Bolsover Local Plan

Hearing Position Statement

Rachael Martin (12369) on behalf of Avant Homes [11765]

Issue 5

Q33  Is the Distribution of housing development around the District appropriate?

1.1  Paragraph 4.4 of our representation statement supports Policy SS2 of the Plan which sets out the Scale of Development during the plan period. The Policy makes provision for sufficient land to accommodate the delivery of 5,168 dwellings to meet the Councils Housing Objectively Assessed Need of 272 dwellings per year from 2014.

1.2  An additional housing land supply buffer is applied so that the plan should provide sufficient land allocations for approximately 5,700 dwellings to 2033.

1.3  In order to deliver the spatial strategy, Policy SS3 provides the distribution of development to the settlements. The policy states that Bolsover will deliver the largest amount of housing, 1,769 dwellings, no employment land is to be delivered in the town.

1.4  Clowne is identified to provide the second highest amount of residential dwellings, 1,494 together with 20 hectares of employment land over the plan period.

1.5  We support the level of Distribution to Clowne as a sustainable settlement.

Q34  Are the 3 Strategic Sites at Bolsover North, Clowne Garden Village and the Former Whitwell Colliery site located in the appropriate place to assist in the delivery of the Council's spatial Strategy?

1.6  As referred to in paragraph 4.25 of the statement submitted with our representations, Policy SS3 of the Plan states that approximately 1500 dwellings will be delivered in Clowne over the plan period, together with 20 ha of employment land to support the shortfall of employment land identified in the Sustainability appraisal.

1.7  Policy SS5 of the Publication Plan seeks to deliver the majority of the growth of the town through a large extension to the north of the village, Clowne Garden Village.

1.8  The policy states that all of the employment requirement and 66%, 1,000 dwellings of the housing distribution for the town will be delivered on this one site over the 15 year plan period with a further 800 dwellings delivered beyond the plan.

1.9  Whilst we generally support the principle of a strategic site allocation, we do not consider in this instance that the proposed strategy of a single large allocation will achieve the distribution of development required by Policy SS3 during the plan period due to a number of constraints associated with the Clowne Strategic Site.
Bolsover Local Plan
Hearing Position Statement

Rachael Martin (12369) on behalf of Avant Homes [11765]

1.10 A greater number of alternative, available and sustainable sites in the village should be allocated to provide greater choice and flexibility over the plan period in Clowne for residents and developers as required by NPPF.

1.11 It is considered that additional sites in the south of the Clowne should be allocated to provide additional choice and flexibility over the plan period.

1.12 Section 5 of our representation statement supports the allocation of rejected site allocations Clowne 29 and Clowne 10 in the Plan evidence base documents as suitable suite to provide additional sites to deliver new housing to meet the distribution requirements set out in Policy SS3.

Q38 Are the development envelopes defined on the Policies Map justified and effective

1.13 As set out in Section 5 of our Representations we consider that additional housing allocations are required in Clowne to support the Spatial Strategy set out in SS3. Therefore the development envelope should be adjusted to reflect additional housing allocations Clowne 29 and Clowne 10 following changes to policy LC1.

Housing supply during the Plan Period

Q41 Have sufficient sites been allocated in the Local Plan to meet the target of 5,700 homes?

1.14 Approximately 67% of new homes (1,000) for Clowne are intended to be delivered on the Strategic Site.

1.15 It is considered that the proposed strategic site has a number of constraints as follows;
• Deliverability of the proposed development
• Phasing of Delivery
• Infrastructure constraints
• Green Belt Release

1.16 These constraints are considered in detail in paragraph 4.31 to 4.83 of our representation statement. It is concluded that the strategic site allocation is not justified and will not be effective as a result of these constraints and that additional sites should be allocated as set out in Section 5 of our Representation Statement.
Bolsover Local Plan

Hearing Position Statement

Rachael Martin (12369) on behalf of Avant Homes [11765]

Q42 Has the housing site selection process been based on a sound process of SA and the testing of reasonable alternatives:

1.17 As set out in Section 5 of our representation we do not consider the Plan in its current form to be sound. The plan strategy seeks to deliver growth to the village of Clowne and currently proposes that the majority of the growth will be delivered through a single large strategic allocation.

1.18 Whilst we do not object to the principal of a large allocation, we do not consider the site will be effective in delivering the growth, nor do we consider the plan is positively prepared or justified.

1.19 Policy LC1 sets out the proposed housing allocations for the District and identifies 4 allocations (including the strategic site) in Clowne. We consider in order to make the policy sound that additional allocations are required to deliver the distribution strategy set out in Policy SS3.

1.20 Two additional site allocations referred to as Clowne 29 and Clowne 10 in the evidence base documents will provide additional choice and flexibility to the growth of Clowne across the plan period.

Q44 Does the Housing Trajectory in Appendix 5.1 accurately reflect the likely start dates, build out rates and completions of the allocated sites?

1.21 As set out in paragraphs 4.88 onwards or our Representation Statement, four sites are allocated in Clowne including the Strategic Site, Clowne Garden Village which is expected to provide 1,000 homes over the plan period.

