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## Location

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Ref: Huthwaite 2024

Ashfield District Council  
Local Plans  
Council Offices,  
Urban Road,  
Kirkby in Ashfield  
Nottinghamshire  
NG17 8DA

26<sup>th</sup> January 2024

Dear Sir/Madam

### **Representations Regulation 19 – Pre-Publication Draft Ashfield Local Plan**

Dukeries Homes Limited are a Mansfield based local builder who control land at Main Street, Huthwaite. We have had the opportunity to review the Regulation 19 Local Plan and would be grateful if the Inspector would take account of our representation. These representations relate to Policies H1 and S7.

The Regulation 19 Plan covers the period 2023-40 and plans for 7,592 houses. The Sustainability Appraisal assesses 2 growth options.:

1. Preferred Option - this uses the Standard Methodology with a requirement of 446 per annum. This equates to 7,582 houses in the Plan period.
2. Reasonable Alternative Flexible buffer - this provides for a 20% buffer and a requirement of 535 per annum. This equates to 9,095 houses in the Plan period.

The assessment in the Sustainability Appraisal (para 5.3.18) concludes:

*" The flexible buffer option (535 dpa) is considered to perform similarly to the Preferred Option figure (446 dpa) for the remaining objectives'*

In our opinion the Council should adopt the Flexible Buffer option so much needed homes are delivered, there is a range of choice and to support economic growth that does not encourage extensive in commuting".

Ashfield has historically been unable to demonstrate a 5 year housing supply. The claimed current position is 2.93 years. An assessment of the 5 year supply leads us to conclude that based on average past delivery of 319 dpa against the current Reg 19 requirement of 446 + 20% equates to 535 dpa. From the start of the Plan period in April 2023 until adoption of the Plan (April 2025) there will be a shortfall in delivery of 432 dwellings.

There will also be a shortfall at the end of the Plan period as the plan only shows a claimed supply of 13 years. This is a shortfall of 1,070 dwellings against a 535 dpa requirement.

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The total shortfall, also taking account of the shortfall since the last Housing Delivery Test is 2,100 dwellings.

The Council's position is more precarious due to:

1. We don't believe that all of the identified allocations and commitments will be delivered. For example some of the allocations are brought forward from the 2002 Local Plan Review. In over 20 years they have not been developed.
2. We consider that some of the projected yields from allocations are over optimistic. Increasing demands for open space, Biodiversity net gain, above ground attenuation are reducing yields. We note that site H1Ve has a projected yield of 169 yet a current full planning application for the site is for 137 houses. We anticipate that this will be similar on other allocated sites.

These will result in a further reduction in delivery.

The Council needs to identify additional sustainable housing sites.


We control an area of 3 hectares of land located off Main Street, Huthwaite. We believe it has a total capacity of 80 dwellings.

Huthwaite is a sustainable settlement, and the site is within easy walking, cycling and car distance from everyday facilities such as shops, medical facilities, schools, extensive open space at Brierley Forest which is adjacent and numerous employment opportunities. Huthwaite also has good bus services which are a short walk from the site.

To demonstrate delivery, we have submitted an Application (V/2023/0286) for 50 dwellings on the western half of the site. At the time of writing our Design Team is making adjustments to the layout in response to consultee responses. We will continue to work with the Council and consultees to deliver a high-quality scheme.

If you require anything further, then do not hesitate to contact me

Yours faithfully

  
  
Mr Stephen Clarke

Dukeries Living Limited