



ASPBURY
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Mr and Mrs Champ (9181665) and
Mr and Mrs Devaney (15192225)
Kighill Lane, Ravenshead

Response to Inspector's Questions -
Issue 8g - Ravenshead

1.0 INTRODUCTION

1.1 I have been instructed to respond to the Inspector's questions in respect of issue 8g: Ravenshead on behalf of Mr and Mrs Champ and Mr and Mrs Devaney, the landowners of 18 Kighill Lane (site 6/669) and 22 Kighill Lane, Ravenshead respectively.

2.0 RESPONSE TO INSPECTOR'S QUESTIONS

Issue 8g: Ravenshead

Q33. Has sufficient land been allocated in Ravenshead? Does it accord with the ACS? (Policy LPD 67)

- 2.1 **Response** – Policy LPD 63 (Housing Distribution) of the Local Planning Document Publication Draft (Part 2 Local Plan) (LPD/REG/02) states that 250 homes will be provided in Ravenshead across the plan period. This does not accord with the Aligned Core Strategy whereby the spatial strategy set out in Policy 2 allocates up to 330 dwellings in Ravenshead. Furthermore, the Council are seeking to deliver only 1515 dwellings across the key settlements which is significantly lower than the Aligned Core Strategy which seeks to deliver up to 1945 across the three settlements of Bestwood Village, Calverton and Ravenshead. This reduction of housing numbers for the key settlements is 'justified' by the Council as the result of an alleged increase in dwelling capacity in the main built up area of Arnold and Carlton as set out in the 2016 Housing Background Paper (LPD/BACK/01).
- 2.2 The Borough Council do acknowledge that they have a recent record of persistent under delivery of housing and prior to the Examination of the Part 2 Plan had a supply estimated at 3.14 years against the requirements of the ACS (EX/23- p9) excluding sites proposed for allocation within the Plan. The Council's Housing Background Paper Addendum (EX 22) undertakes at paragraphs 3.27- 3.31 a further assessment of the housing supply including sites allocated in the Part 2 Local Plan that are deliverable in the five year period 2016-2021 and states that the supply totals 5.01 years, an oversupply acknowledged as just 6 dwellings. This extent of 'alleged' oversupply offers no material flexibility whatsoever and any slight delay or overoptimistic assumption on delivery will bring supply down below five years. Indeed some attendees at the Examination are likely to be challenging the Council's starting figure of 5.01 years' supply.
- 2.3 This supply is clearly vulnerable and the Council should be looking across the Borough to increase supply to a more robust level through this Examination whilst the opportunity presents. Any adjustment for Ravenshead should be proportionate and consistent with the ACS position of up to 330 dwellings. Therefore up to a further 80 dwellings in this settlement would not undermine the objectives of the Aligned Core Strategy or the Part 2 Local Plan.

- 2.4 The Respondents each own small plots fronting Kighill Lane at the southern edge of the village, and have submitted representations to the draft plan in respect of their respective landholdings which have infill frontage to the northern side of Kighill Lane. In the Council's site selection document for Ravenshead (LPD/GRO/09), the land at 18 Kighill Lane (site 6/669) was considered at paragraph 2.4 for further consideration along with three other small sites fronting Kighill Lane (6/841, 6/843 and 6/845). The document indicated at paragraph 3.3 that the Parish Council and local residents were more supportive of development to the south of Ravenshead (Longdale Lane/Kighill Lane) as shown through the preparation of the Masterplan by URS (LPD/GRO/03).
- 2.5 The land adjoining 22 Kighill Lane was not assessed in the Site Selection Document, yet given its location between 6/669 and 6/845, it would no doubt have been considered suitable for allocation. The Council subsequently decided however not to propose removal of these landholdings from the Green Belt which would have subsequently confirmed their suitability and availability for housing. Cumulatively the Council estimate that these sites could deliver around 46 dwellings but due to the constraints of site shape, existing properties and layout considerations, the real capacity will be somewhat lower than the Council's estimate.
- 2.6 The Council's response to the Respondents' submissions is contained at P121 of the Council's Draft Report of Responses to the Local Planning Document Publication Draft LPD/REG/04. The Council actually acknowledge that other than the Wildlife site designation (which only impacts the easternmost site on Kighill Lane 6/841), there are no significant constraints to development. Indeed the Council even acknowledge that the sites could form a logical extension to site H18 if additional land was required in Ravenshead. However, the Council did not consider it 'necessary' to allocate these sites presumably because they feel that they have achieved / exceeded the five year supply requirement by 6 dwellings!
- 2.7 Notwithstanding the marginal if not perilous position on 5 year supply, the Respondents assert that insufficient consideration has been given to the rising demand for self-build plots within the Key Settlement of Ravenshead. The Respondents have not made representation with regards to issue 5g, as set out in the Inspector's Draft Matters, Issues and Questions for Examination and Outline Programme of Hearings; however they consider that the Plan does not make appropriate provision for self-build plots across a range of sites and questions the deliverability of self-build plots given the current wording of LPD 41 and the financial pressures on developers. In October 2016 it was confirmed that 18 people/organisations were registered on the self-build and custom house build register for Gedling Borough. This number has increased exponentially, and in January 2017, 45 individuals were registered on the Gedling register with 16 specifically referring to the demand in Ravenshead. It is considered that these figures do not truly reflect the actual demand across the Borough and

in Ravenshead, and in fact there are higher numbers of individuals and organisations seeking self-build plots. The Self Build and Custom Housebuilding Act 2015 requires that local planning authorities have regard to the demand for self-build as indicated on the self-build register.

- 2.8 Policy LPD 41 (Self Build and Custom Homes) of the Part 2 Local Plan seeks to deliver self-build/custom build plots in Ravenshead on sites of 10 dwellings or more. This fails to consider smaller sites such as the opportunity presented by the small sites along Kighill Lane to meet the rising demand in Ravenshead and across the Borough. Of the sites allocated within Ravenshead, Site H19 already has planning permission with no Self-Build requirement and Policy LPD 67 – Gedling makes no reference whatsoever to allocations H17 and H18 making provision for self-build or custom. In that context, questions must be raised about the Council’s commitment to Policy LPD41 and its deliverability in the context of the demand for self-build opportunity within Ravenshead.
- 2.9 In summary the Respondents consider that there has not been sufficient land allocated within Ravenshead to meet housing needs and in particular small sites suitable for custom and self-build, and that the approach to allocating the bare minimum housing provision for the settlement appears to prevail across the Borough as a whole, with the Borough Council entering this Examination with an alleged 5.01 year supply. There clearly are suitable locations within Ravenshead to boost the supply of housing, and sites to the south of the settlement have generally been supported through assessment and public consultation. As this process requires Green Belt release, the Borough Council should be using this plan review to make adequate provision for the plan period having due regard to the provisions of paragraph 85 of the NPPF.

M.J. Downes
BA, B.PI, MRTPI
January 2017