

**MATTER 6: ARE THEY LIKELY TO SUPPORT A FIVE YEAR SUPPLY OF
DELIVERABLE HOUSING SITES?**

- 6.1 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.
- 6.2 Spatial Policy 1 sets out a hierarchical approach to focussing development in the district with settlements ranked in order of sustainability with Newark as the sub-regional centre, beneath which sit the Service Centres, followed by Principal Villages and finally Other Villages in Newark & Sherwood.
- 6.3 The focus upon Newark as the most sustainable centre for development as the sub-regional centre for the district is understandable however it is evident that the emerging Plan strategy places undue reliance upon the Newark Urban Area to deliver housing at the expense of the rest of the district.
- 6.4 As our statement on **Matter 9** details, of the four Sustainable Urban Extension (SUE) sites proposed, three are within the Newark Urban Area and the four Opportunity Sites which are identified as being able to be brought forward to provide housing should the SUEs fail to deliver as anticipated, are all also within the Newark Urban Area.
- 6.5 The four SUEs propose a total of 8,150 dwellings against an emerging Plan target of 9,080, representing some 90% of the overall housing target. The Opportunity Sites comprise a total of 745 dwellings, equivalent to just 8% of the overall housing target.
- 6.6 It is clear from the above the enormous reliance that the Plan places upon the Newark Urban Area to deliver housing. When the Thoresby Colliery site is removed from the equation the Plan is reliant upon 8,095 dwellings coming forward in the Newark Urban Area housing market, equivalent to 89% of the overall housing target.
- 6.7 This almost complete reliance upon the housing market in Newark to achieve the delivery of the Plan housing target is an inherently risky approach, it has the potential

to 'flood' the market and as such result in a slowing down of overall delivery in the Newark Urban Area.

- 6.8 In addition to which the strategy to include four Opportunity Sites all of which are located within Newark as a means to making up any shortfall in the delivery of the SUEs carries a number of risks.
- 6.9 Firstly, that the market will have failed to deliver the SUEs on greenfield sites yet will be expected to deliver more constrained sites on brownfield land to remedy this, and secondly that two of the four Opportunity Sites are still in active employment use (OS-1 and OS-3), one of which was advertising for new staff as recently as Autumn 2017 suggesting that they are not looking to vacate the site any time soon.
- 6.10 In fact, one of the Opportunity Sites (OS-3) had the benefit of outline planning consent for residential use which has since expired and the site itself remains in active employment use. Another of the Opportunity Sites (OS-2) achieved planning consent in 2015 but was listed as being available for sale with the benefit of consent as recently as September 2017, suggesting that the current owner has been unable to make a deliverable scheme stack up.
- 6.11 There is nothing before the Inspector to suggest that the Opportunity Sites are appropriate 'reserve' sites which will be engaged for residential development should the SUEs fail to deliver as the Council's Housing Trajectory anticipates.
- 6.12 In addition to which this is notwithstanding our considerations in our statements on **Matter 4** and **Matter 5** detailing that the Council is failing to Plan for a sufficient number of homes within the district to assist in addressing the acute affordability issues through cross-subsidised affordable housing delivery resulting from a significant boost in the delivery of housing.
- 6.13 Furthermore, the way in which the level of growth is attributed to individual settlements has the potential to be interpreted rigidly by decision makers when determining individual planning applications. In our experience this can cause difficulties whereby

the achievement of, say 10% of Service Centre growth at Southwell, will have the effect of restricting further development that may be beneficial at that settlement.

- 6.14 This restrictive approach does not accord with the thrust of the NPPF for plans to be positively prepared. Nor is it sufficiently ambitious in its scope nor in its execution; it fails to ambitiously plan to boost the supply of housing across the district, and focuses to its detriment on the achievement of a substantial housing supply on a small number of development sites.
- 6.15 We consider that the conclusions drawn by the Inspector in the Farnsfield appeal are a key consideration in the Plan Review process as are the Governments emerging position on standardised approach to OAN and as such the Council should be seeking to increase its overall housing target and to allocate additional residential development sites in order to deliver this.
- 6.16 A key tenet of this is the NPPF's drive to boost significantly the supply of housing. There is a clear and pressing need for an increase in the overall housing target in Newark and Sherwood District. In doing so this would boost significantly the delivery of housing in line with the provisions of the NPPF and simultaneously provide cross-subsidy for increased rates of delivery of affordable homes to help meet the acute affordable housing needs in Newark & Sherwood District.
- 6.17 As such we do not consider that the Council has an appropriate housing target figure on which to base a five year housing land supply calculation and thus would not be able to support a five year supply of deliverable housing sites.

Prepared by Tetlow King Planning