

BASSETLAW LOCAL PLAN 2020-2038
PUBLICATION VERSION SECOND ADDENDUM
– REGULATION 22
LOCAL PLAN EXAMINATION

RESPONSE TO MATTERS, ISSUES AND QUESTIONS

Matter 7 – Housing Land Supply

On behalf of William Davis Homes in relation to land
north of Mansfield Road, Worksop

November 2022

H e a t o n s
Planning Environment Design




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Revision	Author	Checked by	Date
A	SS	NG	01.11.2022
B	SS	NG	04.11.2022



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Client

William Davis Homes

Our Reference

WDH-001-D

7. 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?

(Policy ST15)

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?

The Council set out the assumed lead in times at Section 5 of the Housing Land Supply Position, Housing Trajectory and Windfall Allowance Background Paper, Updated May 2022. Paragraph 5.3 assumes an average of 27 months from the grant of outline planning permission and 20 months from the grant of full planning permission to first completion. Other sites will not be available until later in the plan period and these have been considered in the phasing of sites.

The main concern here is that research shows that much larger sites take longer to deliver, taking into consideration constraints such as delays within the planning process; agreement on S106 negotiations; delivery of transport infrastructure; protracted landowner negotiations; availability of materials and labour. Many of these identified constraints have become an even greater barrier to the delivery of development post-COVID and particularly given the current economic climate which has seen material prices and property prices increase year on year and a lack of labour resources.

Lichfield's Start to Finish (Second Edition, February 2020) suggests that larger schemes of more than 500 dwellings with an outline planning permission on average takes roughly 36 months to delivery its first home ready for occupation. However, from the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.

We agree that the new local plan should be ambitious in terms of housing delivery. However, Savills Residential Property Forecasts (Winter 2021) suggests that 2025/26 is the earliest time frame for housing delivery to return to pre-pandemic levels (i.e. before the current increases in interest rates affected the . As such, it is considered that there lead in times suggested by the Council are particularly short. It would be more appropriate to adopt a more cautious approach.

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

The Council are opting for a build out rate of 30dph within the housing land supply evidence paper (Page 7). Notwithstanding the potential lack in delivery as noted above, the Councils

assumptions on delivery rates appear to be consistent with the same research papers as outlined above.

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?

This suggests that such sites would make no contribution to completions within the first five years of the local plan (e.g. Peaks Hill Farm HS1 is expected to begin delivery until at least 2027). The Council are heavily reliant on the strategic allocation of HS1 and are anticipating a delivery rate of 120 dwellings per annum from the earliest anticipated decision date (remaining 9 years of the Plan period).

As such, this is considered extremely ambitious, especially when acknowledging the constraints of each site and the trends of the research identified above. Therefore, the allocation of more sites is required within the emerging Plan to avoid a potential shortfall in delivery and provide a degree of flexibility across the Plan Period.

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?

At the time of writing, there are 20 made neighbourhood plans within the district and it is clear that the Council continue to support the preparation and implementation of Neighbourhood Plans with a number of other areas designated. Small sites make an important contribution to the housing delivery within a local authority area.

The Carlton Neighbourhood Plan alone looks to deliver 560 dwellings, with a key contributor being the redevelopment of the former Firbeck Colliery which is expected to begin completions in 2023 and delivering up to 400 units. This would suggest that allocations within Neighbourhood Plans would exceed the 438 new dwellings. We would conclude that it is a reasonable prospect that a total of 438 new dwellings will be provided by the end of 2038.

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?

There are a number of constraints to the delivery of brownfield sites within urban areas, including contamination issues; land ownership issues; conflicting neighbouring land uses; and any issues related to the housing market. As such, it would be necessary for the Council to fully explore all options when assessing a site to be deliverable, available and realistically achievable for housing delivery over the next 15-year period.

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

The inclusion of housing completions between 1st April 2020 and 31st March 2022 would suggest that the Local Plan has already delivered 12% of the housing required for the lifetime of the Plan, with 35% of those delivered within small rural settlements, a delivery strategy which is at odds with draft Policy ST1 and adopted Core Strategy Policy CS1 and is explained further below.

