

Bassetlaw District Council Response to Inspectors Matters, Issues and Questions

Matter 7 – Housing Land Supply

4 November 2022

(Issue 7)

Please note: Where the Council is proposing changes to policies or reasoned justification in the submitted plan these are detailed in the responses as follows:

- Additional and new text proposed underlined
- ~~Deleted text~~ proposed in strike through

(Policy ST15)

Issue 7 - Does the Plan provide an appropriate supply of deliverable and developable sites to meet identified needs and align with national policy?

Note: This Matter focusses on the overall supply of land for housing. The merits of individual site allocations are considered under Matter 6, although our consideration of this question will also be informed by detailed discussion of the deliverability of specific site allocations in Matter 6.

In the light of Matter 5, we will reach a conclusion on whether or not the objectively assessed need for housing of 582 dwellings for the 2020-2038 period is justified. However, without prejudice to that, these questions work on the assumption that 582 dwellings is a soundly based housing requirement figure.

7.1 Are the assumptions that have been made to inform the trajectory justified in relation to the delivery of housing sites, in particular in relation to:

a) lead in times for grant of full permissions, outline and reserved matters and conditions discharge?

BDC Response:

Yes. The Council's approach to considering lead-in times is set out in the Five Year Housing Land Supply Statement July 2022 [SS-019] in Paras 5.6 – 5.13; and in the Land Availability Assessment (LAA) [BG-030] in Paras 2.38 – 2.41.

The Council has engaged site developers, landowners and their agents to understand their intended timescales for bringing forward sites within the District. In addition it has drawn on an analysis of past delivery rates of sites over the 2016-20 period as set out in the LAA [BG-030]. This shows a typical lead-in time of 27 months (2 ¼ years) from determination of an outline application to first completions; and 20 months (1 2/3 years) from the grant of a full planning permission. This includes provision for 3 months for discharge of pre-commencement conditions and 3 months for site preparation.

Its assumptions on lead-in times within the trajectory take a cautious approach. It has taken into account site-specific information on progress towards planning applications, and information provided by site promoters on their delivery intentions. Where promoters assumptions assume earlier delivery than applying the Council's standard assumptions the latter have been used to build flexibility into the trajectory.

Major sites without planning consent are not envisaged to support completions in Years 1-3 (i.e. prior to April 2025). Sites with an extant outline consent are generally not expected to support completions in Years 1 and 2¹.

For the two strategic sites, the lead-in times are based on discussions with the site promoters. As set out in the trajectory, first completions at Peaks Hill Farm are envisaged in 2026/7 and at Ordsall South in 2027/8. As set out in the site specific proformas in BDC-01, site assessment work has been undertaken and preparation of a planning application for both sites is progressing alongside the local plan with pre-application consultation having already happened for Ordsall South and EIA Scoping undertaken for Peaks Hill Farm.

b) site opening up and preparation; and dwelling build out rates?

Yes. As set out in the LAA Table 3 [BG-030], the Council has assumed a 7 month period from start on site to first completions based on analysis of local evidence for development schemes in the District over the 2016-20 period.

Build out rates have been informed by a combination of local and national evidence, engagement with a range of developers and agents and review of national research studies. This is set out in the LAA [BG-030] in Paras 2.42 – 2.47 and in the Five Year Land Supply Statement [SS-019] Paras 5.6 – 5.17 with the supporting analysis outlined in Appendix 3. The historical analysis indicates that volume housebuilders will typically build out at a rate of at least 30-35 dpa.

The Council has had regard to information provided by site promoters, particularly for larger sites which are likely to include a number of different sales outlets and/or developers. It has used site-specific information provided by a site agent/developer where appropriate. Where specific evidence is lacking it has adopted a cautious delivery rate of 30 dwellings per outlet per annum.

Assumptions on individual specific larger sites are outlined in the site proformas in the Council's response to Inspectors Initial Questions [BDC-01]. These have regard to the number of housebuilders/ sales points expected. For instance the delivery rate at Harworth Colliery takes account of the presence of multiple separate land parcels and developers who are expected to deliver concurrently.

7.2 Is there a reasonable prospect that a total of 5,995 new dwellings will be provided by 31/03/38 on sites that had planning permission at 31/03/22?

BDC Response:

Yes. An updated assessment of sites with planning permission that are expected to provide dwellings by 31/03/38 can be found in Appendix 2 of the Council's response to the Inspectors Initial Questions [BDC-01]. This takes into account sites with detailed permission that have commenced construction, those with detailed permission that are yet to commence as well as those that have outline permission. It shows that there are now 6,292 dwellings expected to be delivered on sites with extant planning permission as at March 2022. This breaks down as follows:

¹ The Council consider that the delivery trajectory for Retford Oaks School should now be adjusted with 1st completions in 2024/5

Components of Supply with Planning Permission	Dwellings
Small sites with planning permission	1,003
Large sites – under construction	3,930
Large sites – extant full planning permission (not UC)	1,167
Large sites – outline planning permission	1,195
Total	7,295

Supporting information regarding the deliverability of those sites which have outline planning permission and are expected to contribute to the five year supply are set out in Appendix 2 to the Council's response to the Inspector's Initial Questions [BDC-01].

