



ASHFIELD DISTRICT COUNCIL

Background Paper No 2 Housing

October 2021

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1. Introduction

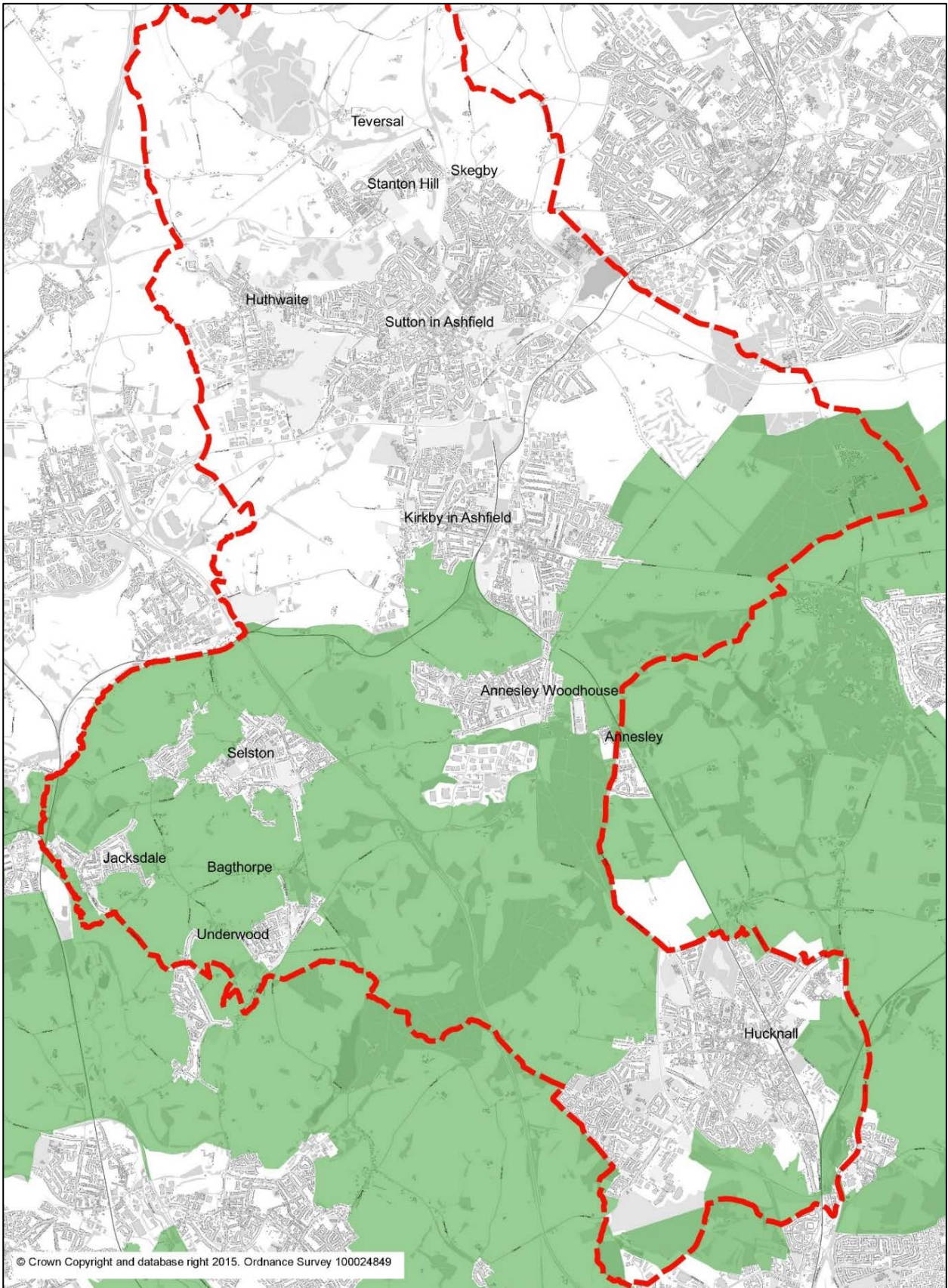
- 1.1 This Background Paper provides the context for the housing provision and supply in the Draft Ashfield Local Plan 2020-2038, together with the context and reasoning behind the housing mix, delivery assumptions and Gypsy and Traveling Showpeople policies. It summarises the broad approach to housing, drawing on evidence and signposting to where further information can be found.

2. Policy Background

- 2.1 The National Planning Policy Framework (NPPF) sets out the Government's approach to significantly boosting the supply of homes. It confirms that the standard methodology for assessing local housing need (LHN) should be the source for determining the minimum number of homes required, unless exceptional circumstances justify an alternative approach. In Ashfield District, no exceptional circumstances exist, and therefore the standard method is the starting point for determining housing provision in the Local Plan.
- 2.2 Ashfield District Council is a Green Belt authority with approximately half of the land outside of the urban areas forming part of the Nottingham-Derby Green Belt. Essentially this is the area in the southern half of the District, surrounding the town of Hucknall and the larger villages of Selston, Jacksdale and Underwood, alongside smaller settlements of Annesley, Brinsley and Bestwood (see Map 1). Any significant increase in housing land supply in these areas is therefore dependent on a review of the Green Belt through the Local Plan process.
- 2.3 The NPPF states that altering Green Belt boundaries through a Local Plan can only be justified by exceptional circumstances. Such exceptional circumstances may include any unmet quantitative need for housing (as derived from using the standard method for assessing housing need) that cannot be accommodated within the built-up area. It has been determined that Ashfield District can meet its own need for housing, but this will necessarily require a review of the Green Belt boundaries in order to address the Council's strategy for growth, as set out in Background Paper 1: Spatial Strategy and Location of Development¹ and Chapter 3 of the draft Ashfield Local Plan.

