

Gedling Borough Council

Response to Matter 5

Housing

Issue 5a: Housing Provision and Distribution

Q1. Is the overall level of housing provision and its distribution in the Plan consistent with the ACS? [Policy LPD 63]

5.1 The overall level of housing provision is consistent with Policy 2 of the Aligned Core Strategy. The Housing Background Paper (**LPD/BACK/01**) explains the housing distribution as set out in Policy LPD63 of the Local Planning Document which is consistent with the Aligned Core Strategy.

Q2. Although the distribution of housing differs in the Plan to that set out in the ACS, would it accord with the Spatial Strategy of the ACS?

5.2 A similar question has been raised in the Inspector's Initial Questions (**EX/01**) – see paragraph 22 on page 4. The Council's response is provided in the Council response to initial questions (**EX/08**) – see pages 8-11.

Q3. The figures in Policy LPD 63 include dwellings which have already been built since 2011, sites with extant planning permission and sites below the threshold for allocation. Does the Plan adequately demonstrate where these sites are and how many dwellings are included? Are all those that have not already been built expected to be constructed in the Plan period?

5.3 Appendix A of the Housing Background Paper Addendum (**EX/22**) provides the full breakdown of housing supply to meet the 7,250 homes. Appendix E provides the list of sites that make up the housing supply for the plan period. Sites that have been completed during 2011 and 2016 are not listed individually, rather a figure for total completions is provided. The appendix lists out sites by settlement so that it is clear where the sites are and how many dwellings are included.

5.4 For those that have not already been built, each site has been considered individually and on its merits. Appendix B of the Housing Background Paper Addendum explains that sites that are unlikely to be developed based on up-to-date information has been provided by developers or where a more recent planning permission has been granted for non-residential development are assessed as 'non deliverable; and are therefore excluded.

Q4. Although a planning application for the Gedling Colliery/Chase Farm site (H9) has been submitted and granted, subject to the signing of a Section 106 Agreement, would it still be necessary to plan for the total of 7,550 homes set out in the ACS (Policy 2) rather than the housing target of 7,250?

5.5 This question has been raised in the Inspector's Initial Questions (**EX/01**) – see paragraph 26 on page 4. The Council's response is provided in the Council response to initial questions (**EX/08**) – see pages 18-19.

Q5. Would this provide sufficient flexibility if problems were to arise with sites coming forward, particularly given that 7,250 homes is a minimum requirement?

5.6 This question has been raised in the Inspector's Initial Questions (**EX/01**) – see paragraph 26 on page 4. The Council's response is provided in the Council response to initial questions (**EX/08**) – see pages 18-19.

Q6. Is the distribution of homes between the Key Settlements appropriate? How has this distribution evolved? Is it clear how and why the housing requirement has been reduced in the Key Settlements? [Policy LPD 63]

5.7 This question has been raised in the Inspector's Initial Questions (**EX/01**) – see paragraph 23 on page 4. The Council's response is provided in the Council response to initial questions (**EX/08**) – see pages 11-16.

Q7. If the provision of up to 260 homes in Other Villages referred to in the ACS (Policy 2) is solely to meet local needs, what evidence of local needs is there to support a requirement for 140 dwellings in the Other Villages? [Policy LPD 63]

5.8 This question has been raised in the Inspector's Initial Questions (**EX/01**) – see paragraph 24 on page 4. The Council's response is provided in the Council response to initial questions (**EX/08**) – see pages 16-17.

Issue 5b: Housing Supply in the Plan period

Q8. Have sufficient sites been allocated in the Plan to meet the target of 7,250 homes set out in the ACS? [Policies LPD 63 – LPD 68 and Policy LPD 70]

5.9 It is considered that sufficient sites have been allocated to meet the target of 7,250 homes. Appendix A of the Housing Background Paper Addendum (**EX/22**) provides the full breakdown of housing supply to meet the 7,250 homes.

Q9. How has the actual number of dwellings allocated been arrived at? [LPD 64 – LPD 70]

5.10 The table below explains how the actual number of dwellings allocated has been arrived at.

Site allocation	Area (ha)	Units	Locality	Density assumptions
H1 Rolleston Drive	3.64	90	Arnold	Density reduced from 30 dph to 25 dph to allow for surface water attenuation if needed.
H2 Brookfields Garden Centre	3.52	105	Arnold	Density based on Policy LPD 33 (a) – 30 dph.
H3 Willow Farm	4.17	110	Carlton	Density based on information provided by the developer through the SHLAA. Equates to 26 dph.
H4 Linden Grove	3.84	115	Carlton	Density based on Policy LPD 33 (a) – 30 dph.
H5 Lodge Farm Lane	7.31	150	Arnold	Density reduced from 30 dph to 20 dph to allow for landscape buffer along northern and eastern edge.
H6 Spring Lane	9.68	150	Carlton	Density considered through determination of planning application.
H7 Howbeck Road/ Mapperley Plains	9.73	205	Arnold	Density reduced from 30 dph to allow for the provision of a primary school within the site. Equates to 22 dph.
H8 Killisick Lane	9.81	215	Arnold	Net developable area is 6.7 ha. Density based on information provided by the developer through the SHLAA. Equates to 31 dph.
H9 Gedling Colliery/ Chase Farm	42.53	660 ¹	Carlton	Density considered through determination of planning application (1,050 homes to be provided on 33 ha).
H10 Hayden Lane	4.80	120	Hucknall	Density reduced from 30 dph to allow for the provision of SUDs and possible school playing field extension. Equates to 27 dph.

¹ Gedling Colliery/Chase Farm will deliver a total of 1,050 homes. However, as set out in the planning application, only 660 are expected to be built in the plan period (2011 to 2028).

Site allocation	Area (ha)	Units	Locality	Density assumptions
H11 The Sycamores	0.62	25	Bestwood Village	Density considered through determination of planning application.
H12 Westhouse Farm	10.23	210	Bestwood Village	Density reduced from 25 dph to allow for the provision of a primary school within the site. Equates to 21 dph.
H13 Bestwood Business Park	6.01	220	Bestwood Village	Density considered through determination of planning application.
H14 Dark Lane	2.65	70	Calverton	Density considered through determination of planning application.
H15 Main Street	2.98	75	Calverton	Density based on Policy LPD 33 (b ii) – 25 dph.
H16 Park Road	14.30	390	Calverton	Density based on Policy 33 (b ii) – 25 dph but increased to reflect information provided by the developer through the SHLAA.
H17 Longdale Lane A	1.36	30	Ravenshead	Density based on Policy LPD 33 (b i) – 20 dph. Number of units has been rounded up to 30 dwellings.
H18 Longdale Lane B	1.24	30	Ravenshead	Density has been considered through the determination of the planning application.
H19 Longdale Lane C	2.29	70	Ravenshead	Density has been considered through the determination of the planning application.
H20 Millfield Close	0.78	20	Burton Joyce	Density has been considered through the determination of the planning application.
H21 Orchard Close	0.74	15	Burton Joyce	Density based on Policy LPD 33 (b i) – 20 dph.
H22 Station Road	1.85	40	Newstead	Density based on Policy LPD 33 (b ii) – 25 dph.
H23 Ash Grove	0.88	10	Woodborough	Density has been considered through the determination of the planning application.

