



Matter 4: Housing Delivery

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.

Inspector's Questions

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?

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

Should the housing sites denoted as Housing Commitments on the Policies Map form allocations in this Plan?

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

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?

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?

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?

How have site densities been determined? Are they reasonably accurate?

How are windfall sites defined? Is the windfall allowance included in the supply trajectory appropriate having regard to the historic rate of windfall delivery in the borough? Should windfalls be included in the early years (ie. the first 2 years) of the supply calculation?

Based on the available evidence is the lapse rate appropriate?

Representations

- 1.1 As is set out in the Inspector's questions a number of factors will impact on housing delivery over the first 5 year period and across the Plan Period:
- Site choice and flexibility
 - Site delivery and build out rates.
 - The Trajectory
 - Site densities
 - Windfall, delivery.
- 1.2 Our comments essentially relate to housing development at the SLG at Toton where there is an extant planning permission (17/00131/ROC) for 500 dwellings. In addition Policy 2 of the SCS identifies the SLG at Toton for "**a minimum of 500 homes**". That was at a time when the SLG was just 74 ha; it is now 154 ha.
- 1.3 The consented land (17/00131/ROC) within the Toton SLG is controlled by two landowners. Our client owns the northern section, the land to the south is owned by another party (a Church). Land to the East of Toton Lane, owned by both parties, is also suitable for housing but outside of the outline planning consent.
- 1.4 The Council's proposed housing delivery trajectory is set out in Table 5. This anticipates delivery of 50 houses from the SLG in 2019/20. Thereafter 100 per annum.
- 1.5 Condition compliance with regard to Condition 12 (safeguarded tramway route) of 17/00131/ROC was submitted in May 2018 and pre-application meetings held with the NET retained consultants (Mott McDonald) to resolve design issues; this condition has not yet been discharged.
- 1.6 Peveril is keen to submit all outstanding condition discharge information with regard the outline consent and reserved matters once C12 is discharged.
- 1.7 Once all conditions are discharged there then on site highway and drainage infrastructure to provide so housing delivery can commence. Housing delivery will, in Peveril's view, be capable of commencement in 2020.
- 1.8 From ongoing discussions with the "Church" land there remains a number of issues to resolve including the requirement for reserved matters approval. This will mean a start on site can be expected in 2021.
- 1.9 For these reasons we believe that the Council's Table 5 Housing Trajectory with regard to the

SLG is optimistic. The following Table, showing the delivery trajectory for the two areas of the planning consent Toton North (Our client) and Toton South (Church), is realistic and achievable but does rely on the Council dealing expeditiously with condition discharges.

Area	19/ 20	20/ 21	21/ 22	22/ 23	23/ 24	24/ 25	25/ 26	26/ 27	27/ 28	Total
Toton N	0	50	50	50	50	50	32	0	0	282
Toton S	0	0	25	50	50	50	43	0	0	218
Total	0	50	75	100	100	100	75	0	0	500
Cum	0	50	125	225	325	425	500	500	500	500

1.10 The Inspector to the Aligned Core Strategy in her letter to the Councils dated 24th July 2014 stated at paragraph 70:

" . . . However, the Toton location has good sustainability credentials for new development , whether or not HS2 goes ahead, being in the south of the Borough and adjoining the main built up area of Nottingham. It is within walking distance of the new tram terminus and park and ride facilities."

1.11 As stated in other representations, we consider that the Plan should be clear, at policy 3.2, that 500 houses is a **minimum** and that housing is also acceptable on land east of Toton Lane, south of the tram line. Land to the East of Toton Lane, within the SLG, would represent an appropriate sustainable development.

1.12 Delivery on Land to the east of Toton Lane, south of the tram line is relatively straight forward with no large power cables to ground, no HS2 access impediments, no tramway issues and low front loaded infrastructure costs. That is why Peveril considers this land should be included for such development adopting the Concept Masterplan policy approach to the SLG.

Policy 3.2 should explicitly provide for housing delivery on land east of Toton Lane, south of the tram