



**NEWARK AND SHERWOOD SITE ALLOCATIONS AND DEVELOPMENT
MANAGEMENT DPD EXAMINATION**

MATTER 1- COMPLIANCE AND PROCEDURAL

**REPRESENTOR NUMBERS 175 – OMNIVALE LIMITED
176 MILLER HOMES LIMITED
177 BRAEMER FARM DEVELOPMENT COMPANY LTD**

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MATTER 1 – COMPLIANCE AND PROCEDURAL

- 1 *Has the Plan been prepared in accordance with relevant legal requirements, including the Duty to Co-operate and the procedural requirements of the National Planning Policy Framework?*

No comment. We have no reason to dispute that the plan preparation does not follow the required legal and procedural requirements of the NPPF although the documented discussion on these matters is limited.

- 2 *Is the Plan in general conformity with the RSS and consistent with the National Planning Policy Framework? Does it reflect the National Planning Policy Framework's presumption in favour of sustainable development?*

This DPD is considered to be in general conformity with the RSS as it implements the housing requirements (with the exception of the Newark Strategic Sites) of the Core Strategy, which was in conformity with the RSS. It is understood however that there is a shortfall in provision in some of the Green Belt affected settlements and the Council's position on addressing this needs to be clarified in terms either of addressing the provision within these settlements or redistributing to other settlements within the hierarchy.

The DPD is also considered to broadly reflect the NPPF's presumption in favour of sustainable development although the Council should produce evidence to demonstrate that the DPD has sufficient flexibility now, and to adapt to rapid change, having due regard to the provisions of paragraph 47 of The Framework. Issues of under provision in certain settlements do raise concerns about flexibility.

The Site Allocations and Development Management DPD does not outline its approach to Paragraph 47 of The Framework in respect of providing a 5% or potentially a 20% buffer to provide flexibility and ensure choice and competition in the market for land. Newark and Sherwood have significantly underperformed in terms housing completions against RSS targets since 2006, notwithstanding the growth point status sought and secured by the District Council, and so there must be greater clarification of how this under-delivery is to be addressed in the first five years of this Site Allocations DPD. This may well require the identification of additional sites across the District and encouraging/ facilitating greater housing numbers from allocated sites where capacity exists.

The Inspector has raised questions directly with the Council in respect of their housing approach (Inspectors initial questions to the Council – Questions 5-8) and we would request that the issue of the NPPF paragraph 47 'buffers' and how this will be addressed across the settlement hierarchy will be addressed.