Site allocation	Area (ha)	Units	Locality	Density assumptions
H24 Broad Close	0.75	15	Woodborough	Density based on Policy LPD 33 (b i) – 20 dph.

Q10. Should a buffer be included? If so, what level should it be? Specifically, have sufficient sites been allocated to meet the housing target and should more housing be allocated?

5.11 It is considered that sufficient sites have been allocated to meet the target of 7,250 homes. Appendix A of the Housing Background Paper Addendum (EX/22) provides the full breakdown of housing supply to meet the 7,250 homes.

5.12 Whilst a similar question was asked by the inspector in her initial questions, this related specifically to the Gedling Colliery/Chase Farm site rather than generally. It is not considered that there is a need for a buffer for the following reasons:-

1. It is considered that the delivery of the sites identified in the housing supply is feasible. The NPPF includes a range of policy matters and require the plan to be realistic, to take account of relevant market and economic signals and be effective and deliverable. A significant increase in the supply of sites through a buffer would not necessarily enhance delivery but would require the release of additional Green Belt land contrary to national policy and could delay progress on some of the more challenging regeneration sites. The Council are seeking to ensure through positive planning that the objectively assessed housing needs target of 7,250 will be met.

2. The Housing Implementation Strategy (LPD/HOU/01) considers the risks to delivery of the allocated housing sites and what action would be taken if monitoring indicates that the Borough Council is not meeting its housing targets. Issues relating to specific sites have been discussed in detail with developers through two rounds of meetings with landowners and developers following consultation on the Local Planning Document Publication Draft.

3. The Council has stated in the Report of Responses document (LPD/REG/04) that 'flexibility is provided through a variety of sources, including the allocation of land at Newstead (but not assuming the site will contribute to meeting the housing requirement), taking a cautious approach to windfall and to delivery on the Gedling Colliery/Chase Farm site and through the identification of safeguarded land. It is considered that the need for flexibility through the allocation of land over and above the housing requirement needs to be balanced against the fact that any additional allocations would be most likely met through land which is in the Green Belt'.

Q11. Are there any important development/changes since the submission of the Plan, for instance in terms of planning permissions/completions? Is the SHLAA and SHMA up to date and robust?

- 5.13 The SHLAA is considered robust and has been updated to 2016. The Housing Background Paper Addendum (**EX/22**) provides an update of the five year land supply assessment against the Local Planning Document and an update of the housing trajectory to reflect the SHLAA update 2016.
- 5.14 The importance of establishing housing need through the Strategic Housing Market Assessment (SHMA) in terms of how many homes, the mix of homes and the needs of different groups within the population is enshrined in national policy. It is also emphasised that housing remains a strategic issue requiring local authorities to work together to plan to meet housing needs, and align with economic strategies.
- 5.15 In terms of whether the SHMA is up to date and robust, the Housing Market Assessment Update April 2012 (**LPD/HOU/04**) confirms that housing market indicators on price and incomes remain largely unchanged since the previous SHMA update in 2009. House prices had dropped slightly since 2009 but remain higher than in 2006 when the original SHMA was completed. This update formed part of the evidence base to inform the examination into the Aligned Core Strategy.
- 5.16 Paragraph 3.2.7 of the Aligned Core Strategy states that “New Government Household Projections based on the 2011 Census are expected to be published in 2014, and by this time economic circumstances may have stabilised somewhat. Should the new objective assessment of housing needs which takes these projections as its starting point indicate that the Councils’ assumptions underpinning housing provision are no longer appropriate, the Core Strategies will be reviewed, commencing in 2018 (three years from adoption of the Aligned Core Strategies).
- 5.17 With that in mind, “The Comparison of the Household Projections underlying the Greater Nottingham Core Strategies and the CLG 2012-Based Household Projections” (**LPD/HOU/02**) presented an assessment of the household projections underlying the Aligned Core Strategies for Greater Nottingham (the Nottingham Core Housing Market Area) in comparison with the latest 2012-based CLG Household Projections. It concluded that there was a good match between the Core Strategies’ projections and the 2012-based projections and that the housing provision contained in the Core Strategies did not require review. However, it is acknowledged that the document should not be viewed as a substitute for a detailed SHMA, but offers a good indication that the Core Strategy still provides an appropriate target to plan for.
- 5.18 In view of the strategic nature of SHMAs it is anticipated that a review of the SHMA will take place following the adoption of the Greater Nottingham Councils Part 2 Local Plans and is likely to be based on the 2016 Household Projections which are due to be released in 2018.

Q12. What evidence is there of the percentage of previous planning permissions being constructed? For instance, how many sites/dwellings with the benefit of planning permission have not been developed as a percentage of the total?

5.19 The table below considers dwellings with the benefit of planning permission² each year since 2011. Please note all homes granted planning permission since 1 December 2013 are still extant until they expire so the percentage figures for 2013/14 to 2015/16 will be subject to change as the percentages of homes being constructed and built would increase.

	Status (at 30 November 2016)			
	No. and percentage of homes under construction or completed		No. and percentage of homes not implemented or lapsed	
2011-12	52 homes	68 %	25 homes	32 %
2012-13	256 homes	96 %	12 homes	4 %
2013-14	75 homes	39 %	115 homes	61 %
2014-15	81 homes	55 %	65 homes	45 %
2015-16	304 homes	83 %	63 homes	17 %

Q13. On what basis are individual sites with planning permission excluded/ included within the supply calculations?

5.20 A similar question has been raised in the Inspector's Initial Questions (**EX/01**) – see paragraph 28 on page 4. The Council's response is provided in the Council response to initial questions (**EX/08**) – see page 20.

Q14. What evidence is there to support build out rates for each site, in particular larger sites?

