

Newark and Sherwood Allocations and Development Management DPD

Written representations on behalf of Mr R Thomas by Ian Baseley Associates

Matter 3 – Housing

8. Is the amount of land allocated for housing sufficient to meets needs? If not, how will the Plan ensure that an appropriate housing land supply will be maintained in the medium and longer terms?

8.1 No. Chapter 4 Spatial Policies of the Core Strategy sets out the Spatial Strategy for the District.

8.2 Spatial Policy 2 sets out the spatial distribution of growth. It sets the level [as percentages] to be met when allocating sites for housing development in the Allocations & Development Management DPD ('The Plan').

8.3 It confirms that 10% of housing growth will be met within the Principal Villages and that 25% of the Principal Village growth will be met in Blidworth as part of the Council's '*Regeneration*' strategy. Paragraph 4.22 of the Core Strategy confirms that individual percentages are based on meeting the aims of the principles assigned to each settlement and an assessment of the capacity of each settlement to support growth, including its function, scope for future growth and infrastructure constraints and potential for future improvements.

- 8.4 The Plan translates these 'set' percentages into a number of new dwellings (and amount of new employment land) required to be provided in each settlement up to 2026.
- 8.5 For Blidworth, this equates to a residual requirement of **299 additional houses and up to 1 hectare** of new employment land.
- 8.6 However, the Plan only identifies sufficient land to accommodate 210 new dwellings in Blidworth, leaving a **shortfall of some 89 houses** (i.e. 30% of the residual housing requirement for the settlement). It explains that, owing to Green Belt constraints, the shortfall will be re-distributed elsewhere. However, this is clearly not what was intended in the Core Strategy.
- 8.7 Accordingly, the Plan **fails to allocate sufficient land to meet the identified housing needs of Blidworth.**
- 8.8 In the above connection, the Plan as submitted is not consistent with the Spatial Strategy, the Spatial Portrait for the District, the Vision and Strategic Objectives, or Spatial Policy 2.
- 8.9 In failing to make adequate provision for the housing requirements for Blidworth, the Plan is also not consistent with Spatial Policy 4A which specifically facilitates a review of the boundary of the Green Belt surrounding Blidworth in order to meet the housing requirements set by Spatial Policy 2.
- 8.10 Indeed, paragraph 4.30 of the Core Strategy explains that the SHLAA revealed that potential housing land supply was limited within those existing settlement boundaries constrained by the Green Belt and therefore consideration would need to be given to *changing* boundaries (i.e. releasing land adjoining settlement boundaries from the Green Belt to accommodate additional development) to meet the wider aims of the Spatial Strategy.

- 8.11 The Council's 'redistribute elsewhere' approach to compensate for the under-provision within Blidworth is also not consistent with the wider aims of the Spatial Strategy.
- 8.12 If the percentages set out in Spatial Policy 2 were only meant to be *broad-brush*, then they would have been stated as "approximately", "up to" or as a range (as is the case for employment land provision). They are not. The intention of the Core Strategy is to direct specific numbers of dwellings to specific settlements to address their specific needs, roles and functions.
- 8.13 To over-provide on sites in Newark is not an acceptable alternative as this comprises a completely different strategic and/or local housing market area and will do nothing to assist the regeneration strategy for Blidworth identified as a key part of the Spatial Strategy or ensure local affordable housing provision is delivered where the need arises.
- 8.14 The acknowledgement in paragraph 4.30 of the Core Strategy regarding the limited scope of sites within existing settlement boundaries also casts sufficient doubt over the Council's suggestion in their 'Responses to the Inspector's Initial Questions' that "redevelopment of existing sites within the villages may still continue to contribute".

Will they provide for an appropriate housing mix, including affordable housing, provision for gypsies and travellers, in the right locations?

- 8.15 No. Paragraphs 5.2 to 5.9 of the Core Strategy explain why Core Policy 1 – 'Affordable Housing Provision' is necessary.
- 8.16 Core Policy 1 confirms that the Council will seek to secure 30% of new housing development on qualifying sites as affordable housing and that off-site provision will not normally be encouraged. It is considered that the

policy as worded provides sufficient flexibility (having particular regard to viability) to ensure the delivery of those allocated sites [with the appropriate level of affordable housing provision as required].

