

Newark and Sherwood Allocations and Development Management DPD

Written Representations on behalf of Mr R Thomas by Ian Baseley Associates

Matter 2 – General Issues

3. Is the Plan consistent with the Core Strategy and is it capable of meeting its objectives?

3.1 No. Chapter 4 Spatial Policies of the Core Strategy sets out the Spatial Strategy for the District.

3.2 Spatial Policy 2 sets out the spatial distribution of growth. It sets the level [as percentages] to be met when allocating sites for housing development in the Allocations & Development Management DPD ('The Plan').

3.3 It confirms that 10% of housing growth will be met within the Principal Villages and that 25% of the Principal Village growth will be met in Blidworth as part of the Council's '*Regeneration*' strategy. Paragraph 4.22 of the Core Strategy confirms that individual percentages are based on meeting the aims of the principles assigned to each settlement and an assessment of the capacity of each settlement to support growth, including its function, scope for future growth and infrastructure constraints and potential for future improvements.

3.4 The Plan translates these 'set' percentages into a number of new dwellings (and amount of new employment land) required to be provided in each settlement up to 2026.

- 3.5 For Blidworth, this equates to a residual requirement of **299 additional houses** and **up to 1 hectare** of new employment land.
- 3.6 However, the Plan only identifies sufficient land to accommodate 210 new dwellings in Blidworth, leaving a **significant shortfall of some 89 houses** (i.e. 30% of the residual housing requirement for the settlement). It explains that, owing to Green Belt constraints, the shortfall will instead be re-distributed elsewhere. However, this is clearly not what was intended in the Core Strategy.
- 3.7 Accordingly, the Plan is not consistent with the Core Strategy in that it **fails to allocate sufficient land to meet the identified housing needs of Blidworth**.
- 3.8 In the above connection, the Plan as submitted is not consistent with the Spatial Strategy, the Spatial Portrait for the District, the Vision and Strategic Objectives, or Spatial Policy 2.
- 3.9 In failing to make adequate provision for the housing requirements for Blidworth, the Plan is also not consistent with Spatial Policy 4A which specifically facilitates a review of the boundary of the Green Belt surrounding Blidworth in order to meet the housing requirements set by Spatial Policy 2.
- 3.10 Indeed, paragraph 4.30 of the Core Strategy explains that the SHLAA revealed that potential housing land supply was limited within existing settlement boundaries and therefore consideration will need to be given to changing boundaries (i.e. releasing land adjoining settlement boundaries from the Green Belt) to meet the wider aims of the Spatial Strategy.

- 3.11 The Council's 're-distribute elsewhere' approach to compensate for the serious under-provision within Blidworth is also not consistent with the wider aims of the Spatial Strategy.
- 3.12 If the percentages set out in Spatial Policy 2 were only meant to be *broad-brush*, then they would have been stated as "approximately", "up to" or as a range (as is the case for employment land provision). They are not. The intention of the Core Strategy is to direct specific numbers of dwellings to specific settlements to address their specific needs, roles and functions.
- 3.13 To over-provide on sites in Newark is not an acceptable alternative as this comprises a completely different strategic and/or local housing market area and will do nothing to assist the regeneration strategy for Blidworth identified as a key part of the Spatial Strategy.
- 3.14 The acknowledgement in paragraph 4.30 of the Core Strategy regarding the limited scope of sites within existing settlement boundaries also casts sufficient doubt over the Council's suggestion in their 'Responses to the Inspector's Initial Questions' that "redevelopment of existing sites within the villages may still continue to contribute".
- 3.15 To make the Plan 'sound', so as to be consistent with the Core Strategy, **additional sites should be allocated to meet the housing requirements for Blidworth.**
- 3.16 This is particularly important where settlements (such as Blidworth) are presently tightly constrained by the Green Belt, as failure to allocate sufficient land within the Plan (hand-in-hand with the Green Belt Review) will necessarily limit the Council's ability to be flexible and/or to allocate additional land in the future given the intended permanence of the [once reviewed] Green Belt boundaries from point of adoption of the Plan and the advice in the NPPF that: - Green Belt boundaries should be defined "in order

to meet longer-term development needs stretching well beyond the plan period”; and that councils should “satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period” (paragraph 85).

3.17 In the above connection, previous representations submitted on behalf of Mr R Thomas highly commended **land south of Dale Lane, Blidworth (immediately adjacent BI/Ho/1)**, in combination with the site to the north of Dale Lane comprising the former Jolly Friar Public House (‘The Pub Site’), as a logical extension of the eastern boundary of the settlement and long-term defensible boundary for the Green Belt in this location.

3.18 The two sites in combination would effectively make up a significant proportion, if not all, of the Plan’s current shortfall of future housing land supply for Blidworth. The Pub Site is previously-developed and, I understand, owned by a developer actively seeking its immediate redevelopment for housing. My client’s land would form a logical extension to BI/Ho/1 where there is also a willing and able landowner who has already received significant interest from a number of national house builders.

