

Examination of the Bassetlaw Local Plan 2020 – 2038.

Matter 5 – The Housing Requirement.

On behalf of Barratt Homes & David Wilson Homes (Yorkshire West)

Date: October 2022 | Pegasus Ref: P22-1973

Author: MG



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
01	November 22	MG	MG	



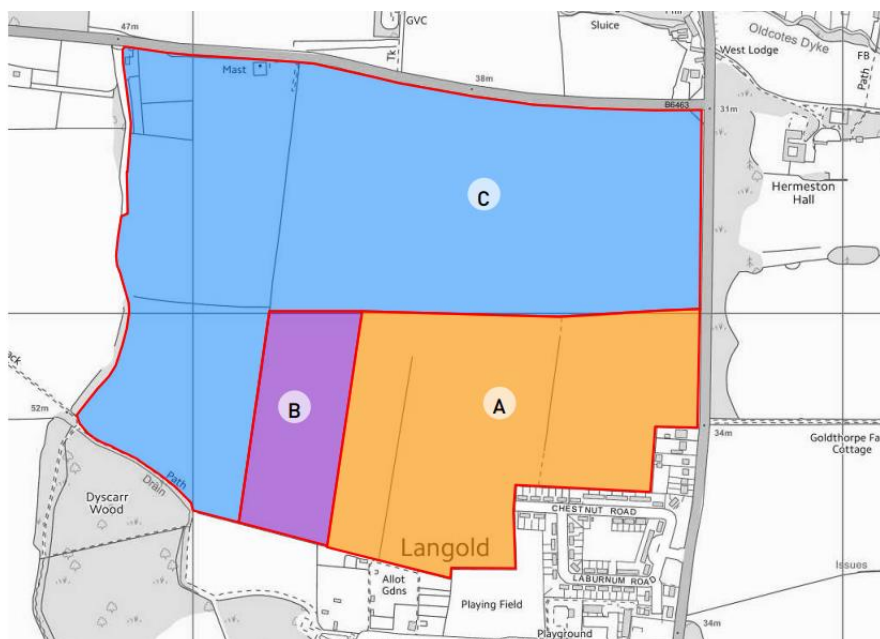
Contents.

1. Introduction.....	1
2. Response to the Inspector's Matter 5 Issues and Questions.....	3

1. Introduction

- 1.1. This Hearing Statement has been produced by Pegasus Group on behalf of our client, Barratt Homes and David Wilson Homes. It focuses upon the Inspectors Matters, Issues and Questions which relate our previous representations.
- 1.2. Our client wishes to ensure that the Bassetlaw Local Plan 2020–2038 (BLP) is prepared in a robust manner that passes the tests of soundness contained in paragraph 35 of the 2021 NPPF, namely that the plan is:
 - Positively Prepared;
 - Justified;
 - Effective; and
 - Consistent with national policy.
- 1.3. The BLP also needs to be legally compliant and adhere to the Duty to Cooperate.
- 1.4. Our client submitted representations to the various stages of plan production including the Publication Version and its associated addendums.
- 1.5. In order to provide context and assist the Inspectors our clients have land interests at Land West of Doncaster Road / North of Langold, as identified by parcels A, B and C (figure 1). These sites are identified in the SHLAA under references LAA209 and LAA312.
- 1.6. Parcel A benefits from an outline consent for 300 dwellings (ref: 15/01605/OUT) and a reserved matters application for 300 dwellings (ref: 21/01730/RES) approved 19th May 2022. Parcels B and C would make natural extensions to the existing approvals.

Figure 1: Site Location





17. Whilst Parcel C is included in its entirety, our client has consistently identified they are willing to discuss potential development opportunities across smaller elements of this parcel.

2. Response to the Inspector's Matter 5 Issues and Questions

2.1. We welcome the opportunity to comment on the Inspector's Matters, Issues and Questions (MIQs) and provide the following responses to selected questions. Our client reserves the right to respond to specific issues raised by the council and other parties within the hearing session in so far as they relate to our previous representations.

Question 5.1: 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. The NPPF, paragraph 22, requires strategic policies to look forward over a minimum 15-year period from adoption. The plan period was extended to 2038 at the Local Plan Publication Addendum consultation, which took place in January – February 2022. Our client supported this change and providing the plan is adopted next year it will meet this minimum requirement. This is clearly reliant upon a relatively smooth examination process without significant changes to the plan.

