

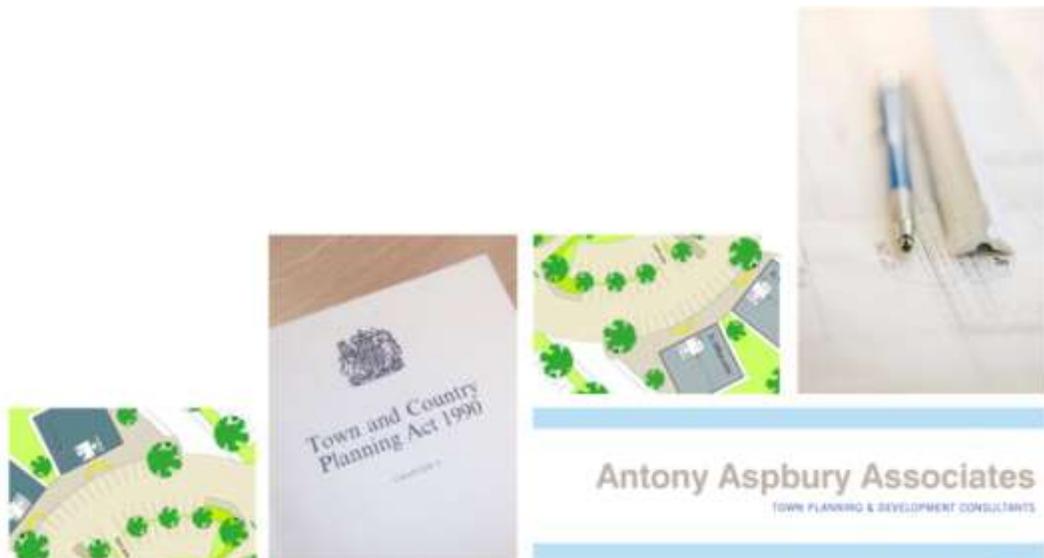


**NEWARK AND SHERWOOD SITE ALLOCATIONS AND DEVELOPMENT
MANAGEMENT DPD EXAMINATION**

MATTER 2 - GENERAL ISSUES

**REPRESENTOR NUMBER – 177
BRAEMER FARM DEVELOPMENT COMPANY**

– DECEMBER 2012



MATTER 2 – GENERAL ISSUES

3. *Is the Plan consistent with the Core Strategy and is it capable of meeting its objectives?*

We consider that the Site Allocations and Development Management DPD is broadly consistent with the Core Strategy and potentially capable of delivering its objectives.

In terms of the proposed housing and employment site allocations, the Core Strategy and in particular Appendix D sets out well defined requirements for housing numbers and the employment land requirements to be identified through the Site Allocations DPD. The subsequent quantum of development identified in this document appears sufficient at first sight to accommodate the intended objectives of the Core Strategy in terms of land use allocation. The site allocation policies are thus in our opinion generally positively prepared and justified, although their effectiveness cannot be pre-assessed in the current economic climate.

Effective delivery of the Core Strategy vision will depend on market forces and the emergence of the economy from recession. The regeneration agenda for the District and growth led revitalization of former mining settlements such as Ollerton & Boughton, Rainworth, Clipstone, Bilsthorpe and Blidworth through substantial housing allocations in this DPD is challenging and the success of the Core Strategy will only be achieved in this respect if housing and employment sites are taken up for development. Elsewhere in the District (Newark's strategic sites identified through the Core Strategy excluded), delivery of the housing objectives of the Core Strategy is unlikely to be a delivery issue.

The Development Management policies are streamlined and worded to encourage a flexibility of approach and interpretation as opposed to a rigid testing against an extensive range of policy criteria. This leads towards a positively prepared and justified approach which should be more effective in delivering rather than constraining sustainable development.

4. *Is the Plan based on a sound process of sustainability appraisal including testing of reasonable alternatives, and does it represent the most appropriate strategy in the circumstances?*

We have no reason to doubt the soundness of the sustainability appraisal and testing of reasonable alternatives. The consultation process leading to this DPD examination has been transparent and all alternative options have been fully aired through public consultation and been subject to sustainability appraisal. From my clients perspective The Plan provides an appropriate land use basis to implement the objectives of the Core Strategy as they relates to the general locations of Southwell and Collingham where their land and commercial interests are focused.

5. *Is the Plan deliverable having regard to viability of allocated sites and the requirements of development management policies?*

In responding to question 3 and consistency of this Plan with delivering the objectives of the Core Strategy, I referred to the economic issues which will influence the delivery of the Core Strategy and its key objectives of growth for Newark and regeneration of the Mansfield Fringe former coalfield settlements. The Core Strategy objectives are not up for re-examination here, yet these objectives will heavily influence delivery of this plan in these areas.

In the settlements and wider hinterland where my clients have land interests, namely Collingham, I consider that mixed use site allocations is viable and deliverable having due regard to Core Strategy Policy requirements, CIL and the Development Management Policies set out in this DPD .

- 6 *Is there sufficient flexibility to cope with changes to individual sites which might render them undeliverable for the purposes envisaged by the plan?*

From the position of the allocated site interest that we represent in Collingham (Co/MU/1), there is no reason why this site should prove undeliverable. There is a three developer consortium outline planning application currently being processed running on the site in Collingham. The preparatory environmental and technical work undertaken on this site and submitted to the District Council in support of the application demonstrate that there are no technical showstoppers or major viability constraints that would preclude this site coming forward in the short term.

Beyond this specific site and settlement, there may well be circumstances which may render certain other sites within the District undeliverable in the short to medium term, particularly in the Mansfield Fringe area, where lower land values and weaker housing market conditions generally prevail. In this scenario a greater degree of flexibility in the plan by the identification of further/reserve sites may be appropriate, particularly if it is held that the Councils overall housing supply does not accord with the flexibility required by paragraph 47 of the NPPF.

- 7 *Are appropriate arrangements in place to ensure proper monitoring of the Plan?*

We have no issues with the Council's monitoring procedures and the Annual Monitoring Report provides a publicly available annual update on housing starts and completions. The potential issue is not likely to be with the monitoring of this DPD, rather the flexibility of the plan policies and allocations to address any significant underperformance in housing delivery.