

PS.M8.06 Dr M Doggett

October 5th 2018

Your ref: Rep Id: SLP278 (A)

Dear Miss Trueman

Position Statement matter 8

Following on from Documents Insp 5 & 7, Examination matter 8 I would like to make a position statement on Matter 8 and to attend the hearing on matter 8 when it is scheduled. (As well as attending the hearing on matter 7 as previously noted).

In particular I would like to comment on matters 8.1, 8.5 a and b and 8.6

I note that the council have produced a viability assessment for residential development (NWBC13 Review and Update of the Council's Viability Assessment (Residential)) for sites H1, H2, H7, H13, H19 and H20.

I note that within this NPPF states the following:

"Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.

I note point 35 of NWBC13 that the outcomes and surpluses of the strategic sites are as follows:

Site Surplus

H1 Land at Holly Lane Atherstone £2,119,775

H2 NW of Atherstone off Whittington Lane £8,161,108

H7 East of Polesworth & Dordon £3,617,052

H13 West of Robey's Lane £9,950,718

If we take the three sites H1 H2, H7 which directly impinge on the A5 I believe that this gives a surplus of around 14 million pounds, and adding H13 which would impinge on the A5 and B5000 this gives a surplus of only less than 24 million pounds.

Matter 8.1 and 8 .6 I believe that the infrastructure required particularly for the transport network and especially to improve the A5 sufficiently for this local plan to be sustainable and deliverable will require much greater funding than is known to be definitely available in the plan. This is also even more important, as with increased employment land, there will also be increased commercial traffic over the same road space. There is aspiration in the local plan, but I have not seen clear evidence to indicate where sufficient funding will come from. Therefore this would put the implementation of the plan at serious risk. ("In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle"). I have not seen appropriate definite evidence regarding viability and infrastructure funding to indicate that the level of development and infrastructure that the LP intends to enable would be delivered in practice and I have not seen the costing and timetabling of all necessary infrastructure. Therefore delivery and development viability appear to be at significant risk of being compromised.

Matter 8.5a The level of developer contribution / surplus available appears insufficient to provide all necessary infrastructure described in the local plan including a good percentage of affordable housing, transport including road building and major road improvements and community assets and facilities. The nature of this particular area of the borough particularly for H1, H2, H7 and H13 particularly in respect of the very major and costly road improvement required for the A5, the close proximity of employment land requiring road use, the construction of a new distributor road, improvements/rebuilds of canal/road bridges and the coal seam and possible coal mine shafts affecting building costs (H7) would I believe be part of the full range of expected requirements for this LP that affect the assumptions for viability.

Matter 8.5b Site H7 in particular lies over a coal seam and possible previous workings. There is a current site in Dunns lane Dordon (immediately adjacent to H7) where building development commenced many months ago (I believe with planning for 8 houses) which remains unbuilt on having appeared to be "abandoned" by the builder or builders with foundation trenches dug; I gather that mine workings were discovered. I also believe that some houses at the new build development at the Polesworth end of H7 have had to piled, presumably increasing building costs. Therefore it seems possible or even likely that the cost of developing and building on the land over mineral (coal) deposits and perhaps possible mine shafts may result in increased building costs with further reduction in land value or profit or developer contribution affecting both the possible percentage of affordable housing and/or money

available for required infrastructure. Again this appears to bring the viability and delivery of the local plan into question.

In the context of the observation that “the key infrastructure requirements on which delivery of the plan depends should be contained within the plan itself“, I would also like to know what the Local Plan's “possible contingency arrangements and alternative strategies” are or will be, if the local plan as it stands is not viable or deliverable because all necessary infrastructure provision cannot be guaranteed.

Thank you

With my regards

Mark Doggett

Dr Mark Doggett