5.21 The build out rates are based on information provided by developers and landowners through the SHLAA process wherever possible. If a response is not received from a developer/landowner, then the Council's assumptions are applied, as explained in Appendix B of the Housing Background Paper Addendum (**EX/22**). Appendix E provides the source of delivery for individual sites.

Q15. Should a lapse rate be included in the calculations?

5.22 Paragraph 3.23 of the Housing Background Paper Addendum (**EX/22**) states that a lapse rate has not been included in the five year land supply calculation as each site with planning permission has been considered individually and on its merits. If a site has been lapsed for five years or more and no information has been provided by the developer/landowner through the SHLAA process to indicate that the site is likely to come forward for development in the future, then it has been assumed that the site is not

² This excludes outline permissions and those that have been superseded by more recent permissions.

deliverable and has therefore been excluded from the assessment. Footnote 11 of the National Planning Policy Framework requires inclusion only of 'deliverable' sites.

Q16. Are all of the housing sites allocated in Policies LPD 64 to LPD 70 justified and deliverable in terms of national policy and guidance and as indicated in the Housing Trajectory? [Appendix A]

5.23 The housing sites are justified in the site selection process and the deliverability of the housing sites is demonstrated through the SHLAA and the housing trajectory. The Site Selection Document Main Report (**LPD/GRO/05**) and Appendices (**LPD/GRO/06** to **LPD/GRO/10** and **LPD/GRO/12** to **LPD/GRO/13**) in relation to the housing sites provide the details. Appendix E of the Housing Background Paper Addendum (**EX/22**) provides the list of housing allocations and includes the source of information on delivery.

Q17. Should the housing sites allocated in Policies LPD 64, LPD 65, LPD 66, LPD 67, LPD 68 and LPD 70 which benefit from planning permission or a resolution to grant planning permission, or are under construction, be formally allocated in the Plan? Have these sites been assessed using the same site selection process? Have any been found to be unacceptable and allocated only because they benefit from planning permission? [H6, H9, H11, H13, H14, H19, H20 and H23]

5.24 The sites mentioned have been assessed using the same site selection process. At the beginning of the site selection process, some of these sites did not have planning status and some had planning permission but were stalled. Through the site selection process the sites were found to be acceptable. They were not allocated only because they benefit from planning permission but rather were allocated in order to clarify the future use of the site if the planning permission should lapse or stall for any reason.

5.25 The appendices to the Site Selection Document (**LPD/GRO/06** to **LPD/GRO/10** and **LPD/GRO/12** to **LPD/GRO/13**) state that sites H6 Spring Lane, H13 Bestwood Business Park and H14 Dark Lane are allocated "to ensure that the residential use of the site is protected in case the planning permission were to lapse". Site H9 Gedling Colliery/Chase Farm was identified as a strategic location in the Aligned Core Strategy but no specific site boundary was allocated. The site has been allocated in the Local Planning Document. Site H19 Longdale Lane C forms part of the safeguarded land identified in the Gedling Borough Replacement Local Plan 2005. Site H20 Millfield Close did not have planning permission at the start of the site selection process and was designated as safeguarded land in the Replacement Local Plan 2005. Site H11 The Sycamores and H23 Ash Grove were allocated to clarify the future use of the site given that planning permission was granted in 2008 and 2007 respectively.

Q18. Is a windfall allowance of 230 homes in the last 5 years of the Plan period appropriate?

- 5.26 Paragraph 3.9 of the Housing Background Paper (**LPD/BACK/01**) states that the National Planning Policy Framework (NPPF) allows for the inclusion of a windfall allowance if there is robust evidence supporting its inclusion. Paragraph 48 of the NPPF is clear that local planning authorities may make allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens.
- 5.27 Paragraph 2.8 of the Housing Background Paper explains that the windfall allowance figure was calculated based on historic windfall delivery on small sites (up to and including 9 dwellings) excluding residential gardens. Delivery from windfall sites during the earlier years of the plan period and from larger sites (10 dwellings and above) was not considered appropriate in order to avoid double counting as such sites are likely to be identified through the SHLAA process. The Council has taken a cautious approach to housing land supply by including the windfall allowance in the last five years of the plan period only. Through the Aligned Core Strategy, Gedling Borough proposed a windfall allowance during the last five years of the plan period and the Inspector raised no objection to this.

Q19. Where are the existing housing commitments? What form do they take – large or small? Is their distribution in accordance with the ACS?

- 5.28 Appendix A and Appendix E of the Housing Background Paper Addendum (**EX/22**) provide information on deliverable housing commitments as at 31 March 2016. Sites with planning permission where information is provided by developers (through the SHLAA 2016 update) indicates the site is not deliverable are excluded from the housing supply.
- 5.29 The Council defines housing commitments as sites with planning permission (including those that have been built since 2011) and sites that are allocated for housing (being the three strategic sites allocated in the Aligned Core Strategy i.e. Teal Close, North of Papplewick Lane and Top Wighay Farm). The table below sets out the distribution of existing housing commitments and distinguishes between large and small sites, where 'large' refers to sites for 10 dwellings and above and 'small' refers to sites up to 9 dwellings. The table also includes planning applications granted subject to the signing of the s106.
- 5.30 The table demonstrates that the housing distribution accords with the settlement hierarchy to accommodate the housing growth as set out in Policy 2 of the Aligned Core Strategy, by focussing most document within and around the urban area, then on the edge of Hucknall, then the key settlements for growth of Bestwood Village, Calverton and Ravenshead and then the other villages. In terms of the key settlements for growth, a higher number of commitments have come forward in Bestwood Village than the other two

settlements (contrary to the distribution in Policy 2 of the Aligned Core Strategy) reflecting the availability of brownfield land within the settlement.

	Net completions 2011 to 2016			Sites with planning permission ³			Strategic sites ⁴	Total
	Small	Large	Total	Small	Large	Total		
Urban Area	191	813	1,004	209	1,097 ⁵	1,306	830	3,140
Edge of Hucknall	0	0	0	0	0	0	1,145 ⁶	1,145
Bestwood Village	4	48	52	11	358 ⁷	369	0	421
Calverton	2	147	149	19	124 ⁸	143	0	292
Ravenshead	25	47	72	36	82 ⁹	118	0	190
Other Villages								
- Burton Joyce	5	0	5	20	23 ¹⁰	43	0	48
- Lambley	11	0	11	5	0	5	0	16
- Linby	3	0	3	1	0	1	0	4
- Newstead	1	0	1	1	0	1	0	2
- Papplewick	3	0	3	1	0	1	0	4
- Stoke Bardolph	0	0	0	0	0	0	0	0
- Woodborough	8	0	8	18	13 ¹¹	31	0	39
Total			1,308			2,018	1,975	5,301

Q20. Does the housing trajectory demonstrate realistically that the housing development, for which the Plan provides, will come forward within the Plan period? [Appendix A]

5.31 The housing trajectory is based on the SHLAA update 2016. Appendix E of the Housing Background Paper Addendum (**EX/22**) provides the list of sites that make up the housing supply for the plan period which includes the housing allocations. Information to explain the source of delivery for the allocations is included. The housing trajectory reflects the build out rate from the SHLAA 2016 update and demonstrates that the housing allocations will come forward within the plan period. The only site that will deliver homes beyond the plan period is the Gedling Colliery/Chase Farm site and the capacity of the site as allocated in the Local Planning Document therefore reflects this.

