

Albemarle Homes Ltd

Bassetlaw Local Plan Examination

Hearing Statement – Matter 2

November 2022



01 Introduction

Introduction

- 1.1 This is a Hearing Statement prepared by Spawforths on behalf of Albemarle Homes Ltd in respect of:
 - Matter 2: Vision & Objectives, Spatial Strategy & Location of New Development, and the Site Selection Process
- 1.2 Albemarle Homes has significant land interests in the area and has made representations to earlier stages of the Local Plan process.
- 1.3 The Inspector's Issues and Questions are included in **bold** for ease of reference. The following responses should be read in conjunction with Albemarle Homes' comments upon the Bassetlaw Local Plan 2020-2038 Publication Plan, Publication Addendum and Second Addendum Version, dated October 2021, February 2022 and June 2022.
- 1.4 Albemarle Homes has also expressed a desire to attend and participate in Matter 2 of the Examination in Public.

02 Matter 2 – Vision & Objectives, Spatial Strategy & Location of New Development, and the Site Selection Process

Issue

- 2.1 Are the provisions of the plan in relation to the Spatial Strategy & Location of New Development justified and consistent with national policy?

Questions

Question 1: Is the proposed spatial strategy and the distribution of development (as set out in policies ST1 and ST2) supported by robust and up-to-date evidence and otherwise soundly based? In particular:

- a) Does it reflect the vision and objectives of the plan?

b) To what degree is the spatial framework in Policy ST2 based on the settlement hierarchy in Policy ST1? Is the focus on strategic allocations in the larger urban settlements justified and soundly based?

c) Would the pattern of development proposed meet the needs of larger settlements in the district?

- 2.2 The Framework describes the purpose of the planning system to contribute to the achievement of sustainable development. There are three overarching objectives which are central to the achievement of sustainable development: economic, social and environmental. The economic objective is to “*help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure*” [Paragraph 8, NPPF, Spawforths emphasis].
- 2.3 Plans are required to be prepared positively and in a way that is aspirational but deliverable, and ensure that strategic policies look ahead over a minimum of 15 years from adoption in order to anticipate and respond to long term requirements and opportunities such as those arising from major improvements in infrastructure. Strategic policies include the scale and quantity of development and making sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development alongside infrastructure and community facilities.
- 2.4 Furthermore, paragraph 22 of the Framework states “*Where larger scale development such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take account the likely timescale for delivery*”. [Paragraph 22, NPPF, Spawforths emphasis].
- 2.5 The Framework is clear that to be considered positively prepared and therefore ‘sound’ the plan must, as a minimum meet the plans objectively assessed needs [Paragraph 35, NPPF].
- 2.6 The Government is committed to boosting the supply of homes and ensuring that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed [Paragraph 60, NPPF].
- 2.7 The Plan is also expected to create conditions in which businesses can invest, expand and adapt, which requires a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. There should be significant weight on the need to support economic growth and productivity. Plans are required to be flexible enough to accommodate needs that have not been anticipated within the Plan. Critically in relation to housing, the Framework requires growth and investment in infrastructure to be aligned, and that policies “*address barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment*”. Policies are also required to recognise and address the specific locational requirements of different sectors [paragraphs 81, 82 and 83NPPF].

- 2.8 Notwithstanding the above, Albemarle Homes is concerned that the annual requirement is not consistent with the Framework and Planning Policy Guidance (PPG). The Publication Local Plan identifies an approach which seeks to deliver 591 new homes per year on the basis of the standard methodology and affordable housing uplift. However, Albemarle Homes does not consider the Housing and Economic Development Needs Assessment (HEDNA 2020) fully addresses the scale of employment growth and any potential uplift for housing associated with it. Albemarle Homes considers the HEDNA 2020 utilises out of date and overly pessimistic forecasts, which will be explored in further detail shortly.
- 2.9 The Framework (paragraph 35) is clear that to be considered positively prepared and therefore 'sound'. The Plan must, as a minimum, meet the Plan Area's objectively assessed needs, Footnote 21 confirms for housing, that such needs should be assessed using a clear and justified method.
- 2.10 The Framework, paragraph 61, is clear when determining the 'minimum' number of homes strategic policies should be informed by a local housing need assessment, with reference to the standard methodology. However policy and guidance is clear that the standard methodology is a starting point for preparing the housing requirement. The PPG explicitly states that the standard methodology does not produce a housing requirement figure. It is also clear that the affordability adjustment within the standard methodology is just to ensure that the minimum housing need starts to address affordability of homes. It therefore does not fully address affordability issues.
- 2.11 PPG goes on to identify the circumstances when it is appropriate to plan for a higher housing need figure than the standard methodology identifies.
- 2.12 *'The Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes in an area...it does not predict the impact of future government policies, changing economic circumstances or other factors that might have an impact on demographic behaviour. Therefore there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicate.'*
- 2.13 *This will need to be assessed prior to and separate from considering how much of the overall need can be accommodated. Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*
- 2.14 *Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth;*
- 2.15 Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally;
- 2.16 *An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.*
- 2.17 *There may occasionally be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA) are significantly greater than*