¹ See documentation at: <https://www.ashfield.gov.uk/local-plan-evidence-base-2021/>

Map 1: Extent of Green Belt in Ashfield District



- 2.4 Once the housing provision has been determined, the NPPF requires the size, type and tenure of housing needed for different groups in the community to be assessed and reflected in planning policies. To this end, Ashfield and the Greater Nottingham councils jointly commissioned the Greater Nottingham & Ashfield Housing Needs Assessment, 2020² (HNA) and the Greater Nottingham and Ashfield District Council Gypsy and Traveller Accommodation Assessment, 2021³ (GTAA).
- 2.5 The HNA considers the size type and tenure of housing required, addressing the needs of groups as set out in the NPPF (i.e. including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes), with the exception of Gypsies and Travellers, whose accommodation needs, together with those of boat dwellers, are considered in the GTAA, and people wishing to commission or build their own homes, which are considered via the joint Self and Custom Build Registers for Ashfield, Newark and Sherwood, and Mansfield districts.

² https://www.ashfield.gov.uk/media/8d890976f713e6c/2020-11-10-greater-nottingham-and-ashfield_housing-needs-assessment_final.pdf

³ Add link when published.

3. Housing Market Area

- 3.1 Ashfield falls within the Nottingham Outer Housing Market Area (Map 2), which also includes the districts of Mansfield and Newark and Sherwood. An economic relationship also exists with Mansfield District Council, and to a lesser extent with Newark and Sherwood. However, all three local authorities are at different stages in their Local Plan preparation and as such there are no proposals for a joint plan covering these areas.
- 3.2 From a strategic perspective, Ashfield District Council forms part of a wider Housing and Functional Economic Market Area. The location of Hucknall and its proximity to Nottingham City has also led to a close working relationship with other local authorities forming part of the Greater Nottingham Joint Planning Partnership. Further information on the duty to co- operate and the Housing and Functional Economic Market areas can be found in the Spatial Strategy background paper.

Map 2: Nottingham Outer Housing Market Area



4. The Need for Homes in Ashfield

Standard Method for assessing Local Housing Need (LHN)

- 4.1 Planning practice guidance sets out the standard methodology for assessing the minimum number of homes expected to be planned for in a local planning authority area⁴. Essentially the process is as follows:-

Calculate the average annual household growth over a 10 year period, based on 2014 household growth data. This should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period.

Ashfield household growth 2021 to 2031 = 4224 (422 dpa)

Adjust the annual figure used on the affordability of the area. This uses a '*median workplace based affordability ratio*' as published by the ONS (Table 5c). The ratio for Ashfield is **5.30** (2020 ratio published March 2021).

$$\begin{aligned}
 \text{Adjustment factor} &= \frac{(5.30-4)}{4} \times 0.25 \\
 &= \frac{1.30}{4} \times 0.25 \\
 &= 0.325 \times 0.25 \\
 &= 0.08125
 \end{aligned}$$

Total minimum annual LHN at March 2021 is calculated as follows:

1 + adjustment factor x projected household growth =

$$1.08125 \times 422.4 = 456.72$$

457 dwellings per annum (dpa)

⁴ <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

- 4.2 Having assessed the land supply, policy and physical constraints, the Council is proposing to adopt a baseline minimum of 457 dwellings per year as its housing target.
- 4.3 The Council do however recognise the volatility of the LHN figure which can change on an annual basis with fluctuations in the variables used to calculate it, i.e., a rolling 10 year household projection and differing affordability ratios. As such, it is proposed that the supply of housing land, through allocations and planning permissions, will exceed the current LHN by a minimum of 10% in order to present a risk-based approach and ensure sufficient future provision.

5. Supply of Housing Land

Sources of Housing Supply

Source of supply	Notes
1. Past completions	This category provides the net number of homes (including new build, converted homes and changes of use and losses) completed from the start of the plan period for the Ashfield Local Plan from 2020.
2. Sites with planning permission ⁵	This category includes all sites with current planning permission unless there are clear indications that the site will not come forward for development. Sites may be under construction, or not yet implemented.
3. Proposed Local Plan allocations not in the above category	This category includes sites that are “developable” using the approach set out in the SHELAA methodology report and have been selected as preferred sites to meet the need for future housing and Council’s strategic approach for growth ⁶ .
4. Other developable sites	This category includes sites that are not included in above categories and may include:- <ul style="list-style-type: none"> • Non-allocated sites awaiting s106 sign off. • Sites without planning permission to be delivered by local authority or partners. • Sites with lapsed permission and new application pending determination.
5. Strategic sites in Ashfield not included in the SHELAA	This category includes a New Settlement proposed for strategic allocation in the Draft Ashfield Local Plan at Cauldwell Road. This site has not been assessed through the SHELAA process but has been reviewed by independent external consultants AECOM and Hyas in respect of availability, suitability and achievability ⁷ .
6. Windfall allowance	The Council includes a windfall allowance for small sites which may come forward from year 5 onwards. This has a basis in historic rates and is set out in more detail in paragraph 5.5 onwards

⁵ Note: Supply from planning permissions is subject to a non-implementation rate.

