

MATTER 1: ARE THERE ANY DIFFICULTIES WITH THE FORMAT OR NATURE OF THE PLAN OVERALL?

- 1.1 This Matter Statement is prepared on behalf of David Sparks of the Minster Veterinary Centre in relation to his land interests at Crew Lane/Fiskerton Road, Southwell.
- 1.2 The National Planning Policy Framework (NPPF) recognises the central role the Local Plan has in guiding planning, acting as the strategic framework and focal point for strategic decision making and for determining individual planning applications. The Local Plan is tasked with ensuring that development is directed to the most beneficial areas, delivering sustainable development with economic, social and environmental benefits.
- 1.3 For this reason Local Plans should be clear and concise, guiding development to deliver the infrastructure and housing and employment land needed to meet an area's needs and build strong and vibrant communities. A key tenet of this is the NPPF's drive to boost significantly the supply of housing, meeting the full objectively assessed needs (OAN) for both market and affordable housing, and to build a strong, responsive and competitive economy. Local Plans should therefore plan ambitiously to achieve this.
- 1.4 This Local Plan has not been sufficiently ambitious in its scope nor in its execution; it fails to ambitiously plan to boost the supply of housing across the district, and focuses to its detriment on the achievement of a substantial housing supply on a small number of development sites. For this reason the Plan should not be considered sound as it fails to pass the test of soundness requiring it to be positively prepared and effective over its lifetime.
- 1.5 Our concerns with the detail of the process by which the Council has defined its OAN, the specific site allocations, and planning for the future delivery of housing land are set out within the individual matter statements to be dealt with later in these hearings. It is important however to raise the general concerns here as these strike at the heart of developing a Local Plan, as defined by the NPPF and Planning Practice Guidance (PPG).

- 1.6 The NPPF places great emphasis on the importance of pre-application engagement; to be effective, Local Plans need to set clear ambitions for the local area, including the development strategy and a robust housing trajectory. An ineffective strategy will lead to poor planning for individual sites, with the potential for sites to come forward on an ad hoc basis instead and lead to planning by appeal in the case of the Council not being able to demonstrate a five year supply of housing land.
- 1.7 Such an approach will also do little to tackle the challenge of the district's acute affordability crisis which not only restricts local people's ability to afford to buy their own home, but places greater strain on the existing affordable housing stock and has wider negative effects on the local economy as social mobility is constrained and people are forced to move to more affordable communities outside of the district meaning that local family connections and ties to local communities are broken.
- 1.8 The district also has a substantial and pressing need for affordable housing; to support the district's towns and villages in sustaining vibrant, healthy communities, the Plan should be setting an ambitious strategy for growth.
- 1.9 It is acknowledged that the Council has sought to 'uncouple' the Core Strategy from a separate Sites and Settlements Development Plan Document (DPD) to identify sites to meet need for Gypsy and Traveller sites in order to put in place a sound plan against which development of housing and employment land can be managed. The Council has acknowledged in **CS.16** that the Settlements and Sites DPD will largely retain the allocations as set out in the adopted Allocations and Development Management DPD (**CS.05**).
- 1.10 This strategy places too great a reliance on concentrations of development on a small number of sites to achieve the development rates as set out in the Housing Trajectory. The failure to deliver housing at the delivery rates anticipated on the strategic sites will (in theory, noting the absence of specific trigger mechanisms) trigger the need to release land on the Opportunity Sites which are focused exclusively around the Newark Urban Area and, based upon the Council's Housing Trajectory, are not expected to deliver before 2027/28 at the earliest.

- 1.11 Leaving delivery of housing on these sites to such a late stage of the Plan without a clear trigger fails to recognise the importance of the NPPF requirement to boost significantly the supply of housing and to front-load development.
- 1.12 There is significant concern that each of the Opportunity Sites are capable of being delivered in a timely fashion, and as noted above the Plan does not set out any clear triggers at which to bring forward additional development to remedy any shortfall arising from the failure to deliver on either the strategic or those Opportunity Sites. Such a mechanism is crucial to ensure continuity of delivery in particular in relation to contributing to reducing the shortfall in affordable housing delivery.
- 1.13 As already noted, the NPPF requires each local planning authority to define the extent of its OAN and to then plan ambitiously to meet the full extent of that need, taking into account the scale of need for affordable housing, and any affordability issues; this Plan fundamentally underplays that evidence.
- 1.14 By opting not to plan positively to meet local needs for affordable housing, and to tackle the local affordability difficulties, the Council is failing to reflect the vision and local aspirations of Newark and Sherwood's local communities.
- 1.15 To resolve these issues the Plan should instead seek to plan for a higher housing target, with a separate target for delivering affordable housing across the entire plan period. A separate target for affordable housing is important as it provides a simple mechanism by which to monitor the delivery of this critical infrastructure, as well as providing a clear indication of the Council's commitment to meeting local needs.
- 1.16 It is not sufficient to leave these critical issues to be resolved through the Settlements and Sites DPD as the Plan remains the main vehicle by which an appropriate strategy for the whole plan period is set. The Plan's spatial portrait sets out the important role that the district's main towns play; this should be properly translated to identifying additional Opportunity Sites at the Service Centres to remedy the Plan's shortcomings in relation to providing greater certainty of delivery.

- 1.17 To achieve the aims to meet housing and employment land needs the Plan should incorporate a more realistic appraisal of the strategic urban extensions, planning for their delivery over a longer timeframe.
- 1.18 Additional Opportunity Sites should also be identified that can assist the Council in meeting local needs and in delivering steady growth across the Service Centres and regeneration areas. In this way the Plan will also more realistically be able to deliver the infrastructure that is required across the district to not only mitigate the impacts of that growth but also contribute to local communities thriving.

Prepared by Tetlow King Planning