

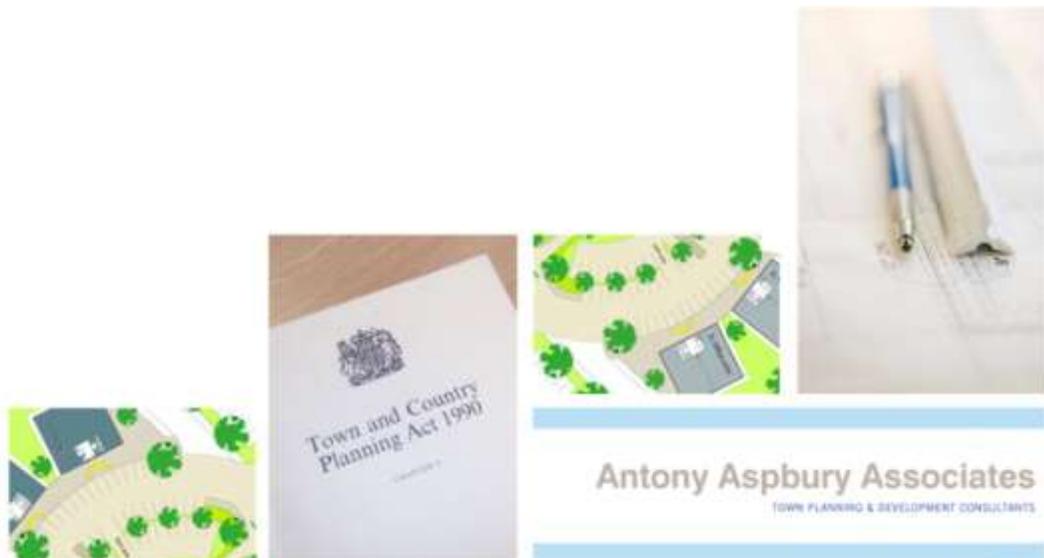


**NEWARK AND SHERWOOD SITE ALLOCATIONS AND DEVELOPMENT
MANAGEMENT DPD EXAMINATION**

MATTER 3 - HOUSING

**REPRESENTOR NUMBER – 177
BRAEMER FARM DEVELOPMENT COMPANY**

DECEMBER 2012



MATTER 3 – HOUSING

8. *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?*

The District Council's overall housing provision is derived from the adopted East Midlands Regional Plan housing requirement and subsequently confirmed in the Core Strategy which was adopted in March 2011. The overall requirement for new dwellings and indeed the approximate residual dwelling requirement (allowing for completions and commitments from 01/04/06) is set out at Appendix D of the adopted Core Strategy.

There was debate at the Core Strategy hearing in respect of the extent of flexibility that should be accorded to the residual housing provision, particularly in respect of the designated Service Centres and Principal Villages. The prevailing view was that to allow 'too much' flexibility in some of these settlements could potentially undermine the role and function settlement hierarchy and adversely impact upon the character and/or sustainability of the individual town or village.

The view of Antony Aspbury Associates with client interests in both Service Centre and Principal Village locations in Southwell, Collingham and Blidworth respectively, is that the Site Allocations DPD does in the main, provide sufficient land to meet needs established by the Core Strategy. This may either be in the form of site allocations cumulatively exceeding the residual requirement set out in the Core Strategy by a modest margin, or of individual site allocations being capable over time, of delivering in excess of the current requirements.

The District Council's previous options consultation on the Site Allocations DPD in 2011 set out Preferred Sites and Alternative Sites for consideration and public comment. Whilst we are supportive of the Preferred Allocations (as they serve our particular client interests) set out in the Publication Version DPD, we have no objection in principle to the identification of reserve sites which could potentially be elevated to allocation status in the medium /longer term either, to maintain supply to meet general housing needs or to address specific affordable or specialist needs that the allocated sites have failed or are unsuitable to address.

We consider therefore that the allocations mechanism for delivering the housing needs quantified by the Core Strategy has been positively prepared and justified by the evidence base and assessment of alternatives. Its effectiveness may potentially be enhanced by introducing some reserve allocations in specific locations previously identified in the plan process, to accommodate any unforeseen 'fall out' of allocated sites in the medium to longer term or to accommodate any specialist and affordable housing needs and opportunities that may arise during the plan period.

9. *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?*

Our comments in respect of viability and deliverability are based on our specific clients' preferred site allocation in Collingham, a location generally acknowledged to be of higher land value and in principle capable of viably supporting new development.

Turning first to viability, the Council's CIL came into force in December 2011 and applies varying charging rates to residential and commercial development across the District. In these difficult economic times, viability was a key consideration at the CIL examination and remains so today. However, a pragmatic approach was taken by all parties at the examination as to how CIL and Section 106 requirements would impact on development in the short term and it was generally agreed that the relevant policies of the Core Strategy offered sufficient flexibility in their application to address site specific viability concerns to promote site delivery in the first five years. The Inspector reporting on the CIL examination observed in paragraph 34 of his report¹ on the specific 'Matter' of delivery/implementation

"Moreover, as the margin of economic viability for the types and locations of new development to which the CIL would apply is not excessively eroded by the rates charged, it should still be possible for other appropriate contributions to local infrastructure needs, such as primary school places, to come forward from most, if not all, significant schemes"