⁶ Further information on site selection can be found in the Background Paper No. 1

⁷ Ashfield New Settlements Study Final Report, March 2021. AECOM

Strategic Housing and Economic Land Availability Assessment

- 5.1 The Strategic Housing Land Availability Assessment (SHELAA) is an ongoing assessment of sites undertaken by councils to identify sites that have may potential for residential development. It helps the council to understand where and when housing could be built in the future.
- 5.2 The SHELAA methodology was updated in 2021 and the individual SHELAA site reports have also been published on the Council’s website. The SHELAA methodology report focusses on the following:-
- The identification of sites/broad locations;
 - Assessment of each site/broad location to consider:-
 - Establishing whether a site can be considered for future allocation based on:-
 - Suitability
 - Availability
 - Achievability
 - Whether identified site constraints can be overcome
 - Estimating the development potential based on:-
 - Density.
 - Developable area
 - Responding to site constraints
 - Lead in times and build out rates
- 5.3 The site assessments enable sustainable site selection from a pool of achievable sites to meet the assessed needs.
- 5.4 An assessment for potential supply from ‘Windfall’ sites, and also an assessment of non-implementation rates is considered separately in this report.

Approach to Windfall Sites

- 5.5 Paragraph 69 of the NPPF emphasises the importance of small and medium sites in meeting an areas housing requirement. It sets out that local planning authorities should support the development of windfall sites through policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.
- 5.6 NPPF paragraph 71 goes on to provides that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that

they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Resisting inappropriate development in residential gardens where development would cause harm to the local area is also encouraged.

- 5.7 The NPPF defines Windfall sites as sites which have not been specifically identified as available in the development plan. It is assumed therefore that the term ‘windfall’ can refer to sites of all sizes.

Large Site Windfalls

- 5.8 For the purposes of the Local Plan and supporting information, ‘large sites’ refer to those of 10 dwellings and above (in accordance with the NPPF definition of ‘Major’ development). The Council do not consider that there is currently any justification to make an allowance for large windfall sites as part of the future housing supply.
- 5.9 The Draft Local Plan includes proposed sites allocated under strategic policies S6 New Settlement Whyburn Farm and S7 New Settlement Cauldwell Road, and housing site allocation policy H1 towards future supply. Those considered to be developable the period 2020 to 2038 have been counted towards the overall supply, whilst only those deliverable 2021 to 2026 have been counted towards the 5 year supply calculations. Where available, the anticipated rates of delivery are as provided by the agent/ developer/ landowner. Where delivery information has not been provided, assumptions have been used (see paragraph XX).
- 5.10 At present there is no justification to include any additional large site windfall allowance in the Draft Local Plan since all appropriate large sites which are not contrary to emerging policy are expected to have been picked up through the site selection process. This approach avoids the risk of over-estimating future supply from large sites. It is reasonable to expect large windfall sites may come forward in future, but these will of course be counted as commitments and monitored accordingly.

Small Site Windfalls

- 5.11 For the purposes of the Local Plan and supporting information, ‘small sites’ refer to those with a yield below 10 dwellings and will generally be considered as windfalls since the Local Plan does not allocate sites below this threshold. Although the SHELAA does not have a site size threshold, few small sites have been submitted for assessment and those deemed deliverable are negligible – these have not been counted as contributing towards future supply. It is therefore considered appropriate to project forward past trends in small site delivery to help establish a windfall rate. This approach ensures that no ‘double counting’ will occur.

Estimating a Future Windfall Allowance for Small Sites

5.12 For the purposes of projecting forward past trends in housing delivery it is appropriate to look back over a longer period in order to take account of the peaks and troughs of the housing market cycle. Between the years 2011 to 2021 a total of 727 dwellings were delivered on small sites, including new build, conversions and change of use. This equates to an average rate of 73 dwellings per annum (dpa).

