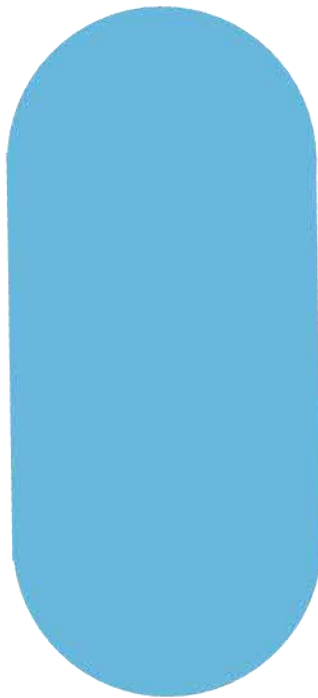


REPRESENTATION ON THE PLAN REVIEW PUBLIC
AMENDED ALLOCATIONS & DEVELOPMENT MANA
DPD (NOVEMBER 2022)

LAND OFF DYKES END AND OAKLANDS, COLLINGB

On Behalf of Clarendon Land & Development



1. INTRODUCTION

- 1.1 This representation is made on behalf of our client, Clarendon Land & Development in respect of their interests at Land off Dykes End and Oaklands, Collingham. It responds specifically to the Amended Allocations & Development Management DPD (November 2022) (Regulation 19 Pre-Submission Draft Plan).
- 1.2 The Plan is currently the subject of consultation and representations are invited until the 9th January 2023.
- 1.3 The representation also provides support for a site for housing at Land off Dykes End and Oaklands, Collingham.

2. THE AMENDED ALLOCATIONS AND DEVELOPMENT MANAGEMENT DPD (NOVEMBER 2022)

- 2.1 The previous Allocations and Development Management DPD was written in accordance with the adopted Core Strategy that was adopted in March 2011 and its approach to settlement growth in identifying specific sites where new homes and employment sites should be built.
- 2.2 The Council adopted an Amended Core Strategy in 2019 which forms the overarching document in the LDF and all other DPDs produced by the Council should be in general conformity with this plan.
- 2.3 The Core Strategy sets out the spatial vision for Newark and Sherwood, contains a range of strategic and area-based objectives for the District and a number of strategic policies for achieving the vision.
- 2.4 Adoption of the Amended Allocations and Development Management DPD (AADMDPD) by the District Council will complete the Plan Review process and replace the previous Allocations and Development Management DPD.
- 2.5 The Council's latest Local Development Scheme (November 2022)

identifies the following timeframes for the AADMDPD:

- Submission of DPD – March 2023
- Examination – September 2023
- Main Modifications – November/December 2023
- Adoption – May 2024

2.6 The Amended Core Strategy (ACS) was adopted in March 2019 and it might be noted it will have reached its 5th anniversary ahead of the expected timeframe for the adoption of the AADMDPD. National Planning Policy Framework (NPPF) paragraph 33 states:

“Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.”

2.7 This is significant not just for the ACS but also the AADMDPD as it relies on the strategic policies within the ACS. This is particularly relevant given the AADMDPD states:

“As the targets in the Amended Core Strategy are lower (albeit for a different time period) and overall, we had made enough allocations to meet the higher target the starting point for the review was that we should have sufficient sites to meet development needs without making further allocations. All sites in the DPD have been appraised to see if they are still available and deliverable, those sites that continue to be, have remained allocated. We have only deallocated sites in circumstances

where they are no longer available or deliverable. Where details regarding allocations have changed or new evidence needs to be taken into account site allocation policies have been amended.” (Paragraph 1.3)

- 2.8 The strategy and policies within the ACS should, of course, be reviewed in advance of this date. Without this, there is a danger that the AADMDPD will rely on an out of date strategy and be out-of-date as a consequence as soon as it is adopted. With such a review, there is a prospect that the strategy will alter and the AADMDPD will need to consider a different package of sites.
- 2.9 With the above in mind, it might be prudent to note that the housing requirement has increased from 454 dwellings per annum (9,080 dwellings between 2013 and 2033 in the ACS) to 470 dwellings per annum according to the most up to date Standard Method calculation. Nevertheless, the figure should be kept under review given the 2022 affordability ratios are due to be published by the Office for National Statistics (ONS) in March 2023 and may increase further.
- 2.10 The NPPF is also clear that the Local Housing Need calculation derived from the Standard Method provides a minimum number of homes to be planned¹. This is supported by National Guidance which includes a non-exhaustive list of circumstances where it might be appropriate for a Local Plan to set a higher housing requirement than the Local Housing Need figure derived from the Government’s Standard Method calculation².
- 2.11 This in of itself highlights the need to review the ACS upon its 5th anniversary but also points to the circumstances which contribute to a stable foundation which the AADMDPD can be built upon including, but not limited to, affordable housing delivery and open space strategy at a time of hosing crisis and deficits in access to green space.
- 2.12 The need for additional provision of open space in Collingham, including