³ Including sites with planning permission that are proposed to be allocated in the Local Planning Document.

⁴ Where strategic sites have planning permission, the information is recorded in the strategic sites column and not included in the sites with planning permission column.

⁵ Including the planning permission granted for H6 Spring Lane (150 homes) which is currently under construction and a planning application for 1,050 homes on site H9 Gedling Colliery/Chase Farm granted subject to the signing of the s106. Footnote 12 of the Housing Background Paper Addendum (EX/22) explains that only 792 homes are expected to be built in the plan period 2011-2028.

⁶ Including the 38 homes currently under construction on part of the site.

⁷ Including two planning permissions granted for site H11 The Sycamores (25 homes) and site H13 Bestwood Business Park (220 homes) and a planning application for 101 homes on part of site H12 Westhouse Farm granted subject to the signing of the s106.

⁸ Including planning permission granted for site H14 Dark Lane (72 homes).

⁹ Including planning permission granted for site H19 Longdale Lane C (70 homes).

¹⁰ Including a planning application for up to 23 homes on site H20 Millfield Close granted subject to the signing of the s106.

¹¹ Including planning permission granted for H23 Ash Grove (12 homes).

Q21. What are the main findings of the Local Plan Viability Assessment? Has this work indicated that any sites are likely to be unviable? What are the implications? Is more work necessary? [LPD/HOU/08]

- 5.32 The purpose of the Whole Plan Viability Study is to appraise the viability of the Gedling Borough Local Planning Document in terms of the impact of its policies on the economic viability of the development expected to be delivered during the Plan period to 2028. The study considers policies that might affect the cost and value of development in addition to the impact of the adopted Community Infrastructure Levy Charges.
- 5.33 Viability assessments were undertaken for both residential and commercial development scenarios and for both greenfield and brownfield development. The results identify the margin of viability for each site, taking account of all development values and costs, plan policy impact costs, community infrastructure levy charges and having made allowance for a competitive return to the landowner and developer. In essence a positive margin confirms whole plan viability.
- 5.34 The testing showed that the Gedling Borough Local Planning Document Policies are broadly viable for all forms of housing development and demonstrate that Affordable Housing delivery at the Council's policy targets of 10-30% delivery proposed by the Plan are broadly viable allowing a degree of flexibility when based on typical site development.
- 5.35 The study illustrates that all greenfield sites in the initial 0-5 year delivery period (i.e. the 5 year land supply) are viable based on the adopted assumptions. A small number of brownfield sites demonstrate marginal viability but are still considered to be broadly viable and deliverable. Viability improves in both the medium term (6-10 years) and longer term (11-15 years) with all sites demonstrating positive viability.
- 5.36 It is not considered that any further work is necessary at this stage. The work undertaken has been carried out as a strategic overview of plan level viability to accord with the requirements of the NPPF and the best practice advice contained in Viability Testing Local Plans (June 2012).

Q22. How have site densities been determined? How rigid are these figures? [Policy LPD 33]

- 5.37 The site densities were derived from a variety of sources. For sites with planning permission the densities reflect the details of the planning permission. For sites below the threshold for allocation the densities were provided by developers. Where this was not available, the details of previous planning permissions were used. For site allocations, Policy LPD33 was applied, unless indicated otherwise. See the table provided as part of the response to question 9.

- 5.38 The densities are not rigid and the policy allows for exceptions in locations where there is convincing evidence of a need for a different figure.

Q23. What is the threshold for the inclusion of sites and why?

- 5.39 The Site Selection Document Main Report (**LPD/GRO/05**) states that the threshold for sites allocated for housing in the Local Planning Document is 50 homes for the urban area and 10 homes for the rural area.
- 5.40 A threshold for the allocation of housing sites was required in order to ensure that work needed to determine whether to allocate a site was proportionate to its impact on the local area and did not result in an unmanageable number of sites being included and ensured that information could be clearly identified on the Policies Map. Thresholds have been applied flexibly and sites which were just under the threshold were considered for inclusion where appropriate.

Q24. Is the type and size of housing provided/planned meeting/likely to meet the needs of the area?

- 5.41 Policies are in place to make provision for affordable housing (LPD 36) (see response to question 43) and for securing an appropriate mix of housing type, size and tenure (LPD 37) and are considered consistent with paragraph 50 of the NPPF. Paragraph 11.3.5 of the LPD clarifies that housing type, size and tenure of new housing should be informed by the context of the local area through: firstly evidence of local need based on the type of existing housing stock, size, occupancy levels, affordability, housing waiting lists and long term vacancies; and secondly taking into account local demographics.
- 5.42 For the other villages, the Local Housing Need document (May 2016) (**LPD/GRO/04**) draws together information from a variety of sources, including the 2011 Census, to inform decisions about the number, type, size and tenure of new homes to be built in the other villages. Based on a range of information, the document makes recommendations about the number and type of new homes needed in the other villages.

Q25. Are the allocations based on a robust assessment of infrastructure requirements and their deliverability, including expected sources of funding?

- 5.43 Appendix 3 of the Infrastructure Delivery Plan Addendum (**LPD/GRO/15**) sets out the likely infrastructure requirements for each individual site allocation and also considers cumulative impacts where necessary. No “showstoppers” have been identified in terms of the critical infrastructure needed to develop each site allocation and it is anticipated that necessary infrastructure can be funded by Section 106 contributions and through the Community Infrastructure Levy (CIL). It is noted that different funding sources were reviewed as part of the evidence base for CIL. Public funding is necessary to deliver the GAR and sources have been identified which will be critical in bringing forward the Gedling Colliery/Chase Farm housing and employment sites.

