

Albemarle Homes Ltd

Bassetlaw Local Plan Examination

Hearing Statement – Matter 7

November 2022



01 Introduction

Introduction

- 1.1 This is a Hearing Statement prepared by Spawforths on behalf of Albemarle Homes Ltd in respect of:
 - Matter 7: Housing Land Supply
- 1.2 Albemarle Homes has significant land interests in the area and has made representations to earlier stages of the Local Plan process.
- 1.3 The Inspector's Issues and Questions are included in **bold** for ease of reference. The following responses should be read in conjunction with Albemarle Homes' comments upon the Bassetlaw Local Plan 2020-2038 Publication Plan, Publication Addendum and Second Addendum Version, dated October 2021, February 2022 and June 2022.
- 1.4 Albemarle Homes has also expressed a desire to attend and participate in Matter 7 of the Examination in Public.

02 Matter 7 – Housing Land Supply

Issue

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

Questions

Question 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?**
- b) Site opening up and preparation; and dwelling build out rates?**

- 2.2 Albemarle Homes has concerns with the housing land supply position in the Local Plan. Albemarle Homes considers the anticipated delivery rates in the Local Plan are overly ambitious and could mean that the housing needs and requirement are not achieved over the Plan period. Furthermore, it is unclear from the range and choice of sites how the Council will achieve the delivery of much needed affordable housing. Albemarle Homes has concerns with regards to the buffer, application of a lapse rate and the deliverability of some of the identified supply. The housing trajectory tables within the appendix to the Plan contain ambitious delivery rates on complex sites. These concerns are further amplified through the Housing Supply Background Paper (May 2022), which shows that it takes an average of 27 months from grant of outline planning permission through to completion of the first unit.

Question 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?

2.3 Albemarle Homes do not have any comments on this particular issue.

Question 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?

2.4 Albemarle Homes maintains its concern with the reliance of sites contained within 'made' Neighbourhood Plans, which have not been subject to the same rigour on deliverability as those within a Local Plan. Albemarle Homes is aware of the unavailability and significant constraints of such sites having approached landowners to enquire about developing these sites only for the landowner to indicate that the sites will not be coming forward at this time. Albemarle Homes has the evidence to demonstrate this position. In particular, Albemarle Homes has evidence that the Land to the East of Spital Road (BDC03) for 55 dwellings is not available and therefore should not be allocated. These sites should be reassessed and other appropriate sites considered, such as Albemarle Homes' site at Blyth Road.

2.5 The range and choice of new housing within Blyth is also not suitably delivering the range of housing required to address housing needs. A number of recent sites coming forward are proposing very large homes and Self and Custom Build housing, or they are small sites. These sites are not delivering the much needed affordable housing. In contrast, Albemarle Homes' site at Blyth Road will be policy compliant and deliver affordable housing.

Question 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?

2.6 Albemarle Homes do not have any comments on this particular issue. However, Albemarle Homes would like to emphasise that sites identified in the Plan need to be deliverable in accordance with national policy and guidance.

Question 5: Is there a reasonable prospect that the total of 2742 new dwellings to be delivered through local plan allocations?

2.7 Albemarle Homes considers that the Local Plan needs to substantially increase housing delivery and the choice and number of sites and potential outlets. To achieve the step change in housing delivery, the Council needs to plan for a range and choice in sites. This range and choice will ensure the right conditions for a competitive market and create the outlets needed to achieve the housing requirement.

2.8 Albemarle Homes is concerned that with the current strategy and proposed sites the Local Plan will not deliver the requisite number of new homes.

- 2.9 Albemarle Homes maintains its original conclusion that there is a need for further allocations to support the requirement within Policy ST1, and this need is even greater when considering the supply against their view of housing need within Bassetlaw

Question 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?

- 2.10 Albemarle Homes considers the evidence for the windfall allowance does not fully reflect national policy and guidance and should show that such a quantum will continue for the lifetime of the Plan. It is understood that the windfall allowance is only going to apply to smaller sites and therefore windfalls are likely to reduce in the future.

Question 7: Has appropriate consideration been given to non-implementation lapse rates?

- 2.11 Albemarle Homes is concerned that it is unclear from the Council's evidence if a non-implementation lapse rate has been applied to existing commitments and / or allocations, which should be included to accord with national guidance.

Question 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?

