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Sustainability Appraisal Analyses

By

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For the attention of Dawn Alvey

**Nottingham City Council - Local Plan (Part 2) Preferred Options Consultation
Response Form Attachment - Consultation ID number: 3215**

Topic - New Aspley Garden Holders Limited Sites DS88 and DS89 - Western
Boulevard.

General note, each redlined section relates to both Omission site New Aspley
Gardens (DS88 and DS89) as one rep and a separate rep on the SA

With reference to the above I list below my comments on your assessment of the
above sites/s as contained in the Nottingham City Land and Planning Polices
Development Plan Document – Local Plan Part 2 Sustainability Appraisal Publication
Version - January 2016)

Note the following headings 1- 14 relate to the Appraisal of DS88 and DS89
contained on pages 957/958 and 962/963 respectively.

1) Housing -

It is noted that sites DS88 and DS89 have been allocated major positive scores
in recognition that a significant level of new housing could be provided by the
implementation of either option.

It is worth noting that the DS88 site is self contained and isolated from any additional
traffic emanating from the Chalfont Drive development. Another plus point is that
there is no access for through traffic.

Site DS89 has 11 minor encroachments into the main area. However, these are located
at the periphery of the site's boundary and hence are not of any significance or
obstacle to development i.e. house building.

DS89, the larger option, has an area of around 24 acres (10 hectares) whilst D88 the
smaller option has an area of 20 acres (8 hectares)

2) Health -

The moderate negative and the moderate to major negative (options 1 & 2)
assessments, I question, as it appears to be principally based on the loss of
recreational exercise and healthy locally produced food.

Only a few of the gardens still have a water supply and are cultivated. Most of the
tenants are elderly and there are serious vandalism problems as stated below under the
heading crime. Hence there is not, overall, a significant amount of recreational
exercise taking place or healthy food being produced.

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Out of the 245 allotments all but 21 have been put forward for sale. This number includes the 11 owners who have a vested interest in not selling, as a result being in the fortunate position where they can extend their house garden by allotment annexation.

No, you cannot assume that these gardens are being used for growing food, think more in terms of flowers and lawn extensions with the odd exception.

The moderate to major negative appraisal (Option 2) is not understood. It appears to be based on the land usage that possibly existed in the early 1980's and as such bears no resemblance to the current conditions on the ground. If houses were built, as suggested, there would be a lot more recreational exercise and gardening taking place by virtue of the new home owners tending their gardens.

If we look at what used to be a pristine green field site, DS26 page 635, under the same heading a moderate positive assessment was allocated. Whilst DS89 a 24 acre unloved allotment site, overgrown and rubbish strewn, with 5 active gardeners, is awarded a moderate to major negative assessment.

The disparity between these assessments, (a positive to negative swing), leaves one to concluded that there appears to be a diagram error in respect of DS89 under the heading, 2) Health. An explanation of the assessment criteria applied here would be appreciated.

4) Crime -

Development would curtail the activities of the people who have been dumping obnoxious waste on the land over a prolonged long period time. The security of the houses located around the periphery of the site will be significantly improved by the secure boundary and improved surveillance associated with a housing development. Lloyds Leisure Centre (option 2) security would similarly be upgraded.

There is no satisfaction in allotment ownership if you have the steel frame of your gate removed by a power driven abrasive cut off disc and the metal clad gate removed for scrap metal. Produce stolen, shed vandalised, domestic and commercial rubbish dumped on your ground along with hypodermic needles, broken glass, old TV's and refrigerators. Part empty drums containing unknown obnoxious waste, car tyres, broken toilets, part filled gas cylinder etc. Not forgetting anything else that can be thrown over the Western Boulevard Fence, the list is endless.

Not every body is in the position to visit their allotment seven days a week to keep an eye on their patch. Nor are they likely to have the use of suitable transport and assistance to remove the dumped rubbish to the local recycling depot. Most owners are aging fast and it is quite conceivable that some of the proceeds from the sale will eventually finish up in your care home budget.

The wishes of the minority, whose gardening interests have been protected in all the development proposals put forward to date, seem to have been given a greater degree of cognisance by the council than the wishes of the majority.

The comments relating to community use are invalid as there is no public access to the land, it is privately owned. A mixed Housing Development would provide public access and arguably be of a significant social and health value to the area.

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5) Social -

If we look at site DS88 page 957 a minor negative value has been allocated. However, if we look at DS89 page 962, a moderate negative assessment has been allocated under the same heading. One can only assume that the social impact has been rated in relation to the sites land area. This assessment is clearly open to question, irrespective of the criteria used. Of the 245 allotments, we can remove from this number the 11 who have annexed their allotment. They are no longer considered to fall within the site area of Options 1 and 2. These owners, although not having sold their allotment, have already benefited financially as a result of enhanced house value associated with having acquired a larger garden.

