

1. These comments are made on behalf of M F Strawson Ltd, promoter of land west of the A60, Redhill, for 150 dwellings. The site is assessed as site 6/778 in the Sustainability Appraisal of Reasonable Alternative Sites (LPD/REG/14). This Position Statement follows on from representations made to the Publication stage of the Local Planning Document, reference lpd\_pub\_b/218 and lpd\_pub\_b/221.

**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]**

2. For the reasons outlined in the Representation submitted on behalf of our client in July 2016 (reference lpd\_pub\_b/218), it is considered that there is no flexibility in the planned amount of housing so as to ensure the objectively assessed housing needs are met. The Council is reliant upon all allocations being delivered within the Plan period in order to achieve their targets, however it is clear from historic delivery of new homes, and the status of a number of the key sites that this is highly unlikely to occur.
3. Including our client's site, Site 6/778, as an additional site allocation for 150 dwellings would assist in addressing this weakness, providing greater flexibility in the Plan and assisting in ensuring the Council meets the minimum housing requirement.

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

4. No comment.

**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. The Council has taken the decision to remove any 'buffer' from their housing targets despite an additional 300 dwellings for flexibility being identified within the Aligned Core Strategy (ACS).
6. As drafted there is no flexibility within the draft Plan to achieve this target, and all allocations will need to come forward within the anticipated timeframe to achieve this. The Inspector at the Stratford Upon Avon Core Strategy Examination (Paragraph 365) endorsed a 9% additional provision in order to ensure a sufficient degree of contingency and flexibility (referred to in our representations on the Publication of the Local Planning Document, reference lpd\_pub\_b/218). We would submit that there must be some reasonable degree of flexibility and contingency and this can only be achieved by amending the plan to make for a greater provision of housing.

7. Furthermore it is considered that by allocating our client's site, Site 6/778, as an additional site allocation for 150 dwellings this would provide greater flexibility into the Plan and assist in ensuring the Council meets their housing targets.

**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?**

8. No comment.

**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?**

9. EX-08 Appendix 2 - Deliverable sites below the threshold for allocation - sets out a table of sites which the Council considers to be deliverable. Many of the sites are subject of lapsed planning permissions, yet are still indicated to be deliverable from year 5 or 6 onwards. The fact that a site has had planning permission but has not delivered any housing is indicative of a barrier to delivery. It is suggested that each of these sites with expired planning permissions should be individually scrutinised to assess whether it is reasonable that they should remain in the housing supply. The fact that there are so many sites with expired planning permissions is indicative that a lapse rate should be applied to existing planning permissions.

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

10. The supply calculations appear to include all sites with planning permission, assuming a 100% implementation rate. It is submitted that a 5% lapse rate should be applied to planning permissions in order to provide for circumstances where planning permissions are not implemented or outline planning permissions do not deliver housing as expected at the detailed stage.

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

11. There is no detailed evidence to support build out rates for each site, in particular larger sites. The information provided in response to each site is merely a snapshot of the site's status and there is no commentary to support how these sites appear in the housing trajectory. This should be provided so that it can be scrutinised on a site-by-site basis in the examination.

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

12. Yes, a 5% lapse rate would represent good practice in ensuring that the identified supply is robust.

**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]**

13. No comment.

**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]**

14. No comment.

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

15. No comment.

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

16. No comment.

**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]**

17. There are a number of sites with expired planning permissions included, for which the delivery of housing is uncertain. As such the trajectory cannot be relied upon as realistic

**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]**

18. No comment.

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

19. No comment.

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

20. No comment.

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

21. No comment.

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

22. No comment.

**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?**

23. There are two websites which provide information on the Gedling Access Road<sup>1</sup>. At the time of writing these websites indicate that the construction of the Gedling Access Road is scheduled to commence in spring 2017 with completion by spring 2019. As a precursor to this the website indicates that a public inquiry into Gedling Access Road would take place in autumn 2016. We are not aware of any public inquiry having taken place and the latest news update on the County Council's website (26<sup>th</sup> August 2016) is that the scheme is still under design and letters have only just been sent to landowners to initiate the land acquisition. It is considered that the Council should provide a detailed update on the Gedling Access Road and how the implementation of the road allows the delivery of housing at affected sites.

**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?**

24. No comment.

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

25. No comment.

**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?**

26. No comment.

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<sup>1</sup> <http://www.gedling.gov.uk/planningbuildingcontrol/gedlingaccessroad/>  
<http://www.nottinghamshire.gov.uk/gar>



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