Table 1: Small Housing Site completions 2011-2021

Year (1st April - 31st March)	New Build	Net Additions through Conversion/ Change of Use	Net additions through Permitted Development	Total Dwellings
2011 - 2012	43	15	n/a	58
2012 - 2013	37	13	n/a	50
2013 - 2014	34	17	n/a	51
2014 - 2015	41	19	n/a	60
2015 - 2016	103	23	n/a	126
2016 - 2017	57	34	n/a	91
2017 - 2018	35	48	4	87
2018 - 2019	63	28	5	96
2019 - 2020	39	9	2	50
2020 - 2021	27	23	8	58
2011 to 2021	479	229	19	727
Average per year	47.9	22.9	1.9	72.7

5.13 As set out in paragraph 71, the NPPF specifically refers to resisting inappropriate development in residential gardens and is less restrictive than the previous iteration of the NPPF in this respect (which excluded residential gardens). Gardens were re-classified as 'Greenfield' from 'Previously Developed Land' (PDL/Brownfield) for planning purposes as of 9th June 2010 through a revised version of PPS3 and development on garden land has therefore been monitored from this date. Data for the period 2011 to 2021 shows that a total of 132, or an average of 13.2 per annum dwellings were completed on small sites on garden land.

5.14 Taking a cautious approach to future provision from this source, it is considered reasonable to subtract the number of homes developed on residential land (albeit accepting there may be appropriate schemes of this nature which come forward in

any event). This would give an annual average of 60 dwellings per annum (dpa) from small site windfalls.

- 5.15 The Housing Land Monitoring Report 2021 (HLMR) and Draft Local Plan includes a future supply from small site planning permissions which amount to some 274 dwellings as of 1st April 2021, after the deduction of a non-implementation rate. These are included in the 5 year housing land supply. As a comparison, projecting forward the reduced historic rate of 60 dpa would provide around 300 dwellings over 5 years. Although the estimated delivery from small site permissions is marginally lower than the projected historic delivery figure, this is to be expected due to the 3 year lifespan of planning approvals. The Council taken the decision not to include any additional small site windfall allowance in the first 5 years supply at this time, in order to acknowledge pipeline projects and avoid double-counting.
- 5.16 It is considered appropriate, however, to include an allowance beyond 5 years, (for the period 2026 to 2038), since small unallocated sites have consistently formed part of past supply and there is no justification to assume this source will cease in future. Projecting forward the 60 dpa will give an additional supply of **720** towards meeting the overall housing requirement for the period 2026 to 2038.

Approach to Non-implementation of Existing Planning Permissions

- 5.17 The HLMR sets out the supply of housing sites deliverable without policy change against the Local Housing Need (LHN) and demonstrates how the District performs with regard to the 5 year supply requirement at April 2021. Appendix 2 of the Draft Ashfield Local Plan 2020-2038 sets out the 5 year Housing Land Supply including new site allocations.
- 5.18 The calculations include all residential planning permissions towards future supply, offset by proposals for losses and demolitions. Whilst there is no reason to believe that any specific permission may not be implemented, it is accepted that there will be a number which may never be developed.
- 5.19 In order to determine a rate for discounting the potential supply from this source, a comparison has been drawn with the number of dwellings on permissions granted against those lapsing over a 10 year period. The assessment has been undertaken separately for small and large sites (see Table 2).

TABLE 2: Historical Lapse Rate for Large and Small Residential Permissions 2006-2016

Site size	Permissions Granted 2006-2016 (Dwellings)	Lapsed Permissions 2006-2016 (Dwellings)	Lapse Rate %
Large	6535	421	6.4%
Small	1011	272	26.9%

5.20 The percentage rates for lapsed permissions have been applied to large site planning permissions where development has not yet commenced since once a site has started it becomes 'extant' and can no longer lapse. In contrast, **all** of the outstanding permissions on small sites have been discounted. The effect of applying a non-implementation rate is illustrated in Table 3 and amounts to **159** dwellings based on historic trends.

TABLE 3: Effect of lapsed rate on unimplemented Planning Permissions deliverable over the Plan Period

Area/Site size	Outstanding permissions*	Lapse rate applicable	Discounted permissions	Dwellings deducted over plan period
Hucknall Large	425	6.4%	398	27
Hucknall Small	127	26.9%	93	34
Sutton/Kirkby Large	479	6.4%	448	31
Sutton/Kirkby Small	200	26.9%	146	54
Villages Large	0	6.4%	0	0
Villages Small	48	26.9%	35	13
Total Large	904	6.4%	846	58
Total Small	375	26.9%	274	101
TOTAL ALL SITES	1279	n/a	1120	159

6. Housing Site Delivery Assumptions

- 6.1 In order to ensure that the Council maintains a sufficient supply of housing to meet the Local Housing Need it has been necessary to undertake a review of housing delivery in Ashfield District over recent years. This analysis has contributed towards the assumptions made in relation to the timescale of housing delivery and the annual build rates included in Ashfield District's Housing Trajectory⁸.
- 6.2 In addition, the Council has liaised with landowners, agents and developers of sites submitted for consideration as housing allocations in the emerging Local Plan. Studies undertaken by the HBF⁹, Nathaniel Lichfield and Partners¹⁰, and Savills¹¹ have also informed the approach taken. Through this process the Council has developed a realistic timetable of future housing delivery, justified through the assessment of past delivery rates, literature review and ongoing dialogue with developers and landowners of potential housing sites.

