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## Ashfield District Local Plan Examination

P&DG on behalf of Aldergate Property Group

Hearing Statement: Matter 9 - The Supply and Delivery of  
Housing Land

## Quality Control

<b>Project No.</b>	21.113			
<b>Client</b>	Aldergate Property Group			
<b>Title</b>	Ashfield District Local Plan EiP: Matter 9 Hearing Statement – The supply and delivery of housing land			
<b>Location</b>	Land off Common Lane, Hucknall			
<b>File Ref</b>	21.113 ADC EiP Matter 9 Hearing Statement			
<b>Issue</b>	<b>Date</b>	<b>Prepared By</b>	<b>Reviewed By</b>	<b>Authorised By</b>
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## 1.0 Introduction

- 1.1 This statement addresses Matter 9 of the Ashfield District Local Plan Examination, focusing on the supply and delivery of housing land. It builds upon our earlier submissions concerning the spatial strategy and housing needs, particularly highlighting the shortcomings in the Local Plan's approach. Our response examines whether the housing land supply strategy is positively prepared, justified, effective, and consistent with national policy.
- 1.2 This statement should be read in conjunction with our previous representations and supporting evidence that has been submitted throughout the Ashfield District Local Plan consultation process.
- 1.3 Aldergate Property Group ("Aldergate") own "Land off Common Lane, Hucknall" that is not currently allocated within the emerging Local Plan. It comprises land considered in the SHELAA as Sites A (HK001), B (HK002), C (HK003) and D (HK004).
- 1.4 Part of the site (Sites HK 001 and HK 002) is subject of an outline planning application for up to 100 no. dwellings under planning application reference (ref: V/2024/0288). This application is a resubmission of an earlier application which was refused solely on Green Belt grounds (see Decision Notice attached).

## 2.0 Matter 9: The Supply and Delivery of Housing Land

### Total Housing Supply

It is not clear how Ashfield has selected those sites which have become proposed allocations. There are a number of sites noted in the SHELAA as “potentially deliverable”, “potentially available” or “potentially suitable”. One of those sites is of more than 23 hectares (Land north of A611 /South of Broomhill Farm, Hucknall) which is noted as having ground stability concerns with a major fault line running through it (Allocation H1Hc SHELAA site reference HK 016).

We are not aware that the potential issues with these sites have been resolved.

Further, it is not clear why sites identified as reasonable alternatives have not been allocated. Many of those can be seen to be more sustainable than those allocated sites, especially in the Hucknall area by reference to the Table attached which is draws on the full data within the S.A. in the spreadsheet at Document ADC 08.

The Council’s Housing Land Supply Position Statement (published October 2024) identifies a shortfall in total housing supply against the Local Housing Need target of 7,582 dwellings over the plan period (2023-2040). In addition, it relies heavily on windfall sites (equating to 1,183 dwellings or 16% of the housing need target) to meet the identified housing needs, as considered in further detail below.

The shortfall in supply is despite the fact that the Council’s housing requirement is based on the minimum Standard Methodology (NPPF September 2023) calculated housing need figure. Additionally, the housing requirement has not taken into consideration the range of circumstances where a higher level of housing growth should be considered. It also fails to provide an appropriate buffer to provide flexibility or additional choice of sites.

Ultimately, it is considered that the shortfall in supply presents a fundamental issue in the Plan’s approach to identifying sufficient deliverable sites and draws into question whether the plan has been positively prepared in accordance with the NPPF.

Whilst it is recognised that the plan is being examined under the September 2023 version of the NPPF, it should be acknowledged that under the new standard method the Council's Annual Local Housing Need would increase from 446dpa to 535dpa. This represents a substantial increase that will further worsen the Council's housing land supply position.

It is abundantly clear, therefore, that in order for the plan to be found sound the Council must identify additional housing sites in order to meet their housing requirement over the plan period. The Council should also apply an appropriate buffer to the housing supply in the event of any unanticipated failure in supply or under provision.

