

Examination of the Bassetlaw District Council Local Plan 2020-2037

Hearings in response to the Matters, Issues and Questions (dated 7th October 2022)

Hearing Statement prepared by Savills (UK) on behalf of private landowner: Carr Family – Land to the south of Coalpit Lane, Elkesley



Matter 5 – The Housing Requirement

Introduction

- 1.1 Savills (UK) Ltd welcomes the opportunity to make representations in response to the Schedule of Matters, Issues and Questions (MIQs) for the Examination of the Bassetlaw Local Plan. The comments enclosed within these representations are made on behalf The Carr Family, a private landowner in respect of Land to the south of Coalpit Lane, Elkesley (the site).
- 1.2 The comments made within this statement directly address the matters identified in the Schedule of MIQs. The statement relates solely to the matters raised in our earlier representations. This statement outlines which particular part of the Plan is considered to be unsound with justification as appropriate. This statement also outlines what proposed amendments are required in order to make the Plan sound.
- 1.3 Each matter, issue or question being addressed is clearly identified as follows.

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;

- 1.4 The UK Government has announced a housing shortage in response to demand consistently outstripping supply. To address this situation, the Government has set an annual housing target of 300,000 homes per annum in England which it is struggling to achieve with less than 225,000 homes delivered per annum over the last five years.
- 1.5 Paragraph 61 of the NPPF requires that, in order to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance.
- 1.6 Having regard for the New Standard Methodology, this calculates a minimum housing need for Bassetlaw of 288 dwellings per annum for the period 2020 to 2038. It's considered that the standard method figure should be used as a starting point before considering the impact of economic growth to come to a more realistic housing need figure for the region. MHCLG are explicit that if LPAs want a more ambitious local plan for growth, then they should incorporate positive growth and housing figures (PPG 02a-010).
- 1.7 Policy ST1 sets out the housing requirement of 10,476 over the plan period up to 2038 which results in a yearly target of 582 dwellings per annum.

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b) Forecasts for economic growth;

- 1.8 Bassetlaw is a district which is well located with direct access onto the A1/A57, which provides strategic connectivity to the M1, the wider East Midlands region and South Yorkshire. In Bassetlaw, specialised manufacturing continues to buck national trends and grow, providing high value jobs with good growth prospects. The logistics sector also continues to grow, with recent significant development at Manton Wood, and substantial construction at Snape Lane and Symmetry Park underway, evidence that potential exists for the District to capitalise on its strategic accessibility along the A1 and A57 corridors.
- 1.9 Bassetlaw is also part of the D2N2 LEP and the corresponding D2N2 Recovery and Growth Strategy 2021.
- 1.10 It is important to reflect on the impacts of the logistics sector in relation to economic growth both nationally and more specifically within the Bassetlaw district. There has been both a historic lack of supply in the logistics sector and also an increasing level of demand, with over 70% of the recent demand for industrial and logistics space located in the North of England and the Midlands as confirmed with The Logic of Logistics report prepared by Savills (2022). Bassetlaw is strategically located with the A1 running through the district as well as direct access to the M1. The District will therefore benefit from this sector demand and lead to economic growth. Industrial and Logistics investments are increasingly becoming integral to the delivery of new homes due to the associated infrastructure investments and the creation of local job opportunities.
- 1.11 It is imperative that the linkages between employment growth strategies and the housing requirement are properly considered and to ensure that the positive ‘policy on’ ambition aligns with both housing and employment need figures over the plan period.
- 1.12 The housing requirement for Bassetlaw has been evaluated in the Bassetlaw Housing and Economic Development Needs Assessment (HEDNA) (2022) and Economic Development Need Assessment (EDNA) produced by GL Hearn (2020 update). This assessment establishes the level of housing requirement above the Standard Method based off the requirement to provide alignment with economic growth.
- 1.13 The housing requirement of 582 dwellings per annum in the Plan (10,476 dwellings by 2038) has therefore been set at a level to support the level of jobs growth (9,852 jobs) as identified in the HEDNA.

c) Alignment of jobs and workers;

- 1.14 National planning practice guidance requires the Council to consider and assess the likely change in the number of jobs over the plan period based on an economic forecast. The HEDNA 2022 identifies an employment need for 2018-2038 of 196.7ha. Additionally, a Strategic Employment Site is identified to meet sub-regional/regional logistics needs. Totalling 304.3ha.
- 1.15 We note that the HEDNA recommends a completions trend scenario, rather than a demand led scenario, which considers jobs assumptions assessed on a site by site basis.

