



MAIN MATTER 6 EXAMINATION STATEMENT

DUNTHORNE & MORLEY

REPRESENTOR 1187010

**WHETHER OR NOT THE PROPOSED HOUSING
ALLOCATIONS ARE SOUNDLY BASED AND
DELIVERABLE, WHETHER OTHER HOUSING
POLICIES ARE SOUNDLY BASED AND WHETHER
A 5 YEAR SUPPLY OF LAND CAN BE PROVIDED
ON ADOPTION AND THROUGHOUT THE PLAN
PERIOD**



Main Matter 6 – Whether or not the proposed housing allocations are soundly based and deliverable, whether other housing policies are soundly based and whether a 5- year supply of land can be provided on adoption and throughout the plan period

Issue – Is the housing site selection process based on a robust assessment of relevant criteria?

5a) Is the amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?

5 b) Is the amount of development proposed on the sites listed in Policy H1 deliverable in the timescales envisaged in the updated housing trajectory in document H2?

5c) Are any further safeguards or mitigation measures necessary to achieve an acceptable form of development

High Oakham Farm (east) H1L

1. Claremont Planning Consultancy Ltd on behalf of the interest party of the land allocated as H1L at High Oakham Farm(east), Dunthorne & Morley, are providing a response to the Inspector's Issues and Matters pertaining to the examination of the emerging Mansfield Local Plan. The allocation at H1L represents a sustainable and appropriate location to achieve moderate levels of development at the edge of the Mansfield Urban area.
2. The allocation at H1L, that which is under the interest of Dunthorne & Morley, represents a component of the spatial strategy which includes a wide range of sites for delivery over the Plan period, including sites which are both strategic and non-strategic in size. This is both a logical and sound approach, given that strategic sites have a long lead-in time for delivery, especially the Sustainable Urban Extensions which have been identified for delivery at the edges of Mansfield. As such, the contribution of smaller sites and non-strategic sites such H1L is valuable in ensuring that the housing trajectory is maintained over the Plan period and that a 5-year housing land supply position can be maintained over the period. The emerging spatial strategy therefore can demonstrate robust compliance with Paragraph 68 of the National Planning Policy Framework where it states that:

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

3. Draft allocation H1L at High Oakham Farm represents a suitable and deliverable allocation that is able to positively contribute towards the housing numbers of the emerging Mansfield Local Plan. The allocation has no absolute constraints, with nearby considerations taken into due account through the draft allocation policy wording which will ensure that these considerations can be mitigated for. These include the setting of nearby non-statutory heritage assets and high value ecological areas such as the woodland which is adjacent to the emerging allocated site to the south and south west.
4. The allocation at High Oakham Farm has undergone a rigorous process of tests to ensure the suitability and deliverability of the site, such as through the Mansfield HELAA 2018 (Submission reference HE2) which recognised that site as available, suitable and achievable. The HELAA also established that the wider area of High Oakham Farm, including the western portion of the farm area, as unsuitable given the significant surface water flood risk arising from the Cauldwell Brook and issues of multiple access to support a development of over 250 dwellings. As such, the eastern



portion of the farm area was established as preferable and therefore was assessed through the Site Selection Paper 2018 (Submission reference H6 & H6a) which provided a greater depth of assessment detail, see Appendix 2. The technical paper assessed the site against the requirements of the Sustainability Appraisal, and it was established that the site only negatively assessed against SA10 Transport (Sustainable Modes) given the site's location towards the edge of Mansfield and as such there would be a primary reliance on private car use. The technical paper also deemed that the deliverability of the site is of "lower risk" given its single ownership and location within a higher value area which would boost its viability as a development site.

5. Beyond the results of the Site Selection Technical paper, such allocations demonstrate that the spatial strategy and approach to be adopted by Mansfield District Council is based on a sound basis to ensure that the requisite housing numbers can be delivered within the identified Plan period. This is further supported by the over-allocation of deliverable numbers within the Plan period which ensures that an appropriate buffer is included within the housing trajectory, to ensure that any shortfall can be quickly made up elsewhere. This ensures that the Plan remains sound in terms of its strategy to maintain a 5 year housing land supply, but also overcomes any issues of any delay in the delivery of the SUEs which have been identified within the emerging Local Plan.
6. Claremont Planning, on behalf of Dunthorne & Morley, support this strategy as it demonstrates a "common sense," approach that is more practically implementable and also ensures that a worst case scenario is planned for. Furthermore, the planned buffer within the housing number delivery strategy avoids any reliance on an early review of the Plan which would normally be required if a shortfall can be demonstrated. This avoids unnecessary cost and valuable time to the Council which will be able to continue implementing sound policy and managing development within the District through the current emerging Local Plan rather than focussing on reviewing policy to ensure that the needs of the District's communities can be met.
7. The question of deliverability is important to incorporate into an emerging Plan and given that the spatial strategy has demonstrated this through including a range of allocated sites, has ensured that deliverable numbers of homes can be maintained over the Plan period. Furthermore, the draft allocation H11 at High Oakham Farm is a non-strategic site and therefore can demonstrate a greater extent of deliverability, given that Dunthorne & Morley have a long history of implementing and delivery such sites within the East Midlands, this reinforces the appropriateness of the site as a draft allocation. Delivery, therefore, is central to the suitability of the site as a component of the spatial strategy and demonstrates that the Local Plan has adopted a sound approach in seeking a deliverable and justified spatial strategy to meet the needs of the District over the new Plan period. This is demonstrated by the 5acre housing development along Paddock Close, the consent for which was gained by Dunthorne & Morley in 2002 before Bloor Homes built the scheme out through Reserved Matters approval in 2004; demonstrating a prompt delivery of the development following the approval of outline consent. A similar timescale and approach is envisaged for the High Oakham site, particularly as highway access is already secured through Paddock Close at the H11 allocation.