- 5.44 The Gedling Borough Council Local Plan Viability Assessment March 2016 (**LPD/HOU/08**) confirms that most of the development proposed by the Local Planning Authority is viable taking into account the cost impacts of policies proposed by the plan the impact of the adopted CIL charges (see response to question 21).

Q26. In assessing the speed at which development will come forward on certain sites, has full regard been had to the proposed Gedling Access Road?

- 5.45 For the site allocations, full regard has been made to the proposed Gedling Access Road (GAR). Site allocations H3 Willow Farm and H4 Linden Grove are dependent on the delivery of the GAR and this is reflected in the housing trajectory as shown in Appendix D of the Housing Background Paper Addendum (**EX/22**).
- 5.46 Some existing SHLAA sites are affected by either the route of the GAR and the Gedling Colliery/Chase Farm housing allocation (site H9), such that any buildings would at some point in the future need to be demolished to allow the new schemes to come forward. Planning permission has been granted for both the GAR and the development of the Gedling Colliery/Chase Farm site (subject to the signing of the S106). As such, the affected existing SHLAA sites¹² have been excluded from the housing supply as they are unlikely to be delivered.

Q27. Does the development of the Strategic Site at Top Wighay Farm for 845 dwellings, rather than 1,000 homes accord with the ACS? Would this scale of development be viable on this site?

- 5.47 Yes it is considered that the development of the Strategic Site at Top Wighay Farm for 845 dwellings rather than 1000 homes accords with the ACS. The development brief which is being prepared for the site (and which is to be adopted on 2nd February 2017) explains that there are a number of factors driving the slightly reduced dwelling number that have only become apparent through detailed, site-specific work that was beyond the scope of the more strategic ACS. These include:
- Seeking to maximise the sustainability of the site (in line with the ACS vision of a sustainable, successful neighbourhood) through providing as wide a range as possible of non-residential supporting uses close to housing, thus minimising the need to travel, but reducing the area available for residential development;
 - A clearer understanding and appreciation of existing local density, character and context, including the site's visibility from and relationship with existing development at both Linby and Hucknall;
 - Consultation with developers and agents indicating that lower densities would have a positive impact on marketability and hence site viability;

¹² Several plots on Glebe Farm site, Lambley Lane (planning refs 2012/0186, 2014/1372, 2015/1174, 2015/1380, 2016/0256 and 2016/0530).

- The fact that part of the residential land has already come forward at a relatively low density; and
- The need to ensure that the impact of development on the two Local Wildlife Sites is minimised, including the need to ensure no built development on the eastern half of Wighay Road Grassland and Top Wighay Farm Drive.

5.48 A similar question has been raised in the Inspector's Initial Questions (**EX/01**) – see paragraph 22 on page 4. The Council's response is provided in the Council response to initial questions (**EX/08**) – see pages 9-10 which explains the distribution of housing around Hucknall.

5.49 The viability of this lower scale of development has been considered through work undertaken since the adoption of the ACS. The viability work informing the ACS and the subsequent introduction of CIL was based on the capacity of the site being 1000 dwellings. However, additional work has been carried out by GBC to consider the viability of the site for 845 dwellings. See separate document in the examination library entitled 'Residential Viability Appraisal of Top Wighay Farm' (February 2016). The assessment concludes that the site is marginally viable. It is important to note that part of the site has been granted planning permission for residential development (38 homes) and is currently under construction – as at December 31st 2016, 35 of the 38 dwellings had been completed.

Q28. Overall, does the Plan deal adequately with uncertainty? Is sufficient consideration given to monitoring and triggers for review?

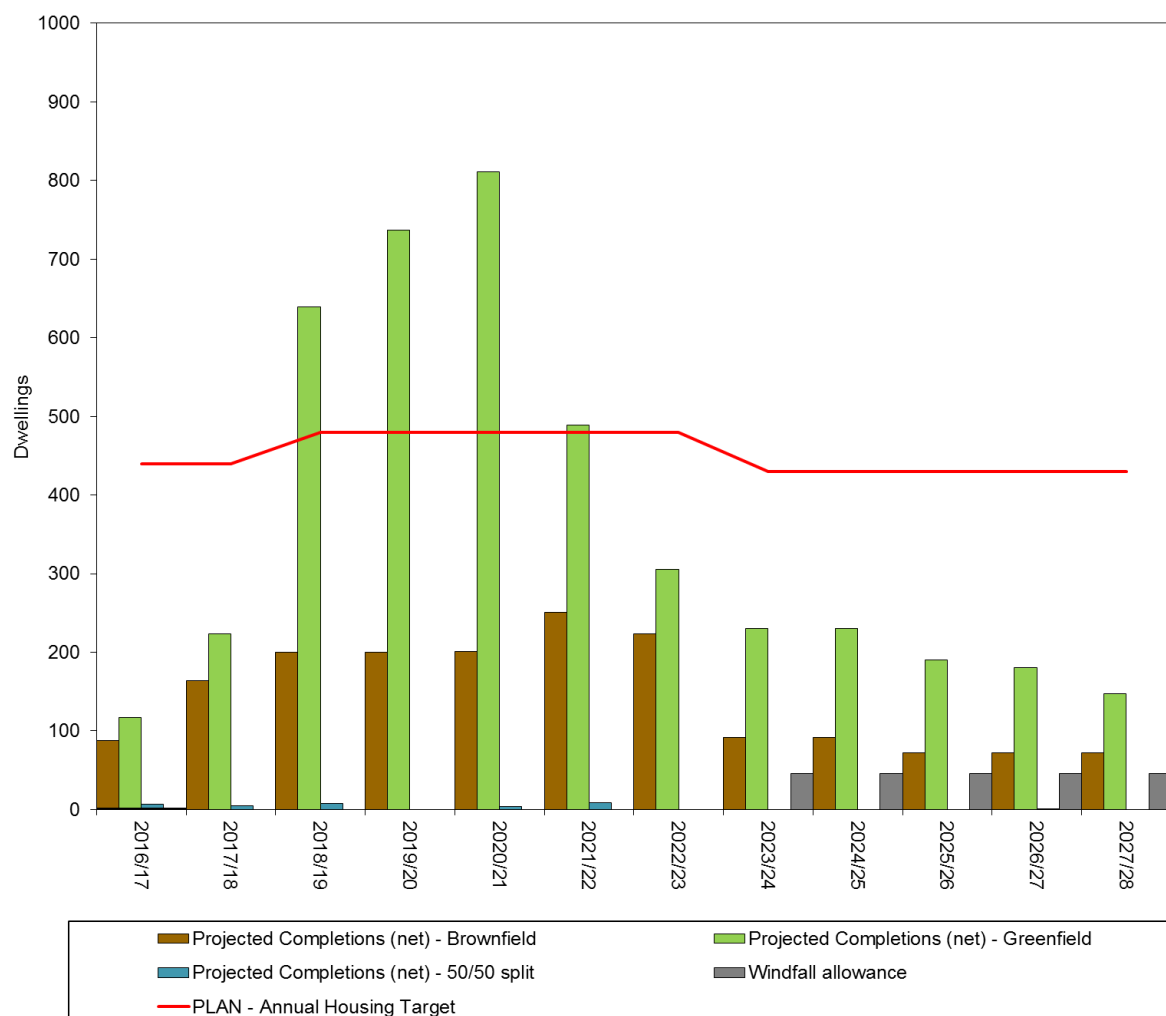
5.50 Uncertainty is considered in the Plan in a number of ways. Monitoring indicators include progress on the delivery of the allocated housing sites in the Local Planning Document.

