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## Ashfield District Local Plan Examination

P&DG on behalf of Aldergate Property Group

Hearing Statement Addendum:  
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>	Date	Prepared By	Reviewed By	Authorised By
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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. The statement has been updated in light of the additional work undertaken by the Council to address the soundness concerns raised by the Inspectors. For ease of reference, the additional responses are highlighted in [blue](#).
- 1.3 Aldergate Property Group ("Aldergate") own 'Land off Common Lane, Hucknall' that is not currently allocated within the emerging Local Plan. However, it is subject of a current outline planning application for up to 100 no. dwellings under planning application reference (ref: V/2024/0288).

## 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 or 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.

## **Housing Shortfall**

The identified housing shortfall of 882 dwellings, as noted above, was raised by the Inspector as a significant soundness concern within their Interim Findings Letter (INS05). The shortfall means that the Council's housing supply is insufficient and they are currently unable to meet their identified housing needs of the plan period, which is critical to the soundness of the plan overall.



The Council have, subsequently, been required to identify additional housing sites to address the housing shortfall. However, as set out within in our Matter 2 Hearing Statement and evidence to the EiP hearings, it is our view that the concerns of the Inspectors have not been fully addressed, and therefore, fundamental soundness issues remain.

Indeed, the Council have not provide robust and justified evidence to demonstrate that all of the proposed additional housing sites are genuinely, available, deliverable and sustainable in accordance with the NPPF. This draws into question whether the identified additional housing sites are capable of providing sufficient capacity to address the housing shortfall over the plan period.

These concerns are exacerbated by the fact that the Council's housing supply currently only includes the provision for a modest buffer, and as such, does not include sufficient contingency to respond to any unanticipated changes in circumstances or delays in housing delivery. A buffer of at least 20% would be appropriate to take into consideration the historic under delivery of housing and substantial out-of-datedness of the existing Local Plan.

Additionally, this is even further exacerbated by the inclusion of a windfall allowance of 91 dwellings per annum, which forms a significant proportion of the Council's housing supply that has not be fully justified with compelling evidence as a reliable source of supply. This is also a key soundness issue raised by the Inspectors that has not been addressed by the Council.

We also draw attention to Gedling Borough Council's decision to withdraw from the draft GNSP so that it can plan to meet its full local housing need under the 2024 standard method, rather than rely on the transitional arrangements to suppress housing numbers. Whilst it may be open to Ashfield to proceed on the basis of the lower transitional figures, there is no requirement for the Council to do so. In the context of persistent under-delivery and an acknowledged housing shortfall, it would be more consistent with national policy and the objective of positively prepared plan-making for Ashfield to plan now for the higher level of need (equating to approximately 450 additional dwellings in each five-year period of the plan), thereby addressing actual current needs rather than deferring them to a future plan review. A failure to do so reinforces our concern that the Plan is not positively prepared and is unlikely to remain sound over the full plan period.

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