- 2.12 Albemarle Homes would like to re-emphasise that the Council's overall housing land supply should include a mix of short and long-term sites. It is generally recognised that housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings, including affordable housing, to meet their housing needs. Such an approach provides choice for

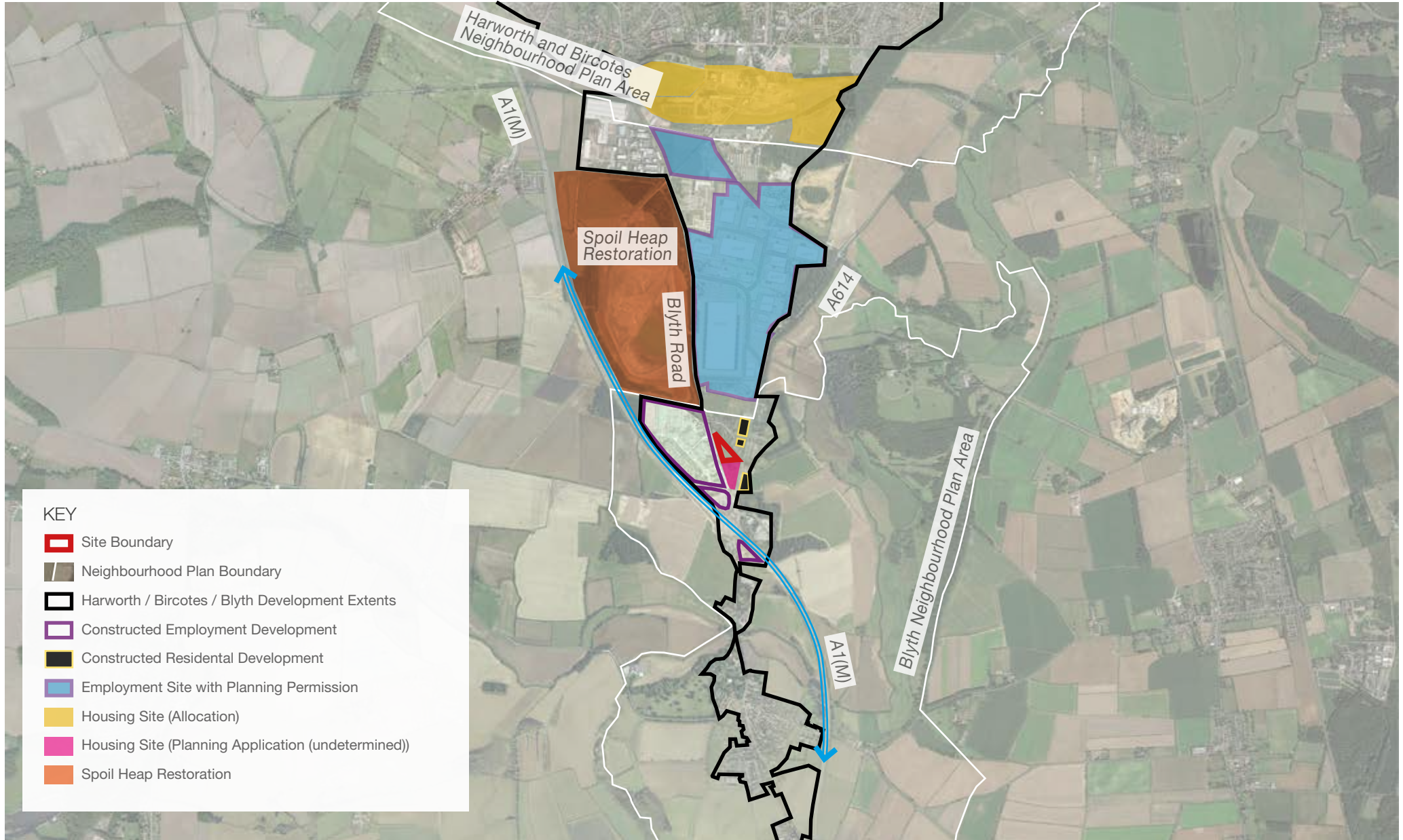
consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market. Therefore, it is important that Albemarle Homes' site at Blyth Road (LAA494) for circa 52 new homes is considered within that context of a smaller housebuilder, on a smaller non-strategic site that can importantly deliver affordable housing.

- 2.13 It is evident that the updated housing trajectory within the appendices includes significant housing numbers on large strategic sites. It is critical that an accurate assessment of availability, suitability, achievability and therefore deliverability and viability is undertaken. The Council's assumptions on lead in times and delivery rates should be correct and supported by promoters responsible for the delivery of housing on each individual site.
- 2.14 It is also important that the Council's five year housing land supply is clear at the point of adoption. Albemarle Homes is concerned that the current statement still suggests an insufficient buffer in the supply of new housing.
- 2.15 Albemarle Homes maintains its original conclusion that there is a need for further allocations to support the requirement within Policy ST1, and this need is even greater when considering the supply against their view of housing need within Bassetlaw.

Proposed Change

- 2.16 To overcome the soundness matters Albemarle Homes proposes the following changes:-
- Review and provide evidence for the windfall allowance.
 - Review delivery rates and trajectory on allocations and commitments.
 - Identify further sites to increase flexibility in the Plan.
 - Allocate for housing Albemarle Homes' site at Blyth Road, Blyth/Harworth (LAA494)

Appendix 1: Blyth Road



Spatial Relationship between Harworth, Bircotes and Blyth