The Council is in the process of agreeing Statements of Common Ground in respect of a number of larger sites. These will be uploaded to the Examination Library when completed.

The majority of sites with planning permission are expected to be delivered over the short-to-medium term over the period to 2029. Larger strategic sites see delivery phased over a longer period, and in the case of Harworth Colliery the site's delivery is expected to continue beyond 2038.

The Council has removed sites which have lapsed from the delivery schedule or where it has information that the planning permission is not expected to be delivered.

- 7.3 Is there a reasonable prospect that a total of 438 new dwellings will be provided by 31/03/38 on sites allocated in made Neighbourhood Plans?

BDC Response:

Yes. Bassetlaw has 21 made neighbourhood plans. A majority of the allocations within these plans are for small sites with just 6 sites in this category that have an assessed capacity for over 20 dwellings. These sites can therefore be brought forward quickly and generally do not require significant infrastructure. Sites in this category are all expected to be delivered in the period to 2030. Information on individual sites is set out in the LAA Appendices [BG-030].

Further information on sites expected to contribute to the five year supply is included in BDC-01 Appendix 2. This draws on information in the LAA Appendices. Lead in/ phasing assumptions are informed by the evidence in the LAA (as set out in the response to Q7.1).

- 7.4 Is there a reasonable prospect that a total of a further 635 new dwellings will be provided by 31/03/38 on sites in the Worksop Central DPD area?

BDC Response:

The Council has prepared a separate Land Availability Assessment for sites in the Worksop Central DPD area [DPD-013]. This includes its assessment of the suitability and availability of sites and whether they are deliverable/ developable.

Further information on sites expected to contribute to the five year supply is include in BDC-01 Appendix 2. Site proformas therein provides information on landowner/developer intentions, progress with site assessment work, ownership and viability issues and infrastructure provision.

As set out in the trajectory in BDC-01, the Council considers that sites in this category will deliver 649 units over the plan period.

- 7.5. Is there a reasonable prospect that the total of 2742 new dwellings to be delivered through local plan allocations?

BDC Response:

Yes. The Council's response to Inspectors Initial Questions [BDC-01] Appendix 2 includes information on the progress and delivery timescales associated with proposed allocations, as well as information on ownership, viability and infrastructure provision. The trajectory shows the timescales associated with delivery.

For the two strategic sites at Ordsall South, Retford and Peaks Hill Farm, Worksop the Council has been engaged in pre-application discussions on both and expects planning applications to be submitted in the coming months. These sites are expected to principally be delivered beyond the five year period, and the Council's phasing and delivery assumptions have been informed by careful consideration of the lead-in time and delivery rates including through engagement with the site promoters.

The Council is in the process of agreeing Statements of Common Ground in respect of the strategic sites. These will be uploaded to the Examination Library when completed.

- 7.6 Is there compelling evidence to justify a windfall allowance of 1200 over the plan period and to demonstrate that they will provide a reliable source of supply?

BDC Response:

The Council's evidence and consideration of windfalls is set out in the May 2022 Housing Land Supply Position, Housing Trajectory and Windfall Allowance Background Paper [SS-026] in Section 7.

The windfall allowance expects delivery of 100 homes per year from unidentified sites from 2026 onwards, as shown in the Housing Trajectory in BDC-01.

There is a strong track record of delivery of windfall sites in the District, and the forecast for future delivery are informed by analysis of trends over the 2011-22 period. Over this period 1273 dwellings were delivered on small sites of 9 or less dwellings, an average of 116 per annum.

The Council has also had regard to future trends and considers that there is potential for *additional* windfall development to arise from new permitted development rights such as the upwards extension of blocks of flats and PD rights allowing COU from Class E to C3 residential; as well as potentially changes in demand for retail and office space.

The Plan’s policies support windfall development. Policy ST1 supports managed growth in both small and large rural settlements. Policy ST2 enables additional development to come forward through neighbourhood plans or in selected other circumstances (where there is no neighbourhood plan) including infill developments, conversions. Development of accommodation for forestry/agricultural workers is supported by Policy 34, schemes of exceptional design quality by Policy ST35 and rural/first homes exception sites in accordance with Policy ST29.

Neighbourhood Plans are also able to plan for higher numbers of homes than the minimum requirements set out in the draft Local Plan.

On balance the Council considers that the evidence supports a windfall allowance of 100 dwellings pa from 2026 onwards. The Council have not included this allowance immediately within the housing trajectory under the assumption that those sites that may be considered windfall in the three years post plan implementation will already benefit from planning permission.

