

Independent Examination of the Gedling Local Plan Planning Document (Part 2 Local Plan)

Matter 5: Housing

Issue 5a Housing Provision and Distribution (Questions 1-7); Issue 5b Housing Supply in the Plan Period (Questions 8-29) and Issue 5c 5 Year Housing Land Supply (Questions 30-34)

With respect to Issues 5a, 5b and 5c and the questions raised by the Inspector, my main concerns relate to the deliverability, particularly of the large sites (ie Teal Close (830), Gedling Colliery/Chase Farm (660 during plan period)) and on land at Top Wighay to the north of Hucknall (845), which together comprise over 2,335 dwelling units – this represents 45% of the new site allocations (which total 5,115) in the ACS and LPD Part 2. Uncertainties and risks associated with the delivery of these sites could severely undermine the delivery of the housing strategy in Gedling, thereby undermining the Vision and Objectives for Gedling as set down in the ACS, and severely impact on its five year housing land supply.

I wish to make a number of key points to highlight my concerns:

- 1 Gedling does not have a very good track record for delivering its housing allocation sites. Having regard to sites allocated in the Replacement Local Plan (1997-2011) only 948 units out of 3,030 which were allocated (ie 31%) have been delivered to date (6 years after the end date of the plan) – see table below. Specifically, none of the large site allocations have been delivered (ie Gedling Colliery/Chase Farm, Teal Close/North of Victoria Park and Top Wighay. Together these comprise 1,695 dwelling units, which is 56% of the total number of dwelling units which were allocated in that plan. At the Local Plan Inquiry (2003) reassurances were made by Officers that development at the Gedling Colliery/Chase Farm site for example would commence by 2007 in parallel with the construction of the GAR. To date construction of the GAR has not yet commenced, although it appears to be moving forward slightly with planning permissions and funding in place. What confidence can we have that the allocation sites, particularly the large site allocations in the ACS and LPD Part 2 will be delivered in the plan period.

Site Ref	Site	LP Allocation	Hses Built to date
H2(a)	Ashwater Drive(Spring Lane)	140	140
H2(b)	Former Newstead Ground	80	0
H3	Gedling Colliery/Chase Farm	700	0
H2 (c)	Park Road, Bestwood	175	175
H4	Stockings Farm	390	280
H2(d)	Wood Lane	40	0
H2(e)	Chartwell Grove	40	20
H2(f)	Flatts Lane, Calverton	90	90
H5	Teal Close	195	0
H5	North of Victoria Park	205	0
H2(g)	Dark Lane, Calverton	110	0
H2(h)	Howbeck Road	50	49
H2(i)	Plains Road/Arnold Lane (South)	80	54
H2(j)	Regina Crescent Ravenshead	140	140

H6	Top Wighay	595	0
	Totals	3030	948
	Percentage allocations built		31.3

- 2 The bringing forward of large site allocations is proving extremely challenging and difficult across the East Midlands. For example in the Leicester and Leicestershire HMA 12 SUEs have been proposed in up to date adopted Local Plans and those under preparation – as yet none have started delivering homes, even though the earliest allocated SUEs such as two in Hinckley and Bosworth Borough were supposed to start delivering by 2011, some 2 years after the Local Plan was adopted in 2009. In Rushcliffe they have recognised that its 3 SUEs and other large site allocations identified in its Local Plan Core Strategy will not now deliver enough houses in the plan period, such that the production of its Part 2 Local Plan has been delayed whilst they now seek to find new allocation sites to meet an estimated shortfall of 1,500 dwellings over the plan period.

- 3 The latest 5 year housing land supply as at 31 March 2016 shows that Gedling has a HLS of 3.14 years (with a 20% buffer), and this is likely to prove to be very optimistic. Across the HMA (including Nottingham City, Broxtowe and also Rushcliffe) the HLS is only 4.05 years (refer Table 1 attached). All four Councils have been gradually falling behind in the achievement of their five year HLS (except perhaps Nottingham City), despite the adoption of the Liverpool method for the first five year period (2011-2016) whereby shortfalls in the annual requirement are deferred until later periods. Until Local Plans are adopted then the housing land supply is likely to deteriorate further. In Gedling the Trajectory in the five year HLS shows that in 2016/17 and 2017/18 only 212 and 327 homes will be built against a requirement of 440 homes per annum (before any backlog and a 5% or 20% buffer are added). During the five year period some 698 homes are expected to be completed on the Teal Close site (commencing in 2017/18), Gedling Colliery/Chase Farm site (commencing in 2017/18) and at Top Wighay (commencing in 2019/20). Given past performance and the need to submit a planning application (Top Wighay), to submit and have approved Reserve Matters applications, sign up to S106 Agreements, reach agreements with developers, as well as initial site works including any removal of contamination and provision of upfront infrastructure, these timescales are totally unrealistic. I would be surprised if any houses are built on these sites during the five year period as shown on the Housing Trajectory.