1.22 It is considered that a greater number of alternative, available and sustainable sites in the village should be allocated to provide greater choice and flexibility over the plan period for residents and developers as required by NPPF.

1.23 The sites referred to as Clowne 29 and Clowne 10 in the Plan evidence base documents should be allocated to provide additional sites to deliver new housing to meet the distribution requirements set out in Policy SS3.

1.24 The sites are available, deliverable and suitable to deliver sustainable new housing to assist the strategy for growth in Clowne. The merits of the sites are discussed in more detail in the following section.
On what basis have the likely start dates, build out rates and completions been assumed?

Paragraphs 4.44 - 4.54 off our statement consider the deliverability of the Clowne Strategic Site.

The Clowne Garden Village application is in outline. As set out in ED3, the Council reply to the Inspectors initial questions following referral to the Secretary of State, the Council is proceeding with determination of the application and the S106 Agreement is being prepared.

As we set out at paragraph 4.46 of our Representation Statement, we question if it is premature to consider the determination of the application ahead of the Plan process. It is clear however, that the timescale of delivery of the Strategic site has already slipped from the indicative development timescale that has informed the deliverability and phasing of the site required to meet the distribution target for Clowne.

The delivery of 200 units (Phase 1A) therefore within a 12 month period (by 2021) is highly unrealistic taking into account average delivery numbers of housebuilders and market factors.

The timescales within the plan and application are not considered to take account of the potential delays associated with securing agreements with land owners and developers to deliver the first phase of house.

Using the assumed project delivery and applying a very aspirational adjustment to assume delivery would start in 2021, the site will deliver no more than 30 dwellings by 2021.

Beyond the first phase, the second, Phase 1B is expected to deliver the remaining 800 units plus the commercial and employment areas, the new link road, secondary infrastructure, services and offsite improvements over 13 years from 2020 to 2033.

The Environmental Statement accompanying the application states that these will be constructed in accordance with various triggers to be agreed. Each area of this phase will be offered to ‘The Market’ in a phased manner as land is brought forward for development.

It is not considered the proposed indicative timescale is realistic. It is highly questionable that the site will be able to deliver more than 200 dwellings in the first five years. This will impact on the remaining delivery, reducing the overall numbers achieved on site in the plan period. Importantly, subject to the specific ‘trigger points’
Bolsover Local Plan

Hearing Position Statement

Rachael Martin (12369) on behalf of Avant Homes [11765]

of the development, the infrastructure and associated facilities will be delayed into the long term delivery bracket.

1.34 We do not consider the site will be effective in delivering the required housing over the plan period and is therefore not consistent with other policies of the plan or National Policy.

Q48 Is too much reliance placed on the development of large sites? Are there any risks to the housing supply in this approach?

1.35 We object to policy SS5 of the Plan and do not consider the plan is sound. It is not considered that the Strategic site is deliverable as proposed during the plan period and will not therefore be effective as set out in paragraphs 4.18 to 4.81 of our Representation Statement.

1.36 The proposed strategic site will not provide an appropriate solution in the short term to the infrastructure requirements it is intended to meet and is therefore not positively prepared. It is not considered the Green Belt release proposed is justified when there are suitable alternatives available in the village and is therefore not the most appropriate strategy.

1.37 The proposed strategic site does not provide a suitable choice of sites or flexibility for residents or housing developers which is likely to impact on the delivery of the strategic growth of the village.

1.38 Additional housing site allocations are required in Clowne under Policy LC1 to deliver housing in the short term and to deliver a greater number of alternative, available and sustainable sites in the village to provide greater choice and flexibility over the plan period in Clowne for residents and developers as required by NPPF.

1.39 Section 5 of our representation statement supports the allocation of rejected site allocations Clowne 29 and Clowne 10 in the Plan evidence base documents as suitable suite to provide additional sites to deliver new housing to meet the distribution requirements set out in Policy SS3.

Q49 Should more small and medium sized sites be allocated for housing to enable development to come forward more quickly?

1.40 It is not considered that the Strategic site is capable of delivering the quantum of development suggested over the plan period and will not provide an appropriate solution to housing and infrastructure delivery in the short term.
1.41 Additional housing site allocations are required in Clowne under Policy LC1 to deliver housing in the short term. It is considered that additional sites in the south of the Clowne should be allocated to provide additional choice and flexibility over the plan period.

1.42 Section 5 of our representation statement supports the allocation of rejected site allocations Clowne 29 and Clowne 10 in the Plan evidence base documents as suitable suite to provide additional sites to deliver new housing to meet the distribution requirements set out in Policy SS3.

Q67 Is the proposed allocation justified and appropriate in terms of the likely impacts of development?

1.43 Whilst we do not object to the principal of a large allocation, we do not consider the site will be effective in delivering the growth, nor do we consider the plan is positively prepared or justified.

