

Barton Willmore, now Stantec on behalf of Howard (Retford) Limited

Examination into the Bassetlaw Local Plan

Matter 5: The Housing Requirement

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?

1. Paragraph 22 of the National Planning Policy Framework (NPPF) states that strategic policies should look ahead over a minimum 15-year period from adoption. It is anticipated that the Bassetlaw Local Plan 2020-2038 (Local Plan) is to be adopted in 2023 which would leave 15 years of the plan period remaining.
2. Our Client is therefore of the view that the Local Plan is justified and consistent with national policy in this regard.

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;***
- b) Forecasts for economic growth;***
- c) Alignment of jobs and workers; and***
- d) Assumptions of housing requirements arising from economic growth.***

3. The Government is clear at paragraph 61 of the NPPF that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method unless exceptional circumstances justify an alternative approach. Any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
4. National Planning Policy Guidance (PPG) establishes that the standard methodology is the starting point for determining housing need as the minimum requirement. Deviation from the standard methodology can be justified based on demographic trends and market signals.
5. The PPG (Paragraph: 010 Reference ID: 2a-010-20201216) also notes the government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. Those circumstances will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan).
6. Using the Standard Method, the housing need for Bassetlaw amounts to 288 residential dwellings per annum. The Council set out at paragraph 5.1.21 of the Local Plan that pursuing a housing target based on the standard method would mean the Plan would not provide a sufficient number of dwellings to support the economic growth objectives in the District.

7. The Council has prepared a robust assessment of housing and employment needs in its Housing and Economic Development Needs Assessment (HENA) (May 2022) (document reference: SS-024) which identifies an employment need of 196.7ha over the period 2018-2038. This level of employment growth is the upper end of projected growth scenarios and provides an employment need buffer of 10% to mitigate economic uncertainty and to accommodate the potential for employment windfall sites. In accordance with the HENA, the Council set out a housing requirement of 582 dwellings per year to support 9,852 jobs.
8. The Council's approach to economic growth seeks to bring about a 'step change' in the District's economy, to retain employment locally, provide opportunities for better paid and higher skilled jobs, and increase productivity (Local Plan paragraph 5.1.9). To accommodate the economic growth envisaged, the Council is seeking to deliver a housing offer which provides the right mix of new homes in the right places, so that past trends of out-migration are rebalanced. Our Client is in support of this approach.
9. A number of significant, high-profile schemes have been delivered in Bassetlaw in recent years in association with the A1 / A1(M) corridor. At junction 34 is Symmetry Park, Doncaster (www.tritaxsymmetry.com/projects/symmetry-park-doncaster), a 22 hectare, 721,000 sqft employment scheme; Mulberry Logistics Park is also in close proximity to Junction 34 and comprises a 160 hectare, 2.5m sqft employment scheme. (www.mulberrycommercialdevelopments.co.uk/mulberry_developments/mulberry-logistics-park-doncaster). Furthermore, 118.7 hectares of employment provision is allocated in the Local Plan at Apleyhead Junction to meet the needs of the sub-regional/regional logistics sector. The employment market in Bassetlaw is therefore clearly buoyant and to harbour future growth Bassetlaw should ensure they deliver sufficient homes.
10. National policy and guidance is clear that the Standard Method is the starting point for calculating housing need, with deviation from the Standard Method justified based on evidenced demographic trends or to support ambitious economic growth plans. The approach and inclusion at Policy ST1 of a housing need requirement of 582 dwellings per year to reflect and accommodate jobs associated with the high job growth scenario set out in the HENA is wholly justified and supported.

Q5.3 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?

11. The Council's affordable housing requirement of 214 dwellings per annum has been informed by the HENA (document reference: SS-007 and SS-024).
12. However, the Council are clear at paragraph 7.17.18 of the Local Plan that the delivery of affordable housing in the District is challenging. The Whole Plan Viability Assessment (document reference: PUB-028) assessed the viability of housing schemes once affordable housing provision, a Section 106 contribution of £3,000 per dwelling, and Biodiversity Net Gain contribution of £500 per dwelling were factored in and recommended that on greenfield and brownfield sites a requirement of 25% and 20% affordable housing provision would be appropriate and not undermine scheme viability.
13. A balance has to be struck between the need to deliver affordable housing and the viability of housing schemes. If affordable housing requirements are too high, it would have a negative impact on scheme viability and have a downward impact on housing delivery. A scenario where affordable housing requirements become a constraint to delivery is particularly self-defeating for affordability is directly linked to housing supply: fewer houses coming forward would result in housing becoming even more unaffordable as demand outstrips supply.
14. It is therefore considered that the Council's approach to delivering affordable housing as set out at Policy ST29 is reasonable and is supported.

Q5.4 Should there be a housing requirement for designated neighbourhood areas in Policy ST1? (paragraph 67 in the NPPF) If so, what should this be?

15. Our Client has no further comment in relation to this particular question.

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