the outcome from the standard method. Authorities will need to take this into account when considering if it is appropriate to plan for a higher level of need than the standard model suggests'.

- 2.18 It is important to recognise that the development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance of housing in an area is necessary for economic growth. This is recognised within the Framework, paragraph 82. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population, which will create more sustainable local jobs from the demand for goods and services. This provides an important sustainable development opportunity for Bassetlaw.
- 2.19 Albemarle Homes maintains that there are clear circumstances in Bassetlaw which demonstrate that housing need in Bassetlaw is higher than the figure that results from the 'Standard methodology' and were explained in detail in the earlier October 2021 representations and are briefly summarised below. These include:
- The growth strategy and investment;
 - Infrastructure improvements;
 - Past delivery rates; and
 - Affordable housing need;
- 2.20 Albemarle Homes consider that the Plan does not appreciate that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth.
- 2.21 Albemarle Homes is therefore concerned that the Plan has not been positively prepared having regard to the economic growth aspirations.

Question 2: What is the evidential basis for the settlement hierarchy in policy ST2? Does this accurately reflect the pattern of settlements across the district? Is this up-to-date? How does this inform the development strategy? What other factors influenced the strategy, such as physical and environmental constraints?

- 2.22 As stated in response to Question 5 Harworth & Bircotes and Blyth that the settlements have effectively merged. Harworth & Bircotes has extended southwards along Blyth Road with significant employment development. Harworth & Bircotes settlement boundary now conjoins with Blyth and has extended into the Blyth Neighbourhood Plan area. Harworth & Bircotes has now effectively extended to the A1(M). The assessment of the role and function of these

settlements within the Plan is therefore incorrect and should recognise more the functional relationship between the two settlements and their new physical extent.

Question 3: What other spatial strategies and distributions of growth were considered during plan preparation, and why were they discounted? Where is the evidence for this? Were alternative approaches tested in the Sustainability Appraisal work?

2.23 Albemarle Homes do not have any comments on this particular issue.

Question 4: Do policies ST1 and ST2 allow sufficient development in large rural settlements, small rural settlements and other villages to comply with para 79 of the Framework? How were the proportions of development proposed for each settlement arrived at?

2.24 Albemarle Homes is concerned that the proportion of housing in Harworth & Bircotes continues to decrease. The evidence base and strategic approach suggests that as a regeneration priority area Harworth & Bircotes would accommodate 20% of new homes in the District. However, the Publication Plan Addendum shows only 16% of new housing is being located in the settlement. **There is no justification or evidence for this adjusted approach.**

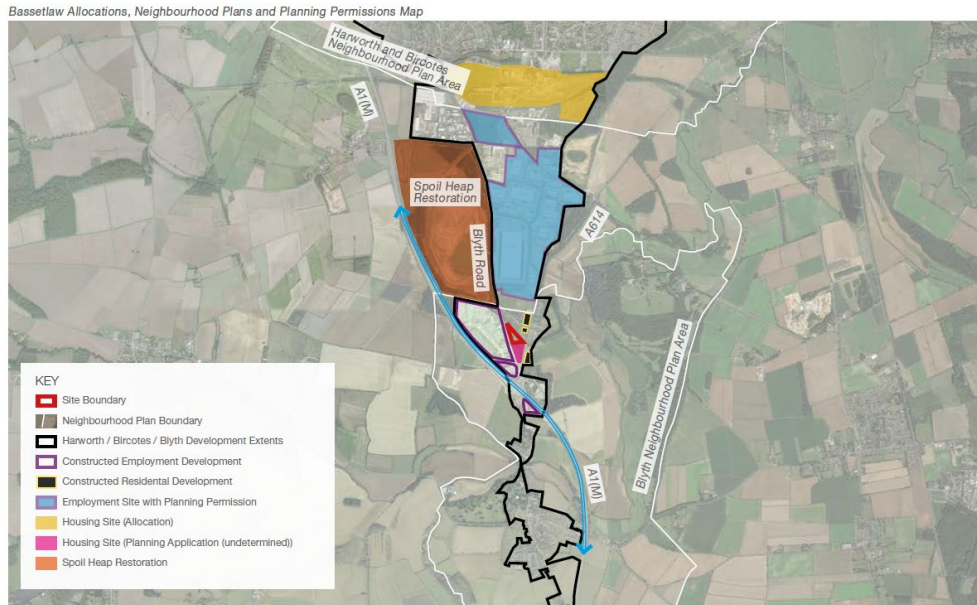
2.25 Albemarle Homes considers that there are suitable sites on the edge of Harworth & Bircotes, which can sustainably accommodate further housing within the settlement, such as their site at Blyth Road, and that reasonable alternatives have not been explored.

