

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST28 - Specialist Housing			
REF136	A and D Architecture	<p>These statistics indicate that the District includes an averaged sized group in the community of people living in static caravans.</p> <p>The evidence base does not make the claim that demand for the sector is in decline (the Nomis web site entry for October 2019 is no different to that cited above). The SHM A-OAN update 2017 states that the population of the District is likely to age over the life of the Local Plan and since Park Home Lifestyles are popular with older people it is likely that demand for static caravans will increase over the life of the Local Plan. There is no evidence therefore to support reducing the static caravan fraction of the District Housing Stock over the life of the Local Plan and yet, by providing for no growth in the sector and yet this is precisely the outcome DBLP Policy will unjustifiably deliver.</p> <p>The Local Plan should be "significantly boosting the supply of homes" in the static caravan sector. That duty is reinforced by the popularity of the type amongst older people who, as a group, is set to increase over the life of the Plan. To avoid a charge of "discrimination by ageism" the Council should not just provide land for static caravan sector growth that keeps pace with the average target for housing growth because that would unfairly reduce choice amongst a group in the community that is disproportionately increasing. Thus, a growth target of 35 static caravans (0.384% of 9087 dwellings) by 2037 would discriminate against older people. Since the number of people aged 65 and over is set to increase by 46% to 2107 one estimate of a fair and equal treatment of the sector would be to allow fractional growth of 46% i.e. that the static caravan fraction of the housing stock should grow from 0.384% to 0.56% (=0.384 x 1.46). On that basis one estimate of a reasonable growth target in the sector without attempting primary research would be 51 static caravans (=0.56% of 9087 dwellings).</p> <p>The Council should therefore allocate land for at least 51 new Park Homes over the life of the Local Plan. Market research suggests that for a person aspiring to release equity and to release onto the market an under-occupied dwelling the Park Home static caravan option is an opportunity that should not be denied by lack of housing supply. The Local Plan should significantly boost the housing supply in this sector accordingly. Allocating no land for growth to serve this sector and this group in the community is unjustified negative planning that is contrary to national policy and makes the Local Plan unsound.</p>	<p>The Council is proposing to allocate land for a range of housing types. The Policies in the Plan are supportive of housing for older people and disabled people. It is not considered necessary to allocate land specifically for park homes.</p>
REF285	Home Builders Federation	<p>Under the 2019 NPPF, the Council should establish a housing requirement figure for their whole area (para 65). As set out in the 2019 NPPF, the determination of the minimum number of homes needed should be informed by an LHN assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). The standard methodology is set out in the updated NPPG. The LHN for Bassetlaw is set out in the Council's Spatial Strategy Background Paper dated January 2020. Bassetlaw's minimum LHN is calculated as 306 dwellings per annum between 2018 – 2037. This calculation is based on 2014 Sub National Household Projections (SNHP), 2018 as the current year and 2018 affordability ratio of 6.21. The calculation is mathematically correct. As set out in the NPPG, the LHN is calculated at the start of the plan-making process however this number should be kept under review until the Local Plan is submitted for examination and revised when appropriate (ID 2a-008-20190220). The minimum LHN for Bassetlaw may change as inputs are variable and this should be taken into consideration by the Council. The Government's standard methodology identifies the minimum annual LHN. It does not produce a housing requirement figure (ID : 2a-002-20190220). LHN assessment is only a minimum starting point. The Government's objective of significantly boosting the supply of homes as set out in the 2019 NPPF remains (para 59). Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere may necessitate a housing requirement figure above the minimum LHN. In Bassetlaw, there is justification for a housing requirement above the minimum LHN. The NPPG indicates that if previous housing delivery has exceeded the minimum LHN, the Council should consider whether this level of delivery is indicative of greater housing need (ID : 2a-010-20190220). In Bassetlaw, housing delivery between 2010 - 2018 has averaged 329 dwellings per annum. The NPPG also recommends that recent assessments of housing needs should be considered too (ID : 2a-010-20190220). The Council's</p>	<p>Thank you for your comments which are noted. The Council will make the background evidence as clear as possible.</p>