- 4 The Housing Background Addendum Paper (December 2016) includes a Housing Trajectory on the assumption that the Local Plan is adopted during 2017. This shows that after the LPD Part 2 is adopted, then the Council will be able to demonstrate a five year housing land supply of developable sites. However, this trajectory is based on very optimistic assumptions. I would suggest that after applying reasonable assumptions on delivery (refer Table 2 attached) , then there will need to be a reduction of 717 dwellings from Gedling’s estimated housing supply totals for its ACS and LPD part 2 allocated sites. Thus it will only be able to demonstrate a HLS of 3.95 years (assuming a 20% buffer) at the time the plan is adopted based on the current proposed set of allocation sites.

The conclusion of this analysis is that having regard to housing delivery that the LPD Local Plan Part 2 is not sound, as Gedling can not demonstrate a supply of deliverable housing sites . Consequently more land needs to be allocated for housing, on sites adjoining the edge of the urban area and also in the Key Settlements.

It is also apparent from the Trajectory that the supply of land from small and medium sized sites will soon dry up, and during the last 5 years of the plan period, Gedling will be totally reliant from new homes being built on the large site allocations at Teal Close, Gedling Colliery/Chase Farm, Top Wighay and at Park Road, Calverton. This cannot be considered to be healthy and is contrary to the NPPF which requires a choice of sites. This reinforces the need to identify additional sites.

If one or more of the large sites fails to come forward, then Gedling will be in an even greater mess. It will be young people who are seeking to purchase their first house who will suffer.

Given the length of time it takes to undertake a Green belt Review, make amendments to the Green Belt boundaries and to get adopted plans in place, it is important that the opportunity provided by this LDP Part 2 to review and amend Green belt boundaries to ensure that gedling has a robust and deliverable supply of Green belt sites to meet current and longer term needs is taken.

For its part Langridge Homes Ltd is proposing additional land which can be easily developed, both on the edge of the main built up urban area and at the Key Settlements of Bestwood and Calverton. Details of these sites have been submitted as part of our representations on the Submission Draft Plan.

With regard to **Issue 5d Range of Different Types of Homes, Issue 5e Gypsy and Traveller Sites, Issue 5g Self Build/Custom Build Homes, Issue 5h Specialist Accommodation, Issue 5i Residential Design and Issue 5j Residential Densities**, we have no further comments to add.

With regards to **Issue 5f Affordable Housing**, there are inconsistencies in the level of affordable housing provision by location. For example in Calverton where houses sell for in excess of £200 per sq foot, the requirement is to provide 20% affordable homes, whereas in Bestwood St Albans where the Key Settlement of Bestwood is located there is a requirement to provide 30% affordable housing, even though house selling prices are considerably lower at £170-£190 per sq ft. On this basis schemes at Bestwood are not viable.