5.51 The Housing Implementation Strategy (**LPD/HOU/01**) considers the risks to delivery of the allocated housing sites and what action would be taken if monitoring indicates that the Borough Council is not meeting its housing targets. Issues relating to specific sites have been discussed in detail with developers through two rounds of meetings with landowners and developers following consultation on the Local Planning Document Publication Draft.

5.52 The 40 homes on the site allocation in Newstead is not included in the housing supply due to the uncertainty as to whether it will deliver new homes within the plan period. The annual Strategic Housing Land Availability Assessment provides further certainty over numbers and delivery of the housing supply for the Plan. See response to question 32 regarding the Council's five year supply of deliverable housing and the adoption of a 20% buffer in order to take a cautious approach.

Q29. Should the development of brownfield sites be undertaken prior to the use of greenfield sites? If so, how would this be achieved and what would be the implications for housing supply and deliverability?

- 5.53 The chart overleaf shows the type of land that makes up the housing supply between 2016 and 2028. Where a site is on predominantly brownfield or greenfield land (i.e. at least 50% is on brownfield or greenfield land), this is recorded under brownfield or greenfield accordingly. It is assumed that all windfall will be delivered in the urban area. As it is not known whether windfall will be delivered on brownfield or greenfield land, it is recorded under a separate category on the chart. The chart shows that there are more dwellings on greenfield and predominantly greenfield land than on brownfield and predominantly brownfield land. As such, any attempt to phase development could have negative consequences on housing delivery by restricting the supply of housing land in the short to medium term. It is likely that the Council would not have a five year supply of housing land. This would be contrary to the objective of maintaining an adequate supply of new housing.
- 5.54 It is noted that the majority of homes on brownfield sites already have planning permission including the Gedling Colliery/Chase Farm site (subject to the signing of s106). Information provided by the developer for the Gedling Colliery/Chase Farm site indicates that the site can deliver 72 homes per annual starting in 2017/18, as shown in Appendix E of the Housing Background Paper Addendum (**EX/22**). Appendix E provides the source of delivery information for the other individual sites on both brownfield land and greenfield land.



Issue 5c: 5 Year Housing Land Supply

Q30. Is it robustly demonstrated that the Plan can deliver a 5 year housing land supply throughout the Plan period, calculated in accordance with national policy and guidance, taking account of past delivery performance and applying the appropriate 5% or 20% buffer?

5.55 The Council has demonstrated that they have a five year supply as explained in the Housing Background Paper Addendum (EX/22). Appendix D provides the detailed housing trajectory for the whole plan period.

Q31. What is the current position with regard to housing supply? Is there a 5 year supply? How has this been calculated?

5.56 The Housing Background Paper Addendum (EX/22) provides the five year land supply assessment which reflects the SHLAA update 2016 and explains the changes to the methodology in calculating the five year assessment which differs from the approach taken in the previous assessment. See paragraphs 3.25 and 3.26 for a summary of the changes. The Council has a 5.01 year supply of land, including a 20% buffer.

Q32. Is the use of a 5% buffer appropriate when calculating the Council's 5 year supply of deliverable housing? Is there any justification for a 20% buffer?

5.57 The Housing Background Paper Addendum (**EX/22**) provides the five year land supply assessment to reflect the SHLAA update 2016 and explains the changes to the methodology in calculating the five year assessment which differs from the approach taken in the previous assessment. One of the changes is that the Council now adopts a 20% buffer in order to take a cautious approach.

Q33. What evidence is there to support the projected completions on the sites expected to deliver homes within the 5 year period 2016 – 2021, in particular on allocated sites which do not currently have planning permission?

5.58 Information on projected completions for specific sites expected to deliver homes within the 5 year period comes from the SHLAA assessment. Appendix C of the Housing Background Paper Addendum (**EX/22**) includes a list of sites that make up the housing supply for the five year period. Appendix E explains the source of delivery for individual sites.

Q34. What evidence is there to support build out rates for each site, in particular larger sites?

5.59 See response to Q14.

Issue 5d: Range of different types of homes

Q35. Does the Plan make appropriate provisions for a range of different types of homes in accordance with national policy (Policies LPD 36 – LPD 42)?

5.60 Yes see responses to question 24 and question 51.

Issue 5e: Gypsy and Traveller Sites

Q36. Does the Plan make appropriate provision for Gypsy and Traveller Sites, having regard to evidence of need?

Q37. Does the Council's approach in relation to traveller sites generally conform with the expectations of the ACS and Planning Policy for Traveller Sites (August 2015)? If not, why not?

Q38. The South Nottinghamshire Gypsy and Traveller Accommodation Assessment (January 2016) identifies a baseline need for a total of 3 additional pitches in Gedling Borough between 2014 and 2029. The Plan does not seek to provide any pitches within the Borough. How does the Council intend to ensure that the 3 additional pitches required within the Borough will be provided?

Q39. Is the Council's approach to future provision, set out in an additional paragraph suggested in proposed MM37 appropriate?

- 5.61 In response to Q36-39, these questions have been raised in the Inspector's Initial Questions (**EX/01**) – see paragraph 19 on page 3. The Council's response is provided in the Council response to initial questions (**EX/08**) – see pages 5-7.

