



Broxtowe Borough Council

Hearing Statement to Matters, Issues and Questions

Part 2 Local Plan Examination

On behalf of Mr Turton [4193]

November 2018

In respect of Hearings Scheduled for:

Weds 5 December 2018:

Matter 4 Housing Delivery, Trajectory and Land Supply

Weds 12 December 2018:

Matter 9 Other Site Allocations

Policy 7 Kimberley

Quality Control

Project No.	13.039			
Client	Mr W.J. Turton			
Title	Examination Hearing Statement			
Location	Land at 121 Kimberley Road, Nuthall			
File Reference	P&DG/13.039 EHS			
Issue	Date	Prepared By	Reviewed By	Authorised By
1.	November 2018	AG	BW	BW

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1.0 Introduction

- 1.1 This Hearing Statement sets out submissions made by Planning and Design Group (UK) Ltd on behalf of Mr Turton. This Statement is submitted concerning the following matter:
- Matter 4: Housing Delivery, Trajectory and Land Supply
- 1.2 Our submission is provided for the Inspector's consideration and discussion during the Hearing sessions. This submission has direct regard to land to the south of 121 Kimberley Road, Nuthall which is accounted for in the 2017/18 SHLAA and forms a part of the Housing Trajectory of the Part 2 Local Plan for around 30 dwellings. The promoter of the land is Mr Turton.
- 1.3 This Statement is submitted in response to the issues and questions established by the Inspector in September 2018 that will guide the relevant Examination in Public. They should be read in conjunction with previous representations made throughout the Broxtowe Part 2 Local Plan drafting and consultation process.

2.0 Matter 4: Housing Delivery, Trajectory and Land Supply

ISSUE: Whether the approach to the provision of housing is justified, positively prepared, effective, deliverable and consistent with the NPPF and the Aligned Core Strategy.

QUESTION 1: *Does the Plan provide sufficient deliverable housing sites to meet the housing requirements of the borough to 2028? Does it accord with the spatial distribution set out in the ACS?*

- 2.1 In principle the Part 2 Local Plan supports the provision and distribution of new homes against the identified need for 6,150 new dwellings in Broxtowe over the life of the Local Plan. This includes a range of proposed land allocations, alongside the site-types identified in the Housing Trajectory (Table 4). The focused areas of growth accord with Policy 2: The Spatial Strategy of the adopted ACS in that land allocations have been proposed in accordance of the settlement hierarchy. Namely the Main Built-Up Area of Nottingham and the other named settlements of Awsworth, Brinsley, Eastwood and Kimberley (including Nuthall and Watnall) across Broxtowe.
- 2.2 Kimberley (including Nuthall) is designated as a Key Settlement and, as such, is identified as suitable for growth in the ACS. Therefore, Kimberley is allocated a distributed target to deliver 600 dwellings as a part of Broxtowe's spatial hierarchy and considered to be a sustainable location for new residential development.
- 2.3 In light of this, the delivery of all sites accounted for the Housing Trajectory, including land at 121 Kimberley Road, Nuthall, will be critical to address to fully address the identified housing need. This is both for Kimberley and Broxtowe as a whole.
- 2.4 Through the most recent SHLAA Broxtowe Borough Council has recognised land 'South of Kimberley Road, Nuthall' (site reference: 218) as a suitable and deliverable site. As such the land forms a part of the identified Housing Trajectory for Kimberley and a part of the wider housing land supply for Broxtowe.
- 2.5 The relevant status of the site, as being considered deliverable between 2018 and 2023, is indicated in the in Figure 1 (SHLAA Map extract) below. However, it is noted that there is some discrepancy in the identified site area which should include all of the land to the south of 121 Kimberley Road's garden up to the western boundary.



Figure 1: Extract of Broxtowe Borough Council's SHLAA Map, indicating estimated delivery commencement times and 'urban' status.

- 2.6 Although the identification of the site in the SHLAA as a part of the Housing Trajectory for Kimberley is welcomed in principle, it is also considered that the allocation of land to the south of 121 Kimberley Road would contribute to the delivery of a more robust housing supply in the Part 2 Local Plan. In turn, enhancing the reasoned justification and effectiveness of the emerging document.
- 2.7 In relation to this, the identified trajectory of housing supply in Kimberley is currently considered to be unsound. This is on the basis that it fails to be effective in the positive delivery of new homes in the area. In particular the proposed housing trajectory for Kimberley represents an over reliance on extant planning permissions and SHLAA sites which, although reflecting an indicative trajectory of housing supply, does not offer the same level of specificity and deliverability as site allocations. The Part 2 Local Plan is required to act as the delivery tool for Broxtowe's adopted spatial growth strategy and as such site allocations form an essential part of this.

