Barton Willmore, now Stantec on behalf of Howard (Retford) Limited

Examination into the Bassetlaw Local Plan

Matter 7: Housing Land Supply

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?
- 1. The Housing Land Supply Position, Housing Trajectory and Windfall Allowance (document reference: SS-026) sets out the anticipated lead-in times and build out rates which have informed the housing trajectory. It suggests 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, and that large-scale sites developed by a single volume house builder will have an average build out rate of 30-35 dwellings per annum.
- 2. It is our Client's view that the above lead-in times are realistic. At the Ordsall South allocation site, subject to securing the requisite planning permissions, it is anticipated that construction could realistically commence on site in Q2 2025. Should outline planning permission be secured in Q2 2023 as anticipated, this would be a lead-in time of 24 months.
- 3. However, it is our Client's view that an average build out rate of 30-35 dwellings per annum to be overly conservative. More than one house builder could be at the Site at any one-time delivering development at different parcels concurrently. It is anticipated that up to 50 dwellings could be delivered by *each* house builder at the site per annum, with the allocation built out in its entirety by 2040.

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??

4. Our Client has no comment to make in relation to this question.

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?

5. Our Client has no comment to make in relation to this question.

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?

6. Our Client has no comment to make in relation to this question.

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

7. Our Client only wishes to respond to this question as it relates to their interests at Ordsall South.

- 8. The Ordsall South site is allocated for 1,250 residential dwellings under Policy 27. Our Client has worked alongside the Council for many years to realise the development potential of the Site. This included a Baseline and Vision Document demonstrating how a mixed-use development could be delivered at the Site, a condensed version of which entitled 'Ordsall South Preliminary Concept Plan' was subject to a public consultation as part of the Draft Bassetlaw Local Plan Focussed Consultation which took place in June 2021.
- 9. Subsequently, a full suite of technical reports have been produced to support development at the Site. The conclusions of these technical assessments demonstrate that, subject to appropriate mitigation measures where necessary, there are no technical constraints which preclude development at the Site.
- 10. Supporting work to realise development at Ordsall South is well advanced and it is the Client's intention to submit an outline planning application to the Council in the short-term.
- 11. Subject to securing the requisite planning permissions, it is anticipated that construction could realistically commence on site in early 2025 and be fully completed by 2040. Table 1 below denotes the indicative construction and phasing programme for the Development.

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	2025-	2026-	2027-	2028-	2029-	2030-	2031-	2032-	2033-	2034-	2035-	2036-	2037-	Total
	26	27	28	29	30	31	32	33	34	35	36	37	38	dwellings
Ordsall South	50	50	100	100	100	100	100	100	100	100	100	150	150	1,250
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Table 1: Indicative Construction Phasing

12. Our Client is therefore of the view that Ordsall South will be delivered within the plan period.

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?

- 13. Policy ST1 makes allowance for 1,200 dwellings to come forward as windfall development over plan period. Our Client is concerned that this could result in double counting, with 3,374 dwellings also set to come forward on non-allocated sites in rural settlements.
- 14. Policy ST1 states that within identified development boundaries, eligible Large Rural Settlements will collectively deliver 1,535 new dwellings and eligible Small Rural Settlements will collectively deliver a minimum of 1,839 new dwellings over the plan period. Eligible settlements are set out at Policy ST2.
- 15. The allowances for residential development in rural settlements do not amount to housing allocations, rather, a level of growth commensurate with the size and sustainability of that settlement. It is not clear how the Council will distinguish between these rural allowances from windfall development. The Councill will face the dual challenge of monitoring and drawing a distinction between these two categories as part the monitoring of the effectiveness of the Local Plan.
- 16. Unless the distinction is defined, double counting may result in fewer dwellings being delivered than planned for, which risks the Council not meeting its local housing need and exacerbating affordability pressures.

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

17. In light of the work undertaken to date and the progress made in relation to the outline planning

application which is set to be submitted to the Council in the short-term, out Client is confident that the Ordsall South allocation will be delivered over the course of the plan period.

Q7.8 Overall, is there convincing evidence that:

Having regard to assumptions about commitments, allocations and windfalls the housing requirement across Bassetlaw between 2021 and 2038 is likely to be met?

- a) A 5 year supply of deliverable housing land will exist on adoption?
- b) An ongoing 5 year supply of deliverable or developable housing land is likely to exist throughout the plan period?
- 18. Our Client only wishes to respond to this question as it relates to their interests at Ordsall South. In light of the work undertaken to date and the progress made in relation to the outline planning application which is set to be submitted to the Council in the short-term, out Client is confident that the Ordsall South allocation will be delivered within the plan period.
- 19. However, flexibility should be incorporated into policies relating to housing supply and delivery to ensure that housing allocations can be delivered in their entirety within the plan period where there is demand. Not only would this be in the spirit of paragraph 60 of the National Planning Policy Framework which seeks to boost the supply of homes, but it would also ensure that there is a mechanism in place to offset aspects of the Council's housing supply which fail to come forward, such as windfall development.

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