

# Bassetlaw Local Plan Examination

## Matter 5: The Housing Requirement

North Road, Retford (HS7 and EM006)

Prepared by Fisher German LLP on behalf of The Hospital of  
The Holy and Undivided Trinity

### Project Title

North Road, Retford

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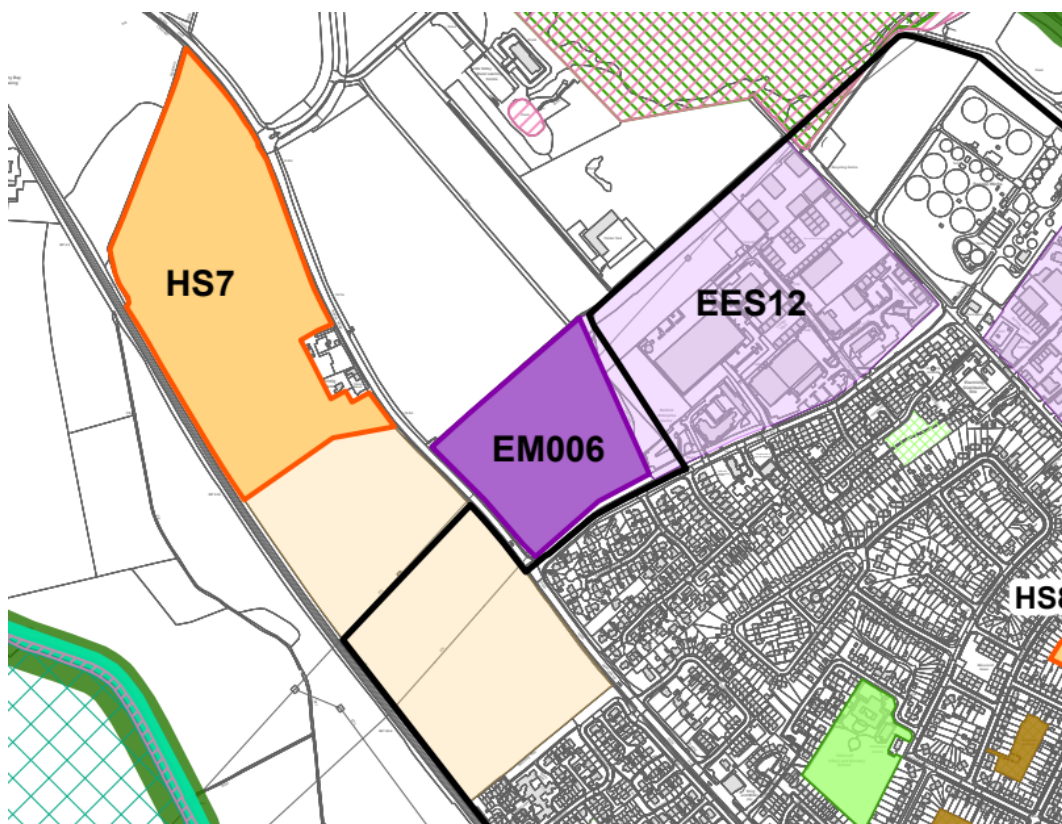
Norman Court

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# 1. Introduction

- 1.1 This Hearing Statement has been prepared on behalf of The Hospital of The Holy and Undivided Trinity in respect of their land interests at North Road, Retford, proposed allocation HS7 and EM006, as illustrated on Figure 1.
- 1.2 Land immediately south of proposed allocation HS7 (buff shading on Figure 1 below) was promoted by The Hospital of The Holy and Undivided Trinity through the previously withdrawn Site Allocations Development Plan Document. An outline planning application was subsequently prepared by The Hospital of The Holy and Undivided Trinity for 196 dwellings (15/00493/OUT) and 11 hectares of employment land.
- 1.3 The residential scheme is now being built out Avant Homes (20/01477/RES), and the employment land to the east of North Road (EM006) will shortly be brought forward. There is active market interest in proposed allocation HS7 and terms for disposal are currently being negotiated with a house builder.



*Bassetlaw Local Plan 2020-2038: Publication Version Policies Maps Composite, July 2022 (The Hospital of The Holy and Undivided Trinity Land Interests HS7 and EM006)*

- 1.4 The Hospital of The Holy and Undivided Trinity support the proposed allocations and remain committed to delivery, as evidenced by the successful delivery of the initial phase of land which is currently bringing forward high quality housing in a sustainable location to the north of Retford, one of the most sustainable settlements in Bassetlaw.
  
- 1.5 This Statement should be read alongside the Statement of Common Ground signed by The Hospital of the Holy and Undivided Trinity and Bassetlaw District Council.