Issue 5f: Affordable Housing

Q40. Does the Plan make appropriate provision for affordable housing? [Policy LPD 36]

- 5.62 Yes LPD Policy 36 and the proposed post submission changes **MM63** and **MM64 (EX/09/B)** make appropriate provision based on evidence provided in the SHMA (**LPD/HOU/04**) which identifies need. However, viability considerations also need to be taken into account in seeking affordable housing as part of S106 agreements see answer to question 43 below.
- 5.63 The Affordable Housing Supplementary Planning Document (**LPD/HOU/07**) explains that the Strategic Housing Market Assessment (April 2009) concluded that 396 affordable homes every year would be required in the Borough to meet emerging need and to clear the backlog of households in housing need, but that following a thorough review of the housing register, this could be revised to 139 per year. A further affordable needs update was undertaken in 2012, Nottingham Core Viability Update Study (**EX/18**), which was considered at the examination for the ACS where the level of need for Gedling Borough was confirmed as 301.
- 5.64 Paragraph 173 of the NPPF requires that viability considerations are taken into account in seeking affordable housing as part of S106 agreements see answer to question 43 below. As such, the Affordable Housing Supplementary Planning Document considered the viability of providing affordable housing in different parts of the borough and concluded that it would be appropriate to adopt different targets for different parts of the Borough, based on housing sub-markets.
- 5.65 Policy 8 of the Aligned Core Strategy states that affordable housing will be required in new residential developments on appropriate sites and that the percentage targets sought through negotiation in Gedling Borough will be 10%, 20% or 30% depending on location.

Q41. What are the targets for the provision of affordable housing? [Policy LPD 36]

- 5.66 Policy 8 of the Aligned Core Strategy states that affordable housing will be required in new residential developments on appropriate sites and that the

percentage targets sought through negotiation in Gedling Borough will be 10%, 20% or 30% depending on location.

- 5.67 Policy LPD36 of the Local Planning Document states that planning permission will be granted for new residential development on sites of 15 dwellings or more subject to the provision of 10%, 20% or 30% of the dwellings provided for affordable housing depending on location.

Q42. Why are these targets dependent on location?

- 5.68 The use of three percentages reflects the wide range of land prices and affordability in the Borough.

Q43. What is the justification for this?

- 5.69 The Nottingham Core Affordable Housing Viability Study prepared in 2009 assesses the viability of providing affordable housing in different parts of the borough and concludes that it would be appropriate to adopt different targets for different parts of the Borough, based on housing sub-markets. It should be noted that the sub-markets reflect those used for the Nottingham Core Strategic Housing Market Assessment and have since been confirmed (apart from one minor change) through the adoption of the Community Infrastructure Levy.

- 5.70 The Nottingham Core Viability Update Study prepared in 2013 (**EX/18**) refreshed the 2009 Viability Study, updated all assumptions, took account of the introduction of different forms of intermediate affordable housing and commented on the likely implications for CIL. Paragraph 6.7 of the Study concluded that the affordable housing policy position being taken forward by GBC looked appropriate and viable.

Q44. Should the targets and the locations to which they apply be set out in an appendix to the Plan, as suggested in the Council's proposed MM64, without reference to the Affordable Housing SPD in Policy LPD 36 as suggested in proposed MM63? Are they clearly defined?

- 5.71 Yes, in response to the Inspector's Initial Questions (**EX/01**) and in accordance with Regulations 5 and 6 of the Town and County Planning (Local Planning) (England) Regulations 2012 and the National Planning Policy Framework (paragraphs 153 and 154), it is suggested that the targets and the locations to which they apply be set out in an appendix to the Plan as proposed by **MM64**.

Q45. As it is intended that they apply to allocated and unallocated sites, should this be set out in the supporting text to the Policy as suggested in the Council's proposed MM63 and MM64?

- 5.72 Yes, for clarity and in response to the Inspector's Initial Questions (**EX/01**) it is suggested that the supporting text be amended as proposed by **MM63** and **MM64**.

Q46. What has been achieved in recent years?

- 5.73 The number of affordable homes delivered and the percentage of affordable homes delivered (in relation to total housing completions) is provided on page 35 of the Authority Monitoring Report 31st March 2015 – 1st April 2016 (EX/24).

Q47. Should the Plan make provision for Starter Homes?

- 5.74 It is not considered appropriate to include policies, such as on Starter Homes, in the Local Planning Document to reflect changes arising from the Housing and Planning Act 2016 at this stage as information is not known regarding the detail of the changes, in terms of what is required and how this would operate. The supporting text will be amended to recognise that the implications of the Act will be taken on board at the appropriate time. The supporting text to Policy LPD36 is proposed to be amended to confirm that the Council will consider the implications of the Housing and Planning Act 2016 and monitor the impact on affordable housing.

Issue 5g: Self Build/Custom Build Homes

Q48. Does the Plan make appropriate provision for the development of Self Build/Custom Build homes in a range of locations and on a variety of sites? [Policy LPD 41]

- 5.75 The National Planning Policy Framework requires local planning authorities to identify local demand for people who want to build their own homes and the Council have maintained a register since April 2016 to allow people to register their interest. Policy LPD41 seeks an appropriate percentage of new dwellings provided on large sites to be for self build and custom plots and also allows for new self build and custom plots to come forward in appropriate locations. The supporting text to Policy LPD41 confirms that the term large sites means a site of 50 homes or more in the main built up area of Nottingham and a site of 10 homes or more in the key settlements and other villages. Given that the 24 housing sites allocated in the Local Planning Document cover a range of site sizes and are distributed across the Borough, it is considered that the Plan makes appropriate provision for the development of Self Build/Custom Build homes.

Q49. How would the appropriate percentage of the dwellings to be provided for Self Build/Custom Build homes be defined?

- 5.76 In terms of how an appropriate percentage would be defined, the Borough Council will use information from the local register to demonstrate whether there is a demand for self build or custom homes. The demand will change over time and the number of plots to be provided on large sites will depend on negotiations with developers. It is proposed to support Policy LPD41 with a Supplementary Planning Document for developers which will provide details

on how to deliver self build and custom plots. Further guidance on the provision of Self Build/Custom Build homes is awaited through the Right to Build later in 2017.

Q50. What is the demand/need for Self Build/Custom Build homes in the Borough?

- 5.77 At 9 January 2017, there were 45 individuals on the Self Build/Custom Build register. The majority (38) are looking for a plot within a village, whilst a further 7 are looking for a plot within a suburb (5) or a town/city centre (2). The majority (23) of those who have expressed a preference would prefer a single plot. The following table shows requests for plots in particular parts of the Borough. It should be noted that preference could be expressed for more than one area.

Location considered	No.
Any Nottinghamshire	21
Ravenshead	16
Lambley	3
Gedling	3
Woodthorpe	2
Woodborough	2
Calverton	2
Arnold	2
Burton Joyce	2
Mapperley	2
Newstead	1

- 5.73 The following tables provides a general indication of the type and potential size requirements of plots in the Borough This information will be utilised in calculating plot size requirements when defining 'appropriate percentages'.