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		<p>latest Objective Assessment of Housing Need (OAHN) is set out in North Derbyshire & Bassetlaw OAN Update Final Report dated October 2017 by G L Hearn. This SHMA identified the following housing needs for Bassetlaw :-• 340 dwellings per annum based on a demographic calculation comprising of 2014 Sub National Population Projections (SNPP) plus adjustments for 10 year migration trends & household formation rates in younger age groups ;• 374 dwellings per annum with an uplift to enhance affordable housing delivery ; and• 417 dwellings per annum to align housing / jobs and to support an ambitious economic growth scenario (4,800 jobs).As set out in the recently published Planning Inspectorate Guidance for Local Plan Examination, evidence base documents, especially those relating to development needs and land availability, that date from two or more years before the examination submission date of a Local Plan may be at risk of having been overtaken by events, particularly as they may rely on data that is even older. Any such documents should be updated as necessary to incorporate the most recent available information.The Council has prudently reviewed and updated its assessment of housing needs. Jobs growth in Bassetlaw will generate a need for an increased labour supply to meet increasing employment demand, which will in turn lead to a need for new homes to accommodate the new population. The 2018 Economic Development Needs Assessment (EDNA) by G L Hearn uses three economic forecasting models from Oxford Economics (OE), Cambridge Econometrics, and Experian to assess jobs growth over the plan period and to inform the number of new homes required to support such jobs growth. In the District over the last decade or more, evidence of the strong performance of the transport and manufacturing sectors implies that uplifted scenarios to the baseline economic forecasts are appropriate. After the inclusion of uplifts to the transport and manufacturing sectors, the OE forecasts are considered to reflect the District’s economy. The OE midpoint has been identified as the expected future economic scenario. This results in an increase of 3,400 jobs to 2035, which in turn results in a need for an increase of 3,323 people in the resident labour supply. This translates into an economic led housing need of 390 dwellings per annum. A market for commercial development along the A1 corridor in the north of the District is emerging, which will serve a sub-regional market for distribution and industrial land that may exceed historic competitions. When jobs growth of 3,400 to 2035 is projected forward to 2037 (5550 jobs), the EDNA 2019 identifies a housing requirement of minimum 478 dwellings per annum.The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. As set out in the NPPG, an increase in the total housing figures may be considered where it could help deliver affordable housing (ID : 2a-024-20190220). The SHMA Update identified affordable housing need of housing need of 2,814 affordable homes (134 affordable dwellings per annum) 2014-2035. Only 236 affordable homes were delivered in the District between 2014 – 2019 therefore there is a residual requirement for 2,578 affordable dwellings. Even though the Whole Plan Viability Assessment identifies that it is not possible to deliver the full requirement for affordable housing through contributions from market housing schemes, a higher overall housing requirement will contribute towards delivery of greater number of affordable homes.The Council recognises the need to plan for more homes than the minimum LHN of 306 dwellings per annum. Policy ST1 – Bassetlaw Spatial Strategy states that there will be provision of land for a minimum of 9,087 dwellings (478 dwellings per annum). The Council’s proposed housing requirement of 478 dwellings per annum for the plan period is justified to meet housing needs ofthe population, to support economic growth of the District and to help deliver affordable housing.However, the Council should make clearer statements about its LHN and housing requirement figures and the derivation thereof in the pre-submission Local Plan. There should also be a distinction between the District’s housing requirement and its HLS.</p>	
REF285	Home Builders Federation	<p>Policy ST28 states that on schemes of 50 or more dwellings, at least 20% should be designed to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations. The 2019 NPPF states that policies should be clearly written and unambiguous so that a decision maker knows how to react to a development proposal (para 16d). It should be clear that the requirement for 20% M4(2) compliant dwellings only applies to schemes of 50 or more dwellings for housing schemes for older people. There should be no conjecture that this requirement applies to general family housing schemes. Before the pre-submission Local Plan consultation, Policy ST28 should be modified.</p>	<p>The requirement is proposed to be applicable to all residential schemes, not just housing for older people. This will be clarified in the policy.</p>

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1197091	William Davis	As with Policy ST27, the broad thrust of the policy is supported. However, it is unclear if the requirement for 20% of schemes to be designed to meet Part M4(2) refers to residential schemes or schemes for care homes. If for residential schemes, it is considered that the evidence provided does not justify the requirement for PartM4(2). The wording is also considered unsound given that it says 'at least 20%' which does not provide certainty for developers. Given the concerns raised about the Viability Assessment, a review of the viability assessment will be required taking account of the increased costs resulting from Part M4(2).	Thank you for your comments, which are noted. The requirement is proposed to be applicable to all residential schemes, not just housing for older people. This will be clarified in the policy. The minimum 20% requirement has been identified as viable in the Whole Plan Viability Assessment. The requirement for specialist housing is higher than 20% (evidenced by the Housing and Economic Development Needs Assessment). Where viable, the Council may seek a higher level of accessible housing, in line with national policy and guidance.
REF299	Gladmans	The above policy requires development proposals of 50 or more dwellings to provide a minimum of 20% of homes to meet M4(2) Building Regulations. Acknowledge the importance of delivering housing to assist in meeting the needs for older people and those with mobility issues. The proposed introduction of higher optional standards for M4(2) however must be supported by robust evidence that would address an identified need for such properties in line with the requirements of the Framework10. Suggest the policy is modified and flexibility added to the policy wording which provides 'support' for the provision of M4(2) but does not set a policy requirement which could impact development viability.	The minimum 20% requirement has been identified as viable in the Whole Plan Viability Assessment. The requirement for specialist housing is higher than 20% (evidenced by the Housing and Economic Needs Assessment). Where viable, the Council may seek a higher level of accessible housing, in line with national policy and guidance.
REF327	Scrooby Parish	Having a specific policy of this nature is welcomed.	Thank you for your comments which are noted.