It noted that the Core Strategy was adopted in December 2011 and set a yearly housing growth target of 350 houses per annum growth target for the District for the period 2010 to 2028, in

order to provide at least a 15-year timeframe for the Site Allocations DPD, which has now been withdrawn. The Core Strategy itself did not allocate sites for residential development.

As Heaton's understand it, data published within the Authority Monitoring Report 2020-2021 (August 2021) indicates that the Council first met the annual housing target six years into the adoption of the Core Strategy in 2015/16, at a point where policies within the Local Plan would be out-of-date with the National Planning Policy Framework (2015/16 AMR: 3.4 YHLS).

With this in mind, there is considerable risk that the Local Plan will not contain sufficient allocations prepared to deal with any future uplift housing requirements leading to inflated housing delivery and a lack of housing land supply. This in turn which would lead to unplanned development that is associated with the significant increase in planning permissions being granted over recent years, which has led to an increase in housing delivery which now makes a significant contribution to the new Plan period.

As discussed, above, it is considered necessary for the local planning authority to allocate additional houses and place less reliance on large strategic extensions coming forward in a timely manner. It is therefore suggested that the Council take extra precaution in allocating additional sites to ensure a healthy delivery of housing across the entire plan period.

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?

The Housing Land Supply Position, Housing Trajectory and Windfall Allowance Background Paper (updated May 2022) and carries forward historic trends of windfall delivery into the new Local Plan. This suggests a net average of 116 windfall completions between 2010 and 2022 on sites of less than 9 dwellings and 342dpa on sites of 10 or more dwellings.

As noted above, the Core Strategy did not allocate sites, and the Council did not meet the housing delivery target in the Core Strategy for the first six years of the Plan period, which left housing proposals to be assessed against the presumption in favour of sustainable development (Para 11, NPPF).

Whilst we agree that small and medium sized sites make an important contribution to meeting the housing requirement of Bassetlaw, National Planning Policy Framework (Para.71) requires local planning authorities to show compelling evidence that windfall sites would provide a reliable source of supply. However, it is considered that the above windfall allowance should be properly evidenced other than relying on past trends in the District.

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

There is no suggestion from the Council's housing evidence base that a non-implementation lapse rate has been included within existing commitments or allocations in the new Local Plan. It is critical that an assumption is included to ensure that the 5YHLS and trajectory are correct and achievable.

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?

With this in mind, there is considerable risk that the Local Plan will not contain sufficient allocations prepared to deal with any future uplift housing requirements leading to inflated housing delivery and a lack of housing land supply. This in turn which would lead to unplanned development that is associated with the significant increase in planning permissions being granted over recent years, which has led to an increase in housing delivery which now makes a significant contribution to the new Plan period.

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

The Council have indicated in their response to the Inspectors MIQs (Paragraph 8.2) that they would like the 5-year housing land supply position to be confirmed as part of the plan-making process.

It is anticipated that the Council will be able to present the evidence to a suitable five-year housing land supply with an appropriate 10% buffer (Paragraph 74, NPPF). However, if this is not the case, it is expected that the Council would review the Plan to bring additional sites forward and boost the supply of housing in the district.