2.26 Furthermore, it is concerning that the Council has not appropriately considered the boundary of settlements in relation to the form and function when assessing potential development sites. Albemarle Homes site on Blyth Road, Blyth is in effect on the edge of Harworth & Bircotes being opposite the new Symmetry Park (EM002) and adjacent to the large new employment site (EM007). The Council considered this site to be a remote rural location, which is inaccurate and incorrect.

2.27 It is also arguable that Harworth & Bircotes and Blyth have conjoined and coalesced and have a distinct functional planning relationship, which is also not addressed within the Local Plan. This is further explored later on in these representations

Question 5: Are the proposed settlement development boundaries appropriately drawn? What factors were taken into account in designating these? Is the approach taken in relation to settlement boundaries in Small Rural Settlements justified and consistent with national policy?

- 2.28 It is evident from an assessment of the relationship between Harworth & Bircotes and Blyth that the settlements have effectively merged. Harworth & Bircotes has extended southwards along Blyth Road with significant employment development. Harworth & Bircotes settlement boundary now conjoins with Blyth and has extended into the Blyth Neighbourhood Plan area. Harworth & Bircotes has now effectively extended to the A1(M). The assessment of the role and function of these settlements within the Plan is therefore incorrect and should recognise more the functional relationship between the two settlements and their new physical extent.
- 2.29 Furthermore, the assessment of sites should recognise this southward expansion of Harworth & Bircotes. The assessment of Albemarle Homes' site on Blyth Road appears to consider the site is in a remote location. However, this is incorrect being adjacent to two new employment parks and existing housing. Symmetry Park (EM002) is under construction and part occupied, whilst the Harworth South scheme (EM007) is now under construction. This view is reinforced when analysing the updated Site Selection Methodology paper (May 2022), which shows that Symmetry Park has been assessed as being in Harworth. As shown on the plan below Symmetry Park is opposite the Blyth Road site and the site should be assessed as being part of Harworth & Bircotes.
- 2.30 The site is effectively an expansion of Harworth & Bircotes, which is a higher order settlement. Albemarle Homes considers the site should be reassessed to reflect its actual situation, particularly as the proportion of housing in Harworth & Bircotes has decreased within the current Plan and does not now reflect the aims of the spatial strategy.



2.31 Furthermore, the proposed allocations for settlements should not be considered on artificial boundaries, but on the functional location of a site. The Blyth Road site is not isolated but is within an expanding area close to employment opportunities, services and facilities. It is a very sustainable location for new housing being adjacent to new employment opportunities and being able to co-locate jobs and homes.

Question 6: Have the sites allocated for development in the plan been appraised and selected in comparison with possible alternatives using a robust and objective process?

2.32 Albemarle Homes do not have any comments on this particular issue.

Question 7: Are the plans assumptions in relation to the amounts and timing of development to be delivered through neighbourhood plans and the Worksop Central Development Plan soundly based?

2.33 Issues with sites in neighbourhood plan – this will be revisited in matter 7

2.34 Albemarle Homes do not have any comments on this particular issue.

Question 8: Are policies ST1 and ST2 otherwise justified and consistent with national policy? Are there any omissions in the policies and are they sufficiently flexible?

2.35 Albemarle Homes consider that inadequate provision for housing has been made within the Bassetlaw Local Plan and therefore it is not in accordance with national policy. Therefore, to resolve this further housing land needs to be identified, including Albemarle Homes' land at Blyth Road.

Question 9: Do the vision and objectives of the plan adequately address matters of climate change and air quality?

