

Albemarle Homes Ltd

# Bassetlaw Local Plan Examination

Hearing Statement – Matter 5

November 2022



# 01 Introduction

## Introduction

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- 1.1 This is a Hearing Statement prepared by Spawforths on behalf of Albemarle Homes Ltd in respect of:
  - Matter 5: The Housing Requirement
- 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 5 of the Examination in Public.

# 02 Matter 5 – The Housing Requirement

## Issue

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- 2.1 Is the identified housing requirement in Policy ST1, justified and consistent with national policy?

## Questions

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**Question 1: Is the Plan period 2020 to 2038 justified and consistent with national policy which requires strategic policies to look at least 15 years ahead from adoption?**

- 2.2 Albemarle Homes notes that the Plan period is 2020 to 2038. However, given the current timescales for the Local Plan it may not be adopted in 2023 and therefore there should be an additional year added to the Plan period.

**Question 2: Is the housing requirement of 10,476 homes during the 2020-2038 period (policy ST1) and the proposed uplift above Local Housing Need (LHN), to a figure of 582 dwellings per annum (dpa), justified by the Council's evidence? Are the assumptions of the 2019 Housing and Economic Development Needs Assessment and Addenda (SS-010, SS-007 and SS-024) soundly based, particularly in relation to:**

- a) Identifying a baseline figure;
- b) Forecasts for economic growth;

**c) Alignment of jobs and workers; and**

**d) Assumptions of housing requirements arising from economic growth.**

- 2.3 There is significant potential for the levels of economic growth, to be achieved and exceeded above trend growth. Despite its preparation relatively recently in 2020, the HEDNA does not reflect the scale of ambition and substantial employment opportunities within the area. There has been a significant change in circumstances since its preparation, and whilst the HEDNA nods to the potential to some of these changes it is clear that the implications of which are not fully reflected in the overall recommendations and consequently within the Plan. The HEDNA 2022 Addendum has sought to update the position but only focusses on employment supply and does not update the position on economic growth.
- 2.4 The Local Plan evidence does not reflect fully on the impacts of Covid-19. It has become clear that the Covid-19 pandemic has not affected all sectors and markets in the same way. Several industry reports show that market activity returned post the first lockdown and that the outlook for the industrial and logistics sector is positive.
- 2.5 The impact of Covid-19 and Brexit has not been restricted to logistics. The UK Industrial Strategy has stressed the importance of manufacturing to the UK economy. Although some areas of manufacturing were affected initially by Covid-19, there are sectors, such as health and medical supplies, which experienced significant growth.
- 2.6 The HEDNA Addendum seeks to justify downgrading the housing requirement to 582 dwellings per annum. It is concerning that given the political and strategic aims from a national to a regional and local level that the HEDNA, including the 2022 Addendum, adopts a pessimistic view on the economy and economic growth, which then transcends through to lower housing growth than would have otherwise occurred. This approach can harm the economy.
- 2.7 Albemarle Homes maintains its concern with the low jobs growth and constant commuting ratio assumptions within the Plan. Albemarle Homes maintains that further employment growth should and can occur, particularly as the site's own promoters suggest higher jobs growth. The higher jobs growth at the strategic employment site with a constant commuting ratio suggests a housing need of 646 dwellings per annum.
- 2.8 Furthermore, the Council can deliver at such levels of growth having recently delivered 693 (2019/20) and 775 (2020/21) new homes in the last couple of years. Such an approach would reflect PPG which indicates that consideration can be given to delivery rates. Where previous delivery exceeds the minimum need it should be considered whether the level of delivery is indicative of greater need.
- 2.9 There is clear evidence of delivery at a higher rate than the proposed requirement of 582 dwellings, and is indicative of a higher need within Bassetlaw and the capacity within the sector. Furthermore, the historic delivery rates witnessed do not reflect the changes in economic growth potential for the District as discussed above. Previous delivery rates should therefore be considered when assessing future housing requirements, in accordance with Government guidance.

**Question 3: In relation to Affordable Housing Needs, is the identified need for 214 dpa been based on robust, up-to-date information? How has this been considered in the overall housing requirement? Based on the thresholds and requirements in Policy**

2.10 The affordable housing need in Bassetlaw is significant. The HEDNA 2020 shows that the affordable housing need is 214 dwellings per annum, which is around a third of the housing requirement. The Council's Viability Assessment identifies affordable housing provision of 15% on brownfield sites and 25% on greenfield sites. Therefore, the affordable housing need in the District will not be achieved and the need will continually increase and worsen without an associated increase in the housing requirement.

**Question 4: Should there be a housing requirement for designated neighbourhood areas in Policy ST1? (paragraph 67 in the NPPF) If so, what should this be?**

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

## Proposed Change

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

- Increase the housing requirement in the Plan
- 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