Lead-in Timescales

- 6.3 For the purposes of estimating future delivery in the trajectory, the Council have adopted a cautious approach to assumptions on lead-in times. For sites with full or reserved matters planning permission, the Council assumes that it will take 9 months for the discharging of conditions and a further 15 months from the granting of planning permission to the commencement of development. Taking this into consideration, the Council has assumed that development will commence in Year 3 of the Local Plan. For small sites with outline planning permission, development is assumed to commence in Year 4 of the Local Plan to take account of the Reserved Matters planning process. Unless site specific information has been submitted by landowners or developers, lead in times for Large sites with Outline planning permission, sites with Permission in Principle, and allocated sites without planning permission are assumed to be beyond 5 years, consistent with the NPPF definition of 'deliverable'¹².
- 6.4 The Council has assumed the following lead in periods in the absence of site specific information which would indicate otherwise. Where there is clear evidence of progress on a site, delivery may be brought forward.

⁸ Included in Appendix 2 of Draft Ashfield Local Plan (2020-2038)

⁹ HBF Policy Conference, 22nd March 2016 – Speaker: John Stewart, Director Economic Affairs
<http://www.house-builder.co.uk/UserFiles/File/JohnStewart-Policy16.pdf>

¹⁰ <http://nlplanning.com/nlp-insight/start-to-finish-how-quickly-do-large-scale-housing-sites-deliver>

¹¹ http://www.savills.co.uk/research_articles/141285/209239-0 Spotlight New Build Homes 2016/17

¹² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

TABLE 4: Standard Lead in Period Assumptions

Planning Status	Commencement Year
Full/detailed planning permission - where development has commenced	Current Year
Full/detailed planning permission - not started	Year 3
Outline permission – Small site (less than 10 dwellings)	Year 4
Outline permission – Large/major site (10 or more dwellings)	Year 6
Sites with Permission in Principle (PIP)	Year 6
Allocated sites without planning permission	Year 6

Annual Delivery Rate

Historic Annual Delivery in Ashfield

- 6.5 An analysis of large site (sites over 10 dwellings) with full or reserved matters planning permission has been undertaken which looks at annual build rates over recent years (Appendix 1). Results demonstrate that, on average, large sites have delivered between 39 dwellings per annum (dpa) in 2013/14 and 44 dpa in 2015/16 which reflects the gradual recovery in the local housing market. Over the three year period, this averages out at 42 dpa. Delivery rates have varied from 25 dwellings per annum up to 66 dwellings on individual sites (looking at full years only).
- 6.6 However, these figures are skewed by 2 sites at Brook Street and Portland road of 25 and 30 dwellings respectively. In both cases the whole site has been completed within 1 year, but delivery has clearly been limited by the total site capacity. If these are excluded from the calculations, delivery rates increase to between 41 and 46 dpa, averaging out at 44 dpa.
- 6.7 It is notable that the larger site at Papplewick Lane (799 dwellings) has delivered between 57 and 129 dpa over the past 3 years. This averages a substantial 87 dpa across the site. However, 2 developers/sales outlets were active on site at the time, consequently resulting in an average of **44** dpa per developer being achieved on the larger site.

Literature Review

- 6.8 A survey undertaken by the HBF¹³ in February/March 2016 on 'large sites' over 350 dwellings, indicated that on average 70 dwellings per annum were delivered. Nathaniel Lichfield and Partners' (NLP) study "Start to Finish - How quickly do large-scale housing sites deliver? (November 2016)" also indicates that, on average, sites with a capacity of between 500 and 999 dwellings deliver approximately 70 dwellings per annum. This study also implies that sites of 1000-1499 dwellings average out at a delivery of approximately 105 dwellings per annum. These are similar findings to the Council's own conclusions on the delivery of development on urban extensions over 500 dwellings which shows that 81 dwellings per annum have typically been delivered.
- 6.9 NLP published a study "Stock and Flow: Planning Permissions and Housing Output, January 2017"¹⁴ which sets out that each sales outlet typically generates 30 to 40 sales per annum.

Future Annual Delivery Assumptions

- 6.10 Large sites (allocations and permissions): The Council has taken a cautious approach in setting the delivery rates in the housing trajectory to ensure that the Draft Local Plan provides for sufficient land to meet the LHN. Consequently, sites between 10 and 500 dwellings are assumed to be capable of delivering 35 dwellings per annum (per developer) based on past delivery rates. This is lower than the average build rates experienced locally in Ashfield but is consistent with the findings of HBF and NLP national studies.
- 6.11 The NLP findings, together with typical large site delivery in Ashfield, support the Council's approach to the delivery of development on larger sites which assumes that sites of 500 or more dwellings will deliver 80 dwellings per annum (based on an assumption of 2 developers/sales outlets). The HBF's report "Responding to demand; Understanding private housing supply (August 2015)" also indicates that larger sites are likely to have more sales units on site. Indeed it is often the case that landowners will seek to realise their return sooner and request that large sites are built out in partnership.
- 6.12 Small Site Permissions: Sites below 10 dwellings are not allocated in the submitted Ashfield Local Plan but do count towards overall supply as commitments. The

¹³ HBF Policy Conference, 22nd March 2016 – Speaker: John Stewart, Director Economic Affairs
<http://www.house-builder.co.uk/UserFiles/File/JohnStewart-Policy16.pdf>

¹⁴ <http://lichfields.uk/media/2517/stock-and-flow-planning-permissions-and-housing-output.pdf>

anticipated delivery of housing from this source is summarised in the Housing Trajectory in Appendix 2 of the Local Plan.

