



ASPBURY  
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Gedling Borough Local Plan Part 2  
Examination.

Response to Inspectors Request – EX 86  
Comments upon Revised Housing Background  
Paper and 5 year Supply Trajectory.

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## Gedling Part 2 Local plan Examination

### Response to Inspectors Request – EX/86 – Aspbury Planning

It is with great disappointment that we review the Council's Revised Housing Background Paper Addendum EX104 and note the Council's claims of an increased overall housing supply of some 426 dwellings at Table 4 and consequent increase in 5 year supply from 5.01 to 5.13 years for the period rolled forward to 2017-2022 without proposing any additional site allocations.

Looking at the headlines of this increased housing supply there are three notable sources for the increased supply claimed by the Borough Council. These are: -

- (i) A proposed increase in the delivery from urban area sites from 1600 to 1898 dwellings (+298)
- (ii) An increase in housing delivery from the County Council owned Top Wighay site from 188 to 253 dwellings (+65)
- (iii) An increase in the housing delivery in Calverton from 374 to 475 dwellings (+101), including 50 of these coming from the H16 Park Road Allocation.

I respectively comment and question these additions to 5 the year supply as follows: -

#### (i) Urban area delivery

Updated Appendix D records housing delivery from 2011- 2017 and then an assumed trajectory of housing delivery forward from 2017 to the end of the plan period.

For the period 2011- 2017 the annual completion rate for the urban area has averaged at just 185 dwellings per annum, with a marked tail off in delivery 2015 and 2016.

The urban area delivery trajectory for the period 2017 – 2022 including the Teal Close strategic site is now suggested to be 432 dwellings per annum, well over double the average for the previous 6 year period, including 125 per annum from small and windfall sites. It is interesting that the Council has downgraded its delivery expectations from most of its allocated sites but more than made up for this by substantially increasing delivery expectations of the smaller and 'under the threshold' sites with no factoring in for non-delivery. This is a very high risk strategy as non-implementation rates are invariably higher on these types of small urban, often poorer quality sites. Recent annual delivery in the urban area as recorded in Appendix D certainly does not support this surge of optimism from the Council that small site delivery, through an additional 298 dwellings from small and windfall sites will support the claimed enhancement to 5 year supply.

#### (ii) Top Wighay

There was ongoing debate at the examination about the delivery capability of the Top Wighay site. The 38 consented and under construction plots are an 'easy win' easy lead in site taking frontage and service infrastructure from the adjoining highway. The balance of the site requires more substantial infrastructure and lead in time before delivery can commence.

With little material progress on this site over some 13 years, it is disappointing that the Borough Council yet again appear all too willing to accept yet another communication from Nottinghamshire County Council promising delivery on the main body of the site. Whilst we acknowledge that there is some prospect of start within five years, for the Borough Council to

increase its 5 year delivery assumption for Top Wighay Farm to artificially bolster its supply appears, from past performance to be misplaced.

### (iii) Calverton

Calverton is one of the 'moderate' market locations in the Borough and the Councils' revised assumptions at tables A1 and A2 at Appendix B – Deliverability Notes suggest that sites of up to 250 dwellings are unlikely to start before 2020.

The Council appear however, to completely ignore their deliverability assumptions in Calverton based upon information received from the site developer that the 390 dwelling H16 Park Road allocation (which does not even have an outline planning permission) will deliver 20 completions by April 2018 and 60 dwellings per annum thereafter, an increase of 50 dwellings for the period 2017-22 upon the previous assumption which we formally commented in earlier representations to be at the very optimistic. In our view there is no logical basis to increase short term delivery from this site and the developer's response may potentially be viewed as tactical in order to seek to head off further allocations in the settlement to address under delivery.

As with Top Wighay Farm, the Borough Council appear content to rely upon the developer response to try to boost their five year supply without any credible evidence on the ground through planning permissions and site activity to justify changes to the trajectory.

### Conclusion

Instead of accepting the deficiencies in their five year housing supply pointed out by many attendees at the examination, the Council has opted to tinker at the edges of the supply by manipulating their delivery assumptions without actually making materially more land available. There is absolutely no delivery precedent or firm evidence to indicate that the three sources of supply will deliver the additional homes in the five year period necessary to maintain a five year supply, and the two sites earmarked for extra delivery simply will not realistically deliver the homes relied upon in the trajectory.

The Council has had the opportunity to voluntarily revisit their housing supply and release additional sites around its settlements to meet the housing requirement. This would require some additional Green Belt release, yet the Council has already done the groundwork to identify suitable sites and have acknowledged in the examination sessions that logical opportunities to exist in settlement such as Calverton and Ravenshead to meet housing needs including specific opportunities such as self-build which the Council has not fully taken on board in its policy formulation and site selection processes to date.

If the Inspector does not now intervene, this plan will proceed to adoption with a hugely questionable five year supply and post adoption delivery constrained by failure to release sufficient Green Belt at the appropriate time, namely this Local Plan review.