



Matter 3/Representor 66/RPS for Harworth Estates

1. Introduction

- 1.1 This statement sets out the responses of Harworth Estates to the Inspectors' Matters and Issues for Examination at Hearings with respect to the Newark and Sherwood Allocation and Development Management Development Plan Document.
- 1.2 This statement therefore provides comments in response to the questions and issues raised by the Inspector and elaborates upon the representations previously raised during public consultation and in our responses to those documents. This statement should be read in conjunction with the Representations previously made.
- 1.3 The two sites relevant to Matter 3 are:
- Former Rufford Colliery, Rainworth within the Mansfield Fringe Area (ADM Ref. X5(RA)), and
 - Site at Eakring Road, Bilsthorpe within the Sherwood Area (ADM Ref. BI/MU/1)

2. Matter 3 – Housing

2.1 Inspectors Question 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?”

- 2.2 Our concern is that since the time the amount of Housing land was established by the Core Strategy in March 2011, the introduction of the NPPF has established a requirement for a further 5% buffer to be brought forward in the first 5 years from later

in the plan period. By definition these sites would need to be deliverable now. Such sites should be allocated rather than met through windfalls.

- 2.3 In this respect, allocating more housing supports the alternative strategy we have put forward for MFA particularly through an additional 100 dwellings at the former Clipstone Colliery site (CI/MU/1).

Inspectors Question 9:

“Are the allocated sites viable and deliverable for the 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?”

- 2.4 The Council’s own Residential Viability Assessment shows that of the sites in the MFA that would be allocated to deliver housing in the first 5 years none of them are viable sites. This is so even without the provision of affordable housing. In order for these sites to be delivered, it would therefore require a willing land owner/developer to accept uncompetitive returns. Without the evidence to show at what level of return to landowners/developers these sites would be viable there is no way of knowing whether the sites are likely to be developed. Landowners/developers will not necessarily accept the level of return for their asset/risk that the sites would allow. Similarly, whilst anecdotal evidence that some sites are being delivered for housing including affordable housing in the MFA this cannot be relied upon where sites have high abnormal costs. Even if sites were to be viable without the provision of affordable housing, it is concerning as to how the objectively assessed affordable housing needs of the MFA will be provided for if not through market housing. This is especially so in light of paragraph 47 of the NPPF that local planning authorities should ensure their plans meet the full objectively assessed needs or affordable housing in the housing market area. The ADM DPD cannot not be reliant on this approach as it is unlikely to deliver sufficient housing to meet the objectively assessed need which the plan is required do.
- 2.5 The Report by Savills at Appendix 1 shows that our alternative strategy for housing at sites RA/E/1 and CI/MU/1 would be viable with affordable housing provision. Not only



is residential suitable for the these available sites, our proposed strategy represents the best strategy of all the reasonable alternatives.

- 2.6 The doubts about the delivery of the Housing sites proposed by Council for the MFA are such that additional sites should be allocated over and above the objectively assessed need to ensure that the need is met if the sites currently proposed to be allocated are not delivered.
- 2.7 Furthermore, the lack of any affordable housing provision for the next 15 years in an area with such a need for affordable housing as the MFA would not be appropriate. In any event, the Council is required to meet in full the objectively assessed needs for affordable housing in the housing market area (NPPF paragraph 47, first bullet).
- 2.8 With respect to the Ollerton area, the Council's Residential Viability Appraisal shows that none of the sites proposed to deliver housing in the first 5 years are viable. Again we acknowledge that landowners/developers may take a lower return and the sites may therefore be delivered. However, without the evidence it is not possible to determine whether the delivery of some or all of these sites is realistic. In this respect, we note that our client's site at Bilsthorpe (Bi/MU/1) is not scheduled to provide any housing within the first five years of the plan period, but that the Council's own viability assessment shows development would be viable even providing 15% affordable housing. We can confirm that the site is deliverable within the first 5 years as defined by the NPPF, and on this basis; therefore, we suggest that it should be identified within the 5 year supply.

Inspectors Question 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?”

- 2.9 With respect to the MFA, we have suggested alternative sites for housing as part of the alternative strategy we have advanced at RA/E/1 and CI/MU/1 (extra housing less employment). Both these sites are within the settlement boundary, and sustainable locations for housing development, but have been identified for employment within employment and mixed use allocations submitted by the Council. However, for the

reasons we identify elsewhere we propose that site RA/E/1 should be allocated for housing. This is on the basis that it would form part of the wider more balanced and sustainable strategy for the MFA. Indeed, it is more appropriate for housing than the proposed housing allocation RA/HO/2 which is within the green belt because it is located within the settlement boundary. The site is in a suitable location, would be available now and would be able to deliver viable housing including affordable housing provision within the first five years of the plan period. The evidence provided by Savills at Appendix 1 shows the site could be viably developed for housing.

2.10 In addition, as part of the alternative strategy we propose, we have also suggested that at least a further 100 dwellings should be provided over and above the number of dwellings the proposed by the ADM at CI/MU/1 (i.e. at least 220 rather than 120). Again the site is within the settlement boundary and identified by the Council as suitable for employment. The additional dwellings are suggested in recognition that the employment site is not as appropriate as the former Rufford Colliery site and therefore 6.5Ha less employment is required on the site as part of the alternative strategy we have suggested, and because as part of our alternative strategy the additional return from the housing would be able to offset the costs of developing the site. The evidence provided by Savills at Appendix 1 shows that the site as we proposed would be viably developed.

2.11 With respect to SA, as CI/MU/1 already proposed residential development it has been subject to SA by the Council. We provide SA for RA/E/1 at Appendix 2 which shows the sites is appropriate for housing relative to the housing sites proposed by the Council.

Inspectors Question 11:

“Are the locations identified the most appropriate when considered against all reasonable alternatives?”

2.12 With respect to the MFA, RA/E/1 is not the most the appropriate site in the MFA for employment. In addition, the proposed green belt encroachment site at Rainworth (RA/HO/2) is not as appropriate for residential development as site RA/E/1. However, RA/E/1 is more appropriate for residential than RA/HO/2 given that it is within the settlement boundary rather than within the green belt, and can deliver housing within the first five years with affordable housing. The site would relate well to the existing

urban area and would be accessed from within the settlement itself rather from the MARR and thus allow for a more efficient use of the site negating the need to take account the difference in levels and the need for an expensive signalised junction as would be required for employment development.

- 2.13 The additional housing we for CI/MU/1 is additional to that identified by the Council and not necessarily at the expense of other sites. It would allow the wider site which would not be viably developed and therefore, would not be delivered as proposed by the Council to become viable. Our alternative strategy for the site would see this key regeneration site developed rather than left vacant.
- 2.14 With respect to Bilsthorpe, the housing element of BI/MU/1 is clearly the most appropriate location for housing when compared to the two alternative sites. Firstly, the site itself would provide the most appropriate settlement boundary rounding it off rather than projecting into the countryside, and with a more defensible boundary provided by the access road along its eastern boundary with the countryside. In combination with this, it is of a more appropriate scale to provide the necessary number of houses identified for Bilsthorpe in comparison to the other alternative sites which are either too small or too large. Importantly, the site would also provide much needed housing in the northern part of Bilsthorpe balancing that provided by the other proposed housing allocations in the south of the settlement, whereas the two alternative sites are both within the south of the settlement. The site also compares better than the alternative sites to the SA criteria. Indeed, we note the reference to potential harm to designated habitats is not based upon any evidence, and the ADM policy itself does not make reference to ecological constraints.