House Type	No.
Detached	37
Semi-Detached	2
Terraced	1
Bungalow	5

Bedrooms (most indicated)	No.
2 Bedrooms	4
3 Bedrooms	16
4 Bedrooms	19
5 Bedrooms	6

Start Building	No.
Immediately	13
1-2 Years	22
3+ Years	5
No Response	5

- 5.74 It is important to note that no sensitivity testing has been carried out with those individuals/associations who have requested to be placed on the Register. This testing would be required to confirm that those listed are wholly committed to pursuing self and custom build construction and also to understand whether their strong preference is for a site within Gedling Borough or whether they are listed on Registered in numerous locations. Until this work has been carried out, caution should be exercised on the above information to avoid basing an approach on over-inflated demand.

Issue 5h: Specialist Accommodation

Q51. Does the Plan make appropriate provision for the development of C2 accommodation? [Policy LPD 38]

- 5.78 Yes Policy LPD 38 permits specialist housing in suitable locations. It is acknowledged that the number of elderly people in the Borough will increase. National and local policy seeks to provide the means for older people to live independently in their own homes. Policy LPD 37 seeks a mix of housing type, size and tenure including provision for elderly people who can then downsize to more suitable accommodation. Extra care homes offer a particular solution encouraging independent living with onsite support and may be located on allocated sites - a possibility that is being explored at Rolleston Drive (site H1). Whilst no representations were submitted seeking a specific allocation for residential homes, any proposals can be dealt with under LPD 38 where demand arises subject to the proposal being in a suitable location.

Issue 5i: Residential Design

Q52. Do Policies LPD 32 – LPD35 incorporate appropriate measures to ensure good design in new developments?

- 5.79 No significant objections were raised to Policy LPD 32 which is considered by the Council to set out all relevant amenity issues and the supporting text gives guidance on how each of the factors will be assessed.
- 5.80 Policy LPD 33 generally applies a density of 30 dwellings per hectare across the urban areas of the Borough, which is considered to be reasonably in keeping with the majority of the area. However, there are exceptions where such a density would not be a keeping with local character and this is set out in LPD Policy 33 (see answer to question 54 below).

- 5.81 Policy LPD 34 controlling development in residential gardens is a direct response to situations where, in some areas, development within residential gardens can have an adverse impact on local character such as Ravenshead.
- 5.82 Policy LPD 35 is based on a similar policy adopted by Bristol City Council and considered sound and provides a comprehensive range of policy principles relating to good design.

Q53. Should the Plan include a policy on space standards?

- 5.83 The Council can only include the nationally described space standards based on the evidence of need which is not currently available. Floorspace is now being monitored comprehensively with the introduction of Community Infrastructure Levy in October 2015 such that the possibility of incorporating a policy in a future review of the Local Plan will be considered. Proposed change reference **MM39** looks to amend paragraph 11.3.11 which forms the supporting text to Policy LPD 37 to recognise the importance of the national space standards.

Issue 5j: Residential Densities

Q54. Are the residential densities included in Policy LPD 33 appropriate and achievable?

- 5.84 The Key Settlements and villages in Gedling Borough vary in character and so the plan sets different minimum densities. For the key settlements of Calverton and Bestwood Village the density of 25 dwellings per hectare is based on the recommendations of the Masterplanning Work (**LPD/GRO/01 to 03**). These masterplanning reports took into account the following factors:-
- local peoples' views that considered recent developments had been too high a density;
 - the need for sensitive landscaping and the suburban semi-rural feel of these key settlements;
 - that houses should not exceed 2 storeys in height; and
 - the need for a mix and range of homes including suitable for the elderly.
- 5.85 For Ravenshead the findings of the masterplanning work suggested lower density of 25 dwellings per hectare which was reduced to 20 dwellings per hectare on the basis of officer's local knowledge of the settlement which is characterised by single dwellings in large plots.

Q55. What evidence is there to support lower densities of 20dph in Burton Joyce, Lambley, Ravenshead and Woodborough and 25dph in Bestwood Village, Calverton and Newstead? [Policy LPD 33]

- 5.86 See response to question 54 for evidence to support the density approach for Bestwood Village, Calverton and Ravenshead. For the settlements of Lambley and Woodborough the lower density was considered appropriate

based the existing historic character and local characteristics. Both these villages have designated Conservation Areas characterised by single dwellings in relatively large plots. The lower densities also took into officer's judgement based on local knowledge reflecting local characteristics including their rural nature, important open breaks and views to and from the surrounding landscape.

- 5.87 Burton Joyce is characterised by suburban type development and based on local knowledge a density of 20 homes per hectare is considered appropriate. Newstead is a former mining settlement with typically higher density where 25 homes/ha would be in keeping.
- 5.88 LPD Policy 33 does allow for higher densities to be applied subject to certain provisos. However, the plan wide viability work is based on these densities which are considered viable and achievable.

Conclusion

- 5.89 The overall level of housing provision as set out in the Local Planning Document is consistent with Policy 2 of the Aligned Core Strategy.
- 5.90 The SHLAA has been updated in 2016 and the Housing Background Paper Addendum provides the full breakdown of housing supply to meet the housing requirement and provides the list of sites that make up the housing supply, including an update on the five year land supply assessment against the Local Planning Document and an updated housing trajectory. It is considered that, together with the existing housing commitments, sufficient sites have been allocated to meet the target of 7,250 homes.
- 5.91 The Council has demonstrated that they have a five year supply plus a 20% buffer taking a cautious approach.
- 5.92 The Local Plan has policies in place to make provision for affordable housing (including different targets depending on location), specialist housing in suitable locations and for the development of self build and custom build homes. Policy LPD37 provides the basis for securing an appropriate mix of housing type, size and tenure including provision for elderly people who can then downsize to more suitable accommodation. It is proposed to support Policy LPD41 with a Supplementary Planning Document for developers which will provide details on how to deliver self build and custom plots. There is currently no on-site Gypsy and Traveller provision within Gedling Borough reflecting the lack of qualitative evidence of need.
- 5.93 The policies in the Local Plan incorporate appropriate measures to ensure good design in new development and the densities are appropriate and achievable. A policy on space standards is not included in the Local Plan as the evidence of need is not currently available but the possibility of incorporating a policy in a future review of the Local Plan is noted.

Further Proposed Changes

5.94 No further proposed changes are being put forward at this stage.