Allowing for the owners who cannot be traced, we are left with around 5 "Hard Core Gardeners" owning 10 gardens apposing the proposed housing development.

The loss of social activity, within the gardening community, therefore, actually relates to the 5 owners of the 10 gardens under cultivation. To put it in perspective, an area roughly equivalent to a quarter of the area of site adjacent to the David Lloyd complex is actually being cultivated. Reference page 251 DS 89.

The Moderate Negative appraisal is obviously invalid, as there is only a minimal level of private social activity taking place on around one twentieth of the total acreage by the five owners and their friends? It should be noted that it has been agreed that land will be set aside for these garden owners in any development that takes place.

The positive social and health benefit, by virtue of house garden cultivation etc, associated with the proposed development of this site has, for some reason, been completely overlooked.

6) Environment Biodiversity and Green Infrastructure --

The council have already conceded that numerous incursions into the environments green infrastructure are inevitable. Confirmed by observed developments currently taking place on pristine agricultural land at the boundary of the city.

The emphasis on the loss of green space in relation to this area appears to have been over emphasized, especially as it is not a public amenity. If you study the area you become aware that the lack of open space is not a significant issue in this part of Nottingham.

For convenience, I list below the green areas that lie within approximately 1 mile of the site.

- a) The David Lloyd Leisure Centre complex and the sports ground that runs adjacent to Grassington Road from the Aspley Lane end as far as Holbeck Road.
- b) Sandwiched between Grassington Road and the railway line are the City owned Windmill Gardens.
- c) The South Field Road Playing Field.
- d) The Melbourne Park recreation ground accessed from Newton Drive and Melbourne Road.
- e) The Manning School Playing Field.
- f) The King George 5th Playing Field.

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- g) The Glaisdale Comprehensive School Playing Field.
- h) The Harvey Haddon Sports Complex.
- i) The Playing Field and Sports Ground which straddles the railway line - Wilkinson Street area.
- j) Wollaton Park
- k) Ellis Gillford Comprehensive School Tennis Courts and Playing Fields.

Development here would be far more sensible than on the flood plane of the River Leen, an area that could easily be converted into a nature reserve with a linking walkway and cycle track without degrading the lands defined designation. Ref. Environment Agency Flood Map.

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7) Landscape -

There is no public access to any of the allotments, as stated. 95% of which are not cultivated as a result of aging ownership, vandalism and rubbish dumping. The latter two are particularly relevant.

There is scope for a positive visual improvement to a section of the recently upgraded Western Boulevard with this development. Perhaps we could have your planning department thoughts on this matter?

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8) Natural Resources and Flooding –

It is noted that this development is no longer listed as being on the flood plain of the River Leen and as such has been allocated a moderate negative assessment.

Run off water could be greatly reduced by having property driveways and service roads built with permeable surfaces. Rain water harvesting and the judicious use of soak a ways etc would also be beneficial in this respect. The incorporation of SUDS would further reduce the peak run off rates from the site. Also the site is reasonably level so water collecting at the lowest point should not be a problem.

If we look at the same aspect in relation to the Bobbers Mill Bridge Site (LA8 DS28), although it is located on the flood plane of the River Leen it has also been allocated a moderate negative assessment.

Can you explain how these two sites, one on a flood plain and the other not, can be deemed to be at the same risk of flooding?

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9) Waste -

Currently it is impossible for the individual to prevent his or her plot from being used as repository for waste of the type that is not normally collected by the city council. Development would eliminate this problem and replace it with a house based waste recycling collection activity.

For a housing complex, I assume this would be categorised as having a moderate negative impact.

The moderate to major negative level allocated would only be reached if approval was given for a significant level of retail development, something that has not been proposed.

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10) Energy and Climate Change.

Comments relating to Energy and Climate change can be countered by stating that this aspect will be minimised by the use of a high standard of thermal insulation and the specification of energy efficient heating appliances. Ground source heating and solar electrical generation is another possibility. Every effort will be made to comply with the Cities Green Energy Policy.

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11) Transport.

There are at least 6 Bus Services, within walking distance of the site, that give direct access to the City. Namely Aspley Lane, Beechdale Road and Nuthall Road NCT services. If you include the Ring Road and Hospital Link services you would be hard pressed to find an area with better connections. For the more energetic there is the NCN6 cycle route on the doorstep.

Access to the site/s has not been raised by your planning department as being a significant problem.

