

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.

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?

2. The Council's calculation of 5 year housing land supply (EX22) is based on the Sedgefield Method, applying a 20% buffer to the housing requirement (including backlog) and starting the 5 year trajectory in the current monitoring year, thus using only known completions. This is considered a robust calculation methodology. However it only results in a 5.01 year supply, which is highly vulnerable. There is a significant risk of the Council's housing land supply falling in to a deficit following the adoption of the Plan and then relevant policies for the supply of housing would be out of date.
3. Furthermore, it is considered that a 5% lapse rate should be applied to existing planning permissions. 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 there are so many sites with expired planning permissions is indicative that a lapse rate should be applied to existing planning permissions.

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

4. The Five Year Housing Land Supply Assessment (December 2016) (EX-23) demonstrates a current housing supply of 3.14 years.
5. The Council state at paragraph 33 of this assessment that it is *"anticipated that the shortfall in supply of housing sites is short term and will be addressed by the delivery of strategic sites in the Aligned Core Strategy and also the adoption of the emerging Local Planning Document which will bring forward additional housing sites."*

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?

6. The Council has adopted a 20% buffer, which is considered appropriate in view of the fact that the housing requirement has not been met for the last 3 years and the pattern has shown a growing gap between requirement and completions.

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?

7. 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. The following sites are highlighted as having particularly optimistic assumptions regarding their delivery:

- **ACS Policy 2 Allocation: Teal Close** - this site is anticipated to deliver 260 dwellings within the 5 year supply period, delivering 20 dwellings during the 2017/18 monitoring year and 80 dwellings per annum thereafter. Whilst outline planning permission was granted in June 2014, there has not yet been a reserved matters application. There is no detailed information regarding the timescale for such an application and the disposal of the land, if necessary.
- **ACS Policy 2 Allocation: North of Papplewick Lane** - this site is anticipated to deliver 255 dwellings within the 5 year supply period, delivering 15 dwellings during the 2017/18 monitoring year with supply ramping to 90 dwellings per annum thereafter. Whilst outline planning permission was granted in October 2015, there has not yet been a reserved matters application. There is no detailed information regarding the timescale for such an application and the disposal of the land, if necessary.
- **ACS Policy 2 Allocation: Gedling Colliery/Chase Farm** – this site is anticipated to deliver 72 dwellings per annum continuously throughout the plan period from the 2017/18 monitoring year. A resolution to grant permission at Gedling Colliery/Chase Farm was passed in May 2016 for 1,050 dwellings, 506 of which were subject to full permission but no more than 315 could be constructed before the completion of the Gedling Access Road (currently programmed for Spring 2019). Planning permission has not yet been issued as it is pending the completion of a s106 agreement. There are two websites which provide information on the Gedling Access Road¹. 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

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

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 (26th 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 the site as shown in the trajectory. Furthermore, information should be provided regarding the timescale for further applications and the disposal of the land, if necessary.

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

8. 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.



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