

For and on behalf of
Mr Keith Haslam (Stags Limited)
And
Bellway Homes Limited (East Midlands)

Matter 2
Ashfield District Local Plan Examination

Meeting Ashfield's Housing Needs

Prepared by
Strategic Planning Research Unit
DLP Planning Ltd
Sheffield

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Prepared by:	Rebecca Neely BA (Hons) Planner
Checked by:	Kirsten Ward BSc (Hons) MA PhD MRTPI Associate Director
Approved by:	Jim Lomas BA (Hons) MRTPI Director
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Strategic Planning Research Unit

V1 Velocity Building
Ground Floor
Tenter Street
Sheffield
S1 4BY

Tel: 01142 289190

Broad Quay House (6th Floor)
Prince Street
Bristol
BS1 4DJ

Tel: 01179 058850

4 Abbey Court
Fraser Road
Priory Business Park
Bedford
MK44 3WH

Tel: 01234 832740

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CONTENTS	PAGE
1.0 Introduction.....	4
2.0 Matter 2 – Meeting Ashfield’s Housing Needs	5
a) Issue 1	5
b) Issue 2	8

1.0 INTRODUCTION

- 1.1 This response to Matter 2 of the Inspectors' MIQs in respect of the Ashfield District Local Plan Examination has been prepared by DLP Planning Limited. DLP Planning have been instructed to appear at the Examination on behalf of Mr Keith Haslam (Stags Limited) and Bellway Homes Limited (East Midlands).
- 1.2 DLP Planning have made submissions on behalf of Stags Limited and Bellway Homes Limited to the Regulation 19 consultation (December 2023 – January 2024) on the emerging Local Plan, objecting to the Submission Version of the Ashfield District Local Plan on several grounds, including in relation to Policies S1, S2, S5 and S7. This statement should be read in conjunction with those submissions.
- 1.3 The cumulative effect of the issues raised in our previous representations and our submitted hearing statements for Matters 2 and 3 should be taken into consideration in considering the soundness of the Ashfield District Local Plan as it progresses through Examination and in any Main Modifications that may be required in order to address these soundness issues.

2.0 MATTER 2 – MEETING ASHFIELD’S HOUSING NEEDS

a) Issue 1

Q2.1. Has the calculation of Local Housing Need (LHN) (446 dwellings per annum) been undertaken correctly?

- 2.1 Point 1 of Policy S7 states that a minimum of 7,582 new dwellings will be delivered in Ashfield over the period 2023 to 2040.
- 2.2 The policy supporting text specifies that the housing requirement figure is based on a Local Housing Need derived from the standard method calculation, which results in a housing need figure of 446 dwellings per annum (dpa) as of April 2023.
- 2.3 We agree, in principle, that the Council’s calculation of the annual housing requirement using the standard method is correct and that over the 17-year plan period (2023 to 2040) the total housing requirement based on the standard method would therefore be 7,582 dwellings. However, this calculation should have been updated to reflect the date of submission of the Plan, including taking account of the 2023 affordability ratio.

Q2.2. Has the correct median workplace-based affordability ratio been used to undertake the LHN calculation having regard to the date of submission of the Plan?

- 2.4 The correct median workplace-based affordability ratio for undertaking the LHN calculation is the 2023 figure of 6.15. This figure is higher than the 2022 figure of 5.84, which indicates that levels of affordability are worsening in Ashfield. The affordability ratio which has been used to calculate the LHN figure of 446 is the 2022 figure of 5.73 (as stated in Background Paper 2: Housing).
- 2.5 The LHN calculation should be updated to reflect the latest affordability ratio at the time the Plan was submitted.

Q2.3. Are there any exceptional circumstances which justify an alternative approach to using the standard method? If so, what are they, and what should the housing requirement be?

- 2.6 It is noted that Policy S8 (Delivering Economic Opportunities) identifies an employment land requirement of 81 ha over the plan period (2023 to 2040). As set out in Table 36 of Background Paper 3: Economy & Employment Land, this figure is based on a scenario derived from past take-up rates. This can be compared with the labour supply scenario derived from the current standard method local housing need figure (446 dpa) of 16.84 ha. The amount of employment land being planned for is therefore significantly in excess of the amount of employment land required under the labour supply scenario.
- 2.7 Whilst it is acknowledged that some of this past take-up trend relates to wider strategic needs rather than local ‘indigenous’ needs of Ashfield’s residents, paragraphs 8.111 and 8.112 of Background Paper 3 identify the past take-up figure attributable to ‘local needs’ as being 27.5 ha. This is still in excess of the 16.84 ha that would be required based on the standard method housing requirement figure of 446 dpa.
- 2.8 Paragraph 8.112 of Background Paper 3 states that “*planning for this higher figure will help to ensure a choice of employment land supply by size, type, location and quality of sites and premises for businesses, and maximising future job opportunities for the local workforce (including those who may currently commute elsewhere)*”. However, in planning for this higher figure it is also necessary for the Council to consider whether there is sufficient housing available to meet the identified growth in jobs. Paragraph 61 of the Framework states that the outcome of the standard method is ‘an advisory starting-point for establishing a housing requirement for the area’ and that there may be exceptional circumstances which

justify an alternative approach to assessing housing need, including an approach that reflects 'market signals'.