Issue – Will the plan provide an appropriate choice and mix of housing to meet the needs of different groups in the community?

8) Is the provision in Policy H5 for at least 5% of the dwelling plots on sites of more than 100 dwellings to be provided for self- build or custom build homes appropriate and what evidence justifies the threshold of 100 dwellings? What evidence is available to demonstrate the level of interest in these types of dwellings?



8. The proposed requirement to provide 5% of self-build homes on all development sites above 100 dwellings requires further clarification. This is particularly relevant for strategic allocations where large-scale housing delivery is expected to be delivered alongside extensive infrastructure provision. Through the production of the Local Plan proposed allocations were tested for viability but the impact of Policy H5 was not taken into account until February 2019 through the specific viability report V2a, significantly after the infrastructure requirements for strategic allocations had been established. This report did not assess the implications of the policy upon strategic sites such as SUE1, only the larger housing allocations. However, the original viability report V2 does not assess the implications of Policy H5 on the large SUE allocations, specifically whether policy H5 applies to them at all, as a whole or their phased delivery. To ensure that the viability evidence and assumptions followed by the Council remain relevant, a minor modification is required to clarify that Policy H5 does not apply to the SUEs or their phase delivery. The provision of 5% self-build units within every phase of a SUE could be harmful in relation to delivery and be a cause of delivery delay. Additional wording is recommended to policy H5 to clarify that the policy does not apply to individual phases of a wider scheme and that the SUE allocations are exempt. If Policy S5 is intended to apply to SUE allocations then the viability evidence base needs to be updated further to assess the implications on phased delivery and overall potential of the allocations.

Issue - Will the plan provide a 5-year supply of specific deliverable housing sites on adoption and is there a reasonable prospect that this will be maintained throughout the plan period?

20) Based on a requirement of 325 dwellings per year, would the plan help to ensure a 5- year supply of deliverable sites on adoption and over the plan period? Is there clear evidence to support the delivery of sites in the relevant 5-year period?

9. Claremont Planning advances that that whilst the emerging Plan has calculated its need using the previous versions of the housing need methodology (NPPF 2012), applying the revised methodology to the need calculation, will mean a lower OAN results, standing at 279 homes per year. However, this is only an assessment of the need regarding today's methodology and it is likely that the housing methodology will change again over the lifetime of the plan, so an effective strategy is to ensure sufficient levels of growth are provided for that correspond with the economic growth intentions for the District. Therefore, whilst the technical assessments establish a somewhat increased figure, the Local Plan's position of 325 dwellings per year represents an appropriate and justified approach that meets the middle-ground between these calculated figures. Claremont Planning therefore are of the position that the Plan has soundly assessed the needs of the District using a justified approach to meeting housing needs, although the potential to truly boost provision still remains and would be advised through an increase in requirement of 350dw/year.
10. The annual housing delivery must also ensure that corresponding economic and growth aspirations for the District are met, as without such housing levels the required promotion of economic prosperity will not be fulfilled. Given that the housing figure which has been incorporated into the spatial strategy represents a deliverable, but also justifiable figure, it is a sound and logical policy that can be well implemented through the Local Plan. Whether the degree of housing supply is sufficient, the policy of the plan should look to boost delivery through varied forms and scales of housing development. Given that the Plan also ensures a wide range of sites form part of this spatial strategy ensures that the identified numbers can be delivered within the timeframe established within the housing trajectory. The Plan does not inappropriately rely on the delivery of large-scale strategic sites on their own and incorporates a diversity of sites that represent differing timeframes for delivery. It is therefore considered that the Plan has successfully recognised that the housing level it requires can



be practically delivered over the period that has been established. Claremont Planning would prefer for the annual housing requirement be increased to 350dw for the first ten years of the plan however, to ensure that housing delivery is sustained by a presumption in favour and attempts to boost provision. This reflects the intentions to boost economic growth and the requirement for the Council to sustain housing delivery above previous levels of supply.

11. The Housing Trajectory provided within the Housing Topic Paper Addendum December 2018 (H2) is noted, with the first five years of the supply bolstered through completed and committed developments that have been delivering up to 510 dwellings a year. This represents a significant boost in delivery above previous years (297 dwellings delivered in 2013/14) but delays the realisation of proposed site allocations until much later in the plan period. Although this corresponds with guidance within the NPPF in respect of the calculation of five-year land supply, it does not realistically address the need to deliver allocations and ensure strategic sites are brought forward alongside windfall applications that have been already granted consent.
12. The related policy of the emerging plan, S2 Spatial Strategy, should seek to ensure that allocations are delivered across the plan period and are not overtly delayed. The supporting paragraph 3.10 is supported in this context with respect to the reference that the five-year housing requirements is a minimum, and that the objective of the plan is to provide 'at least' a five-year housing supply. Notwithstanding this, the proposed trajectory should not be used to curtail the delivery of site allocated through policy H1, which should be clarified within paragraph 5.21 by referring to the trajectory at Appendix 5 as liable to change to facilitate the delivery of sustainable development.