

Bassetlaw Local Plan Examination

Matter 7: Housing Land Supply

North Road, Retford (HS7 and EM006)

Prepared by Fisher German LLP on behalf of The Hospital of
The Holy and Undivided Trinity

Project Title

North Road, Retford

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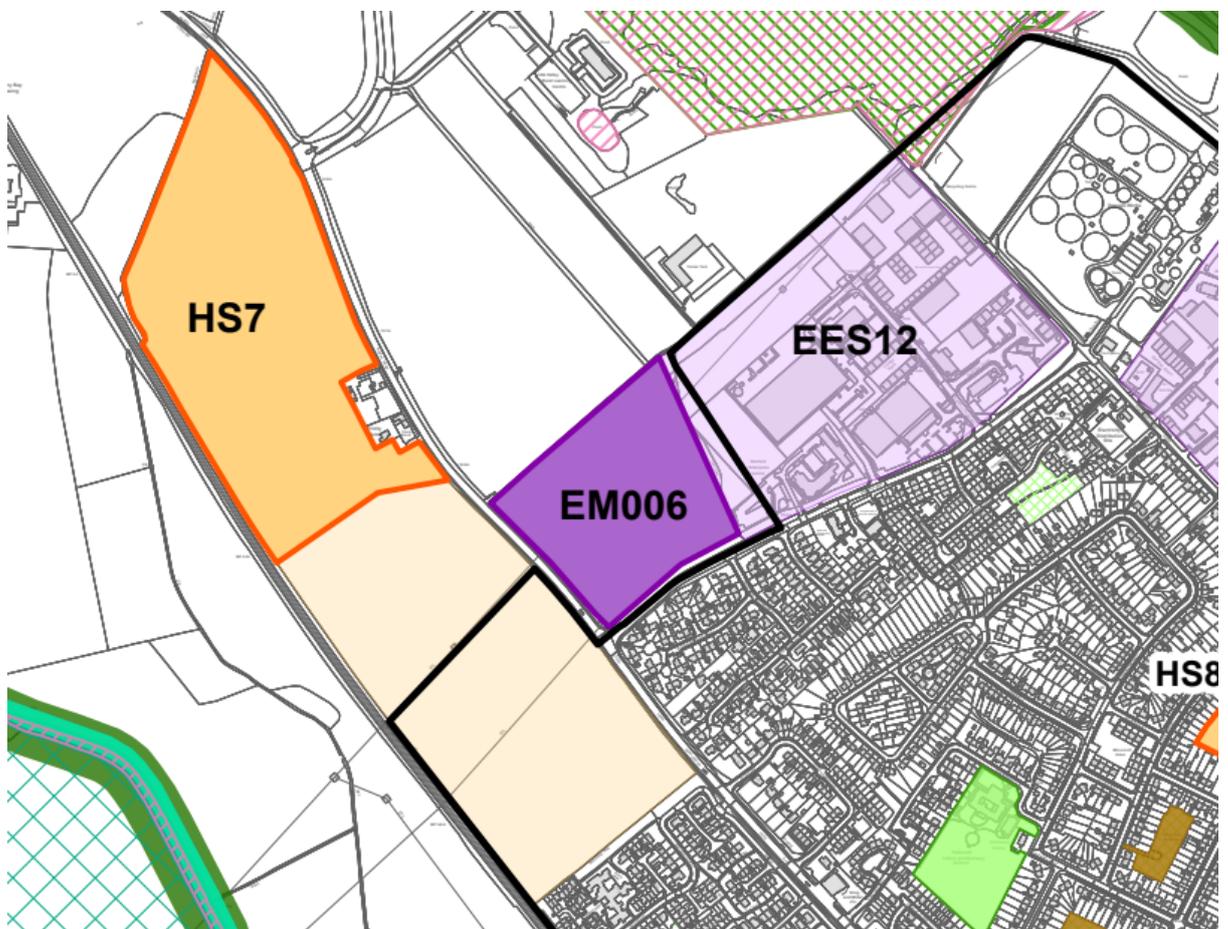
Norman Court

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1. Introduction

- 1.1 This Hearing Statement has been prepared on behalf of The Hospital of The Holy and Undivided Trinity in respect of their land interests at North Road, Retford, proposed allocation HS7 and EM006, as illustrated on Figure 1.
- 1.2 Land immediately south of proposed allocation HS7 (buff shading on Figure 1 below) was promoted by The Hospital of The Holy and Undivided Trinity through the previously withdrawn Site Allocations Development Plan Document. An outline planning application was subsequently prepared by The Hospital of The Holy and Undivided Trinity for 196 dwellings (15/00493/OUT) and 11 hectares of employment land.



Bassetlaw Local Plan 2020-2038: Publication Version Policies Maps Composite, July 2022 (The Hospital of The Holy and Undivided Trinity Land Interests HS7 and EM006)

- 1.3 The residential scheme is now being built out Avant Homes (20/01477/RES), and the employment land to the east of North Road (EM006) will shortly be brought forward. There is active market

interest in proposed allocation HS7 and terms for disposal are currently being negotiated with a house builder.

- 1.4 The Hospital of The Holy and Undivided Trinity support the proposed allocations and remain committed to delivery, as evidenced by the successful delivery of the initial phase of land which is currently bringing forward high quality housing in a sustainable location to the north of Retford, one of the most sustainable settlements in Bassetlaw.
- 1.5 This Statement should be read alongside the Statement of Common Ground signed by The Hospital of the Holy and Undivided Trinity and Bassetlaw District Council.

2. Matter 7: Housing Requirement (Policies 16-28)

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

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?