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- 1.16 The evidenced completions trend scenario indicates that up to 9,852 jobs could be generated overall in the plan period. Within this scenario, 5,996 jobs are anticipated to be provided within the General and Larger Unit Employment Sites. The remainder are anticipated at the Strategic Employment Site.
- 1.17 We agree that factors such as displacement, double-jobbing and multiplier effects should be taken into account however we appreciate these are based on assumptions.
- 1.18 This is considered to be a realistic and appropriate assumption of jobs growth over the plan period and reflects changes to the economic baseline and unemployment rates since 2020, partly being seen as a result of the Covid pandemic. However, development activity indicates that Bassetlaw is currently maintaining pre-pandemic levels of economic growth. To manage any uncertainties in long term economic activity over the plan period, the Plan builds-in flexibility by providing for a buffer in employment terms of around 10%. This is supported.

Other matters

- 1.19 It is relevant to note that over the last five years, the LPA have exceeded on their housing delivery, averaging 644 dwellings per annum between 2017 to 2022. There is evidently demand for new development as shown in recent historic trends. It is therefore important to maintain this level of housing delivery to meet the full housing need across the district.

Summary

- 1.20 The evidence, as detailed above, therefore demonstrates that pursuing a housing target based purely on the standard methodology minimum figure means that the Plan would not provide a sufficient number of dwellings to support the economic growth objectives in the District.
- 1.21 We therefore support the aspirational target in the Plan of aiming for the higher housing requirement of 582 dwellings per annum, 10,476 dwellings by 2038.

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?

- 1.22 There is clearly a relationship between draft policies ST1 and ST2 and neighbourhood plans. Specifically ST2, part 3 which states that:

Where the growth requirement for an eligible Large or Small Rural Settlement has been achieved, additional residential development will only be supported in those eligible settlements where it can be demonstrated that:

- a) it has the support of the community through the preparation of a neighbourhood plan (including a review); or*
- b) in the absence of a Neighbourhood Plan through a developer-led pre-application community consultation, in accordance with the Statement of Community Involvement and Rural Settlement Implementation Guide.*

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- 1.23 It is therefore important that there is due consideration of any adopted Neighbourhood Plans. Notwithstanding this, it is not considered imperative to impose a housing requirement for designated neighbourhood areas, particularly given SP1 and SP2 should be used to underpin the policies within any forthcoming Neighbourhood Plans. The Neighbourhood Plan making process allows for flexibility in this respect.
- 1.24 In the event that a housing requirement is included for Neighbourhood Areas, it is imperative that the housing requirement is set as a minimum figure rather than it be used as a ceiling figure. This is particularly relevant in the context of any settlement which is subject to the lowest levels of growth at 5%. This would reflect the NPPF para 79, which recognises the importance of rural housing to allow villages to grow and thrive.

Conclusion and Recommendations

- 1.25 The thrust of this Hearing Statement is to support the aspiration housing target in the Plan, aiming for a higher housing requirement of 582 dwellings per annum, 10,476 dwellings by 2038.
- 1.26 We set out our recommendations on the Draft Local Plan as follows.

Recommendation 1

- 1.27 In the event that a housing requirement is included for Neighbourhood Areas, it is imperative that the housing requirement is set as a minimum figure rather than it be used as a ceiling figure. This is particularly relevant in the context of any settlement which is subject to the lowest levels of growth at 5%. This would reflect the NPPF para 79, which recognises the importance of rural housing to allow villages to grow and thrive.