

Reference. ID 155226145

Gedling Local Plan Examination

Written Statement on behalf of Troyal Farms Ltd

1. Revised Housing Background Paper Addendum [EX/104]

Q7. Is it robustly demonstrated that the estimated housing land supply for the five year period is deliverable?

Q12. Are the projected completions for deliverable sites included in the 5 year housing land supply period appropriate and achievable and based on sound evidence [Appendix C]?

Q13. Does the detailed housing trajectory demonstrate realistically that the housing development, for which the Plan provides, will come forward within the Plan period [Appendix D]?

Q14. Are the projected completions for deliverable and developable sites included in the Plan period 2011 to 2028 appropriate and achievable and based on sound evidence [Appendix E]?

We do not consider that the Council can robustly demonstrate a five year land supply of housing. The Further Revised Housing Background Paper Addendum (May 2017) details that the Council will have a five supply of 3,805 homes (Table 4) against a requirement for 3,737 homes (Sedgefield with a 20% buffer). The requirement equates to 747 homes per annum. This level of supply gives the Council 5.09 years of housing and a buffer of just 68 homes.

The delivery of the five year supply is reliant on a number of strategic sites, including Teal Close, Gedling Colliery and Top Wighay Farm, which are anticipated to deliver 833 homes within this five year period (Addendum Appendices C, D and E).

These three sites were all allocated in the 2005 Adopted Local Plan but have only delivered 35 homes in total to date (Top Wighay Farm). The historic evidence for these sites (despite Agent assumptions) would therefore suggest that the anticipated rates of delivery will fall significantly below the 833 detailed in the Addendum.

Indeed, if these three sites were to fall back by just one year from the rates anticipated, then the Council could lose 267 homes from the five year period which would immediately lower the supply to well below the five years required by the NPPF.

Furthermore, the projected completions over the next five years post adoption of the Plan would see the Council significantly increase their annual rates of delivery:

- 2017/18 – 295 homes;
- 2018/19 – 681 homes;
- 2019/20 – 866 homes;
- 2020/21 – 1028 homes;
- 2021/22 – 935 homes.

These projected rates of delivery are considered optimistic at best in light of past completions which have only exceeded 400 homes per annum once since 2001/02 and are on average closer to 300 per annum. In our view, these annual rates are unrealistic.

The Teal Close site is worth further reference in this overall regard. Planning permission was granted in 2014. In February this year, Turley wrote to the Inspector [document reference EX/64], suggesting that two things would happen before the end of March; firstly, 'A position with a leading national housebuilder is in the final stages of agreement and is expected to be finalised in March 2017', and 'A Reserved Matters application for the first phase of residential development is currently being prepared and is expected to be submitted to GBC by the end of March 2017.'

Neither of these ambitions has so far been achieved.

If and when the Teal Close site is acquired by a housebuilder, then because of necessary on-site preparatory works and other requirements, it is my view that it will be at least 2 years before the first dwellings will become available. This will not be soon enough to achieve the 5-year delivery anticipated by the Council.

There is demonstrably some uncertainty regarding the timing of delivery of new dwellings at Teal Close. This uncertainty leads to an unreliability in the Plan's proposals. Furthermore, at the time of writing [June 14th], no planning permission has been issued at Gedling Colliery/Chase Farm.

The difficulty of implementing relatively large edge-of-urban sites is not restricted to Gedling. For example in Rushcliffe Borough, which lies to the south of the river in Nottinghamshire, delivery of proposals in the adopted Local Plan for three sustainable urban extensions has, in each case, stalled, resulting in the Council falling behind in demonstration of a 5 year housing supply. In this case, the Council has taken the initiative to identify additional land and is currently consulting on options to make up the shortfall. The sites now being considered are all, relatively, small sites, in single ownership and capable of immediate delivery. This approach has been informed by the delivery success in the Borough at East Leake, where a series of small, individual sites have been granted permission and implemented.

This approach perhaps demonstrates that whilst large sites, concentrated around the urban fringe will eventually come forward, they do take a long time to bring into a viable, deliverable state and in the meantime, smaller sites, more readily brought to fruition can provide a balanced portfolio of opportunity which in turn can ensure a more certain supply.

Q8. Should a lapse rate be included in the calculations? If so, what would be an appropriate percentage?

Yes a lapse rate should be included in the housing supply calculations. The justification for a lapse rate results from the Council not being able robustly to demonstrate a five year supply of housing. Appendix E of the Addendum shows that the rates for delivery of a number of sites have already lapsed one year or reduced in completions over the five year period. A significant number of sites are also based on 'Council assumptions' which leads to questions relating to the realistic delivery of those projected rates.

We therefore consider that an appropriate lapse rate to be applied would be 20% to provide the maximum level of buffer needed to demonstrate a robust five year supply.

Q9. Is the deletion of sites from the Schedule in Appendix E an indication that a lapse rate should be included?

Yes. The deletion of sites shows the unreliability of the Council's previous supply calculations which require as strong a buffer as possible to demonstrate a robust five year supply; something the Council is currently unable to do.

A conclusion of the assessment points to housing delivery being uncertain, unreliable and unrealistic. The consequence of this is that the Plan should not be found sound. It could be made sound by allocating more, smaller sites which are demonstrably deliverable.

I represent owners of land at Burton Joyce, where recently a planning permission for 14 dwellings has been given on their land. In our view, this can, without harm, be increased up to 45 dwellings. The site is in single ownership and immediately available.