- 6.13 Assumptions applied in respect of annual delivery were initially drawn up with input from the development industry and historic evidence. Developments consisting entirely of flats are assumed to have a quicker build out rate due to the nature of construction.
- 6.14 Table 5 illustrates Ashfield's approach to annual delivery rates. These are applied in the absence of any alternative site specific information being made available to the Council.

TABLE 5: Standard Assumptions Annual Delivery Rates

Site size/house types	Dwellings per Year (per developer)
1 - 4 houses	2
1 - 4 flats	4
5 - 9 houses	5
5 - 10 flats	10
10 – 499 houses	35
>10 flats	50
>500 dwellings	40

Density

- 6.15 Sites with Full or Reserved Matters planning permissions are based on the approved details. For Outline permissions and allocated sites without planning consent, the approach to densities is as follows, and is reflected in the Draft Local Plan policy H7.
- 6.16 Development on sites of 0.4 hectares or greater, within distances indicated below from district shopping centres and major public transport nodes are subject to the following minimum densities:
- Within 400m - 40 dwellings per hectare
 - Within 1Km - 34 dwellings per hectare
 - Over 1km - 30 dwellings per hectare

6.17 Where sites have masterplans or are subject to a pending planning application, these have helped to inform potential site delivery.

6.18 A conservative approach to site densities has been applied in order to avoid over estimating delivery and to ensure enough development to meet the needs of the district. In instances where sites have significant constraints which restrict the developable area, this is taken into account when estimating potential yield. Furthermore, it is important that densities are applied to a net developable area, rather than the total site area in order to acknowledge the need for essential infrastructure. Consequently, the following density multipliers have been applied to allocated sites without planning permission to establish the net developable area. Exceptions to this include sites where comments from the owner/developer have justified a different capacity.

TABLE 6: Standard Assumptions to Identify Net Developable Area

Site size (Ha)	Multiplier	Comments
Sites below 0.4 ha	100%	No reduction – Gross site area used to calculate yield.
Sites between 0.4 ha – 2.0 ha	90%	On sites with an area between 0.4 and 2 hectares, a 10% reduction is applied for potential infrastructure requirements.
Sites between 2.0 ha – 10.0 ha	75%	Where sites exceed 2 hectares, 10% of the site size is deducted to accommodate open space requirements (in accordance with Policy H5 of the Draft Ashfield Local Plan 2020-2038). A further 15% is to take account of additional necessary infrastructure.
Sites over 10 ha	60%	On large sites over 10 Hectares a 40% reduction is applied to take account of larger scale infrastructure e.g. the potential need for a new primary school, local shopping centre or medical centre, etc.

7. Supply of Housing Land to meet Need in Ashfield

- 7.1 Table 7 illustrates how housing land allocations in the Draft Ashfield Local Plan 2020-2038 will meet future requirements alongside existing residential commitments from planning permissions and Prior Approvals. This takes account of the assumptions set out in Sections 5 and 6 of this paper with respect to potential non-implementation, windfalls, lead-in periods and build out rates.
- 7.2 Residential Institutions have also been included towards the supply of homes for Ashfield. National Planning Practice Guidance provides that housing for older people, including residential institutions in use class C215, should be counted towards their housing requirement. The Housing Delivery Test Measurement Rule Book published in July 2018 sets out that the number of net homes delivered should be adjusted to include a figure for student accommodation and other communal accommodation (calculated by applying nationally set ratios to the bedroom data of 2.5 and 1.8 respectively). Ashfield does not currently have any student accommodation which falls into this category.
- 7.3 As Table 7 identifies, the Plan currently provides for an over-provision of approximately 11% of the established housing need as a buffer (901 dwellings). This is considered to be an appropriate risk based approach to account for any future changes in the variables used to calculate the LHN via the Standard Methodology, and to enable flexibility and choice of sites.
- 7.4 Housing trajectories illustrating the anticipated delivery of individual sites on an annual basis are included in Appendix 2 of the Draft Local Plan, along with the 5 year Supply of deliverable housing sites. These elements are updated annually in the Housing Land Monitoring Report.