The Major negative appraisal appears to be out of kilter with reference to other sites. What are the special circumstances driving this transport assessment?

12) Employment.

13) Innovation.

14) Economic Structure.

SUMMARY

In conclusion it is difficult to understand how a prime city site, located local to Western Boulevard, does not fit into the cities development plan.

It will improve the security of surrounding properties including the David Lloyd sports complex.

It is not contaminated and not subject to flooding.

It has access to excellent bus services.

Traffic flow will not interfere with that from the Chalfont Drive development as access has been proposed as being from Aspley Lane.

Will have a minimal effect on the air quality in the area. New houses will obviously have energy efficient heating systems coupled with a high standard of thermal insulation.

The area will become socially more active.

The current waste tipping problem will be avoided.

Finally the development will complement the existing housing on Western Boulevard and provide the space for housing that the city desperately needs.

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It appears that the use of a virtually unused (5 gardeners), overgrown rubbish strewn allotment site of 24 acres for much needed house building is an Athena to the City Planning Department.

Constructive ideas or comments on how "we" mitigate your concerns would be appreciated.



Nottingham City Council Local Plan Part 2: Land and Planning Policies Document Publication Version Response Form

Ref:

For official
use only

You are advised to read the [guidance note](#) before completing this form, but if you have any questions, please call 0115 876 4594. For the [online](#) form if your response to any question is longer than 10,000 characters or contains maps/diagrams you can either upload your response using the [online](#) form or send it via [email](#).

Please return this response form to localplan@nottinghamcity.gov.uk or Nottingham City Council, LH BOX 52, Planning Policy Team, Loxley House, Station Street, Nottingham, NG2 3NG.

Your response will be regarded as a formal response on the Local Plan Part 2: Land and Planning Policy Document.

Responses must be received by 5.00pm Friday 11 March 2016.

Part A – Contact Details and Future Notifications

Q1 Are you responding as?

Individual
 Landowner/Developer
 Organisation
 Other _____

Q2 If you have commented before on the Local Plan and have your consultee ID number (this will have been provided on your consultation letter) please provide it.

ID No. 3215

Q3 Your Details

Title	MR
First Name	RAYMOND
Last Name	FRETWELL
Job Title (if relevant)	
Organisation (if relevant)	
Address Line 1	[REDACTED]
Address Line 2	[REDACTED]
Address Line 3	ARNOLD
Address Line 4	NOTTINGHAM
Address Line 5	
Post Code	[REDACTED]
Telephone Number	[REDACTED]
E-mail Address	[REDACTED]

Q4 Agent's Details (if relevant)

25 Do you wish to be notified of any of the following?
(please tick yes or no for each question)

Submission of the Local Plan Part 2 for Examination?
Publication of the Recommendations of the Inspector?
Adoption of the Local Plan Part 2?

Yes No
 Yes No
 Yes No

Part B – Your Response

If you wish to make more than one response you will need to fill out another form for each response.

26 What does your response relate to? (please select one only from a-e below).

a Does your response relate to a site (whether included or not included within the Plan)? (if yes, please specify the site and move to **27**)

Which site? (please provide details of the site including ref number and site name. If your comments relate to a site not included in the Plan please provide details so that the site can easily be identified).

Yes ASPLEY GARDENS ALLOTMENTS
 No OPTIONS 1 and 2

Site included within the Plan
(please give details)

Site Ref: D588 and D589

Site Name: NEW ASPLEY GARDENS

Site not included in the Plan
(please give details)

Site Name and address:

b Does your response relate to a Policy? (if yes, please give the Policy, give details then move to **27**)

Which Policy? (please provide the Policy reference)

Yes
 No

Policy

Does your response relate to the Policy text or justification text?

Which part of the text? (please provide the related Policy criteria or paragraph number)

Policy text
 Justification text

c Does your response relate to another part of the document? (if yes, please state which section then move to **27**)

Which part?

- Policies Map
 Section 1: Introduction
 Section 2: Background
 Appendix 1: Parking Guidance
 Appendix 2: Schedule of Proposed Transport Network Schemes
 Appendix 3: Housing Delivery
 Appendix 4: Employment Delivery
 Appendix 5: Retail Delivery
 Appendix 6: Methodology for Significant HMOs Concentration
 Appendix 7: Schedule of Caves

Yes
 No

Q1 Does your response relate to supporting documents? (if yes, please specify which document, then move to **Q7**)

Yes

No

Which document?