2.36 Albemarle Homes do not have any comments on this particular issue.

Question 10: Are the Council's proposed modifications to the policies necessary for soundness?

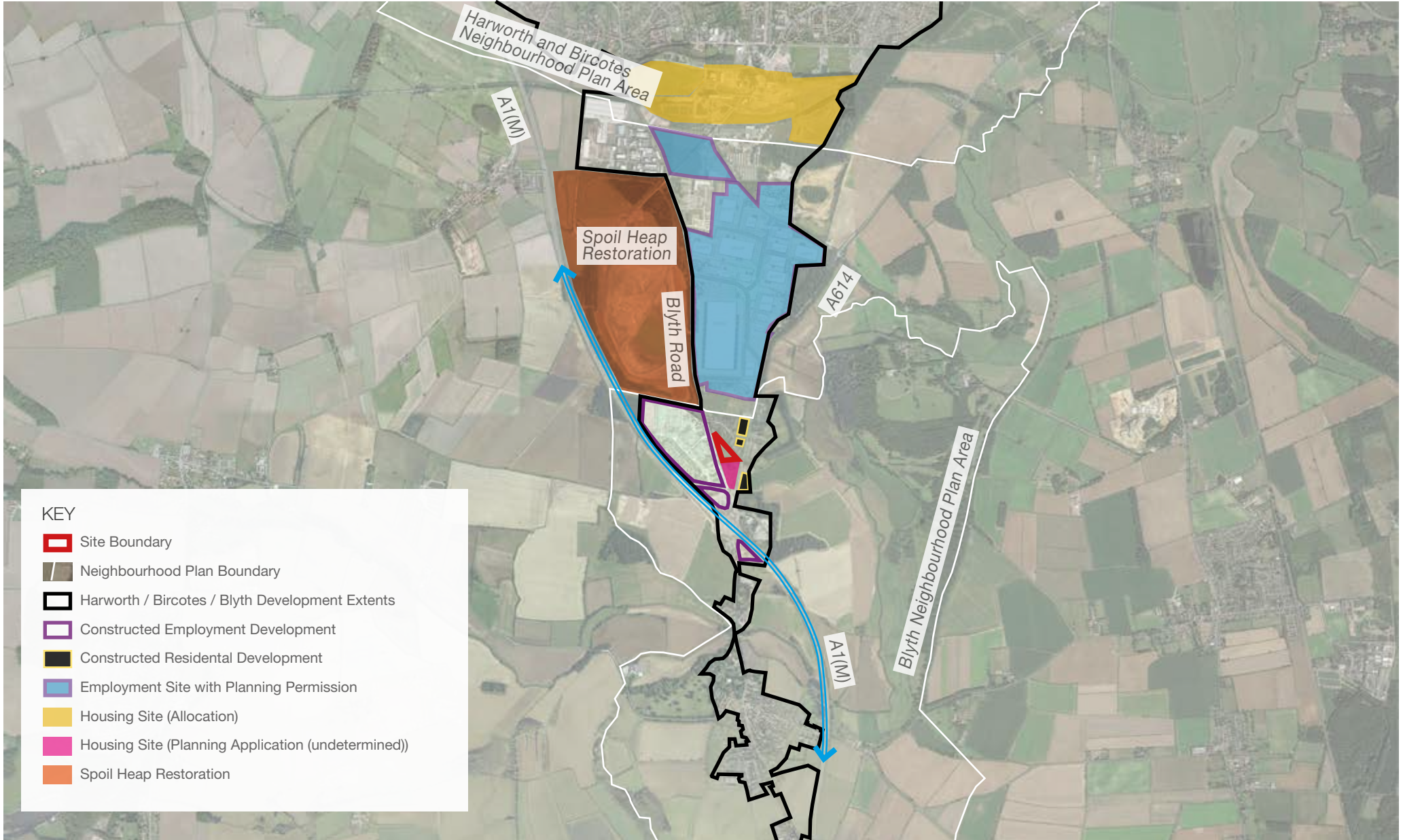
2.37 Albemarle Homes do not have any comments on this particular issue.

Proposed Change

2.38 To overcome the soundness matters Albemarle Homes proposes the following changes:-

- Increase the housing requirement.
- Identify further sites to increase flexibility in the Plan.
- Allocate for housing Albemarle Homes' site at Blyth Road, Blyth/Harworth (LAA494).

Appendix 1: Blyth Road



Spatial Relationship between Harworth, Bircotes and Blyth