2.1 We have been in dialogue with the Council throughout the production of the Plan in respect of Policy HS7. Whilst we appreciate the Council has a requirement to produce a housing trajectory which is deliverable and demonstrates the Council's ability to deliver the overall housing requirement in full, as well as a rolling five-year housing land supply. In this context we understand the Council's may wish to advance a cautious approach.

2.2 The Council's submitted housing trajectory (Appendix 3), assumes a start at Trinity Farm in the year 2029/30, delivering 12 dwellings. These scales up to 60 dwellings for the next 4 years, concluding in the year 2034/35 with 58 dwellings delivered. We have maintained and now agreed through a Statement of Common Ground with the Council that a more optimistic timetable can be adopted (see SoCG for more information).

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?

2.3 We have no specific comments on individual sites. Annex 2 of the NPPF however sets out the scenarios wherein a site should be considered to be deliverable. It is noticeable that having regard for the Council's trajectory, nearly all sites with planning permission are considered deliverable in full by 2037/38. Only one site with planning permission is anticipated to not fully deliver by the end of the Plan period (Harworth Colliery, Scrooby Road (1300 dwellings)). On that basis even with some slippage on other sites, it is considered likely sites with planning permission could deliver 5,995 dwellings up to 2038. If specific evidence is provided to demonstrate that individual sites either will not deliver as anticipated, or deliver at all, then that may have an impact on the quantum of development deliverable.

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

- 2.4 We have no specific comments on individual sites. Annex 2 of the NPPF however sets out the scenarios wherein a site should be considered to be deliverable. It is noticeable that having regard for the Council's trajectory, all sites allocated in made Neighbourhood Plans are to complete delivery by 2029/30. On the basis that all Neighbourhood Plans have gone through an examination process and there are is a significant time buffer till the end of the Plan period, it is assumed reasonable that all Neighbourhood Plan allocations will deliver in full by the end of the Plan period.

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?

- 2.5 No specific comments.

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

- 2.6 We have no specific comments on the deliverability of other Local Plan allocations, but would again that proposed residential allocation HS7 is deliverable, with negotiations progressing with a housebuilder. The site is capable of delivering in excess of 300 dwellings and there is a strong likelihood that a start on site will commence far sooner than proposed by the Council's trajectory. The Statement of Common Ground between our client and Bassetlaw District Council (6.1.1), details our proposed delivery trajectory for the site.

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?

- 2.7 Whilst we have no specific objection to the windfall rate applied by the Council, it is noted that whilst based on recent evidence of windfall delivery, it was delivered at a time wherein there was no up to date local plan and no housing allocations (since 2011). As such, it may be when the new Local Plan is adopted, the rate of windfall reduces due to the availability of allocated land.
- 2.8 The Council set out that since 2011 there has been annual average delivery of 116 dwellings per annum on sites of 1-9 dwellings and 342 dwellings per annum on larger sites. The Council may consider that the rate of 1-9 dwelling sites will not be directly influenced by the increase in provision of larger sites through the Local Plan. It is also noted that sites suitable for minor development are not an infinite resource, so some capacity studies of settlements may be beneficial to establish whether there is enough land to deliver this total for the remainder of the

Plan period.

7.7: Has appropriate consideration been given to non-implementation rates

- 2.9 It does not appear that the Council have utilised non-implementation or lapse rates in its calculations. There is no specific national policy or guidance which requires this. Whilst we consider the implementation of a lapse rate it likely to be beneficial for overall delivery, it in essence fulfils the same function as having a sufficient buffer of housing land available for development. Assuming the deliverability of the Council's trajectory, there is a buffer of 17%. Whilst applying a lapse rate would further aid the deliverability of the Plan, a 17% buffer is a useful step and will provide some protection for the Plan in terms of non-implementation of sites. In this context it is not considered that a failure to implement a lapse rate is necessary for the overall soundness of the Plan, nor should its omission be seen as terminal.

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?*
- 2.10 Having regard for the provision of a 17% buffer, a strong reliance on sites which already benefit from planning permission and subject to a robust examination of the Plan, it is considered entirely possible that the overall housing requirement can be met by 2038. In any event, given supply is particularly strong in the initial years of the Plan, through future Plan reviews the likelihood of delivery of the remaining housing requirement in full can be fully explored without harming housing delivery in the short term.
- 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?*
- 2.11 The Council have published a five-year housing land supply statement in July 2022, which resulted in a supply of 13.5 years. However, it is noted that this, in accordance with guidance, utilised base Local Housing Need (279dpa) as established through the Standard Methodology, which is significantly below the proposed housing requirement of the Local Plan.
- 2.12 To calculate an updated position, it is first necessary to establish the requirement. The Plan proposes a housing requirement of 582 dwellings, equating to a 5 year requirement of 2,910 dwellings per annum. Assuming a 10% buffer, the Council confirm at 8.2 of examination document BDC-01 that they wish to set a five-year land supply position through the Plan's examination, this results in a requirement of 3,201 dwellings (640 per annum). The Council's supply, as per Appendix

3 of the Local Plan for the period 2022/23-2026/27 is 4,720 dwellings. This equates to 7.375 year supply. Whilst there may be some reduction in supply through the removal of sites or updated delivery assumptions reducing delivery within the 5 year period, the position is considered likely to be robust. Even more so if only a 5% buffer is utilised.

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

- 2.13 On the basis of the submitted trajectory it is considered likely that the Council will be able to demonstrate a consistent supply of housing throughout the Plan period. However, future reviews of the Local Plan enable the position to be monitored and if required mitigatory measures such as additional housing allocations made if required.