

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

Examination into the Bassetlaw Local Plan

Matter 8: Meeting Housing Needs of different groups in the community

Issue 8 - Does the Plan set out positively prepared policies to meet affordable housing needs and the housing needs of other groups, which are justified, effective and consistent with national policy?

Q8.1

- a) In Policy ST29 is the 20%/25% (brownfield/greenfield) affordable housing requirements justified, and will it be effective in helping to maximise affordable housing and not undermining deliverability?**
- b) Is there convincing evidence to justify the proposed tenure split for affordable housing units? Would this accurately reflect the requirements for affordable housing in the Housing and Economic Development Needs Assessment and Addenda (SS-010, SS-007 and SS-024)?**
- c) Is Policy ST29 sufficiently clear in the approach to be taken for off-site and/or financial contributions in lieu of on-site provision?**
- d) Are the suggested main modifications to ST29 and the supporting text necessary for soundness?**

1. The Council's approach to the tenure split of affordable housing is set out at Figure 27a of the Local Plan. It is acknowledged that a Written Ministerial Statement published in May 2021 requires 'First Homes' to account for at least 25% of all affordable housing units delivered. However, the tenure split of the remaining affordable units should not be prescriptive to allow flexibility in the provision of affordable housing to reflect locally identified needs and up to date evidence.
2. The proposed split at Figure 27a appears to relate to the needs set out within the Bassetlaw Housing and Economic Development Needs Assessment (HENA) 2020 (document reference: SS-007) and the Whole Plan Viability Assessment 2022 (document reference: SS-024). Those needs represent only a snapshot in time and therefore Policy ST29 should be amended to allow flexibility in the provision of affordable housing to reflect locally identified needs as they change over time.
3. We consider that the policy should not specify a tenure mix but require developers to provide a tenure mix to reflect local needs (based on up-to-date evidence) and to allow for deviations from that mix where viability or other site-specific matters necessitate. Such an approach would maximise the delivery of affordable housing, provide sufficient certainty to developers, and would avoid delays in the delivery of new homes.
4. The Council's affordable housing requirement of 214 dwellings per annum has been informed by the HENAs (document reference: SS-007 and SS-024).
5. However, the Council are clear at paragraph 7.17.18 of the Local Plan that the delivery of affordable housing in the District is challenging. The Whole Plan Viability Assessment (document reference: PUB-028) assessed the viability of housing schemes once affordable housing provision, a Section 106 contribution of £3,000 per dwelling, and Biodiversity Net Gain contribution of £500 per dwelling were factored in and recommended that on greenfield and brownfield sites a requirement of 25% and 20% affordable housing provision would be appropriate and not undermine scheme viability.
6. A balance has to be struck between the need to deliver affordable housing and the viability of housing schemes. If affordable housing requirements are too high, it would have a negative impact on scheme viability and have a downward impact on housing delivery. A scenario where affordable housing requirements become a constraint to delivery is particularly self-defeating for affordability is directly linked to housing supply: fewer houses coming forward results in housing becoming even

more unaffordable as demand outstrips supply.

Q8.2

- a) ***Does ST30 provide an effective framework for ensuring an appropriate mix of housing will be delivered over the plan period?***
 - b) ***Is the requirement in ST30 to provide 2% of plots on housing allocations over 100 for self-build plots justified? Will the policy approach be effective in ensuring the delivery of an adequate supply of custom and self-build plots over the plan period?***
 - c) ***Is the suggested main modification to the supporting text necessary for soundness.***
7. Policy ST30 seeks to deliver a mix of housing by requiring efficient use of land, while respecting the character of the area, and providing an appropriate mix and type of market housing, affordable housing, and specialist housing for older people and disabled persons informed by the Council's most up-to-date evidence of housing need. Our Client is broadly supportive of this approach to delivering a mix of housing.
 8. Our Client is supportive of self-build plots for their potential to contribute to the overall supply of housing. However, the Council's approach is only changing housing delivery from one house builder to another without boosting housing supply. The Council should identify additional sites that could deliver self-build housing rather than place an additional burden on the house building industry.
 9. We consider Government guidance on this issue to be more focussed on identifying appropriate sites rather than requiring plots to be provided by the housing building industry for self-builders. The Planning Practice Guidance outlines that the Council should engage with landowners and encourage them to consider self-build and custom housebuilding and use their own land for self-build and custom housebuilding (Paragraph: 025 Reference ID: 57-025-20210508).
 10. The Council is seeking to amend Policy ST2 to allow for self-build dwellings in rural settlements once an eligible settlement has met its housing requirement. The rationale behind this is to boost the supply of housing. We support this approach and are of the view that this is how the Council should approach self-build plots in relation to allocated sites. In essence, once allocated sites are built out in places like Retford, the Council should countenance additional sites coming forward as self-build sites in the interests of boosting housing supply.
 11. Our Client is of the view that the policy should be amended to encourage the provision of self-build plots on non-allocated sites consistent with the Government's intention. Such an approach would require the Council to take a more proactive approach to finding land for self-builders which would contribute to boosting the supply of housing.

Q8.3

- a) ***Are the requirements of ST31 relating to the provision of homes that comply with M4(2) of the building regulations justified by evidence relating to need and viability?***
 - b) ***Does ST31 provide an effective framework to ensure the needs for specialist housing over the plan period will be met? Will the criteria ensure such housing is provided in appropriate locations?***
 - c) ***Are the main modifications to the policy and supporting text suggested necessary for soundness?***
12. Policy ST31 sets out that proposals for residential market housing should be designed to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations.
 13. However, there is no requirement set out in the NPPF for residential dwellings to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations. Footnote 49 of the NPPF 2021 sets out that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties.

14. The Bassetlaw Housing and Economic Development Needs Assessment (document reference: SS-024) acknowledges that there is a need to increase the supply of accessible and adaptable dwellings. However, these documents stop short of recommending an exact proportion.
15. Reference to the need to increase M4(2) homes in the evidence base does not justify all dwellings being subject to this Building Regulation standard. It is also our Client's views that there is no justification for the Council to seek to prescribe Building Regulations at all which are properly controlled by separate legislation.
16. Our Client is of the view that a proportional requirement would be more appropriate based on the evidence presented by the Council for there is no evidence to suggest all homes should be built to Part M4(2) standard. Some but not all homes should be built to Part M4(2), to provide sufficient scope to meet the need for such homes whilst also ensuring development design and mix is not compromised by the demand for all homes to be built to the Part M4(2). Our Client therefore objects to point 3 of Policy ST31.

Q8.4

- a) *Would ST32 provide an adequate framework to ensure the need for additional accommodation for Gypsy and Travellers can be met as required by national policy? Are the requirements of the policy clear, and would they be effective?*
 - b) *Is the Bassetlaw Gypsy and Traveller Accommodation Needs Assessment and the Update 2022 up-to-date and robust in its identification of needs for plots and pitches?*
 - c) *Have the sites allocated been selected against possible alternatives using a robust and objective process?*
 - d) *Does the Council's approach in relation to traveller sites generally conform with the expectations of Planning Policy for Traveller Sites (August 2015)?*
 - e) *Are there any omissions in the policy, and is it sufficiently flexible?*
 - f) *Are suggested main modifications to the Policy and the supporting text necessary for soundness?*
17. Our Client has no comment to make in relation to this question.

Q8.5 Is the main modification suggested to policy ST33 1c) necessary for soundness?

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

Total Word Count (Excluding Questions): 1,048