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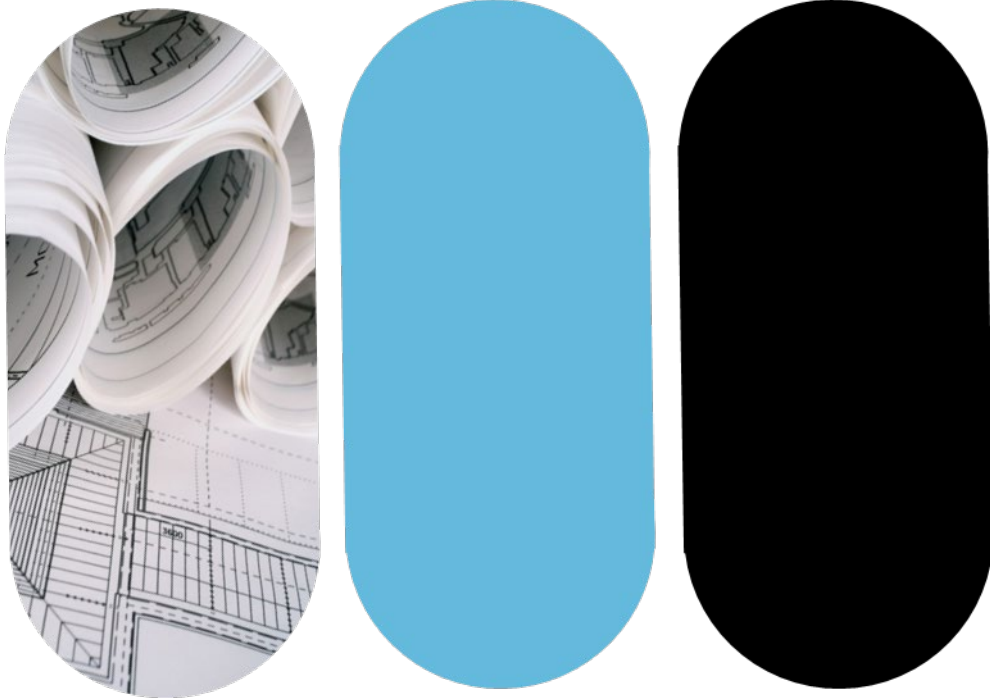
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**WRITTEN STATEMENT IN RESPECT OF THE ASHFIELD LOCAL
PLAN 2023-2040 EXAMINATION**

MATTER 2 – MEETING ASHFIELD’S HOUSING NEEDS

On Behalf of Persimmon Homes Nottingham



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1. INTRODUCTION

- 1.1 This Written Statement is made on behalf of our client, Persimmon Homes Nottingham, in response to the Inspectors' Matters, Issues and Questions for the examination hearings for the Ashfield District Local Plan Examination.
- 1.2 Persimmon Homes Nottingham are promoting two sites; the Land North of Fackley Road, Teversal which is identified as a residential allocation within the plan (allocation reference H1Sl) and Sunnyside Farm, Blackwell Road, Huthwaite which is identified as a residential allocation within the plan (allocation reference H1Sk).
- 1.3 Persimmon Homes Nottingham has engaged in all stages of the plan making process and previously made representations to the Regulation 19 Local Plan consultation (Marrons Representation dated January 2024, Respondent ID 223).

2. MATTER 2 – MEETING ASHFIELD'S HOUSING NEEDS

Issue 1 – Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to meeting housing needs.

- 2.1 The Local Housing Need calculation is set out in full within Background Paper 2 – Housing (BP.02) and has been correctly calculated at 446 dwellings per annum based on the methodology. However, as identified within Question 2.2, the Local Housing Need figure of 446 dwellings per annum relies upon Ashfield's housing growth 2023-2033, rather than 2024-2034¹ (the current year), and the 2022 median workplace-based affordability ratio (published March 2023) rather than the 2023 median workplace-based affordability ratio² (published March 2024) as the most recent version available.

¹ 3930

² 6.15

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- 2.2 Notwithstanding the latest data, a revised 2024 Local Housing Need calculation continues to total 446³ dwellings per annum.
- 2.3 We recognise that the Council are correct in utilising the Local Housing Needs figure as the starting point for calculating housing needs and ultimately the housing requirement. However, the Local Plan's under-identification of homes over the plan period at 882 dwellings⁴ within Table 2 is considered a fundamental concern. We recognise that the Council's approach, as reiterated within their Regulation 19 Statement of Consultation (SD.08), that despite the shortfall the numbers identified they exceed the provisions of NPPF paragraph 68 to plan for 10 years and that the Council expect that actual delivery will be closer to meeting the level of need over the entire plan period, as additional large windfalls could be anticipated towards the latter stages of the Plan period. In addition, the Council consider that the Plan will be reviewed at least every 5 years to ensure a sufficient supply of land for new homes moving forwards.
- 2.4 Our position remains, as set out in previous representations, that this is a fundamental concern and that rather than an under-identification the Council should instead seek to ensure an appropriate buffer in housing provision to provide more certainty that the minimum housing requirement will be met within the plan period. A buffer of 10-15% above the minimum housing requirement would be appropriate to ensure the necessary flexibility to fully accord with NPPF paragraph 68 and to be considered positively prepared in line with paragraph 35a.
- 2.5 In respect of Green Belt boundaries and NPPF paragraph 143(e), there is a clear risk, given the shortfall in identified housing numbers, that a further review and additional sites for release from the Green Belt may be required ahead of 2040. This may potentially occur within one of the reviews anticipated by the Council.

³ $(6.15-4)/4 * 0.25 = 0.134375$ & $393 * (1+0.134375) = 445.8$

⁴ $7582 - 6,700 = 882$

2.6 The Sustainability Appraisal (SA) assessed the Standard Method figure of 446 dwelling per annum alongside a flexible buffer at 535 dwellings per annum. It also assesses Policy S7 on the basis that the minimum housing requirement of 7,582 would be met (Appendix G) (SD.03j) with no clear acknowledgement that this is not the case and the associated impacts of this.

2.7 The latest Housing Delivery Test (2022) identifies Ashfield at 74% and the presumption in favour being applied. This reiterates the importance of providing sufficient housing numbers and flexibility across the plan period and add greater weight to the need for a sensible buffer to be applied to the housing requirement.

Issue 2 – Whether the plan will deliver an appropriate mix of housing to meet the various housing needs over the plan period and whether these are justified, effective and consistent with national policy.

2.8 The 2024 Update of the Greater Nottingham & Ashfield Housing Needs Assessment (SEV.19a) identifies a social/affordable rented housing need of 302 dwellings per annum. This is an increase from that set out in the 2020 Housing Needs Assessment cited within the submitted Local Plan and represents 67% of the district's total local housing need. It is clear given the provisions within Policy H3 that this need will not be met across the plan period and an increasing shortfall will occur.

2.9 We recognise that there is no requirement for the Council to meet affordable housing needs, but Strategic Objective SO3 rightly seeks to meet needs by "Increasing the supply of quality affordable homes to provide inclusive and mixed communities".

2.10 The Council's ability to meet the affordable housing need would be boosted through the provision of an additional buffer to the housing requirement and through increased allocation yields.