- Sustainability Appraisal
- Equalities Impact Assessment
- Preferred Option Report of Consultation
- Employment Background Paper
- Retail Background Paper
- Green Belt Background Paper
- Climate Change Background Paper
- Site Assessment Background Paper
- Minerals Background Paper
- Sustainable, Inclusive and Mixed Communities Background Paper
- Transport Background Paper
- Infrastructure Delivery Plan

Q2 Does your response relate to another item not listed? (please specify then move to **Q7** where you can provide more details)

Yes (please give details)

Q7 and **Q8** are required by Planning Regulations. Please refer to the [guidance note](#) for more information

Q7 Do you consider the Local Plan Part 2 to be legally compliant? (please tick yes or no)

Yes

No

Q8 Do you consider the Part 2 Local Plan to be 'sound'? (please tick yes or no)

Yes

No

If you consider that the Plan is unsound, explain why (please select all that apply and explain in the box to Q9)

Q9 Do you consider the Plan is unsound because it is not 'positively prepared'?

Yes

No

Q10 Do you consider the Plan is unsound because it is not 'justified'?

Yes

No

Q11 Do you consider the Plan is unsound because it is not 'effective'?

Yes

No

Q12 Do you consider the Plan is unsound because it is not 'consistent with national Policy'?

Yes

No

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The diagrammatic appraisal of sites DS88 and DS89 appear to be highly subjective. Comparison with other sites, throws up inconsistencies in the positive and negative scores awarded under the headings 1-14 ie Housing through to Economic Structure.
SA objective tables covering the same aspects are inconsistent and therefore of dubious value. Leading to the conclusion that there is an inbuilt bias in the assessment of the above sites for housing building.
The negative aspects listed (Not always valid) appear to be over emphasised whilst the converse applies to positive features. My detailed comments on the tables, relative to aspects 1-14, are contained in the attached letter dated 10-03-2016 address to Dawn Alvey.
These comments I consider, give a more balanced insight into house the ground is currently used and its potential for house building.

20 Please explain why you 'support' or 'do not support' the Local Plan Part 2 (ie why you think the Plan is/is not legally compliant/sound). Try and be as precise as possible.

The diagrammatic appraisal of sites DS88 and DS89 appears to be highly subjective. Comparison with other sites, throws up inconsistencies in the positive and negative scores awarded under the headings 1 – 14, i.e. Housing through to Economic Structure.
SA Objective tables covering the same aspects are inconsistent and therefore of dubious value. Leading to the conclusion that there is an inbuilt bias in the assessment of the above sites for house building.
The negative aspects listed (Not always valid) appear to be over emphasised whilst the converse applies to positive features. My detailed comments on the tables, relative to aspects 1-14, are contained in the attached letter dated 10-03-2016 address to Dawn Alvey.
These comments, I consider, give a more balanced insight into how the ground is currently used and its potential for house building.

(please continue on a separate sheet if necessary)

210 Please set out what change(s) you consider necessary to make the Plan legally compliant or sound, having regard to the reasons you identified in **20**. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any Policy or text. Try and be as precise as possible.

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A more constructive or sound assessment of the above site, without the baggage associated with the use of allotment land (A doubtful description as explained in the attached letter) would elevate DS88 and DS89 onto your preferred list for development.

A more constructive or sound assessment of the above site, without the baggage associated with the use of allotment land (A doubtful description as explained in the attached letter) would elevate DS88 and DS89 onto your preferred list for development.

(please continue on a separate sheet if necessary)

Please note your response should cover succinctly all the information, evidence and supporting information necessary to support/justify the response and the suggested change, as there will not normally be a subsequent opportunity to make further responses. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Q11 If your response is seeking a change, do you consider it necessary to participate at the examination in person?

- Yes, I wish to participate in person at the examination
 No, I do not wish to participate in person at the examination

Q12 If you wish to participate in person at the examination, please outline why you consider this to be necessary.

As a garden owner I have a valid interest in how the response process is conducted.

(please continue on a separate sheet if necessary)

Please note the Inspector will determine who participates at the Examination and the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination.

Responses must be received by 5.00pm Friday 11 March 2016.

Thank you for taking the time to have your say on the Nottingham City Council Local Plan Part 2: Land and Planning Policy Document. For further information about this consultation and / or the Local Plan document please contact: Local Plans team on 0115 876 4504 or email localplans@nottinghamcity.gov.uk

Data Protection - The response(s) you submit on the Local Plan Part 2 will be used in the plan making process and may be in use for the lifetime of the Local Plan in accordance with the Data Protection Act 1998. The information will be analysed and the Council will consider issues raised. Please note that responses cannot be treated as confidential and will be made available for public inspection. All responses can be viewed at the Council offices. If you provide your email address this will be the method of communication used in the future by default unless you advise us otherwise.