

Reference. ID 155226145

Gedling Local Plan Examination

Written Statement on behalf of Troyal Farms Ltd

Matter 6: Housing Allocations

Issue 6a: General Questions

Q1. Was the site selection process robust? Was an appropriate selection of potential sites assessed? Were appropriate criteria taken into account in deciding which sites to select and was the assessment against these criteria robust?;

Housing Needs:

- 1.1 The selection process is not robust as the Publication draft does not provide a sufficient number of sites to address the housing needs of Burton Joyce, as required by Policy 2.3(d) of the Aligned Core Strategies (ACS) (see previous representations ref. 155226145).
- 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 also 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 selection has therefore not been robust as it does not provide sufficient housing or any flexibility to deliver the identified local need in Burton Joyce, as required by ACS Policy 2.3(d).
- 1.5 The selection process is also 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 In respect of housing needs across the Borough, 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.
- 1.7 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 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'.

- 1.8 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.
- 1.9 In order for the selection process to be robust, 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.
- 1.10 The Plan should therefore include the Glebe Farm, Burton Joyce site for 45 dwellings as detailed in our previous representations (ref. 1552261450), in order to help address the housing needs of Burton Joyce and provide more flexibility in delivering a 5 year housing supply.

Evidence Base:

- 1.11 The evidence base for the Plan, and in particular the selection process for the sites in Burton Joyce, is not based upon a robust and credible evidence base particular, the background papers assessing the Green Belt (2015) and Site Selection (2016) do not provide an accurate or fair assessment of the Glebe Farm site in Burton Joyce and therefore their conclusions should be reviewed.

Green Belt Assessment:

- 1.12 The Green Belt (GB) Assessment considered a significantly wider site than Glebe Farm by including the Plantation Woodland to the west. As a result of this inaccuracy, the assessment relating to the Green Belt value of the site is incorrect. The GB Assessment details that the site is in the sensitive gap between Burton Joyce and the Urban Area, however, in the Site Selection background paper (Appendix E), it is stated that the site, when assessed as just Glebe Farm, is not in the sensitive gap.
- 1.13 The Assessment also states that there is little containment and that the site would form a wedge into the countryside. In the Report of Responses (October 2016) the Council maintain that the site would be an intrusion in to the countryside, however in our response to the GB Assessment (dated September 2015), it was made clear that the Glebe Farm site has existing defensible boundaries through the Plantation Woodland, boundary hedgerows and the surrounding topography. Our response to the Assessment also provided an outline Framework Plan for how a development could secure and strengthen these defensible boundaries by extending the woodland across the northern perimeter of the site. This would result in a proposal which restricts further encroachment in to the Green Belt and forms a natural extension to the settlement boundary.
- 1.14 The GB Assessment also fails to take account of the existing extent of built form and dilapidated condition of the site, which detracts from the appearance of the area and the openness of the Green Belt. The redevelopment of the site and proposed strategic landscaping would improve its appearance and landscaping value.

Site Selection background paper:

- 1.15 The Site Selection paper provides a further inaccurate assessment of the site by considering the development of the Glebe Farm site for 60 dwellings, and concluding that at this level of development access via Woodside Road was unsuitable. However, an outline application for 45 new dwellings on the Glebe Farm site was submitted in March 2016 and is currently being considered by the Council (ref. 2016/0306). This discrepancy in the number of dwellings is important as the County Highways Officer has assessed the current application for 45 new dwellings, which includes use of the existing access off Woodside Road, and considers that the principle of the development and access arrangements are acceptable.

- 1.16 The Site Selection Paper does not fully take account of the conclusions with the Sustainability Appraisal which considers Glebe Farm to have a 'low landscape value', to be 'visually contained' and an overall 'low visual sensitivity within the study area'. The papers reference to the high point on the site being sensitive and lack of defensible boundaries to the north, is clearly demonstrated to be mitigated in the framework plan through the extension of the woodland across the northern boundary of the site.
- 1.17 The outline application (ref. 2016/0306) currently being considered by the Council is supported by a number of reports and statements which surveyed and assessed the effects from the development of the site for 45 dwellings. These reports lead to the conclusion that there are no highways or environmental constraints which would prevent the site from being developed in the short term
- 1.18 In the Council's response (dated 9th December 2016) to the Inspector Initial Questions (22nd November 2016), they acknowledge the number of homes allocated to Burton Joyce is less than the identified need. The given justification for this relates to flood risk and topography limiting developing development in the village. However as outlined above, the current application for Glebe Farm demonstrates that these issues are not limiting factors in developing the site for up to 45 new dwellings.
- 1.19 In conclusion, the site selection process for the Plan has not reasonably assessed or allocated alternative sites to meet local needs, particularly the Glebe Farm site which should be allocated for 45 new dwellings to help address the identified housing needs for the Borough and in particular, Burton Joyce.