- 2.8 However, only three housing sites are allocated in the Kimberley area delivering a total of 167 dwellings. This reflects a modest 27% contribution to the 600 dwellings required in Kimberley. Notwithstanding wider site allocations across Broxtowe a robust housing supply is still required for the Kimberley area. This is to allow identified local housing need to be properly addressed and in the interests of delivering fully the adopted spatial strategy.
- 2.9 The optimal method of securing a robust housing supply, and in fulfilling the purpose of a Local Plan, is through the allocation of relevant land for development. Critically, housing allocations provide both landowners and prospective developers a far greater degree of certainty and confidence in bringing forward land for development. A specific allocation will galvanise existing developer interest and reduce their risk to a level where an appropriate disposal land value can be established. This has the dual positive impact of providing the Part 2 Local Plan with more assurance of site delivery, certainly important where the proposed Housing Trajectory is relatively backloaded in relation to supply.
- 2.10 Land to the south of 121 Kimberley Road is within the existing urban area and is identified as suitable, deliverable and available within the life of the Part 2 Local Plan. Given the site's location within the adopted ACS settlement hierarchy, and urban containment, it is also a sequentially beneficial and sustainable site. This is particularly important in the context of high local land restraint where 65% of Broxtowe is designated as Green Belt and there is naturally more necessity for urban sites such as land to the south of 121 Kimberley Road to come forward for development.
- 2.11 There is therefore no reason to inhibit the suitable allocation of land to the south of 121 Kimberley Road for development in the Part 2 Local Plan.
- 2.12 The site comprises vacant and underutilized land. As such its development is wholly consistent with the regeneration and urban concentration aims of the ACS and allocation would subsequently reduce pressure on speculative Green Belt or greenfield development in the Kimberley area. Given the size of the site it is capable of being developed in a single phase and within a single year. Development timescales of the site will be significantly brought forward on the confident basis of an allocation in the Part 2 Local Plan, supported by a willing landowner and active developer interest in the site.

- 2.13 The site measures 0.9 hectares and is considered suitable for up to 30 dwellings, as such it would be similar in scale to the Policy 7.3 'Eastwood Road Builders Yard' allocation for 22 dwellings.
- 2.14 In summary, whilst the strategic distribution of housing growth is considered acceptable in principle, doubts over the soundness of the Housing Trajectory for Kimberley are raised. Greater assurance of land delivery needs to be secured and this can be achieved through the suitable allocation of further sites. This includes land to the south of 121 Kimberley Road, which will act to support landowner and developer confidence and minimise delivery risks of the Part 2 Local Plan.
- 2.15 A Main Modification to the Part 2 Local Plan is proposed, with suitable wording to be agreed with Broxtowe Borough Council and the Inspector, that allocates recognised land 'South of Kimberley Road, Nuthall'. This new allocation would be placed under Policy 7: 'Kimberley Site Allocations' and operate successfully alongside other allocations in the Part 2 Local Plan.

QUESTION 2: Does the Plan provide sufficient choice and flexibility of sites to meet current and future housing needs?

- 2.16 The Part 2 Local Plan has a considerable deficit in smaller sites (i.e. less than 1ha). The delivery of small sites has been clarified in the revised NPPF being critical to the provision of more market choice in land, increasing the provision of housing through more diversity in supply and encouraging SME developers to engage in housebuilding. Currently, the Part 2 Local Plan appears to allocate only two sites for allocation that are less than 1 ha in size. This equates to a very limited proportion of housing supply.
- 2.17 Although the Part 2 Local Plan is not being assessed against the revised NPPF, this document provides the clear direction of travel for national planning policy. Additionally, all subsequent Local Plans for Broxtowe will be considered against the document and alignment now would also act to enhance the current strategy. In paragraph 68 the revised NPPF states:

'Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.'

- 2.18 In order to achieve this new Local Plans should seek to 'accommodate at least 10% of their housing requirements on sites no larger than one hectare'. The Part 2 Local Plan should work toward this aspiration, which will also act to significantly enhance the

choice and flexibility of sites that are presented. This can be secured through the suitable allocation of land that is less than 1 ha, drawn from the assessed pool of SHLAA sites that includes land to the south of 121 Kimberley Road.

- 2.19 In relation to Broxtowe, and to provide a working benchmark, 10% of the housing requirement would equate to around 615 dwellings with a requisite number of smaller sites allocated to accommodate such development. This would act to better secure the Housing Trajectory and encourage a greater diversity of market choice and flexibility in the supply of new dwellings.
- 2.20 Land to the south of 121 Kimberley Road, as an identified deliverable SHLAA site in a sequentially preferable urban location, offers excellent potential as a smaller site for appropriate allocation in Part 2 Local Plan. It is also noted in paragraph 7.2 of the Part 2 Local Plan that 'it is considered that there are exceptional circumstances [in Kimberley] required to amend the boundary of the Green Belt to allow residential development.' Whilst this conclusion is acceptable in the interest of enhancing housing delivery, we also draw attention to sites such as our client's which can offer a sustainable, urban location that will act to alleviate overall development pressure on the Green Belt.