- 2.9 At present the amounts of land allocated for employment and housing growth within the Plan are misaligned. There may therefore be justification for planning for more housing than indicated by the Standard Method. The allocation of additional housing land which meets the housing requirement for the whole plan period, together with a potential uplift to reflect anticipated levels of jobs and economic growth, should therefore be considered in order to ensure the Plan has been positively prepared.

Q2.4. Is the plan positively prepared in light of the under-identification of homes over the full Plan period compared with the requirement under the standard method (6,825 compared to the LHN of 7,582)?

- 2.10 Strategic Policy S7 states that “A minimum of 7,582 new dwellings will be delivered within the period 2023 to 2040, dispersed across the District in accordance with the Council’s spatial strategy for growth”. However, the Trajectory which is included in Appendix 2 of the Plan only shows 6,825 dwellings as being deliverable over the plan period to 2040.
- 2.11 Table 2 on page 57 of the plan also only identifies a total housing supply of 6,700 dwellings over the plan period, which is a deficit of 882 dwellings compared with the minimum housing need of 7,582 dwellings, and represents just 15 years’ supply. Paragraph 22 of the NPPF states that “Strategic policies should look ahead over a minimum 15 year period from adoption”. Given that the Plan is not expected to be adopted until 2025 at the earliest, the Plan should identify sufficient housing to meet the District’s needs to at least 2040, which is 17 years from the base date of the Plan (i.e. a housing need of 7,582 dwellings).
- 2.12 Therefore, the Plan is currently neither positively prepared nor effective, as it states that 7,582 dwellings will be delivered over the plan period, despite the fact that within this figure there are 882 dwellings that have not been positively planned for and it is unclear how or where these 882 will come forward. No further clarity is provided in the associated Background Paper 2: Housing or in the other supporting evidence base documents.
- 2.13 This background paper establishes that the current supply of deliverable and developable sites combined with extant permissions (as at April 2023) allow the authority to only confirm the delivery of 6,700 of its 7,582 target, leaving a clear deficit of 882 dwellings for the plan period.
- 2.14 While this shortfall is acknowledged by the Council, it is justified (in paragraph 7.3 of Background Paper 2) on the basis that it is compliant with paragraph 68 (now paragraph 69) of the Framework because: “...the Plan currently provides for 6700 dwellings against a need of 7582 to the year 2040, amounting to approximately 13 years supply post adoption (to year 2038/39). It is considered to be consistent with NPPF paragraph 68 which requires policies to identify a sufficient supply and mix of sites, (taking into account their availability, suitability and likely economic viability), with specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan” (Background Paper 2: Housing, paragraph 7.3)
- 2.15 These are the years which paragraph 69 of the Framework states must be effectively planned for and covered by any emerging local plan, with specific deliverable sites for the first five years identified following the intended date of adoption, developable sites identified for the 6-10 year post-adoption period, and, where possible, found for the 11-15 year post-adoption period. However, the Plan is not expected to be adopted until 2025 at the earliest, and therefore the deliverable sites should cover the period 2025-2030, and the developable sites should be identified for the remaining plan period 2030-2040.

- 2.16 In order to ensure the Plan is sound at the point of adoption the Council should identify further developable sites at this stage to ensure that the Plan meets the housing requirement in full and to avoid unnecessary delays during the Examination process should further allocated sites be required.
- 2.17 The Plan, in particular Policy S7, is not positively prepared nor consistent with national policy because the level of housing provision that has been planned for (as also set out in the housing allocations identified in Policy H1) does not meet the identified needs for the plan period and is not in accordance with NPPF paragraphs 22 and 69.
- 2.18 In order to ensure the plan is positively prepared and consistent with national policy, the Council should ensure that sufficient sites are identified which, as a minimum, meet the housing requirement for the whole plan period (7,582 dwellings), including through allocating further deliverable and developable sites, as required.

Q2.5. The plan identified a shortfall in housing allocations over the full plan period but nonetheless proposes the release of a number of sites from the Green Belt. Is this approach consistent with paragraph 143(e) of the Framework which indicates that when defining Green Belt boundaries, plans should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period?

- 2.19 As noted above, the Council should identify sufficient housing allocations to meet their housing needs in full over the Plan period. The release of some Green Belt land is therefore likely to be required. These should include those where exceptional circumstances to justify their removal has been demonstrated, such as site H1Hc (Land North of A611 / South of Broomhill Farm, Hucknall).

Q2.6. How has the SA considered the under-allocation of housing compared to the housing requirement over the full plan period?

