

**Newark and Sherwood District Council  
Site Allocations and Development Management DPD Examination in Public**

Day 1/2  
11/12 December 2012

Statement on behalf of Mr N Dean – Site at New Lane, Blidworth

**Introduction**

1. This statement has been made on behalf of Mr N Dean in respect of his land south of New Lane, which adjoins land recommended for allocation in the Site Allocations Plan under Site Ref: BI/Ho/3.
2. This statement relates to the Inspector's Examination Agenda Matter 3 which raises the following questions among others
  - Is the amount of land allocated for housing sufficient to meet needs? If not, how will the Plan ensure that an appropriate housing land supply will be maintained in the medium and longer terms? Will they provide for an appropriate housing mix, including affordable housing, provision for gypsies and travellers, in the right locations?
  - Are the allocated sites viable and deliverable for 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?
  - 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?

**Is the amount of land allocated for housing sufficient to meet needs? If not, how will the Plan ensure that an appropriate housing land supply will be maintained in the medium and longer terms? Will they provide for an appropriate housing mix, including affordable housing, provision for gypsies and travellers, in the right locations?**

3. The Core Strategy identifies Blidworth as a Principal Village with an assessed housing requirement of 299 new dwellings to 2026. It is identified as a settlement that would benefit from regeneration and it is well served by local education facilities, shops, local services and local employment opportunities.
4. The Site Allocations and Development Management document, which seeks to identify specific sites for this requirement, identifies sufficient land for only 210 dwellings. Notably, the Site Allocations and Development Management Document must be in accordance with the Core Strategy if it is to be found sound.
5. The document states that having undertaken a review of the Green Belt around Blidworth, the Council considers that the settlement is unable to accommodate 299 dwellings and they consider that this growth will be met elsewhere in the district. It is not clear where or how this growth will be met elsewhere, or how that is justified in terms of meeting local need.

6. A review of the allocated numbers, reveals an overall shortfall in allocated sites in the magnitude of 600 dwellings overall, with Newark accounting for a significant proportion. However, with reference to lower order settlements, there remains an overall shortfall in allocated sites of 27 dwellings. As such, the underprovision at Blidworth has not been fully redistributed to other parts of the district. On a Mansfield Fringe, sub-area level, the overprovision at Rainworth of 3 dwellings and at Clipstone of 16 dwellings do not compensate for the shortfall in local provision at Blidworth. The overprovision at Ollerton and Boughton or in other areas will not sufficiently meet local need in Blidworth. On this basis, the document fails to meet objectively assessed housing needs in direct conflict with the requirements of the National Planning Policy Framework, and the Core Strategy
7. The Council's report into the production of the Site Allocations document contains the consultation response of the County Council who state that a small scale under-provision may be acceptable, but that over-provision should be preferred.
8. The Core Strategy Inspector's report noted that 'There are .....important CS objectives of meeting local housing needs, including for affordable housing, and facilitating economic regeneration in former mining communities to be considered.' Together these provide the necessary 'exceptional circumstances', in accord with national guidance in PPG 2, to properly justify the need for a localised boundary review immediately around these settlements.' The emphasis in the inspector's report is on meeting local housing needs, which justifies a local review of Green belt boundaries. In the light of the inspector's report, it is not appropriate to redistribute Blidworth's local housing need to other parts of the district, where it will not address the housing requirements of local people and will not contribute to the regeneration of the village. The inspector's support for local provision was clear and in his words constitute 'exceptional circumstances' that demand provision at the point of need.
9. The inspector also noted that the Core Strategy levels of housing growth at Blidworth were justified 'so that it continues to play a role in providing services for the rural area around.' If growth based on an assessment of local need is not developed here but elsewhere, the strategy is undermined and two of the key principles of the spatial strategy, and enshrined in the Core Strategy are ignored for the sake of convenience. Blidworth is the only Principal Village in the Mansfield Fringe Area and it is therefore essential that it meets its commitment to local housing provision in accordance with its status in the adopted hierarchy. To fail to meet locally identified and objectively assessed housing needs is an abdication of responsibility that does not comply with the Core Strategy and directly contradicts the requirements of the National Planning Policy Framework.
10. The Council understands the importance of delivering sufficient affordable housing recognising that Newark and Sherwood is the 8th least affordable district in the East Midlands (N&S AMR 2010/11). The housing allocation for Blidworth equates to 2.5% of the total district requirement. The proportionate affordable housing requirement for the settlement, based on Core Policy 1 is 111 dwellings (30% of 2.5%). The residual allocation of 299 assumes that 55 dwellings have been delivered, of which 17 should be affordable under Core Policy 1 (we note application ref 07/01832/FULM approves 18 dwelling for an RSL and effectively delivers this requirement). The residual allocation would provide up to 100 affordable dwellings over the plan period giving the potential for affordable housing delivery of 118 dwellings. However, the actual allocation of 210 dwelling in the DPD provides potential for only 63 affordable dwellings, which with the 18 committed gives a total of 81, a shortfall of 30 affordable dwellings on the overall requirement. Further, with reference to the Council's 2009 Housing Needs, Market and Affordability Study, the overall identified affordable housing requirement for Blidworth is 177 dwellings. On the basis of this identified and

evidence based requirement, the potential affordable housing delivery represents a 54% shortfall or 96 dwellings. We would note that this identified requirement is a need specifically identified for Blidworth, with respondents having noted the settlement as their required location. As such, alternative geographic provision would not meet this locally identified need based on proximity to family, jobs etc. As set out the DPD will fail to sufficiently identify an increased supply and choice of affordable housing in Blidworth, and will fail to meet the objectively assessed needs specific to Blidworth. This is in direct contradiction with the aims and objectives of the Newark and Sherwood Community Plan and a key priority the Nottinghamshire Sustainable Community Strategy.

