

## **Matter 7 – Housing Land Supply (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?**

1. The Housing Land Supply Position, Housing Trajectory and Windfall Allowance Background Paper (May 2022) considers lead in times it states that on average it takes 27 months from grant of outline permission to first completion, and 20 months from grant of full permission to completion. It also states that where specific site evidence has been received this has been considered in the phasing of sites. The HBF considers that these lead in times seem particularly short and would suggest that potentially if there is not clear evidence that these lead in times are suitable that it may be appropriate to apply a more cautious approach. Particularly for the larger sites where research<sup>1</sup> by Lichfields suggests that for sites of 500+ that the average time taken from outline to first dwelling completions is circa 3 years. The HBF would strongly recommend that the Council works closely with developers and the homebuilding industry to ensure that the lead in rates reflect the realities of the sites included in the supply.

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

2. The Housing Land Supply Position, Housing Trajectory and Windfall Allowance Background Paper (May 2022) considers the build rates within section 5.5 it states that an average build rate of 30dpa, will be used unless written evidence is provided by an agent or developer. The HBF considers that the Council's assumptions on sites in relation to build out rates should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.

### **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?**

3. Figure 7 of the Local Plan identifies capacity for 5,995 dwellings on committed sites with outstanding planning permissions on both large and small sites as of 31<sup>st</sup> March 2022. The HBF does not wish to comment upon the acceptability or otherwise of individual sites. However, the HBF considers it is important that all the sites contained within the plan are

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<sup>1</sup> Start to Finish (Second Edition, 2020) <https://lichfields.uk/content/insights/start-to-finish>

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deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the Council to have the evidence to support the proposed delivery of these sites.

**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?**

4. The HBF does not wish to comment upon the acceptability or otherwise of individual sites. However, the HBF considers it is important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the Council to have the evidence to support the proposed delivery of these sites.

**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?**

5. The HBF does not wish to comment upon the acceptability or otherwise of individual sites. However, the HBF considers it is important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the Council to have the evidence to support the proposed delivery of these sites.

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

6. As above, the HBF does not wish to comment upon the acceptability or otherwise of individual sites. However, the HBF considers it is important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the Council to have the evidence to support the proposed delivery of these sites.

**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?**

7. The Housing Land Supply Position, Housing Trajectory and Windfall Allowance Background Paper (May 2022) states that analysis of historic trends and consideration of future windfall sources have been undertaken to assess what the appropriate level of allowance should be. The Council suggest that there has been a strong track record of windfall delivery in Bassetlaw. Table 3 of the Paper identifies a net average of 116 windfall completions on sites 1-9 dwellings over the period 2010/11 to 2021/22 and 342dpa on sites of 10 or more dwellings. However, paragraph 7.11 of the Paper highlights that all sites delivered in Bassetlaw since 2011 have been on unallocated as the Bassetlaw Core Strategy did not allocate sites for residential development. Therefore, the HBF considers that the historic trends are unlikely to be truly reflective of the situation going forward once there is an adopted Plan and allocated sites. The HBF considers that the windfall allowance of 1,200 dwellings, 100 dpa from 2026/27, needs to be robustly evidenced, as national policy only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply.

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

8. From the Council's evidence, it is not apparent that a non-implementation lapse rate has been applied to existing commitments and / or allocations, which should be clarified by the Council. The HBF considers that it can be beneficial to include a lapse rate in consideration of the supply, as this allows for circumstances where sites do not come forward as expected or

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where sites are stalled or where sites are amended and there is a change to the previous permission.

**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?**

9. The HBF has not considered in detail the deliverability of the individual sites that make up the supply, and therefore can not confirm if the requirement can be met. However, the HBF would expect the Council to be able to provide evidence to support the assumptions that they have made in relation to each site.

**b) A 5 year supply of deliverable housing land will exist on adoption?**

10. The Five Year Housing Land Supply Statement (July 2022) identifies a 13.5years housing land supply, although this is calculated using a 5% buffer and the 279dpa LHN.

11. The NPPF<sup>2</sup> makes it clear that a buffer is required as part of the supply of specific deliverable sites, the 5% requirement is the minimum requirement and applies where the Council is not wishing to demonstrate a five-year supply of deliverable sites through a recently adopted plan (where a 10% buffer would apply) and there has not been a significant under delivery of housing over the previous three years (where a 20% buffer would apply). The NPPF<sup>3</sup> states that under delivery will be measured against the Housing Delivery Test (HDT), where this indicates that delivery was below 85% of the housing requirement. The 2021 HDT score for Bassetlaw was 248%, therefore the 20% buffer would not apply. However, the Council's response to the Inspector's Initial Questions (2022) states that they wish to confirm a five year supply, therefore, the 10% buffer appears appropriate.

12. If the Council were to use the proposed housing requirement of 582dpa, and the 10% buffer the 5-year requirement increases to 2,968dwellings or an annual requirement of 594dwellings, which would significantly reduce the housing supply to 6.67 years.

13. The HBF has not considered in detail the deliverability of the individual sites that make up the supply, and therefore cannot confirm is a 5-year supply will exist on adoption. However, the HBF would expect the Council to be able to confirm the delivery of the sites included in the 5-year supply and to have evidence to support this delivery.

**c) An ongoing 5 year supply of deliverable or developable housing land is likely to exist throughout the plan period?**

14. The Council's housing trajectory suggests a rolling five-year housing land supply through much of the Plan period, however, this is currently dependent on the sites and windfall sites coming forward as expected. The HBF would expect the Council to keep the trajectory under review and to monitor the delivery of sites to ensure that there is an ongoing 5-year housing land supply. If the Council is not able to provide a 5-year housing land supply the HBF would expect the Council to take action, and potentially to review the Plan to bring more sites forward.

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<sup>2</sup> Paragraph 74 of the NPPF 2021

<sup>3</sup> Footnote 41 of the NPPF 2021

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