

Bassetlaw Local Plan Examination, Vistry Group Ltd, 4th November 2022

Hearing Statement – 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?

Response to Inspector's Question 7.1:

1. The assumptions made appear to be drawn from the Housing Land Supply Position, Housing Trajectory and Windfall Allowance Paper, May 2022 Update (**SS-026**). With respect to both lead-in times and building our rates (Inspector's questions 7.1(a) and 7.1(b)), the May 2022 LAA (**BG-030**) referenced, which, at Appendix 3, includes a table of historic build rates and lead-in periods over a four-year period 2016-2020.
2. **BG-030** shows an average of 3.6 years from the grant of outline to first completions for outline consents, and 2 years from the grant of full consent to first completions. However, it is unclear how this has informed the Housing Trajectory at Appendix 3 of the Public Draft (**SUB-010**), particularly given that eight of the 'Proposed Local Plan allocations' at pages 239-240 of this trajectory are estimated to deliver from 2025/26 onwards (even assuming Local Plan adoption 2023 and the subsequent granting of consents in 2024 these lead-in times appear optimistic).
3. None of the evidence in the LAA (**BG-030**) demonstrates sites which sustain *average* delivery rates of 75dpa as proposed in the trajectory for Harworth Colliery, outline permission reference 18/01210/OUT, page 238 of the Publication Draft (**SUB-010**), nor 90dpa as proposed in the draft allocations at Retford (LAA245-246) and Worksop (LAA462) (Housing Trajectory, page 239, **SUB-010**).
4. Peak delivery rates are referred to in Appendix 3 to the LAA, but nothing insofar as average delivery rates sustained over a consistent period in order to provide a realistic benchmark of future delivery rates.

Response to Inspector's Question 7.2:

5. No comment.

Response to Inspector's Question 7.3:

6. No comment.

Response to Inspector's Question 7.4:

7. No comment.

Response to Inspector's Question 7.5:

8. It is not a reasonable prospect that the 2,742 new dwellings on the allocations as proposed will be delivered given the constraints and issues raised in the Council's Land Availability Assessment (LAA) and Appendices, May 2022 (**BG-030**) which at present appear unresolved. For example, the Tuxford draft allocation under Policy HS14 has issues relating to impacts on the conservation area, allocation HS7 (Trinity Farm) requires sequential and exception tests to be undertaken with respect to on-site flood risks, as well as landscape constraints, the Policy HS3 allocation at Radford Street, Worksop, is already subject to an outline planning application but faces an unresolved objection from the Highway Authority.
9. The necessary 'clear evidence' required to demonstrate deliverability under the NPPF Annex 2 definition remains lacking for sites with outline consent and draft allocations.

Response to Inspector's Question 7.6:

10. As explained in previous submissions, the reliance on windfalls - which constitute over 11% of the overall supply against the Policy ST1 requirement for 10,476 dwellings – is not justified and conflicts with other Local Plan objectives for the following reasons.
 - Windfalls are likely to be smaller sites or brownfield sites within existing settlement limits, where the ability to realise policy compliant levels of 25% affordable housing are likely to be limited.
 - A reliance on windfalls may add 'hope value' to existing employment land to come forward for housing development, hindering local economic objectives and reducing the self-containment of settlements.

Response to Inspector's Question 7.7:

11. No consideration appears to have been given to non-implementation lapse rates.

Response to Inspector's Question 7.8:

12. Fundamental concerns have been raised regarding the site selection and SA process insofar as how this has determined the spatial strategy and the draft allocations proposed. It is for these reasons that there is considerable doubt as to the delivery of housing land supply through to 2038, including for the first 5-year period.

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