



**NEWARK AND SHERWOOD SITE ALLOCATIONS AND DEVELOPMENT
MANAGEMENT DPD EXAMINATION**

MATTER 3 - HOUSING

**REPRESENTOR NUMBER – 176
MILLER HOMES LIMITED**

DECEMBER 2012



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TOWN PLANNING & DEVELOPMENT CONSULTANTS

MATTER 3 – HOUSING

8. *Is the amount of land allocated for housing sufficient to meet needs? If not, how will the Plan ensure that an appropriate housing land supply will be maintained in the medium and longer terms? Will they provide for an appropriate housing mix, including affordable housing, provision for gypsies and travellers, in the right locations?*

The District Council's overall housing provision is derived from the adopted East Midlands Regional Plan housing requirement and subsequently confirmed in the Core Strategy which was adopted in March 2011. The overall requirement for new dwellings and indeed the approximate residual dwelling requirement (allowing for completions and commitments from 01/04/06) is set out at Appendix D of the adopted Core Strategy.

There was debate at the Core Strategy hearing in respect of the extent of flexibility that should be accorded to the residual housing provision, particularly in respect of the designated Service Centres and Principal Villages. The prevailing view was that to allow 'too much' flexibility in some of these settlements could potentially undermine the role and function settlement hierarchy and adversely impact upon the character and/or sustainability of the individual town or village.

The view of Antony Aspbury Associates with client interests in both Service Centre and Principal Village locations in Southwell and Collingham respectively, is that the Site Allocations DPD does in the main, provide sufficient land to meet needs established by the Core Strategy. This may either be in the form of site allocations cumulatively exceeding the residual requirement set out in the Core Strategy by a modest margin, or of individual site allocations being capable over time, of delivering in excess of the current requirements.

The District Council's previous options consultation on the Site Allocations DPD in 2011 set out Preferred Sites and Alternative Sites for consideration and public comment. Whilst we are supportive of the Preferred Allocations (as they serve our particular client interests) set out in the Publication Version DPD, we have no objection in principle to the identification of reserve sites which could potentially be elevated to allocation status in the medium /longer term either, to maintain supply to meet general housing needs or to address specific affordable or specialist needs that the allocated sites have failed or are unsuitable to address.

We consider therefore that the allocations mechanism for delivering the housing needs quantified by the Core Strategy has been positively prepared and justified by the evidence base and assessment of alternatives. Its effectiveness may potentially be enhanced by introducing some reserve allocations in specific locations previously identified in the plan process, to accommodate any unforeseen 'fall out' of allocated sites in the medium to longer term or to accommodate any specialist and affordable housing needs and opportunities that may arise during the plan period.

9. *Are the allocated sites viable and deliverable for first 5 years, having regard to the provision of the necessary infrastructure, affordable housing, environmental constraints and development management policies? Is the Plan sufficiently flexible to enable delivery given the current market conditions?*

Our comments in respect of viability and deliverability are based on our specific clients' preferred site allocations in Southwell and Collingham, locations which are generally acknowledged to be of higher land value and in principle capable of viably supporting new development.

Turning first to viability, the Council's CIL came into force in December 2011 and applies varying charging rates to residential and commercial development across the District. In these difficult economic times, viability was a key consideration at the CIL examination and remains so today. However, a pragmatic approach was taken by all parties at the examination as to how CIL and Section 106 requirements would impact on development in the short term and it was generally agreed that the relevant policies of the Core Strategy offered sufficient flexibility in their application to address site specific viability concerns to promote site delivery in the first five years. The Inspector reporting on the CIL examination observed in paragraph 34 of his report¹ on the specific 'Matter' of delivery/implementation

"Moreover, as the margin of economic viability for the types and locations of new development to which the CIL would apply is not excessively eroded by the rates charged, it should still be possible for other appropriate contributions to local infrastructure needs, such as primary school places, to come forward from most, if not all, significant schemes"

From the perspective of our client land interest at Nottingham Road, Southwell (Site So/Ho/3), there are no material issues having regard to the provision of infrastructure, affordable housing, environmental constraints and the emerging Development Management Policies that impact on the site viability and delivery within the first five years. This site was historically allocated for in the 1999 Newark and Sherwood Local Plan (H2- Sn), and subsequent concerns regarding ecological interests, tree preservation, access and potential visual impacts in wider views have been substantially resolved between the Council and the landowners to the extent that the allocation is re-confirmed. The current site promoters, Miller Homes are now working up a planning application for the site with a view to submission in early 2013, having due regard to policy context set out in Policy So/Ho/3 and So/PV.

This site is eminently deliverable in its entirety within the first five year period of this DPD and can in part help address the shortfall of delivery in the District within the period 2006-2012, particularly as the is a national housebuilder signed up to develop the site.

¹ Report on the examination into the Newark and Sherwood Community Infrastructure Levy Charging Schedule -19.08.11

Attached to this representation is the latest pre-application sketch layout which illustrates the potential layout taking due account of ecological, drainage, access and visual impact considerations.

10 *Are alternative proposals that have been put forward in representations appropriate and deliverable? Have they been subject to sustainability appraisal compatible with that for the Plan?*

From the perspective of our specific client land interests, we are fully confident of their sustainability and deliverability and consider that these have been demonstrated to the District Council who have selected the respective sites for allocation. We are not aware of any alternative sites in these locations which we consider to be more appropriate, more sustainable and more deliverable than the allocated sites we have promoted.

We have not considered alternative sites outside of Southwell (and Collingham – our other client interest) and cannot comment on the suitability of these as additional, replacement or fallback options for the sites currently identified in the Publication Version DPD.

11 *Are the locations identified the most appropriate when considered against all reasonable alternatives?*

Our comments in respect of this question relate to our specific knowledge of Southwell and our promotion of the preferred site allocation therein.

Paragraph 3.5 of the Publication Version Site Allocations DPD records that Southwell is a town of outstanding architectural and historic interest; has a wealth of historic buildings, a large Conservation Area, and important public and private Open Spaces. There is an essential need to ensure that the rural nature of the town is preserved along with its landscaped settings. Views of and across principal heritage assets of the town are to be protected and any development within view cones set out on the Proposals Map are required to demonstrate under the provisions of Policy So/PV that they do not negatively impact upon the views of these heritage assets.

The housing site selection process for Southwell leading to the preferred sites in the Publication Core Strategy reflects these constraints in the identification of 7 small to medium sized housing sites, a small mixed use proposals and a dedicated employment allocation adjacent to the established Crew Lane employment site on the eastern edge of the town. From a housing perspective these sites can deliver a range and choice of house types and their relatively modest scale enables them to assimilate more readily into the built up fabric of the town without offending matters of visual impact and rural character.

Alternative site proposals put forward at Options stage in 2011 and the Additional Sites Consultation Paper of March 2012, have been generally larger housing sites on the western periphery of the urban

area or the subsequent large mixed use site proposal to the east of the proposed employment allocations (So/E/2 & So/E/3), which has generated concerns over its scale, highway impact and ultimately the need for the nature of development proposed. None of these alternatives is considered by us to be superior to the portfolio of sites allocated in the DPD. On this basis the site selection process is considered to be positively prepared, justified and effective.

Our client's landholding at Nottingham Road is a low lying parcel of land already within the built up limits of Southwell. It is one of the closest allocated sites to the centre of Southwell, which facilities are readily accessible on foot. The environmental interest is largely contained to the margins of the site, where the retention and enhancement of the natural vegetation around the perimeter will contain development and limit its visual impact in any required assessment of Southwell's protected views. The development will provide high quality family homes and affordable housing in an accessible and sustainable location on a major bus route into Southwell.