Table 1 Housing Land Supply in South Notts

ACS Requirement	2011-28	2011-13	2013-18	2018-23	2023-28				
Total									
Broxtowe Borough Council	6,150	200	1,800	2,150	2,000				
Gedling Borough Council	7,250	500	2,200	2,400	2,150				
Nottingham City Council	17,150	950	4,400	5,950	5,850				
TOTAL ACS	30,550	1,650	8,400	10,500	10,000				
Rushcliffe Council	13,450	500	2,350	6,500	4,100				
TOTAL ACS + Rushcliffe	44,000	2,150	10,750	17,000	14,100				
Delivery									
	2011/12	2012/13	2013/14	2014/15	2015/16	Total del	Total req	Diff	
Broxtowe Borough Council	140	67	150	78	100	535	1,280	(745)	
Gedling Borough Council	275	227	321	311	174	1,308	1,820	(512)	
Nottingham City Council	422	505	890	889	552	3,258	3,590	(332)	
TOTAL ACS	837	799	1,361	1,278	826	5,101	6,690	(1,589)	
Rushcliffe	293	209	199	373	487	1,561	1,910	(349)	
TOTAL ACS + Rushcliffe	1,130	1,008	1,560	1,651	1,313	6,662	8,600	(1,938)	
Requirement	1,075	1,075	2,150	2,150	2,150		8,600		
Difference Delivery - Requirement	55	(67)	(590)	(499)	(837)			(1,938)	
Average pa						1,332	1,720		
NB No step change in rate of delivery since 2013/14									
Five Year HLS 2016/17 to 2021/2022	Gedling	Broxtowe	Nottm City	Total ACS	Rushcliffe	Total			
Requirement									
Requirement 2016/17-2021/22	2,320	1,970	4,540	8,830	4,840	13,670			
Add Shortfalls 2011/12 - 2015/16	512	745	332	1,589	351	1,940			
Total Requirement	2,832	2,715	4,872	10,419	5,191	15,610			
Add 20% Buffer	3,398	3,258	5,846	12,503	6,229	18,732			
Average pa	680	652	1,169	2,501	1,246	3,746			
Supply									
With planning /under con/SHLAA									
ACS/CS Strategic Site Allocations									
Outstanding new Allocations									
Total Supply	2,134	2,790	6,038	10,962	4,225	15,187			
Difference Supply-Requirement	1,264	468	(192)	1,541	2,004	3,545			
Yrs HLS	3.14	4.28	5.16	4.38	3.39	4.05			
Notes									
HLS in Gedling relies on 953 dwellings from 4 large sites, none of which have started (45%)									
HLS in Rushcliffe relies on 5 strategic sites coming forward of which none have started (2050 homes in total- 48%); and 3 sites in key settlements which are awaiting allocation in the Local Plan Part 2									
HLS in Nottm City relies on mixed site allocations without planning permission for 1524 dwellings (25% of total)									
HLS in Broxtowe Council relies on 3 strategic sites delivering 935 dwellings (33% of total supply), none of which have started construction									
Overall HLS in S Notts is expecting 5462 dwellings to be built on sites which have not yet started/do not have pp etc - this is 36% of total estimated supply									
Overall HLS is 4.05 yrs; Gedling is the worse with a 3.14 yr HLS.									

Table 2 Assessment of Housing Trajectory in Housing Background Addendum Paper (December 2016)

Site	2016/17	2017/18	2018/19	2019/20	2020/21	Total	Risk	Comment
Urban Area – ACS &LPD								
Teal Close		20	80	80	80	260	Red	RM, S106 and Land Deal, Contamination, Infra – 2 yr delay
H1 Rolleston Dr			35	35	35	105	Green	
H2 Brookfields				5	25	30	Green	
H3 Willow Farm					40	40	Yellow	GAR construction??
H4 Linden					40	40	Green	
H5 Lodge Fm			50	50	50	150	Yellow	Optimistic start year – 1 yr delay
H6 Spring Ln	10	30	30	40	40	150	Green	
H7 Howbeck		25	40	70	70	205	Green	
H8 Killeseck Ln			45	105	65	215	Yellow	Optimistic start year
H9 Ged Coll		72	72	72	72	288	Yellow	Optimistic start year – 1 yr delay
Sub Total	10	147	352	457	517	1,483		
Adjusted Total	10	55	177	457	477	1,176		Reduction of 307
Hucknall Area								
N of Papplewick		15	60	90	90	255	Yellow	Optimistic delivery rate in 2019/20 & 2020/21 – say 50
Top Wighay				50	100	150	Red	No planning app, no developer, RM, S106, infra etc – min 2 yr delay
H10 Hayden Ln		10	20	30	30	90	Green	
Sub Total	0	25	80	170	220	495		
Adjusted Total	0	25	80	80	80	265		Reduction of 265
Bestwood								
H11- Sycamores		8	8	9		25	Green	
H12 – Westhse			20	50	81	151	Green	
H13 – Business		35	37	37	37	146	Green	
Sub Total	0	43	65	96	118	322		
Adjusted Total	0	43	65	96	118	322		
Calverton								
H14 Dark Ln			18	18	18	54	Green	
H15 Main St			25	25	25	75	Yellow	Optimistic Year – 1 yr delay
H16 Park Rd		10	50	60	60	180	Red	Optimistic start year – delay 2 yrs
Sub Total	0	10	93	103	103	309		
		0	18	53	93	164		Reduction of 145
Ravenshead								
H17 Longdale A		10	10	10		30	Green	
H18 Longdale B		5	20	5		30	Green	
H19 Longdale C			70			70	Green	
Sub Total		15	100	15		130		
Adjusted Total		15	100	15		130		
Other Villages								
H20-24	1	17	35	7	2	62	Green	

Adjusted Total	1	17	35	7	2	62		
TOTALS						2,801		
Adjusted Totals						2,084		Reduction of 717