# **Bassetlaw Local Plan Examination in Public**

Matter 7, Issue 7

Statement on behalf of Hallam Land Management Ltd and IBA Planning





#### INTRODUCTORY STATEMENT

- i. Hearing Statements are submitted by Christopher Waumsley DipTP MRTPI of Inovo Consulting supported by David Lock Associates Ltd on behalf of Hallam Land Management and IBA Planning (hereinafter referred to as HLM/IBA), promoter of land at **Peaks Hill Farm, Worksop** for which a draft allocation is made under Policy 16:HS1 of the *Bassetlaw Local Plan Submission Version* July 2022.
- ii. Hallam and IBA control and are promoters of land at Peaks Hill Farm Worksop which is proposed as a strategic mixed use allocation in the draft plan. The intention is to provide a sustainable urban extension to the north of Worksop incorporating strategic green and grey infrastructure, most notably a new East West link road to serve the town from the A60 (Carlton Road West) to the A6045 (Blyth Road).
- iii. Hallam and IBA have been positively engaged with the Policy Team, and more latterly, Development Management Team at Bassetlaw since 2019 and throughout the evolution of the local plan.
- iv. For context a summary of activity and engagement undertaken to date in respect of the proposed allocation site is set out below:
  - a) An initial development concept for a sustainable urban extension at Peaks Hill Farm was prepared in July 2020, worked up in conjunction with the planning authority and proposing a broad vision and overall objectives for development. This concept plan informed the preparation of technical survey and assessment and was subject to public and stakeholder engagement alongside the November 2020 Local Plan consultation.
  - b) Responses to that consultation exercise and engagement with key officers, stakeholders and consultees in the period since has resulted in the evolution of the concept plan into a draft Development Framework which was subject to a second round of stakeholder engagement in Feb 2022 and is currently the subject of pre-application discussions. The Development Framework is intended to govern the submission of an outline planning application, design coding and detailed applications for infrastructure and development in accordance with local plan policy objectives set out in Policies ST56 and ST58 and referenced in paras 12.3.4-5 of the draft Plan.
  - c) Alongside this work the promoter's consultant team have carried out a wide range of assessments and studies to allow the identification of the technical considerations pertinent to the site's development. This technical information has informed the preparation of a draft outline planning application for the site's development. As part of that process an EIA screening opinion was submitted February 2022, a subsequent EIA scoping opinion received March 2022 and a formal pre application submission was made in August 2022.

- d) Taken together, the EIA outputs and the feedback from stakeholder and officer consultation has allowed mitigation to be designed into the masterplan; the likely infrastructure requirements arising from the development to be confirmed; and has provided a greater degree of detail - and therefore certainty – over the nature and quantity of development and infrastructure to be delivered on site.
- v. Hallam and IBA are appearing at the Examination in support of BDC's commitment to an urban extension north of Worksop to meet the needs of the plan area within the plan period to 2038. Those needs have been assessed in the evidence base and are articulated in the plan (in particular in Policy 16: HS1). The allocation of an urban extension at Worksop represents a spatial growth solution which is aligned with the overarching Vision and Objectives of the Plan and will ensure outcomes which ensure effective delivery of Plan objectives.
- vi. In response to the Inspectors' *Part 1 Matter, Issues and Questions (MIQ)* issued October 2022, HLM/IBA wish to make a number of points to supplement the representations made by Inovo at the Regulation 18 state consultation and the Regulation 19 stage consultation of the *Bassetlaw Local Plan (BLP).*
- vii. Our Hearing Statements provide clarification of our clients' position to assist the Inspectors in consideration of their questions posed to the Council in the *Matters, Issues and Questions.* As part of the review of the evidence base published since the submission of the Plan, technical evidence and input to these Statements has been provided by:
  - FPCR (master planning, arboriculture and ecology);
  - ADC Infrastructure (highway design); and
  - Rodgers Leask Ltd (drainage)

#### MATTER 7 – HOUSING LAND SUPPLY

#### (Policies ST15)

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

- 1.1 Based on the available evidence supporting the Plan, we consider that it does provide an appropriate supply of deliverable and developable site to meet housing needs and align with national policy.
- 1.2 However, our response on this matter is made with reference to the Peaks Hill Farm draft allocation and we do not offer any commentary on the developability or deliverability of other individual sites.
  - Q7.1 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?
- 1.3 We note that the latest housing trajectory is set out in Appendix 3 of the Second Addendum to the submission Plan (trajectory dated April 2022). Peaks Hill Farm is included on page 2 of this Appendix (ref LAA462), and the following is assumed:
  - (a) Start on site Yr 2026/27 with 90 dwellings delivered;
  - (b) Delivery rate of 90 dwellings per year between 2027/28 until 2037/8
  - (c) Thus, delivery of 1,080 homes within the plan period, with the balance (c 40 units) to be delivered thereafter.
- 1.4 We consider that this trajectory is entirely reasonable, on the basis of evidence summarised below:
  - i. First, that (as set out in our introductory paragraph to this Matter Statement), considerable work has been undertaken by HLM/IBA since 2019 in undertaking technical assessment work, EIA Screening, Scoping and assessments, stakeholder and pre-application consultation with a view to making a single outline application for the entirety of the urban extension and link road. The application material is currently in advanced draft form and subject to the conclusion of the current round of pre-application discussions, is anticipated to be submjtted to BDC shortly thereafter.

- ii. With the submission of a single policy-compliant application in late 2022/early 2023, we anticipate that outline consent could be issued in mid 2024. Preparation of the first infrastructure and built development RMAs and discharge of pre-commencement conditions would take place over the next 12 months, so that decisions could be issued in early-mid 2025 with a start on site thereafter;
- iii. For sites of this scale, HLM/IBA assume the role of master developer, securing the consents and implementing the common green and grey infrastructure to allow the disposal of serviced development parcels to third party housebuilders. Assuming three housebuilders on site at any one time (which is a reasonable assumption given current market conditions) each building out 30 homes per year), then the trajectory assumption of 90 dwellings per year can be achieved year on year.
- iv. In addition to the market housing, affordable homes and other specialist housing (such as extra care/care home) would also be brought forward, which would increase the annual delivery rates beyond the 90 assumed.
- v. This trajectory also allows for the concurrent phased delivery of on-site infrastructure alongside new homes and jobs to ensure that receipts from the sale of land parcels can support infrastructure costs in a way which does not adversely impact the viability and thus deliverability of the site.

# Q7.2 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?

1.5 It is anticipated that this question will be addressed by the Planning Authority.

## Q7.3 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?

1.6 It is anticipated that this question will be addressed by the Planning Authority.

## Q7.4 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?

1.7 It is anticipated that this question will be addressed by the Planning Authority and others.

## Q7.5 Is there a reasonable prospect that the total of 2742 new dwellings will be delivered through local plan allocations?

1.8 It is anticipated that this question will be addressed by the Planning Authority.

# Q7.6 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?

1.9 It is anticipated that this question will be addressed by the Planning Authority and others.

### Q7.7 Has appropriate consideration been given to non-implementation lapse rates?

- 1.10 It is anticipated that this question will be addressed by the Planning Authority.
  - *Q7.8 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?
- 1.11 It is anticipated that this question will be addressed by the Planning Authority.