7.7 Has appropriate consideration been given to non-implementation lapse rates?

BDC Response:

As set out in the Housing Land Supply Position Background Paper [SS-026] in Para 1.6, sites where planning permission has lapsed have not been included within the supply. No specific non-implementation rate has been applied as it is not a requirement of the NPPF or the PPG.

In any case the Plan provides supply-side flexibility through the inclusion of a buffer in calculating the 5 year supply to allow for non-implementation or delivery slippage on individual sites. This is considered further in Q7.8.

7.8 Overall, is there convincing evidence that:

- a) Having regard to assumptions about commitments, allocations and windfalls the housing requirement across Bassetlaw between 2021 and 2038 is likely to be met?
- b) A 5 year supply of deliverable housing land will exist on adoption?
- c) An ongoing 5 year supply of deliverable or developable housing land is likely to exist throughout the plan period?

BDC Response:

Over the Plan period, the total supply in the trajectory is 12,323 dwellings as against the housing requirement of 12,551 dwellings. This equates to 18% supply-side flexibility over and above the requirement and provides confidence that the housing requirement over the Plan period can be met.

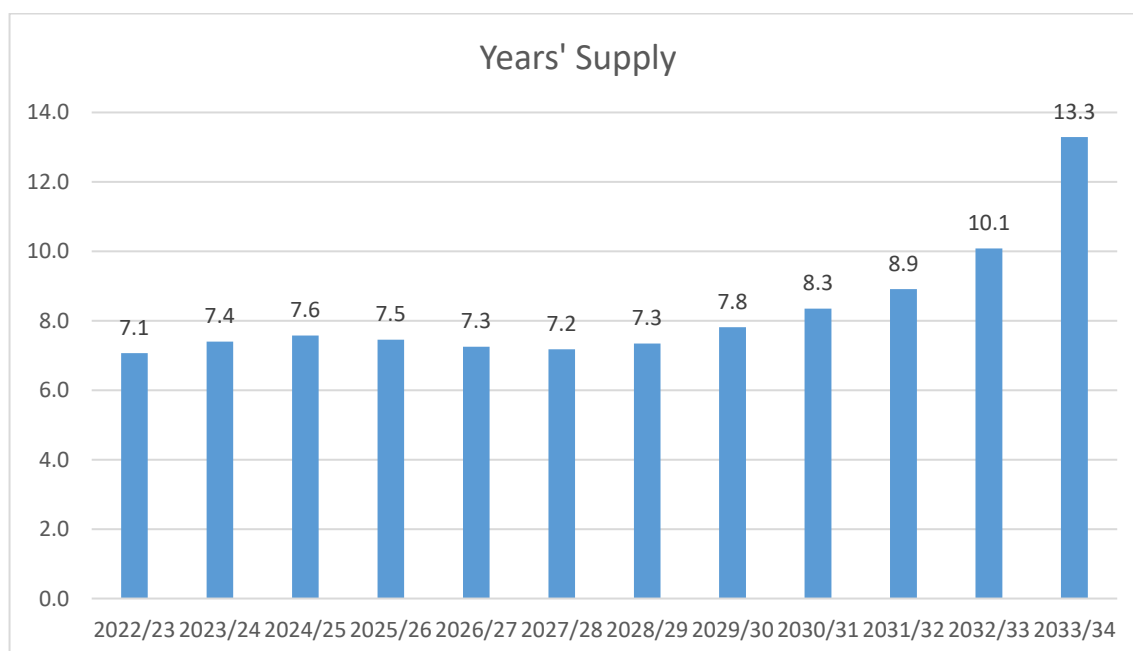
The table below sets out the housing land supply calculation for the current year, and the following year (2023/24) as this may be the point of adoption. It shows a healthy housing land supply in either scenario. This assumes a 10% buffer in line with NPPF Para 74 as the Council wishes to confirm the 5 year supply position.

	Dwellings	
	2022-27	2023-28

Annual Average Requirement	10496	10496
Past delivery	1541	2272
Residual requirement	8955	8224
Remaining Years in plan period	16	15
Annualised future requirement	560	548
5 year base requirement	2798	2741
10% Buffer	280	274
Total requirement	3078	3015
Annualised total requirement	616	603
Deliverable supply	4340	4454
Years' supply	7.0	7.4

The housing requirement represents the housing need over the plan period and it is therefore appropriate to seek to manage supply over this plan period as a whole. Delivery is expected to be stronger in the early years, resulting therefore in a lower residual housing requirement in the latter part of the plan period.

The graph below appraises how the HLS position changes over time. It indicates that the Council is able to maintain a supply of over 5 years across the plan period. The analysis assumes a 10% buffer in the first 2 years shown (to be consistent with the above) and 5 year buffer thereafter. The 2033 calculation runs to the end of the plan period in 2038.



The analysis shows that the Council will be able to maintain a healthy housing land supply position over time.