

MATTER 27: SHOULD APPENDIX F INCLUDE TRIGGERS FOR BRINGING FORWARD OPPORTUNITY SITES?

- 27.1 This Matters Statement has been prepared by Tetlow King Planning on behalf of David Sparks of the Minster Veterinary Centre in relation to his land interests to the east of Southwell.
- 27.2 Spatial Policy 5 sets out that where it becomes clear through the monitoring process that delivery is not taking place at the rates required on the four strategic allocations, the Council will actively seek to bring forward Opportunity Sites by working with landowners and developers to release sites earlier in the Plan period.
- 27.3 Paragraph 4.38 of the reasoned justification to the Policy sets out that the Council considers there to be a number of sites which were allocated or had planning permission previously, which are still considered developable but are subject to uncertainty over timescales for delivery, which have been identified as Opportunity Sites and are detailed in the Allocations & Development Management Plan.
- 27.4 It states that where it becomes clear through the monitoring process that delivery rates are dropping the Council will work with landowners and developers to try to actively resolve delivery issues where this will bring forward development on these Opportunity Sites.
- 27.5 Not all of the proposed opportunity sites, as illustrated by figure 27.1, are included within the adopted Site Allocations DPD (**CS.05**), specifically sites OS-1 and OS-4 are carried forward existing allocations whereas sites OS-2 and OS-3 are currently set out in the emerging draft Settlements and Sites DPD which has yet to be tested at examination and is subject to a number of outstanding unresolved issues and objections.

Figure 27.1: Emerging Settlements and Sites Opportunity Sites

Site Reference	Opportunity Sites	Potential number of dwellings
OS-1	Tarmac Site – Hawton Lane/Bowbridge Road, Newark	270
OS-2	The Bearings – Bowbridge Road, Newark	65
OS-3	Flowserve – Hawton Lane, Balderton	210
OS-4	Land North of Beacon Hill Road (former NUA/Ho/5)	200
Total		745

Source: Emerging Draft Settlements and Sites DPD

- 27.6 Furthermore, all of the identified Opportunity Sites fall within the Newark Urban Area, thus placing complete reliance upon the housing market within the Newark Urban Area delivering these sites in the event that the strategic Sustainable Urban Extension (SUE) allocations at Newark, Fernwood and Thoresby fail to deliver at the anticipated rates set out in the Council’s Housing Trajectory.
- 27.7 The inclusion of these sites alone as Opportunity Sites seems an illogical approach given that the emerging Plan acknowledges that these Opportunity Sites are “*subject to uncertainty over timescales for delivery*” added to which the identified Opportunity Sites have failed to deliver thus far and there is no evidence before the Inspector to suggest that this will change in the event that the four strategic sites fail to deliver new homes at the rate at which the Council’s Housing Trajectory anticipates.
- 27.8 As our statement on **Matter 9** illustrates in more detail, the identified Opportunity Sites are no more certain of being delivered than the identified SUEs. Three of the four SUEs are in or adjacent to the Newark Urban Area and all of the Opportunity Sites are within the Newark Urban Area. This approach places huge reliance upon the housing market in Newark delivering the Opportunity Sites (mainly brownfield sites with numerous constraints, including that some are still in employment use) when it would have failed

to deliver the SUEs on greenfield sites which are relatively unconstrained by comparison.