¹⁵ Town & Country Planning (Use Classes) Order 1987, as amended

Table 7: Dwelling Requirement and Provision 2020-2038

	REQUIREMENT	Dwellings
1	Annual Local Housing Need at April 2021	457
2	Houses needed to meet requirement 1/4/2020 to 31/4/2038 (18 years)	8,226
3	Net Homes delivered 1/4/2020 to 31/3/2021	265
3a	Homes delivered through C2 residential institution development (dwelling equivalent - see para 3.6) 1/4/2020 to 31/3/2021	48
4	Net requirement 2021 - 2038	7,913
	SUPPLY	Dwellings
5	Houses deliverable on small sites , 1/4/2021 to 31/3/2038	
5a	- With planning permission (including new build, net conversions and change of use) at 1st April 2021*	390
5b	- Known permitted development/prior notification schemes not yet implemented at 1st April 2021	5
5c	- Demolitions and other losses with planning permission at 1st April 2021	-4
5d	- Small site windfall allowance beyond 5 years - 1/4/2026 to 1/4/2038	720
6	Houses deliverable on large sites 1/4/2021 to 31/3/2038	
6a	- Strategic Site Allocations under Policies S6 and S7	1915
6b	- Housing Allocations under Policy H1**	5941
7	Deduction to account for potential lapsed permissions	-159
8	Provision from C2 residential institutions (dwelling equivalent)	6
9	Total housing supply 1/4/2020 to 31/3/2038 (5a+5b+5c+5d+5e+6a+6b-6c+6d+7+8)	8814
	NET PROVISION 2020-2038	Dwellings
10	Over provision	901

* includes an additional 15 dwellings from yield on 'large site' permissions where outstanding balance is less than 10 dwellings

** includes large sites (10 or more dwellings) with planning permission plus SHELAA sites

8. Housing Mix

- 8.1 Paragraph 62 of the NPPF requires planning policies to take account of the housing needs of different groups in respect of size, type and tenure. The specific groups named under this paragraph are “those who require affordable housing, families with children, older people, students, people with disabilities, people who rent their homes and people wishing to commission or build their own homes”.
- 8.2 Paragraph 63 of the NPPF states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required (having regard to the types of affordable housing included in the NPPF glossary definition).
- 8.3 The Planning Practice Guidance on housing needs assessments states that authorities will need to consider how the needs of individual groups can be addressed within the overall need established. The need for particular sizes, types and tenures of homes as well as the housing needs of particular groups should be considered separately. There is also specific PPG on Self Build and Custom Housebuilding; Build to Rent and Housing for Older and Disabled People.
- 8.4 The requirement for local plan policies to take account of First Homes was announced in the Written Ministerial Statement (WMS) on 24 May 2021, and states that local plans and neighbourhood plans should take this requirement into account from 28 June 2021. Further detail on First Homes and the expectations for plan making is set out in the amended Guidance. This states that First Homes should account for at least 25% of all affordable housing units delivered by developers through planning obligations and that this requirement should be set out in local plans.
- 8.5 The Greater Nottingham and Ashfield Housing Needs Assessment Report, October 2020 (HNA) prepared by ICENI consultants was commissioned to address the requirements of the NPPF in respect of paragraphs 62 and 63. The study was commissioned jointly with the Greater Nottingham authorities of Broxtowe, Gedling, Erewash, Nottingham City and Rushcliffe councils. As this was commissioned and published prior to the publication of the WMS on First Homes, the study has not taken account of First Homes, but did consider the need for affordable home ownership by individual authority.
- 8.6 The key recommendations from the HNA and the policy response to these are summarised in the Table 8. Draft ALP policies H3, H4 and H6 together with their associated supporting text set out the Council’s approach to delivering a mix of housing types to meet need

Table 8: Key findings of the Housing Needs Assessment

Key finding / recommendation	Policy response
<p>Housing sub-market areas: The report identifies 44 housing sub-market areas across the plan area. The methodology for identification is based on analysis of data on sales transactions by type, house price patterns by type, commuting flows, self-containment and urban form/ morphology.</p>	<p>The housing sub-market areas will be used in any subsequent viability work. Due to the varying levels of viability across authority areas it is considered appropriate to set different levels of affordable housing and tenure requirements based on sub-market area.</p>
<p>Housing mix: Housing mix recommendations at an authority level and housing sub-market area (in terms of bedroom sizes)</p>	<p>As currently drafted, the justification text to policy H6 includes the housing mix recommendations (by tenure). The policy requires these to be used as a starting point for negotiations on house size mix on application sites.</p>
<p>Rented affordable housing need: A need for 237 dwellings per annum is identified for Ashfield. The report does not break this need down into social rent and affordable rent, although it is indicated that social rents will be affordable to a greater proportion of households than affordable rents</p>	<p>The identified level of need identified in the report provides a starting point in developing an affordable housing target. Draft policy H3 is informed by the approach taken in the Nationwide CIL Viability Study which tested a range of different affordable housing levels and tenures. This will need to be updated and the policy amended accordingly if required.</p>
<p>Affordable home ownership need: A negative need for –195 dwellings per annum is identified for Ashfield. Although the analysis shows there are a number of households able to afford to rent privately but who cannot afford to buy because of the initial outlay/ deposit/securing a mortgage, there was considered to be enough potential supply within existing stock to make a contribution to this need with a reasonable proportion of properties available at lower quartile prices.</p> <p>If the Council seeks to provide affordable home ownership, then Shared ownership is recommended as the most appropriate type product.</p>	<p>This recommendation was made prior to the First Homes requirement being introduced and as such draft policy H3 does include an element for affordable home ownership. This is informed by the approach taken in the Nationwide CIL Viability Study which tested a range of different affordable housing levels and tenures. This will need to be updated and the policy amended accordingly if required.</p>