3.19 Both sites are free of any of the constraints to development (or delivery) affecting proposed allocations BI/Ho/3 and BI/Ho/4 and are considered to be capable of being delivered confidently within the first five years of the plan period.

4. Is the Plan based on a sound process of sustainability appraisal including testing of reasonable alternative sites, and does it represent the most appropriate strategy in the circumstances?

4.1 No. It is considered that the Council have failed to adequately test those sites put forward as additional allocations in Blidworth to meet the housing requirements set by the Core Strategy.

- 4.2 The Council's approach set out in the Plan results in a significant shortfall in housing land (both as a number and percentage of provision for the settlement).
- 4.3 Spatial Policy 4A specifically facilitates a Green Belt review around Blidworth in order to *meet* housing requirements. The Council's conclusion that, owing to Green Belt constraints, it was not possible to identify any other sites is neither accepted, nor considered acceptable as a concept.
- 4.4 Two of the sites proposed for allocation in Blidworth (BI/Ho/3 and BI/Ho/4) are subject to unresolved site constraints which will either delay, or prevent, delivery in the form envisaged in the Plan.
- 4.5 In adopting an approach which results in a material shortfall of housing supply provision in Blidworth and places reliance on the aforementioned two sites which may or may not come forward in the plan period to accommodate the number of dwellings required, with no realistic contingency in place either on adoption or towards the end of the Plan period (owing to the present Green Belt designation), **the Plan is not considered to be 'sound' in that it does not represent the most appropriate strategy in the circumstances.**
- 4.6 Reasonable alternatives are not considered to have been adequately tested and initial background documents (e.g. Newark and Sherwood Green Belt Study) do not appear to have been revisited/re-appraised to take into account sites unearthed through the consultation process, or those previously identified, but discounted, and which needed to be subsequently re-considered.

6. Is there sufficient flexibility to cope with changes to individual sites which might render them undeliverable for the purposes envisaged by the Plan?

6.1 No. Earlier representations have highlighted potential complications regarding the delivery of two sites in Blidworth which the Council rely on – Bl/Ho/3 and Bl/Ho/4.

6.2 In short, with regard to Site Bl/Ho/3, there are identified deficiencies in the width, alignment and capacity of the New Lane/Mansfield Road junction. The Schedule of Proposed Modifications contains a requirement for the preparation of a Transport Assessment “as part of any planning application” to determine the impact of the development on the highway network which should specifically include the impact on New Lane and New Lane/Mansfield Road junction and the provision of appropriate mitigation measures.

6.3 Owing to the above, the suggested capacity of this site is proposed to be restricted to 100 dwellings. However, given the importance of those sites (which the Council are evidently relying on to deliver new housing in Blidworth), it is essential that the Plan ought to provide reasonable certainty that such numbers could be achieved and delivered as intended.

6.4 The requirement for a Transport Assessment “as part of any subsequent application” (i.e. post allocation) seems a little too late in the process, since it leaves the Council with no contingency whatsoever should it ultimately transpire that 100 dwellings cannot be accommodated on the site, or that the site cannot be delivered at all because of the potentially significant highway constraints identified at the allocation stage.

6.5 Whilst the southern part of the original Bl/Ho/3 has not been carried forward from the Preferred Options stage, the remainder of the allocation abuts the Conservation Area and is therefore bound to have an effect on

the setting of this part of the Conservation Area. I am not aware that the Council, or those promoting the site, have provided any form of assessment regarding potential impact on this designated heritage asset, or indeed the effect this designation might have on the ultimate layout and capacity on the site. The adjacent Conservation Area may therefore also serve to limit the number of dwellings ultimately achievable on this site.

- 6.6 In addition to the above, Site Bl/Ho/4 comprises land owned by the Parish Council presently used locally as allotments.
- 6.7 Delivery of this site can only be assured once an alternative site (inevitably in the Green Belt!) has been identified, secured and delivered.
- 6.8 The above requirements cast substantial doubt on the ability of this site to be delivered in the way the Council envisages. The Council's amended Housing Trajectory table confirms this site is not likely to be delivered until 2024/2025 at the earliest.
- 6.9 It is further understood that there may be a longstanding covenant on the land which could also serve to prohibit or delay this site coming forward for development.
- 6.10 I repeat, the Council's approach already results in a material shortfall in housing provision in Blidworth – this would be further exacerbated by the failure of either or both Sites Bl/Ho/3 and Bl/Ho/4 to be delivered in the way envisaged.
- 6.11 Given that the Green Belt completely surrounds the settlement, there will be no flexibility to deliver an alternative site to make up the numbers during the remainder of the plan period, or even perhaps beyond.

6.12 To ensure there is sufficient flexibility within the Plan, **additional sites should be allocated to meet the housing requirements for each Principal Village.** [Please refer to my earlier paragraphs' 3.16 to 3.19 which are equally relevant to this question.]

Nick Baseley
[1,878 words]