchanged from previous Local Plans within the Plan area. The intention is to distribute development primarily in those locations which are most suitable and sustainable so that they can make the least impact on existing infrastructure and be most well placed for future residents. This is articulated within the policy, including at 1, d, where it is stated that sustainable development in the Plan area will be achieved through, inter alia:

'creating sustainable communities that have local community services and facilities, are attractive places to live and visit and which enhance the quality of life for residents;'

3.1.2 Policy 2 provides that development shall be located as preference within the built-up area of Nottingham, then adjoining the same, then adjoining Hucknall, then within and adjoining Key Settlements. Development in all other settlements is not accounted for in the Plan, being "at a smaller scale as defined through plan preparation".

3.1.3 The “main built up area of Nottingham” is shown in the Key Diagram in the appendices of the GNSP, as follows:



3.1.4 To focus on the Site at Simkins Farm specifically, the Site lies just outside of the main built up area immediately adjacent to the area known as Lady Bay. Draft allocation of the site for residential development would thus accord with the spatial strategy of the plan.

4. LAND AT SIMKINS FARM, ADBOLTON LANE, NOTTINGHAM

4.1.1 For the avoidance of doubt, we consider that the site at Simkins Farm, Adbolton Lane, Nottingham, offers a sustainable location to accommodate a smaller scale residential development that could be brought forwards quickly to boost local housing land supply. The site has previously been submitted to the Core Strategy Review Call for Sites (July 2019) and has been promoted through the Strategic Plan as well as the Rushcliffe Part 2 Local Plan (now adopted).

4.1.2 The site constituted the northern tip of a wider suggested strategic allocation at R07.1PA9 East of Lady Bay, West Bridgford (SHLAA reference HOL/501) in the Rushcliffe Preferred Options document (December 2022). The Sustainability Appraisal in the aforementioned document outlined that the wider site would be very suitable for housing as well as being suitably situated within the highways network and in sufficient proximity to local services.

4.1.3 The main issue identified with the wider site (R07.1PA) in the Rushcliffe Preferred Options Document was that a large portion of it is within Flood Zone 3b, as defined by the Environment Agency Flood Map. However, the land solely to the north of Adbolton Lane and

the subject of this representation is within Flood Zone 1, making it more suitable for development. In fact, it is one of the only areas in the vicinity that is not at a heightened risk of flooding.

4.1.4 The SHLAA assessment also concludes that the landscape and visual sensitivity is low (with medium landscape value) and that the site does not contain any Green Infrastructure assets. The site is not located within an AQMA and the site doesn't contain any designated nature conservation assets. A Grade II listed building (Simkins Farm) is located to the east of the site, however, this is screened by converted and new outbuildings. Development at the site would be well related to the existing built form of Lady Bay.

4.1.5 Vehicular and pedestrian access can easily be accommodated off Adbolton Lane. A well-lit pavement connects the site to the centre of Lady Bay and West Bridgford. There are a number of services and facilities close to the site, including, Lady Bay Primary School, Lady Bay Pharmacy, play area, Co-op food-store, the Hook nature reserve, Lady Bay Tennis and Sports Club, and a number of shops, cafes, bars and pubs. Bus stops are located adjacent to the south of the site on Adbolton Lane, with regular services to Nottingham. Nottingham Railway station is under a ten minute drive away from the site and a twenty minute bus journey.

4.1.6 The site has capacity for approximately 35-40 homes based on a density of 30 dwellings per hectare. The scheme would be designed to be in-keeping with the local area.