

Covering letter

12th April 2010

Gotham Parish Council response to the
Greater Nottingham
Aligned Core Strategies
Option for Consultation
February 2010

Attached are the comments from Gotham Parish Council to the latest document in the process towards a long overdue Local Development Framework. While we welcome the opportunity to take any part in the consultation process, we are beginning to feel that we have been here before and are merely re-hashing old arguments. In his book 'Web of Deceit' (Vintage Original ISBN 0-099-44839-4), Mark Curtis describes the lack of real democracy and the process of sham 'consultations' in Britain. He states 'It is hard to spot any ways in which significant government policies have ever actually been influenced in any major (or even minor) way by these consultations. The process is more about securing public support and NGO acquiescence in government strategy while offering the pretence of influencing the process.'

GPC will comment in more detail on how Rushcliffe Borough Council have implemented this consultation at a later date, but we feel that despite the hard work and commitment of RBC employees, the publicity events have fallen short of their objective in informing and mobilising public opinion. GPC feel that our parishioners are being worn down by the repetitive nature of this process and are concerned that whatever they might say they are unlikely to make any difference.

Yours sincerely

Judy Raven, Clerk etc

Gotham Parish Council response to Greater Nottingham 'Aligned Core Strategies – Option for consultation (February 2010).

1. INTRODUCTION

1.1 The Government has said (1.1.9) that *The Aligned Core Strategies MUST take account of the Government's East Midlands Regional Plan, which is the RSS. This was published by the Secretary of State in March 2009 and sets out the number of new homes WHICH WILL HAVE TO BE BUILT in each Council area, together with guidance on how to provide for new jobs and work places up to 2026.* Here is the classic language of the sham consultation referred to in our covering letter. Gotham Parish Council believes the housing targets are excessive and in every consultation we make this point in the hope that the numbers will be reduced.

1.2 The Government has said (1.3.1) that *Changes in planning legislation have sought to introduce a simpler and more effective planning system, strengthening community involvement in planning.* How small Parish Councils are now expected to respond to Regional Strategies and aligned County Council strategies in Greater Nottingham fits in to the idea of simplicity is questioned. The task was simpler when planning was locally based and dealt with in the County Structure Plan.

2. *The Future of Greater Nottingham.*

2.1 (2.2.3) The designation of a New Growth Point, which brings extra resources to help provide the infrastructure necessary to support new housing growth is nothing short of bribery. This policy is only of benefit to the city. Sustainable Urban Extensions are simply a device for imposing massive housing development, irrespective of whether they will form successful harmonious communities. A SUE is not appropriate for Rushcliffe Borough Council and Gotham Parish Council is at a loss to understand why RBC is willing to accept this imposition on their rural borough.

3. *The Delivery Strategy*

3.2 POLICY 2 THE SPATIAL STRATEGY

3.1 (Point 1) GPC urge RBC to continue to challenge the numbers of houses forced upon the East Midlands in the RSS. The methodology and assumptions to the latest report (October 2009) from NHPAU on which these numbers are based can be found in <http://www.communities.gov.uk/nhpau/keypublications/research/morehomesappendix/>.

There are significant assumptions in assessing demographics, migration and the recession that need to be critically examined by RBC for their relevance and accuracy to the East Midlands. There is no sensitivity analysis, which is surprising given the apparent complexity of the computer model, and GPC urge RBC to demand this from NHPAU. Indeed, CPRE have shown from their own investigations that 'small changes in these assumptions can lead to large changes in the estimated figures' (*Housing the Future: An analysis of the Government's household projections and their use in planning for new housing, December 2009*). Given the volatility of the last few years, there must be huge uncertainty when looking ahead as far as 2026 or 2031: it is simply denying responsibility to say, as NHPAU do, that in the long term the recession and the drop in migration will pick back up again.

3.2 (Point 1b) GPC oppose the proposed SUE at Clifton as an unnecessary development in the green belt, giving rise to the loss of significant areas of valuable grade 2 arable land of which there is very little in Nottinghamshire. Throughout this entire planning process the value of arable land has been consistently understated. The 1980's grain mountains have disappeared, the set aside policy has vanished and now the Government is telling farmers to increase yields. The ability of this country to grow its own food is becoming increasingly more important and GPC insist RBC analyse this in depth before committing such land to go under concrete and be lost to agriculture forever.

3.3 The scale of the housing proposed in the SUEs does not allow for a proportion of housing being allocated to smaller villages to meet local need, especially affordable housing or for re-development of brownfield sites in suitable locations. We believe that given the current recession and changed migration patterns, fewer houses may be needed. A more sound strategy would be to continue with the sequential approach to development giving urban land and brownfield sites preference to allocations on Green Belt land.

3.4 Current uncertainty brought on by the recession and the likelihood of substantial Government cuts in capital and revenue expenditure must be translated into adjusting the number of new dwellings required by 2026. (It would be much more sensible to only identify land for the next ten years).

3.5 It seems unlikely in the present financial climate, building rates could be increased beyond the rate achieved when the economy was buoyant, as is required in this document.

3.6 GPC note that in the Issues and Options box: *Most developers (though not all) support SUEs and most members of the public and councillors object to Greenfield development.* Will this latest round of consultations add any more weight to the general public's opinion? A more logical approach would be to plan on the basis of past building rates (achieved before the economic and banking turn down).

3.7 It would also help the housing situation if current vacancy rates (currently 12,000 in Nottingham alone) were improved.

3.8 With this in mind, GPC urge RBC to challenge SHLAA and look at achieving development land from existing settlements. There have been recent press statements about development sites in Nottingham City foundering from lack of money. GPC questions whether there has been appropriate consultation with the City Council over its potential development sites.