2.3. Whilst our client supported this change it must be recognised that 15-years is the minimum period advised by the NPPF for strategic policies. A more positive strategy would be for the strategic policies to look beyond a 15-year time horizon to 2040 or further. This would provide greater certainty and clarity regarding longer term development within Bassetlaw.

Question 5.2: 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.

2.4. The identification of a housing requirement above the minimum required by the LHN is supported and justified within Bassetlaw. The Planning Practice Guidance (ID 2a-010-20201216) identifies several circumstances where the minimum requirement set by the LHN standard method should be exceeded. These are:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally;
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground; and

- Past rates of delivery

- 2.5. It is considered all these circumstances apply within Bassetlaw. In particular, employment growth and past rates of delivery. We do, however, consider that the evidence base supporting the proposed requirement is flawed. Our reasoning is fully outlined within our consultation response to the BLP 2nd Addendum where the Council reduced the minimum plan requirement from 10,638 dwellings to 10,476 dwellings yet increased the planned level of jobs growth from 9,735 to 9,852 over the plan period.
- 2.6. The Council has not provided any additional evidence at this stage and as such our comments remain the same. In aid of brevity our previous comments are summarised below.
- Table 2.3 of the HEDNA 2022 identifies that additional plan period (2020 to 2038) jobs are likely to fall within the range 9,852 and 11,354 jobs. The requirement for 582dpa is linked to the upper end of this range. This is supported.
 - The 2022 HEDNA converts this jobs range into the housing requirement using three main assumptions, these being: double-jobbing, community ratio and claimant count. The key difference between the 2020 HEDNA and 2022 HEDNA is understood to relate to the claimant count – largely related to the impact of the Covid-19 pandemic.
 - The impact of the Covid-19 pandemic was considered in both the 2020 and 2022 HEDNAs. However, only the 2022 version adjusts the housing requirement based upon the fact that an increase in the claimant count in quarter 1 of 2020 led to an additional 1,870 persons not working, who could return to work.
 - Figure 1.3 of the 2022 HEDNA identifies that the recovery from the pandemic to date has been swift. Indeed, it has recently been widely reported that UK unemployment edged down to 3.7% in quarter 1 2022. This is the lowest reading since 1974 with fewer unemployed people than job vacancies.
- 2.7. Given this information it appears that the 2022 HEDNA is unduly pessimistic in terms of the ability of those unemployed during the pandemic to get suitable work in those sectors within which they previously worked. Given these recent changes it is considered that the discount applied to the housing requirement on the basis of those unemployed is unjustified and effectively dampens the economic-led housing need figure.
- 2.8. In addition, the Council has in recent years delivered significantly more housing than the 582dpa identified within Policy ST1. Indeed, paragraph 5.1.23 of the Local Plan 2nd Addendum acknowledges an average supply of 644dpa. This is 62dpa or nearly 11% greater than the proposed housing requirement. Setting the housing requirement below these average levels which include a pandemic are contrary to the ethos of the NPPF and its requirement to boost significantly the supply of housing.
- Question 5.3: 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 ST29, will affordable housing needs be met?***
- 2.9. No, the affordable housing need represents circa 37% of the overall housing requirement. Whilst it is recognised other methods of affordable housing delivery are available this is



significantly greater than the affordable housing requirements of 20% on qualifying brownfield sites and 25% on qualifying greenfield sites.

2.10. The PPG (ID 67-008-20190722) identifies that:

“...An increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes.”

2.11. This provides further arguments to increase the housing requirement.

Question 5.4: Should there be a housing requirement for designated neighbourhood areas in Policy ST1? (paragraph 67 in the NPPF) If so, what should this be?

2.12. No comment at this stage.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

.Leeds

Pavilion Court, Green Lane, Garforth,
Leeds, LS25 2AF
T 0113 2878200
E Leeds@pegasusgroup.co.uk
Offices throughout the UK & Ireland

Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE



All paper sources from sustainably managed forests

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.

Registered office: Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT
We are ISO certified 9001, 14001, 45001



Pegasus_Group



pegasusgroup



Pegasus_Group

PEGASUSGROUP.CO.UK