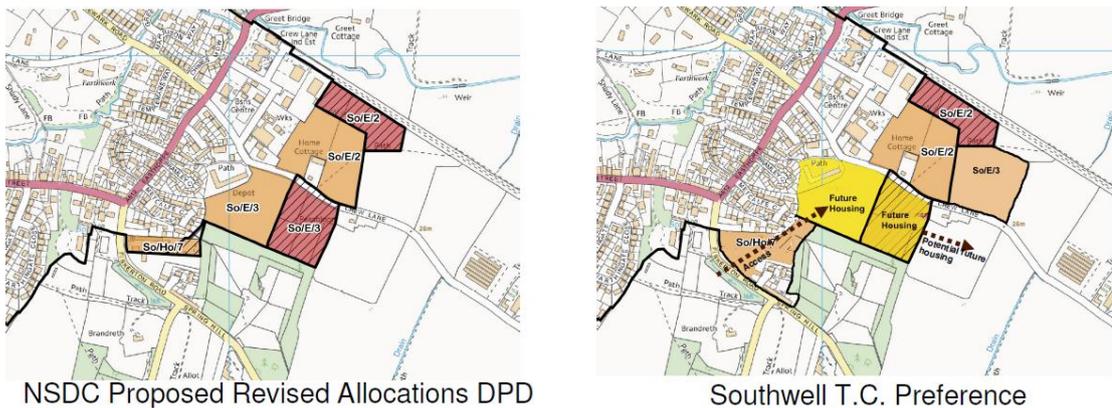
- 27.9 Additionally, at no point in the Policy or the Monitoring Framework at Appendix F to the emerging Plan does it detail a trigger for what constitutes delivery not taking place at the rates required which would result in Opportunity Sites being brought forward.
- 27.10 Furthermore, it is not clear if any shortfall in delivery would relate to each individual SUE, or would relate to the shortfall in delivery across the SUEs cumulatively.
- 27.11 The Council's Housing Trajectory does not envisage the delivery of any Opportunity Sites until 2027/28 at the earliest, which further illustrates that the Opportunity Sites identified by the Council are insufficient to address any shortfall in the delivery of strategic sites, particularly in the earlier stages of the Plan period.
- 27.12 A trigger which engages the release of opportunity sites should the SUEs fail to deliver should be included in the Monitoring Framework in the earlier stages of the Plan where delays to the delivery of the SUEs are most likely to occur given the infrastructure requirements necessary to make delivery acceptable in planning terms.
- 27.13 As such, additional Opportunity Sites should be identified to remedy this. The four Opportunity Sites already identified all fall within the Newark Urban Area, within which three of the four SUEs are also located which places enormous reliance upon the housing market in the Newark Urban Area delivering the proposed Opportunity Sites in the event that it has already failed to deliver SUEs in the same market area.
- 27.14 To remedy this Opportunity Sites should be provided elsewhere within the district. The spatial portrait of the district at paragraph 2.4 of the Plan details that the main towns of Newark, Southwell and Ollerton & Boughton act as a focus for their communities and those in the wider area.
- 27.15 This is reinforced by Spatial Policy 1 which sets out the settlement hierarchy for the district with the sub-regional centre of Newark the focus for development, following by

the Service Centres of Southwell, Ollerton & Boughton, Edwinstowe, Clipstone and Ranworth thus clearly identifying these as higher order sustainable settlements.

27.16 Additional Opportunity Sites should therefore be identified in the Service Centres as these represent the most sustainable settlements in the district outside of the sub-regional centre of Newark.

27.17 In the representations that Southwell Town Council made to the Plan Review (CS.11D) process Southwell Town Council indicated their preference for future housing sites to be identified to the east of Southwell along Crew Lane. Figure 27.2 replicates the Town Council’s representations.

Figure 27.2: Southwell Town Council Representation to Plan Review Process



Source: Southwell Town Council Meeting (January 2017)

27.18 Whilst noting that this Examination is for the Plan Review DPD rather than the Settlements and Sites DPD, given the clear need to identify additional Opportunity Sites outside of the Newark Urban Area it is appropriate to promote our clients land to the east of Southwell as an appropriate additional Opportunity Site.

27.19 The land identified by the Town Council for residential development within our client’s ownership constitutes around 2.26 ha, which if it were to be developed in line with Core Strategy Policy CP3’s density target of 30 dph, would result in an additional 68 dwelling Opportunity Site to assist in addressing any shortfall in the delivery of SUEs.

- 27.20 It is also of relevance to illustrate that this is not the full extent of our client's land ownership to the east of Southwell. In total our client controls some 10.5 ha of land situated in the area south of Crew Lane and north of Fiskerton Road which can be accessed via Crew Lane or Fiskerton Road and has the potential capacity to accommodate circa 300 dwellings.
- 27.21 To conclude, we consider that a trigger point is required to bring forward Opportunity Sites should the SUEs fail to deliver at the rate of delivery anticipated by the Housing Trajectory. In addition to the inclusion of a trigger, we consider that the Opportunity Sites currently identified are insufficient and by the Council's own admission are subject to uncertainties over timescales and as such cannot be considered to represent a suitable alternative should the SUEs fail to deliver as anticipated.
- 27.22 Additional Opportunity Sites must be identified outside of the Newark Urban Area in the Service Centres. Our clients land to the east of Southwell has the support of Southwell Town Council as being a site suitable for residential development and represents a deliverable residential Opportunity Site that is not reliant upon the Newark housing market and should be allocated as an additional Opportunity Site.

Prepared by Tetlow King Planning