

MATTER 2 – GENERAL ISSUES

3. Is the Plan consistent with the Core Strategy and is it capable of meeting its objectives?

We consider that the Site Allocations and Development Management DPD is broadly consistent with the Core Strategy and potentially capable of delivering its objectives.

In terms of the proposed housing and employment site allocations, the Core Strategy and in particular Appendix D sets out well defined requirements for housing numbers and the employment land requirements to be identified through the Site Allocations DPD. The quantum of development identified in this document initially appears sufficient to accommodate the intended objectives of the Core Strategy in terms of land use allocation. On this basis the site allocation policies are generally positively prepared and justified, although their effectiveness will be difficult to assess in the current economic climate.

Effective delivery of the Core Strategy vision will depend on market forces and the emergence of the economy from recession. The regeneration agenda for the District will only be achieved if housing and employment sites are taken up for development. In some locations across the District the delivery of the housing objectives of the Core Strategy is unlikely to be an issue.

The Development Management policies are streamlined and worded to encourage a flexibility of approach and interpretation as opposed to a rigid testing against an extensive range of policy criteria. This leads towards a positively prepared and justified approach which should be more effective in delivering rather than constraining sustainable development.

4. Is the Plan based on a sound process of sustainability appraisal including testing of reasonable alternatives, and does it represent the most appropriate strategy in the circumstances?

We have no reason to doubt the soundness of the sustainability appraisal and testing of reasonable alternatives. The consultation process leading to this DPD examination has been transparent and all alternative options have been fully aired through public consultation and been subject to sustainability appraisal.

5. *Is the Plan deliverable having regard to viability of allocated sites and the requirements of development management policies?*

In the settlement of Collingham where my Clients have a land interest, I consider that the housing allocations are viable and deliverable having due regard to Core Strategy Policy requirements, CIL and the Development Management Policies set out in this DPD, but they do need to factor-in the need to deliver land and, therefore, greater flexibility regarding additional housing numbers, as referred to in our response to Matter 1., Question 2.

6. *Is there sufficient flexibility to cope with changes to individual sites which might render them undeliverable for the purposes envisaged by the plan?*

From the position of the interest that we represent in Collingham (Co/AS/2), there is no reason why this site should prove undeliverable. Initial work has been carried out on the site (including 'pre-application' discussions with the LPA), initial drawings have been prepared and there is developer interest. The site is readily accessible and will link directly into the established infrastructure, all of which goes to establish that there are no show-stoppers in bringing this site forward for development.

Beyond this specific site and settlement, there may well be circumstances which render certain other sites within the District undeliverable in the short to medium term, particularly in the Mansfield Fringe area, where lower land values and weaker housing market conditions generally prevail. In this scenario a greater degree of flexibility in the plan by the identification and bringing forward of reserve sites may be appropriate, particularly if it is held that the Councils overall housing supply does not accord with the flexibility required by paragraph 47 of the NPPF.

7. *Are appropriate arrangements in place to ensure proper monitoring of the Plan?*

We have no issues with the Council's monitoring procedures and the Annual Monitoring Report provides a publicly available annual update on housing starts and completions. The potential issue is not likely to be with the monitoring of this DPD, rather the flexibility of the plan policies and allocations to address any significant underperformance in housing delivery.