¹ NPPF Paragraph 61

² PPG Paragraph: 010 Reference ID: 2a-010-20201216

amenity greenspace, children and young person provision and natural/semi-natural greenspace is highlighted within AADMDPD Table 2. There appears to be no clear mechanism for their delivery other than through existing housing allocations which may have advanced plans and/or through the District/Town/Parish Council working with their partners.

2.13 The latest need affordable housing need is identified in the District Wide Housing Needs Assessment (2020) as being 243 affordable homes each year across the district (2019-33) with existing shortfalls identified in all sub-areas. Against this target an average of 109 affordable homes have been built each year over the past 5 years to 2018/19.

2.14 Core Policy 1 – Affordable Housing Provision seeks to secure 30% Affordable Housing on qualifying schemes on the basis that this will help secure the highest level of such housing that is viable. Even if we presume that 30% of the annual housing requirement of 454 dwellings per annum were to be affordable (noting that not all developments will deliver affordable housing) this would equate to 136 affordable homes a year against a target of 243 affordable homes a year. This is far below the identified need and across the life of the plan would see a shortfall of around 1,500 affordable homes (if 30% was secured on every development) and around 1,880 affordable homes if the five year trend in AH delivery was maintained.

2.15 This justifies the identification of additional housing allocations within the AADMDPD to support the delivery of affordable housing and assist local people in accessing much needed homes.

2.16 For a plan to be adopted it must pass an examination and be found to be 'sound'. NPPF Paragraph 35 identifies that plans are 'sound' if they are:

a) **Positively prepared** – *providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent*

with achieving sustainable development;

*b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

2.17 As drafted the AADMDPD is not considered to be sound on the basis that it is not positively prepared given it relies on the housing requirement in the ACS which is lower than the up to date Standard Method calculation and will be in excess of five years old at the point of adoption.

3. REPRESENTATIONS IN RESPECT LAND OFF DYKES END AND OAKLANDS, COLLINGHAM

3.1 The Land off Dykes End and Oaklands, Collingham extends to approximately 2.1 hectares. The site forms a single parcel of pasture land bordered to the north, south and west by residential development and to the east by horse paddocks. The site is located outside of, but adjacent to, the Collingham village envelope. Access connections to Oaklands to the west and The Paddock to the south provide positive pedestrian and vehicle connections into the site.

3.2 The site was assessed as part of the Strategic Housing Land Availability Assessment (SHLAA) under Site Reference: 16_0074 which concluded that the site was available, achievable and may be suitable.

3.3 The site is not subject to any planning or environmental constraints that

would restrict the delivery of development and is located outside of the Conservation Area. Two Public Rights of Way are located within the site, South Collingham FP8 runs in a north-south direction and South Collingham FP9 is located along part of the site's southern boundary.

- 3.4 The AADMDPD highlights the need for additional provision of open space in Collingham, including amenity greenspace, children and young person provision and natural/semi-natural greenspace. As mentioned above, there is no clear mechanism for delivery set out in the plan and we are not aware of any other credible vehicles for delivering those requirements.
- 3.5 The proposed development can be appropriately designed to maintain the existing footpaths within a green corridor and deliver additional open space and green infrastructure planting, well related to the countryside and, in essence, securing the delivery of greenspace to reduce the deficit recognised by the AADMDPD. This provides a significant benefit to the wider village given the acknowledged deficit.
- 3.6 Collingham is identified within the ACS as a Principal Village, which has a good range of day to day facilities – primary school, food shop, health facilities, employment or access to nearby employment. It is therefore considered a sustainable location for additional residential development.
- 3.7 The site benefits from good pedestrian connectivity to the village services and facilities including the Medical Centre, Pharmacy, Co-Op food store, Primary School and train station all located within 600m. The community hall and a number of pubs are located within 300m.
- 3.8 The site is also well placed to deliver much needed affordable homes at a time of housing crisis.
- 3.9 The site is situated within Flood Zone 1 and therefore at very low risk of flooding. There are no ownership constraints with a single land owner and is being promoted for development by Clarendon Land & Planning.
- 3.10 As such there are no physical or technical constraints which would
-

prevent development from taking place and we can confirm that the site is available and suitable for development within the next five years.