From the perspective of our client land interest at Collingham (Co/MU/1) there are no substantive issues having regard to the provision of infrastructure, affordable housing, environmental constraints and the emerging Development Management Policies that impact on the site viability and delivery within the first five years. In this case the landowner is part of a three developer consortium who have submitted an outline planning application to the District Council in July 2012 for mixed use development on the site and an additional element of extra-care housing². The submitted proposals broadly reflect policy Co/MU/1 as proposed to be modified in the Council' Schedule of Modifications in that the outline scheme includes up to 90 dwellings including affordable homes; up to 0.75ha Class B1 employment development ; open spaces including allotments ;site access from Station Road and Swinderby Road, and improved pedestrian and cycle linkages. There is also scope to provide additional car parking for Collingham Station on land within the Preferred Allocation albeit outside the current application red line

¹ Report on the examination into the Newark and Sherwood Community Infrastructure Levy Charging Schedule -19.08.11

² Planning Application reference 12/00895/OUTM

boundary. The implementation of this car park will be subject to a reassessment of need following Network Rail's acquisition of land to the east of Collingham railway station develop their own dedicated car parking area. If outline planning permission is forthcoming in early 2013 then the respective housebuilders within the developer consortium (Gusto Developments, Larkfleet Homes & Lindum Homes) would look to follow with Reserved Matter applications shortly after.

This site is potentially deliverable in its entirety within the first five year period of this DPD and can in part help address the shortfall of delivery in the District within the period 2006-2012, particularly as there are three housebuilders (one local developer and two regional builders) signed up to develop the site and providing a wide range of house types and tenures. In this regard, we OBJECT to the phasing provisions set out in CO/PH/1 as unnecessary and potentially restricting on the natural development of the site from two identified access points.

Attached to this representation is the latest illustrative Masterplan submitted to the Council which illustrates the intended juxtaposition of land uses within the scheme proposals.

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?*

From the perspective of our specific client land interests in Collingham (and other client interests in Southwell and Blidworth), we are fully confident of their sustainability and deliverability and consider that these have been demonstrated to the District Council who have selected the respective sites for allocation. We are not aware of any alternative sites in these locations which we consider to be more appropriate, more sustainable and more deliverable than the allocated sites we have promoted.

We have not considered alternative sites outside of Collingham (and other client interests in Southwell and Blidworth) and cannot comment on the suitability of these as additional sites, replacement sites or fallback options for the sites currently identified in the Publication Version DPD.

11 *Are the locations identified the most appropriate when considered against all reasonable alternatives?*

Our comments in respect of this question relate to our specific knowledge of Collingham, and our promotion of the preferred site allocation therein.

The 'Principal Village' of Collingham has a large Conservation Area of very high quality extending over most of the 'historical' western half and all of the southern side of the village, and a number of 'Main Open Areas' linked by footpaths within the compact built up area within and adjoining the Conservation Area that are highly valued by its local residents. Flood risk from the Trent also impacts on development potential to the west and north of the village. The area of search for alternative sites and the

subsequent consultation process has therefore had to consider the appropriateness of open land within the Conservation, Main Open Areas within and adjoining the Conservation Area and my client's landholding at Braemer Farm which is outwith both the currently designated Main Open Areas in Collingham and the Conservation Area.

Following the earlier consultations only this site is proposed as a mixed use allocation (Co/MU/1) to accommodate the residual housing and employment requirements for this important Principal Village serving a large rural hinterland east of the River Trent and up to the Lincolnshire county boundary. We have consistently promoted this site as the only location within Collingham which is capable of delivering housing and complementary local employment opportunity as well as enhancing linkages to and facilities at Collingham railway station which currently sits out on a limb from the rest of the village. The site has no material ecological, landscape or amenity value (unlike the Main Open Areas) and is physically contained on its outer boundary by the Newark to Grimsby passenger rail line. Whilst the site is located on the eastern periphery of the village, it is only a short level walk along Station Road or Swinderby Road to the thriving village centre and even closer to bus services operating along Braemer Road immediately to the west of the site. None of the alternatives consulted upon can sustainably deliver the mixed- use offer proposed by the preferred site or secure the wider benefits of enhanced pedestrian and vehicular linkages, improved station facilities and community facilities that the mixed use allocation delivers. To dilute the allocation by redistribution to other locations elsewhere in the village could undermine its ability to deliver the range of benefits set out in the policy Co/MU/1.

In summary terms, having due regards to the specific housing and employment requirements for Collingham derived from the Core Strategy and reflecting other more localised issues and requirements for the village, the preferred site allocation is clearly the most appropriate in that; -

- The site does not encroach into a MOA or the Collingham Conservation Area
- The site secures improved access to the only remaining dedicated employment land in the village and creates additional employment land with potential for expansion .
- The size of preferred site can accommodate the identified combined need for market and affordable housing /a Continuing Care Retirement Complex / accessible serviced employment land / a potential station car park / village allotments and open space and enhanced pedestrian links to Collingham station.
- A link road between Station Road and Swinderby Road to improve local connectivity within the village and improved links to Collingham railway station.

Any dilution or redistribution of the housing currently proposed for this site would not secure the wide ranging benefits to the village which could only be delivered as part of a larger mixed use allocation.