8.17 However, as the Plan fails to meet the housing requirements set for Blidworth, this will also necessarily directly impact on the number of affordable houses which will be built in the village and therefore similarly fail in meeting its affordable housing provision requirements.

8.18 For example, 30% of the residual 299 dwellings equates to **local affordable housing provision in Blidworth of some 90 dwellings**. As the Plan only identifies sufficient land to accommodate 210 dwellings, then the number of affordable dwellings to be built in Blidworth over the plan period would **reduce to only 63 dwellings** – i.e. 27 affordable houses less than is suggested to be required.

8.19 If either BI/Ho/3 and/or BI/Ho/4 fail to be delivered in the form envisaged in the Plan (which it is submitted for the reasons advanced above is a distinct possibility), then clearly the level of affordable housing provision, particularly during the early stages of the Plan (when the need is arguably at its greatest), will plummet further.

8.20 Indeed, the preamble to Core Policy 1 confirms that the true affordable housing figure is far greater than this (79% of the RSS figure) but to require higher than 30% would seriously affect viability and ultimately prevent delivery.

8.21 This situation cannot be remedied by the Plan's 're-distribute elsewhere' approach as the suggested 'over-provision' in Newark will not give rise to additional affordable housing provision to meet the local affordable housing needs of Blidworth. Moreover, Core Policy 1 confirms that off-site provision will not normally be encouraged. Even if it was, the Green Belt constraint

surrounding Blidworth would prevent such affordable housing being delivered [following an off-site contribution derived from a development site elsewhere] as a Rural Affordable Housing Exception Site since Spatial Policy 4B would prohibit this by restricting such opportunities to “in or adjacent to” the villages of Bulcote, Caythorpe, Epperstone, Gonalston, Gunthorpe, Hoveringham and Oxtun – all of which are of course far less sustainable than Blidworth.

8.22 Even if Spatial Policy 4B were worded to allow a ‘Rural Affordable Housing Exception Site’ adjacent to the main built-up area of Blidworth (which it is not), inevitably such a site would be in the Green Belt and no doubt as far away from the Conservation Area as possible so as to preserve its special character or setting in accordance with the requirements of criterion 5 of Spatial Policy 9.

8.23 As Spatial Policy 4B explicitly recognises that meeting an identified local housing need is capable of comprising the exceptional circumstances necessary to justify such development in the Green Belt, it seems somewhat perverse to adopt an approach which specifically seeks not to allocate a site in the Green Belt which is capable of delivering the level of affordable housing required for Blidworth, but to instead seek allocate elsewhere and rely on a windfall rural exception site in the same part of the Green Belt at a later stage - particularly when the same site could be allocated as part of this process *and* deliver the residual market housing requirement for Blidworth all in complete accordance with the wider aims of the Spatial Strategy.

8.24 To remedy all of the above, **additional sites should be allocated in the Plan to meet the housing requirements for Blidworth up to 2026.**

8.25 This is particularly important in Blidworth where its existing settlement boundary is presently tightly constrained by the Green Belt, as failure to

allocate sufficient land within the Plan (hand-in-hand with the Green Belt Review) will necessarily limit the Council's ability to be flexible and/or to allocate additional land in the future given the intended permanence of the [once reviewed] Green Belt boundaries from point of adoption of the Plan and the advice in the NPPF that: - Green Belt boundaries should be defined "in order to meet longer-term development needs stretching well beyond the plan period"; and that councils should "satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period" (paragraph 85).

9. Are the allocated sites viable and deliverable for the first 5 years, having regard to the provision of the necessary infrastructure, affordable housing, environmental constraints and development management policies? Is the Plan sufficiently flexible to enable delivery given the current market conditions.

9.1 No. Earlier representations have highlighted potential complications regarding the delivery of two sites in Blidworth which the Council rely on – Bl/Ho/3 and Bl/Ho/4.