QUESTION 4: *Is the Housing Trajectory realistic? Are the assumptions with regard to delivery and build out rates justified by the available evidence?*

- 2.21 As discussed in relation to the questions above, the current Housing Trajectory places a heavy reliance on extant planning permissions and relevant SHLAA sites in Kimberley. Therefore, a greater number of suitable allocations which draw on the pool of already assessed SHLAA sites, including land to the south of 121 Kimberley Road, will help assure that the delivery of the Housing Trajectory is more realistic.
- 2.22 The allocation of such land is absolutely critical in the adoption of a sound, plan-led approach, that is in-line with principles of the NPPF. This is particularly whereby the designation of land for development through the Part 2 Local Plan will provide significantly enhanced land owner and developer confidence in bringing forward sites for development. This in turn will enhance the provision of new dwellings and boost the supply of much needed housing. Site allocations also reduce the level of more speculative development proposals and work in the interests of pursuing a robust, plan-led approach to the housing delivery. In the absence of this approach site delivery is liable of becoming more *ad hoc* in nature, which then presents the risk of ongoing shortfalls in the delivery of new dwellings.

QUESTION 5: *The Trajectory illustrates a shortfall of delivery in the early stages of the Plan period but a much higher annual delivery towards the latter stages. Is there a need for a flexible approach to maximise delivery in the early years of the Plan? Is a delivery of over 1000 dwellings per year in 2020/21 – 2023/24 realistic and achievable bearing in mind past delivery rates and the local housing market.*

- 2.23 The relative backloading of the Housing Trajectory is noted, and reflects a proportionate dependency on larger sites. Whilst no in principle objection is raised to this approach, as the proposed allocations are critical to the delivery of the identified need for housing and relate to the spatial strategy of the ACS, some concern is raised over the potential vacuum of housing sites earlier in the Part 2 Local Plan period.
- 2.24 Further to the responses provided above, a greater flexibility in relation to the suitable allocation of land in the Part 2 Local Plan will help alleviate the risks associated with a backloaded Housing Trajectory. Notably, the allocation of smaller sites, drawn from the pool of assessed SHLAA sites that area already accounted for in the Housing Trajectory, will promote a greater assurance of delivery. This is through enhanced developer and landowner confidence operating alongside a greater diversity of site and market choice of land.
- 2.25 Deliverable sites, such as the land identified to the south of 1211 Kimberley Road, should therefore be allocated and form a more robust component of the Part 2 Local Plan's Housing Trajectory.

QUESTION 6: *If allocated sites do not come forward as anticipated, in particular the sustainable urban extensions, does the Plan adequately set out potential contingency measures? Is sufficient consideration given to monitoring and triggers for review?*

- 2.26 The pipeline of proposed allocations in the Part 2 Local Plan, particularly larger sustainable urban extensions, can be supported by an increased diversity of allocated site types to protect against any delivery shortfalls. As discussed above, smaller sites of less than 1 ha provide more market choice in land, increase the provision of housing through more diversity in supply and encourage SME developers to engage in housebuilding.
- 2.27 Therefore, a greater range in the type and supply of allocated land in the Part 2 Local Plan will provide a suitable contingency in the circumstances that delivery on larger sites is stalled or delayed. Notwithstanding the need for contingency, increased diversity in site allocations will have the additional benefit of enhancing the supply of new housing.

This is particularly relevant to the earlier stage of the Part 2 Local Plan where a boost to the housing supply is required.

QUESTION 7: What is the current position with regard to five year housing land supply? Is the methodology for the calculation of the 5 year housing land supply appropriate? In particular should the buffer also be applied to the shortfall?

- 2.28 The current deficit in housing land and delivery shortfall across Broxtowe makes the need for housing delivery through the Part 2 Local Plan even more pressing. This is highlighted in the most recent SHLAA document which states that Broxtowe Borough Council can only evidence 3.9 years' worth of housing land supply as of April 2018.
- 2.29 In addition, and to be factored into the five-year housing land supply position, is the current delivery shortfall of 856 dwellings, prompting the addition of a 20% buffer. The application of a 20% buffer is certainly considered appropriate given the context of housing under-supply. The allocation of land to the south of 121 Kimberley Road will therefore directly support the delivery of housing against this shortfall in turn make a contribution to the delivery of a sound Part 2 Local Plan.

Planning and Design Group (UK) Limited
Pure Offices

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