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Ms Carmel Edwards
Local Plan Programme Officer
c/o Gedling Borough Council
Civic Centre
Arnot Hill Park
Arnold
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18th April 2017
Our ref.1046.L02

Dear Ms Edwards,

Revised Housing Background Paper, March 2017 (EX-104) – Comments on behalf of M F Strawson Ltd

Further to the Inspector's invitation in note EX-106 to make comments on the above document, I am pleased to submit comments on behalf of M F Strawson Ltd, promoter of land west of the A60, Redhill, for 150 dwellings. These comments follow on from representations made to the Publication stage of the Local Planning Document, reference lpd_pub_b/218 and lpd_pub_b/221, our Position Statements submitted in relation to the Matters and Issues Questions and our participation in the examination.

We agree that the five year supply calculation should be based in April 2017 and that the estimated net completions figure of 199 for 2016/17 is reasonable.

The Council state that the Local Planning Document will deliver a 5.13 year supply of housing. However, should more than 94 dwellings in this trajectory fail to be delivered then the Local Planning Document will not deliver a 5 year supply of housing.

At 3.13A-C the Council has set out that they now consider windfall development can come forward from Year 4 onwards, rather than just in the final 5 years of the plan period as agreed in the Core Strategy. This introduces 80 dwellings in the 5 year supply. This change to the housing supply methodology does not arise from discussion at the examination sessions. It would appear that justification has been retrofitted due to the need to include windfall supply in the 5 year supply in order to try and demonstrate a robust supply. It is considered that this element should be removed from the 5 year supply. **This would result in the loss of 80 dwellings to the 5 year supply.**

Notwithstanding the above, it is agreed with regard to paragraph 3.13C that it should not be assumed that windfall will only be delivered in the urban area.

At paragraph 3.23 the Council explains that they have discounted some sites from the supply, but has not applied a lapse rate to sites with planning permission. The updated information in Appendix F provides many examples of sites where planning permission has lapsed and they have rightly been removed from the trajectory. Therefore it is puzzling that the Council does not accept that there will be any further lapses of planning permission. It is considered that a 5% lapse rate should be applied. **This would result in the loss of at least¹ 27 dwellings to the 5 year supply.**

In the trajectory at Appendix 4, the Council has included new sites subject of a pre-application enquiry or current planning application in the five year supply. These site comprise 61 dwellings, as set out below.

- Derwent Crescent Arnold – 9 dwellings
- Chase Farm, Carlton – 35 dwellings
- Plains Road, Carlton – 14 dwellings
- Queens Ave, Carlton – 1 dwelling
- Collyer Road, Calverton – 1 dwelling
- Seely Ave, Calverton – 1 dwelling

To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. It is considered that sites without planning permission should not be considered deliverable in the initial 5 year period if their deliverability has not been tested through the planning process and it cannot be robustly determined that there is a realistic prospect of their delivery in this period. It is therefore considered that these sites should be placed in Years 6-10. **This would result in the loss of 61 dwellings to the 5 year supply.**

We would also raise the following specific concerns about the robustness of assumptions behind particular sites in the housing trajectory.

H1 Rolleston Drive – the Council has assumed that the site will deliver 35 dwellings per annum from 2018/19 onwards. However the details for the site show no response from the site promoter and no planning application. The site is awaiting the adoption of informal planning guidance, which is likely to delay a planning application being submitted given the uncertainty that this creates. It is therefore highly doubtful that the site will deliver housing in the next monitoring year. It is considered more realistic to assume that delivery will commence in 2019/20, following adoption of the planning guidance (which has not yet been published for consultation), grant of planning permission and disposal of the site to a developer. **This would result in the loss of 35 dwellings to the 5 year supply.**

6/477 Daybrook Laundry – this site has been brought forward in the 5 year supply on the basis that there has been a pre-application enquiry for 49 dwellings. Until planning permission is granted for residential development on this site it is considered there is insufficient evidence that 49 dwellings are deliverable in the initial 5 year period. It is therefore considered that this site should be placed in Years 6-10. **This would result in the loss of 49 dwellings to the 5 year supply.**

¹If 5% discount is applied only to 548 dwellings with permission, shown at Table 4 of EX-104.

H16 Park Road, Calverton - although it would appear that a consultation response has been received in 2017 confirming that the site can be delivered earlier than anticipated, bringing a further 50 dwellings in to the 5 year supply, it still seems very unlikely that delivery will commence as suggested in the current monitoring year, with 20 dwellings delivered by the end of March 2018 and 60 dwellings annually thereafter. The site is yet to be released from the Green Belt and no planning application has yet been submitted. It is suggested that this site should be expected to deliver housing from 2018/19 onwards. **This would result in the loss of 60 dwellings to the 5 year supply.**

The Council's assessment produces a 5.13 year supply. This position is still far too vulnerable as a basis to adopt the Local Planning Document. Doubts have been illustrated above (summarised and highlighted in **bold**) which could result in the removal of at least 312 dwellings from the housing trajectory. This would result in a 4.7 year supply². Since Gedling is a Green Belt authority it would be very difficult for the Council to respond rapidly in addressing any deficit in the 5 year supply. Therefore it is considered important that the Local Planning Document robustly delivers a 5 year supply of housing upon adoption.

I would be grateful if you could pass these comments to the Inspector.

Yours sincerely



Caroline Chave BA (Hons) DipTP MRTPI
Director
Chave Planning

² Table 4 of EX-104 total supply 3,830 minus 312 = 3,518 against requirement of 3,736 (paragraph 3.31 of EX-104).