<p>Accessible and adaptable homes: A need for around 3,203 wheelchair accessible dwellings for wheelchair users across the study area (including Erewash and Ashfield) has been identified, equivalent to 5% of the total housing need identified through the standard method.</p>	<p>Draft policy H6 requires that 10% of dwellings on sites with a capacity of 10 or more dwellings will be accessible or easily adaptable.</p>
<p>Specialist residential accommodation: For Ashfield District, the analysis in this report points to a need for 1,037 units of housing with support to 2038, and 507 units of housing with care. The report also identifies a need for 1,252 additional bed spaces (C2 Use class).</p>	<p>Draft policy H6 has does not include any specific targets in relation to specialist accommodation for older people. However, the requirement for 10% adaptable dwellings on large sites will contribute towards future needs for specialist housing. The Council will also encourage proposals which include supported/ specialist accommodation and residential institutions, where they are in suitable locations.</p>

9. Gypsy, Traveller and Travelling Showpeople's Accommodation

- 9.1 The Government's Planning Policy for Traveller Sites (2015) states that local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit site accommodation needs of travellers in their area. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward.
- 9.2 In line with the requirement to review Traveller accommodation need, the Greater Nottingham and Ashfield District Gypsy and Traveller Accommodation Assessment¹⁶ (GTAA) was commissioned in 2020 and completed by RRR consultancy in 2021. It assessed the accommodation needs of Gypsies, Travellers, Travelling Showpeople and boat dwellers, including
- A review of national and local planning policies, recently undertaken GTAAs, and an analysis of secondary data.
 - An online survey, and extensive face-to-face and telephone surveys of Gypsies, Travellers and Travelling Showpeople, covering a range of issues related to accommodation and service needs. RRR achieved a 90% survey rate.
- 9.3 The study used 3 different approaches to establishing need. First, one based on the ethnic identity definition; second, based on the needs of families who have *not* permanently ceased to travel (i.e., based on the PPTS 2015 definition); and third, based on the 'travel to work' interpretation of PPTS 2015. PPTS requires travellers to demonstrate that they have not ceased to travel in order to be defined as such. Because of the 'ambiguity' around demonstrating this and various court challenges to it, RRR recommended that second approach was used.
- 9.4 The GTAA sets out the level of future need for the District for the period 2020 to 2038 as illustrated in Table 9. These needs will be met through criteria based policy H2 and site allocations within policy H2a.
- 9.5 The provision of Traveller sites will be monitored in future Housing Land Monitoring Reports on an annual basis.

¹⁶ <https://www.ashfield.gov.uk/planning-building-control/development-management-documents/>

Table 9: Ashfield Future Pitch/Plot Requirements 2020 to 2038

Period	Gypsy/Traveller Pitches	Showpeople's Plots/Yards
2020 to 20125	0	9
2025 to 2030	1	2
2030 to 2035	1	2
2035 to 2038	1	1
Total 2020 to 2038	3	14

APPENDIX 1 – Delivery Rates on Large Sites 1st April 2013 to 31st March 2016

Delivery Rates on Large Sites between April 1 st 2013 – 31 st March 2016								
Site Name	Date full permission granted	Greenfield/ Previously Developed Land	Lead in period from date granted to start of development (months)	Total number of dwellings	Dwellings Delivered 1/4/13 to 31/4/14	Dwellings Delivered 1/4/14 to 31/4/15	Dwellings Delivered 1/4/15 to 31/4/16	Dwellings remaining to build
Brook Street, Sutton	28/02/2013	PDL	3	25	25	complete	complete	0
Lynton Drive, Sutton	19/03/2008	Greenfield	36	169	57	complete	complete	0
Sheepwash Lane, Sutton	14/10/2014	Greenfield	5	66	N/A	Not started	66	0
Former Courtaulds Factory, Unwin Road	04/03/2015	PDL	6	145	13	50	65	17
Greenwood Falls Farm, Huthwaite	21/07/2011	Greenfield	12	83	38	25	complete	0
Lindleys Lane, Kirkby	24/04/2008	Greenfield	36	148	59	44	29	39
East of Sutton Road/South of Kingsmill Road, Kirkby	04/08/2014	Greenfield	8	225	N/A	Not started	37	188
Fomer Annesley Colliery	13/05/2014	PDL	7	176	45	29	58	54
Portland Road, Selston	24/05/2013	Greenfield	11	30	Not started	30	complete	0
Garden Road, Hucknall	17/11/2006	Greenfield	24	217	29	23	33	6
Papplewick Lane, Hucknall*	16/08/2007	Greenfield	12	799	29	65	37	55
Papplewick Lane, Hucknall*	17/08/2007	Greenfield	12	799	28	64	37	55
Broomhill Farm, Hucknall	28/11/2013	Greenfield	9	141	Not started	15	36	90
Averages:			14	N/A	36	38	44	
Whole year development averages					39	44	44	
Whole year development averages (excl. smaller sites)					41	46	44	

* NB Papplewick Lane development had 2 developers active within this period. Figures have therefore been divided by 2 in order to avoid over-estimating delivery.