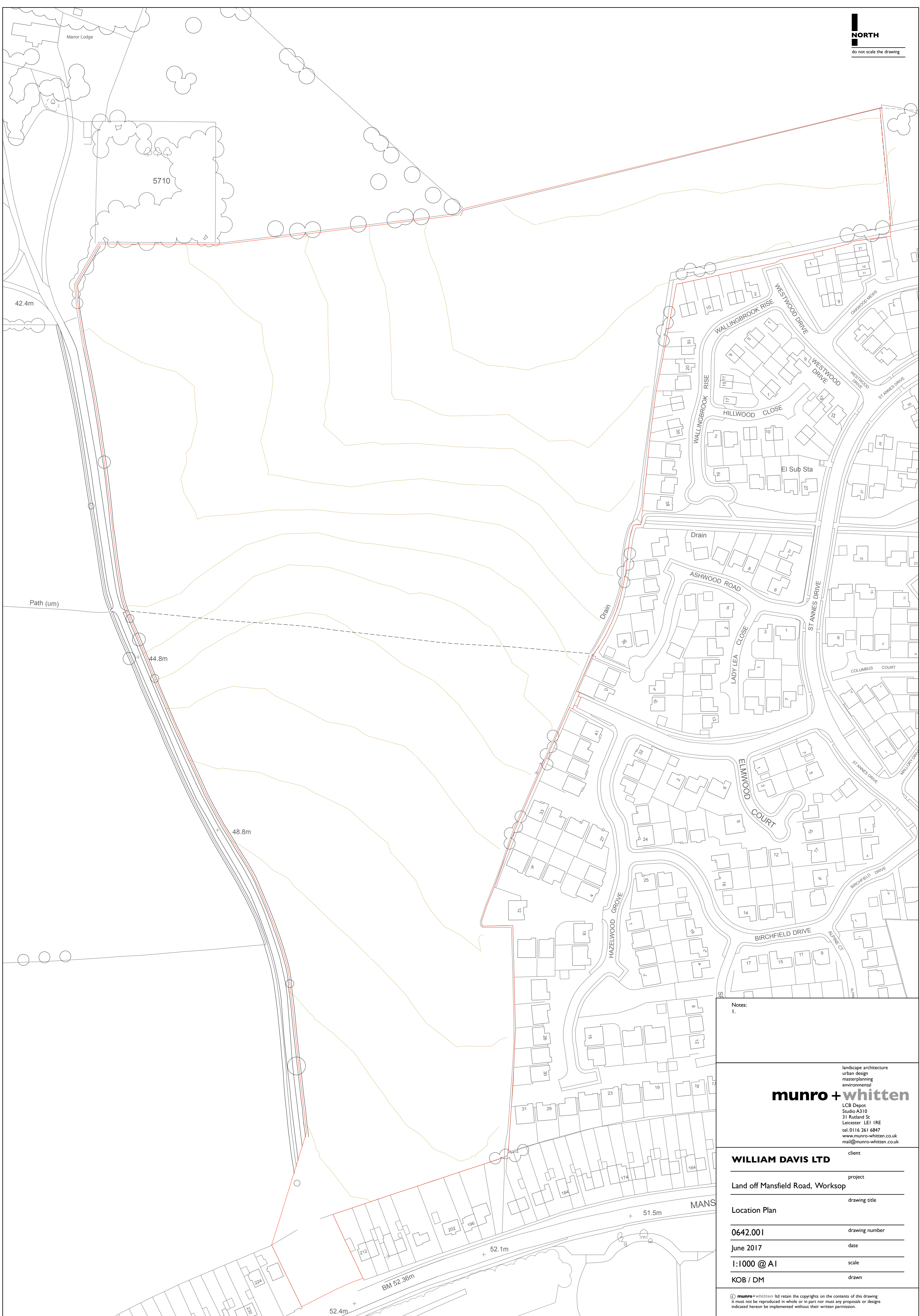
- c) An ongoing 5-year supply of deliverable or developable housing land is likely to exist throughout the plan period?

Based on the above, and our previously representations during the preparation of the new local plan, there is not convincing evidence that the Council will maintain an ongoing five year housing land supply throughout the plan period up to 2038.

There are certain assumptions made at this stage that are insufficiently evidenced (i.e. windfall sites) and a heavy reliance has been placed on the delivery of large urban extensions where clear constraints are present. As above, if a five-year housing land supply cannot be maintained throughout the plan period, it is expected that the Council will commit to an early review of the Local Plan to bring more sites forward.



Enclosure 1: Site Location Plan



Notes:
1.

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Land off Mansfield Road, Worksop	project
Location Plan	drawing title
0642.001	drawing number
June 2017	date
1:1000 @ A1	scale
KOB / DM	drawn

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