9.2 In short, with regard to Site Bl/Ho/3, there are identified deficiencies in the width, alignment and capacity of the New Lane/Mansfield Road junction. The Schedule of Proposed Modifications contain the requirement of the preparation of a Transport Assessment as part of any planning application to determine the impact of the development on the highway network which should specifically include the impact on New Lane and New Lane/Mansfield Road junction and the provision of appropriate mitigation measures.

9.3 Owing to the above, the suggested capacity of this site is proposed to be restricted to 100 dwellings. However, given the importance of those sites (which the Council are evidently relying on to deliver new housing in

Blidworth), it is essential that the Plan ought to provide reasonable certainty that such numbers could be achieved and delivered as intended.

- 9.4 The requirement for a Transport Assessment as part of any subsequent application (i.e. post allocation) seems a little too late in the process, since it leaves the Council with no contingency whatsoever should it ultimately transpire that 100 dwellings cannot be accommodated on the site, or that the site cannot be delivered at all because of the potentially significant highway constraints identified at the allocation stage.
- 9.5 Whilst the southern part of Bl/Ho/3 has not been carried forward from the Preferred Options stage, the remainder of the allocation still abuts the Conservation Area and is therefore bound to have an effect on the setting of this part of the Conservation Area. I am not aware the Council, or those promoting the site, have provided any form of assessment regarding potential impact on this designated heritage asset, or indeed the effect this designation might have on the ultimate layout and capacity on the site. This factor may also serve to limit the level of development achievable on this site.
- 9.6 Spatial Policy 9 provides advice on selecting appropriate sites for allocation. It states that sites allocated for housing as part of the A&DM DPD will, amongst other things, *“not impact adversely on the special character of the area, including not impacting on important open spaces and views, all designated heritage assets including listed buildings or locally important buildings, especially those identified in Conservation Area Character Appraisals.”*
- 9.7 In addition to the above, Site Bl/Ho/4 comprises land owned by the Parish Council presently used locally as allotments.

- 9.8 Delivery of this site can only be assured once an alternative site (inevitably in the Green Belt!) can has been identified, secured and delivered.
- 9.9 The above requirements cast substantial doubt on the ability of this site to be delivered in the way the Council envisages. The Council’s amended Housing Trajectory table confirms that this site is not likely to be delivered until 2024/2025 at the earliest.
- 9.10 It is further understood that there may be a longstanding covenant on the land which might also serve to prohibit or delay this site coming forward for development.
- 9.11 The Council’s approach already results in a material shortfall for the settlement – this would be further exacerbated by the failure of Sites Bl/Ho/3 and Bl/Ho/4 to be delivered in the way envisaged.
- 9.12 Given that the Green Belt completely surrounds the settlement, there will be no flexibility to deliver an alternative site to make up the numbers unless appropriate provision is made within this Plan.
- 9.13 The above also clearly has implications regarding the delivery of affordable housing in the Village to meet identified local needs during the first 5 years of the plan period, if indeed ultimately at all.
- 10. Are alternative proposals that have been put forward in representations appropriate and deliverable? Have they been subject to sustainability appraisal compatible with that for the Plan?**
- 10.1 Yes. Our earlier representations on behalf of Mr R Thomas highly commended **land south of Dale Lane, Blidworth (immediately adjacent Bl/Ho/1)**, in combination with the site to the north of Dale Lane comprising the former Jolly Friar Public House (‘The Pub Site’, as a logical extension of

the eastern boundary of the settlement and long-term defensible boundary for the Green Belt in this location.

- 10.2 The two sites in combination would effectively make up a significant proportion, if not all, of the Plan's current shortfall of future housing land supply for Blidworth. The Pub Site is previously-developed and, I understand, owned by a developer actively seeking its immediate redevelopment for housing. My client's land would form a logical extension to BI/Ho/1 where there is a willing and able landowner who has already received significant interest from a number of national house builders.
- 10.3 Both sites are free of any of the constraints to development (or delivery) affecting proposed allocations BI/Ho/3 and BI/Ho/4 and are considered to be capable of being delivered confidently within the first five years of the plan period.

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[2,312 words]