# Newark & Sherwood Allocations and Development Management DPD Examination - Matter 2: Urban Area Policies, Site Selection, and Housing Site Allocations

### Bellway Homes Ltd (respondent no: 052)

### October 2024

#### Introduction

- 1. This Hearing Statement is submitted in response to the Newark and Sherwood Amended Allocations and Development Management DPD Examination ('AA&DMDPD') on behalf of Bellway Homes Ltd ('Bellway') in respect of their land interests at the site referred to as *"Land to the north of the A617, Rainworth"* ('the site').
- 2. We respond to Matter 2, Issue 2 Site Selection (question 2.2) and Issue 3 Housing Allocations (questions 2.10a, 2.10b and 2.10d).
- 3. Please note, Regulation 19 representations were submitted on behalf of Bellway in November 2023 and January 2022. The representations submitted are included in the Council's *"Statement of Consultation"* submission document (Ref: CD12) and appear in Appendix C and D (respondent no: 052/representation number(s): 0128, 0126, 0127, 0213, 0211, 0212). We would direct the attention of the Inspector to these representations which contain further detail in respect of the site and key points raised, which have not otherwise been addressed by the Council in their response to representations.

#### Issue 2

# Question 2.2 Is the evidence on housing need sufficiently up-to-date, having regard to any changes since 2015?

- 4. Much of the evidence base underpinning the emerging AA&DMDPD, and particularly in respect of housing, is dated, having previously formed part of the evidence base for the amended Core Strategy, adopted in March 2019. It should be noted that the Core Strategy was originally adopted in 2011.
- 5. Paragraph 33 of the National Planning Policy Framework (NPPF, 2023) sets out a requirement for policies within a Local Plan to be reviewed every 5 years. Since the Amended Core Strategy is now over 5 years post adoption, and as such, is in need of review (as noted at paragraph 1.32 of the AA&DMDPD), the evidence base documents this plan is informed by and subsequently, those included in the evidence base for the AA&DMDPD, are also considered to be dated and in need of update.
- 6. On this basis, and as previously set out in the submitted representations, Bellway are of the view that the AA&DMDPD should set out a firm commitment to commencing a full review of the Local



Plan immediately following the adoption of the AA&DMDPD. This notwithstanding, given the time it takes to prepare a Local Plan and noting the ongoing planning reform in respect of plan making, the Council should urgently commence the update of the Local Plan evidence base, particularly in respect of housing. This will be particularly important given the proposed changes to the Standard Method and significant increase in Local Housing Need (LHN) expected in the district which would result in an additional 293 dwellings per annum.

7. As the Council commence the update of the evidence base in the preparation of a new Local Plan, Bellway would welcome the opportunity to engage further and directly with the Council in respect of the site in Rainworth. The site represents a significant opportunity for Sustainable Urban Extension (SUE) scale growth of a mixture of uses, directly north of an existing *"Service Centre"* (tier 2 settlement as established by the Amended Core Strategy, 2019) in the Mansfield Fringe Area.

#### Issue 3 – Mansfield Fringe Area – Rainworth

# Question 2.10a: Is the proposed scale of housing development justified, having regard to any constraints and the provision of necessary infrastructure?

- 8. As noted by the Inspector, the wording for Policy Ra/Ho/2 (Warsop Lane) states that the allocation will provide around 190 dwellings. Both the 2023 Strategic Housing Land Availability Assessment ('SHLAA') and Housing Monitoring and 5 Year Land Supply Report (2023) states that the site will deliver 95 dwellings within a 5-10 year period from adoption of the AA&DMDPD. Combined with those dwellings already delivered (160 dwellings completed up to 2019/20), this represents an additional 65 dwellings to be provided on this site.
- 9. Subject to the plan being found sound, the policy wording for this allocation should be revised to clarify that only 95 dwellings will be delivered within the plan period, taking into consideration the completions on site to date.

#### Question 2.10b: Is the allocation consistent with the development strategy in the Core Strategy?

- 10. Whilst not a direct response to an individual housing allocation, we note that the strategic housing requirement for Newark and Sherwood is 9,080 dwellings as set out within the Adopted Amended Core Strategy DPD (March 2019). The AA&DMDPD seeks to deliver this through a series of allocations which were established through the adopted A&DMDPD
- 11. To be positively prepared in line with Paragraph 35(a) of the NPPF, the AA&DMDPD must ensure that the Council meets its objectively assessed housing needs. It should explicitly confirm whether it allocates sufficient housing to meet this requirement, ensuring alignment with the overall housing targets set in the Core Strategy.
- 12. In the Amended Core Strategy, Rainworth was allocated 10% of growth, circa 264 homes, between 2013 2033, and 187 of these units have already been completed or committed, leaving the emerging plan to identify sites for a residual requirement of 77 new homes.
- 13. Although it is noted that the proposed update of Policy Ra/Ho/2 (Warsop Lane) seeks to increase the capacity of the allocated site (as above) and would provide for the residual requirement, the Housing Monitoring and 5 Year Land Supply Report (2023) sets out that delivery wouldn't start until 2028/29 with completion expected by 2033. Given the lead in times for delivery on site, opportunities may be considered for other site options which could deliver the additional units more quickly, for instance on the site north of Rainworth, which could meet this housing need in



the short term and would have longer term potential for SE scale growth. This is supported by Paragraph 60 of the NPPF which is clear that the supply of new homes should be provided for across a range of sites to meet identified needs and the Ministerial Statement UIN HCWS48<sup>1</sup> which demonstrates the Government's commitment to increasing the supply of new homes over next five years and beyond.

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11 October 2024

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<sup>&</sup>lt;sup>1</sup> Building the homes we need - made on 30 July 2024