1.44 Paragraphs 4.72 – 4.80 of our Representation Statement set out our assessment of the Green Belt. It is not considered that the Strategic Site provides exceptional circumstances to justify the release of Green Belt when there are alternative deliverable and available sites, particularly to the south of the village which are in outwith the Green Belt in sustainable countryside locations.

1.45 Policy LC1 sets out the proposed housing allocations for the District and identifies 4 allocations (including the strategic site) in Clowne. We consider in order to make the policy sound that additional allocations are required to deliver the distribution strategy set out in Policy SS3.

1.46 Two additional site allocations referred to as Clowne 29 and Clowne 10 in the evidence base documents will provide additional choice and flexibility to the growth of Clowne across the plan period.

Q68 Is the proposed housing allocation deliverable and/or developable in accordance with the housing trajectory? In particular, is it:

a) Confirmed by the landowner involved as being available for the use proposed?

b) Supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?

c) Deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?
1.47 As referred to in paragraphs 4.32 onwards of our representation statement

1.48 We question the deliverability of such a large development during the plan period. We note that a planning application was submitted in December 2017 for the site development supported by an Environmental Impact Assessment (EIA), application number 17/00640.

1.49 As set out in ED3, the Council reply to the Inspectors initial questions following referral to the Secretary of State, the Council is proceeding with determination of the application and the S106 Agreement is being prepared.

1.50 We consider that the approval of the application for such a large scale development is premature. The proposal will fundamentally influence and affect the distribution of development in the district before the strategy has undergone public examination by an independent Inspector. We do not consider the current outline application for the Garden Village can be determined ahead of the Inspectors report into the examination of the Local Plan.

1.51 In response to point a) of question 68, the application form supporting the outline application serves notice on fourteen (14) separate landowners or persons with an interest in the land. There is no indication in the documents that options and delivery agreements are concluded with the interested parties and stakeholders.

1.52 The timescales of securing delivery agreements are uncertain, from experience these can often be protracted, particularly with greater numbers of parties involved, as is the instance in this situation.

1.53 In response to point b and c) paragraphs 4.60 to 4.71 comment on Infrastructure constraints in Clowne and query the evidence to support the delivery of this in the phasing plan supporting the application.

Q69 Are there any constraints to development?

1.54 Paragraph 4.24 of the Plan, states that the strategic sites will deliver substantial growth and will contribute to the delivery of the infrastructure required to achieve sustainable development.

1.55 Policy SS5 states that the site will provide 25 hectares of employment land, new road links and improvements, a new primary school and new high quality green spaces.
Bolsover Local Plan
Hearing Position Statement

Rachael Martin (12369) on behalf of Avant Homes [11765]

1.56 The Environmental Statement (ES) accompanying the outline application for the development of the site provides further information on Phasing and Construction in chapter 5.

1.57 As discussed above in paragraphs 4.60 to 4.71 of our Representation Statement we question the delivery of the required infrastructure in accordance with the phasing strategy which states that, for example, the school will not be delivered until Stage three of Phase 1B, which is estimated as 2025 onwards. However, by this point the development is assumed to have to have delivered 330 new dwellings.

1.58 It is not clear how the delivery of the first 330 dwellings is achievable or considered sustainable and we question that therefore the effectiveness of Policy SS5 in the delivery of infrastructure to the town to support the growth of the village.

1.59 We do not consider Policy SS5 is sound. It is not effective or justified in delivering the strategy to provide growth and new infrastructure to Clowne and does not enable the delivery of sustainable development in the short term, contrary to National Policy.

**Q70 Is policy SS5 sound given that if refers to an indicative masterplan for the site or any subsequent approved document? Should the policy clearly set out the requirements for the development of this site?**

1.60 It is not considered that the Strategic site is deliverable as proposed during the plan period and will not therefore be effective.

1.61 The proposed strategic site will not provide an appropriate solution in the short term to the infrastructure requirements it is intended to meet and is therefore not positively prepared. It is not considered the Green Belt release proposed is justified when there are suitable alternatives available in the village and is therefore not the most appropriate strategy.

1.62 The proposed strategic site does not provide a suitable choice of sites or flexibility for residents or housing developers which is likely to impact on the delivery of the strategic growth of the village.

**Q72 Has the Council considered the development of a smaller site in this location as a Reasonable alternative?**

1.63 It is not considered that the Strategic site at Clowne is capable of delivering the quantum of development suggested over the plan period and will not provide an appropriate solution to housing and infrastructure delivery in the short term.
Bolsover Local Plan

Hearing Position Statement

Rachael Martin (12369) on behalf of Avant Homes [11765]

1.64 Whilst we do not object to the principal of a large allocation, we do not consider the site will be effective in delivering the growth, nor do we consider the plan is positively prepared or justified.

1.65 We consider in order to make the policy sound that additional allocations are required in Clowne to deliver the distribution strategy set out in Policy SS3. Additional housing site allocations are required in Clowne under Policy LC1 to deliver housing in the short term.

1.66 Two additional site allocations referred to as Clowne 29 and Clowne 10 in the evidence base documents will provide additional choice and flexibility to the growth of Clowne across the plan period as set out in Section 5 of our Representation Statement.