The Plan fails to include safeguarded land which in Aldergate's view is essential to provide a pool of sites which can be brought forward swiftly in the event of supply failure of under provision.

Aldergate has consistently highlighted through the consultation process that the plan fails to direct sufficient growth towards the sub regional centre of Hucknall, which is a highly sustainable area with well-established sustainable transport links and infrastructure to the city of Nottingham. The failure to recognise Hucknall as a sustainable location for additional growth entirely undermines the Local Plan's ability to deliver sustainable growth and address the historical under-deliver of housing across the District. It is clear that additional allocations are required to ensure the Plan's soundness, and these should be directed towards sustainable urban areas, such as Hucknall.

### **Supply from Site Allocations**

In addition to "windfall" sites the Plan places heavy reliance on large, unconsented sites, which raises questions about their deliverability. Despite Hucknall's suitability for further growth, only 23.9% of development is directed to the area, compared to 45.9% in Sutton. This imbalance overlooks Hucknall's strong connectivity and its ability to support sustainable development.

Land at Common Lane, Hucknall, is a viable and sustainable option that could contribute to housing delivery with minimal Green Belt harm. This site has been assessed as causing "low harm" to the Green Belt and offers opportunities for

mitigation measures, including biodiversity enhancements and improved public access to open spaces.

### **Timing of Projected Completions from Large Sites**

The Council's Housing Trajectory projects significant peaks and troughs in delivery, relying heavily on overly optimistic assumptions about the speed of development on large, unconsented sites. This approach risks failing to meet housing needs within the Plan period. Smaller, readily deliverable sites such as Common Lane could smooth out delivery patterns, providing a more reliable trajectory. Including such sites would also reduce the risk of delays and ensure that housing targets are more readily met in a timely manner.

### **Approach to Windfall**

The Council relies very heavily upon "windfall" sites continuing to come forward over the plan period (equating to 1,183 dwellings or 16% of the overall housing requirement). It is considered that the Council has not presented any compelling evidence that would suggest that the windfall sites would provide a reliable source of supply. On the contrary, we feel that the Council's failure to have an adopted plan since 2002 naturally leads to a substantial increase in consents on none allocated sites and as such is likely to have distorted the windfall delivery rate. This, therefore, significantly undermines any suggestion to include such a large windfall allowance.

This level of reliance on unplanned sites reflects the inadequacy of the Council's site selection process and spatial strategy. Planned allocations in sustainable locations, such as Hucknall, should be prioritised to provide greater certainty and consistency in housing delivery. There is no need for such a heavy reliance on windfall sites when there are suitable, available and deliverable sites such as Land at Common Lane, Hucknall that can come forward immediately.

## **Five-Year Housing Land Supply**

The Council claims to have a five-year housing land supply post-adoption, but this is based on unrealistic assumptions regarding delivery rates and the reliance on unconsented sites. The inclusion of such sites raises concerns about their deliverability within the required timeframe. Land at Common Lane, Hucknall, offers an immediate solution, with minimal barriers to development. Its inclusion would bolster the five-year supply and provide much-needed certainty for developers and local communities.

## **Alignment with National Policy**

The National Planning Policy Framework (September 2023 NPPF) requires Local Plans to identify sufficient deliverable sites to meet housing needs, including a five-year supply with an appropriate buffer. The current Plan fails to meet this requirement, particularly given its persistent under-delivery and the omission of key sustainable sites such as Common Lane. Allocating land at Hucknall would align with national policy by prioritising sustainable development in well-connected areas, ensuring the Plan is effective and robust.

## **Conclusion**

Aldergate strongly urges the Council to revise its housing supply strategy. Additional sustainable sites, such as Common Lane in Hucknall, should be allocated to address the identified shortfall and support a realistic housing trajectory. This would reduce reliance on windfall sites and unconsented Green Belt land, ensuring the Plan is positively prepared, justified, effective, and aligned with the NPPF. These adjustments are essential to deliver a sound and sustainable Local Plan that meets the housing needs of Ashfield District.



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