3.9 Green Belts introduced 60 years ago to protect the countryside from this sort of development are the planning systems main tool for containing urban sprawl. They have been successful and enjoy strong public support, though they only cover 13% of the land surface of England.

3.10 GPC note that (*Justification 3.2.3*) SUE developments will be '*exemplar in terms of their design*'. We expect RBC to rigorously apply this to any proposed SUE at Clifton.

3.3 POLICY 3 THE SUSTAINABLE URBAN EXTENSIONS

3.11 While GPC oppose the proposed SUE south of Clifton, in the event of the development going ahead, GPC will expect RBC to give full consideration to the needs to Gotham parishioners to have access to the facilities and transport infrastructure. In particular an off road cycle track from Gotham to the SUE should be provided to enable access to the tram network.

3.12 Currently the land is designated as Green Belt and is fulfilling four of the five purposes as set out in PPG2. We fear that the landscape character of this area is constantly undervalued. The openness of the area makes it distinctive, with its unenclosed land pattern.

3.13 Development on this site is dependent on the duelling of the A453 and the prospect of NET phase 2. In the current economic climate there is no guarantee that these projects will come to fruition and planning permission for any housing should not be given if these transport projects are not fully funded.

3.14 We would prefer RBC to have the authority to develop strategy for building new housing that sets realistic targets for the Borough, which allocates fair shares to existing settlements rather than having SUEs imposed by central government.

3.15 Also despite the best intentions there will be inevitable demand for existing established facilities in Gotham from the residents of the Clifton SUE. Appropriate investment in the infrastructure of Gotham should be made to accommodate this demand (see POLICY 19). There has always been a demand from City residents to use the County schools and we see no change here – there may need to be an investment at Gotham Primary School.

3.16 GPC are also concerned at the lack of consultation with city residents. As the CABE report commissioned by RBC itself said, the whole principle of an SUE is that it develops the urban area it extends, in this case Clifton. GPC feel that the residents of Clifton are relatively unaware of the SUE development and that the implications of extensive building at the back of many peoples' back gardens have not been understood. Indeed there is reported alarm amongst residents of the Lark Hill residential complex that they have no idea that their view of the green fields of Clifton Pastures are under threat. For RBC to claim to have conducted a proper consultation, when they must consult with the people who will be most affected by the SUE at Clifton – the people of Clifton themselves. Such a significant development as this must not be hindered by poor communication between neighbouring councils.

3.4 POLICY 4 EMPLOYMENT PROVISION AND ECONOMIC DEVELOPMENT

3.17 GPC are always staggered by the overambitious estimates of business development based on East Midlands Airport. We note the recent closure of the bus link from Nottingham Parkway station to EMA as evidence of unrealistic claims.

GPC are also concerned over the possible development of a retail park as part of SUE at Clifton and the detrimental effect that it would have on local businesses.

3.7 POLICY 7 REGENERATION

3.18 There are substantial sites in Nottingham City, e.g. Waterside and Eastside, that are crying out for investment which would bring prosperity to a major brownfield site in a run down area.

3.8 POLICY 8 HOUSING SIZE, MIX AND CHOICE

3.19 GPC consider its own housing needs should be met within its own community. We accept the principle that SUEs should look to their urban neighbour to assess housing demand.

3.9 POLICY 9 GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

3.20 GPC welcome this policy.

3.12 POLICY 12 CULTURE, TOURISM and SPORT

3.21 GPC believe that any new major new football stadium should be built in the city so as to be accessed by rail and public transport, and bring benefit to City Centre hotels and restaurants.

POLICY 13 MANAGING TRAVEL DEMAND

GPC make no comment.

3.14 POLICY 14 TRANSPORT INFRASTRUCTURE PRIORITIES

3.22 Gotham lies in the path of any southward traffic leaving the proposed SUE at Clifton. Our Parish Plan (2005) showed that the main concern of our residents was the level of traffic through our village. We are very concerned that in the event of the development of the SUE at Clifton going ahead, that the levels of traffic will become unacceptably high and demand that appropriate modelling is undertaken to avoid this possibility. It is concerning that RBC has no expertise itself and will rely on third parties, probably the Highways Authority, for judgement on traffic levels. While GPC has confidence in HA and its computer models, it has none in developers who have both the motive and the ability to conceal the reality, and not much in RBC to enforce suitable constraints on them.

3.15 POLICY 15 GREEN INFRASTRUCTURE, PARKS AND OPEN SPACE

3.23 Nottingham has been blessed with a Green Belt around it for many years. Originally established to halt the urban sprawl, it also acts as the green lungs for the city. Green Belt forms a key part of the green infrastructure for Nottingham providing footpaths and bridleways for urban residents to enjoy and employment for others.

3.16 POLICY 16 BIODIVERSITY

3.24 SUEs, like the proposed expansion at Clifton and Gamston will only degrade the current biodiversity we have in the East Midlands. The extension at Clifton will take a vast area of grade 2 arable land out of production and will impact on wildlife in ways we cannot imagine at present.

3.17 POLICY 17 LANDSCAPE CHARACTER

3.25 GPC are appalled that the beauty of the Clifton Pastures area is being threatened by the proposed SUE. We feel that the 'moderate' value placed on the Clifton Slopes zone in the Greater Nottingham Landscape Character Assessment 2009, is too low.

3.19 POLICY 19 DEVELOPER CONTRIBUTIONS

3.26 GPC expect developer contributions towards infrastructure development in Gotham if the SUE at Clifton goes ahead. These would include:

- Provision of an off-road cycle track connecting Gotham to the tram network
- Extensive disincentives to car users to 'rat run' through Gotham away from the A453
- Development of the Memorial Hall and Recreation Ground complex to meet the increased demand from residents of the Clifton SUE, including car parking areas as they will of course arrive by car