**Are the allocated sites viable and deliverable for 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?**

11. Bl/Ho/1 is a visible and attractive greenfield site. The site provides an important open and low key approach to Blidworth from the east. The site is as far from the local centre as is it possible to get, and the site would have no relationship to the historic morphology of the village settlement which lies much further to the west. Instead, development of this site would consolidate and exacerbate the eastward sprawl of the settlement into the rural landscape. The site has potentially significant surface water drainage issues, which have caused flash flooding onto the adjoining road carriageway. The site is remote and disconnected from the village centre (800m to shops), and would also result in prominent encroachment of the settlement into the open countryside. We are unaware of any evidence having been produced relating to Landscape and Visual Impact Appraisal, Ecological Impacts or Transport Assessment for this site.
12. Site Bl/Ho/4 is currently in use as allotments and will require suitable alternative provision before it can be released as a housing site. No timetable or certainty is given to ensure that the site is deliverable within the plan period.
13. Sites affecting Green Belt land are reviewed in the 'Newark and Sherwood Green Belt Study' 2011. While we endorsed such a review in our submissions to the Core Strategy examination, we stated that 'such a review must be fully independent and open to public scrutiny and consultation'. It is our view that The 'Newark and Sherwood Green Belt Study' 2011 was not robustly prepared, is not an objective assessment aimed at accommodating growth and we question its suitability as evidence. In particular, it is not clear how site Bl/Ho/1 is so distinct from other sites in its contribution (or lack of) to the Green Belt e.g. land west of BL/Ho/3, to make it more capable of accommodating local housing needs. Put another way, if the exceptional circumstances exist to justify removing this site from the Green Belt, why not other sites, which are less visible and better contained. The allocation of this site in isolation neither preserves the Green Belt from encroachment nor satisfies objectively assessed local housing needs. The identification of this site, appears to be justified as a two dimensional 'rounding off' of the settlement, rather than based on an objective assessment of visual impact, Green Belt Impact and sustainability. Plan making should respond to historic morphology and sustainability principles, rather than being an exercise in neatening the village edge by filling in the gaps. It is not clear how the identification of this site takes into account the potential impacts on the setting of the Scheduled Ancient Monument to the east of Haywood Oaks Farm.
14. The Bl/Ho/3 New Lane site has been reduced in size in order to reduce the potential impact on the Conservation Area. The site area reduction amounts to 0.71 ha. The site lies directly adjoining the highly sensitive Conservation Area boundary and will

require a generous buffer / landscape screening in order to minimise the visual impact on the heritage asset. It is understood that a water main runs directly across the site and will require a broad easement. The accompanying appendix contains a series of photographs of the BI/Ho/3 site taken on the weekend of 26 November 2012. A consequence of a wet summer and heavy rainfall lead to significant pooling in the centre of the site at its natural drainage point. The photos demonstrate that to take account of the storm event, and to avoid flooding elsewhere, a significant area of the site will need to be taken up with balancing ponds. Taking account of these significant constraints, the site is only likely to achieve a maximum of 70 to 80 units. On this basis, the site in its current form cannot deliver the housing numbers anticipated and will further restrict the ability of allocated sites in Blidworth to meet objectively assessed local housing needs.

**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?**

15. The shortfall in numbers on site BI/Ho/3 can be readily replaced / substituted, by a modest and well designed incursion into the adjoining New Lane site to the west. By substituting the housing numbers originally intended within the Conservation Area, to be accessed from New Lane, there will be no additional adverse traffic impact on New Lane itself
16. The site lies immediately to the west of the BI/Ho/3 allocation and is identified in the Council's Strategic Housing Land Availability Assessment (SHLAA). The assessment concluded that the site was not suitable for development due to potential impact on the highway i.e. a narrow access from New Lane, and the potential for impact on views in and out of the Conservation Area. However, notably, site BI/Ho/3, was also found to be unsuitable on highway issues, putting significant doubt on the usefulness of the SHLAA as evidence for assessing site suitability. It is also clear that our client's site could have no greater impact on views into or out of the Conservation Area than the adjoining land, as they are viewed in precisely the same context. In terms of its proximity to services site 08\_0007 was considered to be suitable and sustainable within the SHLAA. On the basis of the allocation being taken forward, under BI/Ho/3 and in the context of the need for Green Belt boundary adjustment, there can be no sound reason for excluding our client's site as a potentially suitable housing site to assist in meeting local need.
17. In order to allocate additional / remoulded land at BI/Ho/3 to include additional land to the west, which is available, suitable and deliverable. While this land is also Green Belt, the Core Strategy justifies the exceptional circumstances relating to Blidworth, and there are no significant physical constraints that would prevent the site's development as part of a wider scheme. Green Belt land south of New Lane, and to the west of site BI/Ho/3 is available, and represents a visually discreet and enclosed areas of land, within close walking distance of all village services and facilities. As such it represents a sustainable suitable location for development in order to assist in meeting the housing requirements for the village
18. The site has been subject to Sustainability Appraisal and is included in Appendix F to the Sustainability Appraisal Report carried out by WSP. Against each identified objective, the site is equally or more sustainable than the corresponding proposed allocated sites. This makes it even more surprising that the site has not been included to assist in meeting needs.