

**NEWWARK AND SHERWOOD SUBMISSION SITE ALLOCATIONS &
DEVELOPMENT MANAGEMENT DPD**

**Examination in Public: Hearing Statement
December 2012**

Matter 1 (1) Compliance and Procedural

**Land north of Southwell Road, Farnsfield (Fa/AS/2)
Representor ID: 141**

Submission by
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Hollins Strategic Land**



Matter (1) – Compliance and Procedural / Representor 141 / P O'Shea Hollins Strategic Land

Matter (1) (1) Has the Plan been prepared in accordance with relevant legal requirement, including the Duty to Co-operate and the procedural requirements of the National Planning Policy Framework?

1. The NPPF is clear that policies in Local Plans should follow the presumption in favour of sustainable development (Para 15) and *'plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan'*. For 'Plan – making', Para 14 requires local planning authorities to positively seek opportunities to meet the development needs of their area and that Local Plans *'should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change'*. There are 12 core planning principals that should underpin plan-making (Para 17), one of which is that *'every effort should be made objectively to identify and then meet the housing, business and other needs of an area and respond to positive wider opportunities for growth.'*
2. It is clear that national policy requires LPAs to plan positively by identifying and then meeting the housing needs of an area. The Council undertook a housing study of the area in 2009 which identified specific housing demand for affordable and market homes. The Newark & Sherwood Housing Needs, Market & Affordability Study (2009) was commissioned by the Council and assumedly informed the Core Strategy housing requirement. It however provides a relatively up to date independent objective assessment of housing demand in the district. The purpose of the study was to *'undertake a comprehensive and robust assessment to obtain high quality information about current and future housing needs at a local authority level and to inform the development of policies and underpin local housing strategies'*. The report (in light of NPPF plan-making requirements) is a fundamental part of the evidence base upon which the Council must have regard to in the preparation of the A+DM DPD. However, the Council has made no reference to this report in their evidence base and as such we question whether the Council has in fact followed the procedural requirement of the NPPF for Plan – Making in this regard.
3. The A+DM DPD as drafted has a shortfall against the actual planned housing provision set out in Core Strategy Policy 2. In determining the number of allocations to be made, the Council has in essence planned to deliver minimum requirements and in doing so has still fallen short in meeting minimum provision in some areas (i.e. Blidworth). As well as this shortfall, the A+DM DPD plans to meet minimum housing provision despite an available evidence base demonstrating that in some areas housing needs and demand are significantly high (e.g. Southwell Area).
4. Indeed the Inspector's report on the Core Strategy under Matter 1 / 2 – Strategy / Vision / Sustainability (page 4) para. 8 is clear that the housing provision for the district was a minimum and that a higher figure might actually be necessary; stating;

'...the new housing sought....is a minimum' and ' the level of growth is supported by robust evidence base of local housing needs / demands and population changes, including in respect of new household formation'.

'the latest household projections for the County indicate that a higher figure might actually be necessary to meet local housing needs'.

This above further endorsing the minimum housing provision is not a target and that the DPD must reflect local needs/demands according to specific areas.

5. The Plan is not positively prepared in that it is not based on a strategy which seeks to meet objectively assessed housing needs. It must therefore consider the inclusion of alternative sites and increase the provision of new homes where evidence clearly identifies a need.