- 2.20 Appendix E of the Sustainability Appraisal (SA) assesses the impact of the Preferred Option being the delivery of 7,582 dwellings over the plan period 2023-2040. No assessment of the under-allocation of housing compared to this Preferred Option has been undertaken, only an assessment of a higher housing delivery figure of 535 dpa, which includes a flexible buffer.
- 2.21 It is anticipated that were the under-allocation of housing to be assessed it would certainly score more negatively against some of the SA Objectives, namely SA Objective 1: Housing, which seeks to ensure that the housing stock meets the housing needs of Ashfield.

Q2.7. Do the Council's latest Housing Delivery Test results have implications for the housing delivery and trajectory expectations in the submitted plan?

- 2.22 The latest Housing Delivery Test results for Ashfield published in December 2023 for the year 2022 indicate that over the past three years the number of homes delivered in the District was just 74% of the total number of homes required, thereby triggering the Presumption in Favour of Sustainable Development.
- 2.23 The trajectory included at Appendix 2 of the Draft Local Plan similarly shows an under-delivery of dwellings compared with the cumulative requirement over the first five years of the Plan (2023/24 – 2027/28).
- 2.24 In order to ensure that the Plan continues to deliver sufficient sites needed to meet the identified housing requirement over the full plan period, the allocation of additional housing sites should be considered in order to provide a sufficient buffer against potential future under-delivery.

b) **Issue 2**

Q2.8. How does the need for affordable housing compare to the housing requirement? Based on the thresholds and requirements in Policy H3, will affordable housing needs be met?

2.25 No response.

Q2.9. What is the need for specialist forms of accommodation (e.g. Older persons housing, housing people with disabilities, student accommodation)? How does the submitted plan seek to address these needs?

2.26 No response.

Q2.10. Are the requirements for affordable housing in Policy H3, including the proposed tenure splits justified? Are the affordable housing percentages justified? Will they be viable?

2.27 No response.

Q2.11. Are the requirements in Policy H4(1) justified?

2.28 No response.

Q2.12. What is the need for custom and self-build housing in the District? How will this be met over the plan period?

2.29 No response.

Q2.13. Are the requirements of Policy H5 justified? What is the evidence for the thresholds set out in the Policy?

2.30 No response.

Q2.14. Is Policy H5(1)(b) sufficiently clear to developers, decision-makers and local communities? Is it justified?

2.31 No response.

Q2.15. Does the Sustainability Appraisal (SA) meet the requirements for a Strategic Environmental Assessment?

2.32 No response.

Q2.15. Does Policy H6 accord with paragraph 62 of the Framework in respect of those who wish to commission or build their own homes?

2.33 No response.

Q2.16. Does Policy H6 reflect the housing mix that was subject to viability testing in the Whole Plan Viability Assessment (SEV.38)? Why is the recommended housing mix not included within the text of Policy H6?

2.34 No response.

Q2.17. Are the housing density requirements in Policy H7 justified? Are they evidence-based?

2.35 No response.

Q2.18. Is the wording of Policy H7 sufficient clear as to whether the density requirements are gross or net? Is Policy H7 sufficiently flexible to deal with circumstances where the minimum densities set out may not be appropriate for particular site-based reasons?

2.36 No response.

Q2.19. Is Policy H8 sufficiently clear to decision-makers, developers and local communities where Houses in Multiple Occupation (HMOs) will be permitted?

2.37 No response.

Q2.20. Taking each in turn, are the criteria in Policy H8(2) justified?

2.38 No response.

BEDFORD / SDD / SPRU

4 Abbey Court, Fraser Road
Priory Business Park, Bedford. MK44 3WH
bedford@dlpconsultants.co.uk
01234 832 740

BRISTOL / SDD / SPRU

Broad Quay House (6th Floor)
Prince Street, Bristol. BS1 4DJ
bristol@dlpconsultants.co.uk
01179 058 850

EAST MIDLANDS

1 East Circus Street, Nottingham
NG1 5AF
nottingham@dlpconsultants.co.uk
01158 966 622

LEEDS

Princes Exchange
Princes Square, Leeds. LS1 4HY
leeds@dlpconsultants.co.uk
01132 805 808

LONDON

The Green House, 41-42 Clerkenwell Green
London. EC1R 0DU
london@dlpconsultants.co.uk
020 3761 5390

MILTON KEYNES

Midsummer Court, 314 Midsummer Boulevard
Milton Keynes. MK9 2UB
miltonkeynes@dlpconsultants.co.uk
01908 440 015

SHEFFIELD / SDD / SPRU

Ground Floor, V1 Velocity Village
Tenter Street, Sheffield. S1 4BY
sheffield@dlpconsultants.co.uk
0114 228 9190

RUGBY

18 Regent Place, Rugby, Warwickshire
CV21 2PN
rugby.enquiries@dlpconsultants.co.uk
01788 562 233

**RTPI**

Chartered Town Planner

