

**Reference. ID 155226145**

## **Gedling Local Plan Examination**

### **Written Statement on behalf of Troyal Farms Ltd**

#### **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];*

*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]*

- 1.1 The distribution of housing in the Plan is not consistent with the ACS, in particular, in the distribution of new homes in the Other Villages is significantly short of the 260 in the ACS.
- 1.2 The Gedling Local Housing Need (LHN) document (May 2016) refers to a need for between 70 to 90 new homes in Burton Joyce over the period 2011 – 2018. The latest figures from the Council in the Housing Background Paper Addendum (December 2016), details that 63 homes should be completed in the village over the Plan period which is clearly insufficient in comparison with the identified need.
- 1.3 The LHN document only considers the need for Burton Joyce up to 2018, ten years short of the Plan period (2028). This indicates that additional housing, over and above the 70 to 90 stated in the LHN, is required in the period 2018 to 2028.
- 1.4 The Plan is therefore not in accordance with national policy as Paragraph 159 of the National Planning Policy Framework (NPPF) requires plan makers to:

*“...identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*

  - *meets household and population projections...;*
  - *addresses the need for all types of housing...and;*
  - *caters for housing demand and the scale of housing supply necessary to meet this demand”.*
- 1.6 It is clear from the evidence base that cumulatively, the housing needs for the Other Villages will not be met over the Plan period and therefore additional and available sites should be allocated in the Plan to address this. Our previous representations (ref. 1552261450) and the current planning application for 45 new dwellings at Glebe Farm (ref. 2016/0306) demonstrate that the site is available and deliverable within the short term.

Issue 5b: Housing Supply in the Plan period

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

- 1.7 The Plan does not provide or plan for the house types and sizes required to meet the needs of the area. The Local Housing Need (LHN) document (March 2016) identifies that Burton Joyce which has a need for smaller family homes, particular 2 or 3 bed properties. Evidence provided in the LHN document demonstrates that the existing permissions (at the time of publication) are still inadequate to address the need. Out of 14 permission only three were for 2 bed properties and four for 3 bed properties. Half of the permissions were for 4 bed properties which already have a high representation in the village compared to the rest of the Borough.
- 1.8 As outlined in our previous representations (ref. 1552261450), the Council have not positively prepared the Plan as both the number of dwellings proposed and consideration given to the house and type is inadequate to address the identified need from the Council's own evidence base.
- 1.9 The Plan is not in accordance with national policy as Paragraph 159 of the National Planning Policy Framework (NPPF) requires plan makers to:
- “...identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*
- meets household and population projections...;*
  - addresses the need for all types of housing...and;*
  - caters for housing demand and the scale of housing supply necessary to meet this demand”.*
- 1.10 The Plan should help to address the identified need in Burton Joyce through the allocation of the Glebe Farm site for 45 new dwellings.

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?*

- 1.11 The Housing Background Paper Addendum (December 2016) details that based on proposed allocated sites in the Local Plan Publication draft, the Council will have a 5 year supply of 5.01 years (3,404 dwellings against a requirement for 3,398 dwellings) on adoption of the Plan. This level of supply is calculated using the Sedgfield approach and a 20% buffer in line with guidance in the NPPF.
- 1.12 However, considering the Council's recent rate of under-delivery over the period 2011 – 2016, a 5.01 years supply does not provide any flexibility against lower than projected completion rates in the first 5 years post-adoption of the Local Plan. Indeed, it would only take one site to not deliver as projected in the Addendum to leave the Council with a less than 5 year supply soon after adoption of the Plan, and the Plan therefore quickly 'out of date'.
- 1.13 Completion rates over the past 15 years (never higher than 447 homes in 2007/08) when compared with the projected completed rates (up to 1,016 homes in 2020/221), as shown in the Addendum, indicates that the Council is being ambitious in their outlook to securing a 5 year supply.
- 1.14 In order to make the Plan sound the Council should allocate additional sites which are able to be delivered within the first 5 years post-adoption of the Local Plan. This will provide the additional flexibility and certainty in relation to housing delivery necessary to make the Plan sound and 'boost' housing supply. The Plan should therefore include the Glebe Farm, Burton Joyce site for 45 dwellings as detailed in our previous representations (ref. 1552261450).