3.11 We believe the site would contribute to not only the delivery of housing, including affordable homes, but also much needed open space infrastructure within the village.

3.12 Notwithstanding the above, and should the Council not consider it necessary to allocate Land off Dykes End and Oaklands to meet housing need and infrastructure requirements in the immediate plan period, it may be prudent to consider identifying the land as a reserve allocation or Broad Location for Growth. Under either scenario, the site could be released in the event that:

- the Council were unable to, or at risk of being unable to, demonstrate a 5 year housing land supply;
- a local plan policy related to unmet need or increased housing need were triggered;
- Infrastructure requirements dictated the specific need for additional sites to be delivered; or
- sites were needed for an accelerated local plan review.

4. CONCLUSION

4.1 As drafted the AADMDPD is not considered to be sound on the basis that it is not positively prepared as it relies on the housing requirement in the ACS (454 dwellings per annum) which is lower than the figure within an up to date Standard Method calculation (470 dwellings per annum) at a time when the ACS will have reached its 5th anniversary and require a review ahead of the adoption of the AADMDPD.

4.2 The AADMDPD does not identify any new allocations as the requirement within the ACS housing is lower than the previous CS and sufficient

allocations are claimed within the Plan without the need for further allocations to be identified.

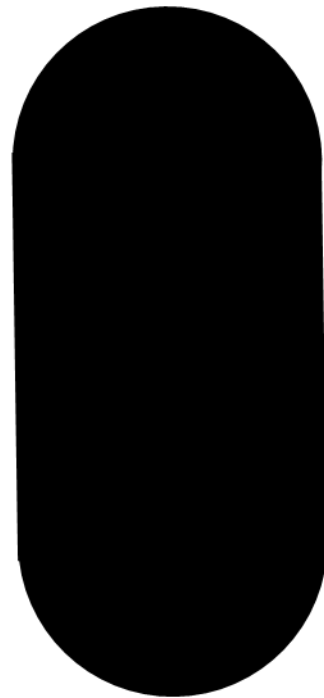
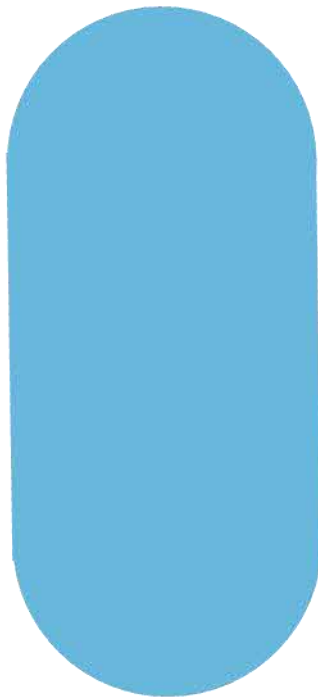
- 4.3 However, the AADMDPD does not seek to meet the latest affordable housing need as identified in the District Wide Housing Needs Assessment (2020) at 243 affordable homes each year across the district (2019-33). Even if we presume that 30% of the annual housing requirement of 454 dwellings per annum were to be affordable (noting that not all developments will deliver affordable housing) this would equate to 136 affordable homes a year against a target of 243 affordable homes a year. This is far below the identified need and across the life of the plan would see a shortfall of around 1,500 affordable homes (if 30% was secured on every development) and around 1,880 affordable homes if the five year trend in AH delivery was maintained.
- 4.4 The AADMDPD acknowledges the need for additional provision of open space in Collingham, including amenity greenspace, children and young person provision and natural/semi-natural but provides no clear mechanism for delivery other than as part of housing allocations and/or through the District/Town/Parish Council working with their partners.
- 4.5 These matters provide justification for additional housing allocations to be identified within the AADMDPD to support the delivery of affordable housing and assist local people in accessing much needed homes and to reduce the deficit in accessible greenspace as recognised in the AADMDPD itself.
- 4.6 In this context it is considered that the Council must 'future-proof' the AADMDPD through the provision of additional allocations.
- 4.7 Additional allocations, such as at Land off Dykes End and Oaklands, would provide additional flexibility in meeting the increased Standard Method housing requirements but also deliver the much needed additional publically accessible green space within the village.
- 4.8 The site is suitable, available and achievable and Clarendon Land &

Planning are committed to its promotion and the delivery homes in the short term. The site can positively contribute towards a five year supply and as a result we respectfully request that Land off Dykes End and Oaklands is identified as a housing allocation within the AADMDPD.

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