## 2. Matter 5: The Housing Requirement (Policies 16-28)

### ***Issue 5: Is the identified housing requirement in Policy ST1, justified and consistent with national policy?***

*Q5.1: 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?*

- 2.1 The NPPF sets out at Paragraph 22 that Strategic policies should seek to look ahead over a minimum 15-year period from adoption. This requirement is to anticipate and respond to long-term opportunities, such as the delivery of infrastructure or strategic scale development.
- 2.2 Whilst there is every hope that the Local Plan can be adopted in the next 13 months, there remains the possibility that the examination process may become more protracted. If that does happen, it may be that there is less than 15 years from the Plan's adoption. If further years are added to the Plan period, this may necessitate further allocations.
- 2.3 Whilst clearly having in excess of 15 years is likely to be beneficial, at this stage there has been no indication from Inspectors that the Plan is likely to take all of 2022 to be examined and on this basis there remains the opportunity for the Plan to be adopted at some point next year. As such, presently the Plan may be justified and consistent with national policy in respect of the 15 year period post adopted and as such no reason for main modifications to extend the plan period, with the associated work and delay that would inevitably involve. Given the requirement for a review every 5 years anyway, and opportunities for earlier review, it is considered more beneficial for development and certainty in Bassetlaw to have a NPPF compliant Local Plan in place as soon as possible. A

*Q5.2: 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;*

- 2.4 The Local Housing Need for Bassetlaw was established through the 2020 HEDNA. Whilst a more recent Local Housing Need figure may now be available, the PPG is clear that once submitted local authorities will be able to rely upon a Local Housing Need figure for a period of 2 years. As such,

whilst there may be a slightly updated figure, the approach adopted by the Council is sound. In any event the significant uplift applied by the Council from base Local Housing Need will significantly eclipse slight changes to the Standard Method figure through updated assessment. In this context the approach adopted by the Council is likely to be sound in respect of the LHN adopted, regardless of eventual adoption date.

*b) Forecasts for economic growth?*

- 2.5 There are a range of estimates for likely job generation in Bassetlaw. The HEDNA sets out at 4.23 that the unadjusted Oxford Economics projection was only an increasing 112 jobs only, predominantly due to expected decline in manufacturing employment. Experian however were more positive in their assessment (Sheffield City Region LEP), which indicates an additional 3,928 jobs (FTE) during the same period as the Oxford Economics assessment. Within the HEDNA, GL Hearn is of the view it remains valid to test a growth scenario, where the manufacturing and transport jobs provide significantly more strongly than anticipated by Oxford Economics. Overall Experian predicted that there would be 3,796 more jobs than Oxford Economics. Given the Plan is based on a strong growth agenda, at a time where many authorities in the region are delaying plans or reducing their scope in terms of housing and employment supply, this could drive demand into Bassetlaw helping to drive additional job growth. The Icen Addendum (April 2022) provides a range of potential job growth options, having regard for factors such as differing committing patterns. This resulted in a potential generation of 9,852 jobs at the lower end and 11,354 at the higher side. Whilst somewhat aspirational, have seen no evidence to verify that this scale of employment growth cannot be delivered.

*c) Alignment of jobs and workers;*

- 2.6 The HEDNA (2020) concluded that to align residential and employment growth, 562-591 dwellings per annum would be required (on an economic growth led strategy). Table 19 of the HEDNA explored the housing need applicable against a range of employment led growth scenarios. This ranges from 236 dwellings (Oxford Economics baseline), to 646 based on the delivery of all employment sites and high wider job provision. GL Hearn however set out that the most realistic scenario to test through the Local Plan was a range between 562-591 dwellings per annum, but assumed delivery of the Apleyhead scheme.
- 2.7 The 2022 Icen Addendum updates the HEDNA 2020 and sets out an updated range at 2.21, from 523 dwellings to 582 dwellings, which is largely dependent on the level of jobs created at the Apleyhead Junction (assuming a 1:1 commuting ratio).

2.8 In this context, the approach adopted by the Council is both positive, supported by robust evidence and thus considered to be sound (particularly given the significant uplift from base Local Housing Need).

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

2.9 It is obviously the case that there is a lack of certainty with strategic modelling of the interplay between employment and population growth. Ultimately there are no restrictions on where people will work and it cannot be guaranteed that housing and employment will align perfectly in practice. Despite this, it is standard practice and accepted that it should be the aim of strategic policy making to align jobs and housing, to give the best possible chance for people to live sustainably and for employers to have ready access to suitable workforces. The availability of labour will help drive company decisions relating to location of new business and expansion of business. This combined with the good level of accessibility provided by the strategic highway network and good rail links mean that it is possible for the Council's employment aspirations to be realised.

*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?*

2.10 The affordable housing need for Bassetlaw is derived from the 2020 HEDNA. This evidence is recent, however there has of course been significant movement in the last couple of years, months and even daily, due to COVID, Ukraine, inflation and cost of living. As such, the true need is likely highly volatile and as such a true estimation of affordable need is likely impossible to quantify. Given this level of uncertainty and in the absence of alternative data, it is not considered unsound to proceed on the basis of 214 dpa as the best available evidence and thus that which should be used.

2.11 Given there has been a significant uplift in housing need to cater for a economic growth led scenario, this uplift will also be default capture an increase in affordable housing. Clearly given the issues of viability of sites and that likely less than 1 in 5 dwellings delivered in Bassetlaw will be affordable, it is clearly unreasonable to try and meet the affordable housing needs in full given this would take an annual requirement of at least 1,000 dwellings per annum. A figure far in excess of demographic or economic needs, that will simply not have the market absorption to deliver.

2.12 It is noted that it is now not uncommon for Local Plan's to advance with a strategy that likely means that affordable housing needs cannot be met in full but given the clear aspirations for

growth and a strategy which adopts significant uplifts in housing, the position will still likely be improved in Bassetlaw when compared to other, less progressive authorities.

*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?*

- 2.13 The NPPF is clear that a housing requirement for Neighbourhood Plan groups should be provided as part of strategic plan making. Where it is not possible, an indicative figure should be provided. The Council are best placed to provide numbers for each area. This should be provided even where Neighbourhood Plan's have already been made, this should be confirmed as will inform future reviews of Neighbourhood Plans.