



**Ashfield District Council**  
**Housing Land Supply: Explanatory Paper**

**January 2017**

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## **Foreword**

This paper has been prepared to clarify and draw together information regarding the Council's approach to various aspects of housing land supply in Ashfield and support the submitted Ashfield Local Plan. If required, further information can be found in the annual Housing Land Monitoring Report, Nottingham Outer Strategic Housing Market Area Assessment (SHMA), Strategic Housing Land Availability Assessments/Methodology, Housing Options Spatial Approach Paper and submitted Local Plan.

## 1. Approach to Windfall Sites

### Background

- 1.1 The Housing Land Monitoring Report 2016 (HLMR) sets out the supply of housing sites deliverable without policy change against the Objectively Assessed Housing Need (OAHN) for the District, and demonstrates how the District performs with regard to the 5 year housing supply requirement. Table 1 and Appendix 2 of the submitted Ashfield Local Plan 2017 sets out the 5 year Housing Land Supply at the point of submission (i.e., including new site allocations). The OAHN is identified as 480 dwellings per annum in both cases.
- 1.2 Paragraph 48 of the NPPF provides that an allowance for windfall sites in the five year supply if they have compelling evidence that such sites consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and should not include residential gardens. Windfall sites are defined in the NPPF (glossary, page 57) as:

*“Sites which have not been specifically identified as available in the Local Plan process.....**normally** comprise previously–developed sites that have unexpectedly become available.”*
- 1.3 It is assumed therefore that the term ‘windfall’ can refer to sites of all sizes.

### Small Site Windfalls

- 1.4 Small sites in this context refer to those with a yield below 10 dwellings and will generally be considered as windfalls since the Local Plan does not allocate sites below this threshold. Although the SHLAA does have a lower threshold, very few small sites have been submitted for assessment and those deemed deliverable are negligible – these have not been counted as contributing towards future supply. It is therefore considered appropriate to project forward past trends in small site delivery to help establish a windfall rate. This approach ensures that no ‘double counting’ will occur.

## Historic Delivery of Small Sites

- 1.5 Between the years 2006 to 2016 a total of **770** dwellings were delivered on small sites, including new build, conversions and change of use. This equates to an average rate of **77** dwellings per annum (dpa).
- 1.6 Table 1 below illustrates delivery of small sites over the past 10 years, including conversions or change of use developments.

<b>TABLE 1: Small Site Completions 2006 to 2016</b>			
<b>Year</b> (31st March to 1st April)	<b>New Build</b>	<b>Conversions/ change of use</b>	<b>All</b>
2006/2007	66	39	105
2007/2008	100	25	125
2008/2009	50	10	60
2009/2010	44	26	70
2010/2011	51	14	65
2011/2012	43	15	58
2012/2013	37	13	50
2013/2014	34	17	51
2014/2015	41	19	60
2015/2016	103	23	126
<b>Total</b>	<b>569</b>	<b>201</b>	<b>770</b>
Average per annum	57	20	77

- 1.7 The NPPF specifically refers to the exclusion of residential gardens (paragraph 48). Gardens were re-classified as 'Greenfield' from 'Previously Developed Land' (PDL/Brownfield) for planning purposes as of 9th June 2010 through a revised version of PPS3. Development on garden land has therefore been monitored from this date. Data for the period 2010 to 2016 shows that a total of 90 dwellings were completed on small sites on garden land. In comparison, 410 dwellings were delivered on all small sites over the same period. Garden land completions therefore equate to around **22%** of all small site completions over the past 6 years.

**Estimating a Future Windfall Allowance for Small Sites.**

- 1.8 For the purposes of projecting forward past trends in housing delivery it is appropriate to look back over a longer period in order to take account of the peaks and troughs of the housing market cycle. This approach is consistent with National Planning Guidance paragraph 35 and is particularly pertinent as the period where garden land was monitored (years 2010-2016) fall within a recession/post-recession recovery period.
- 1.9 The 22% garden land delivery rate has therefore been applied to the overall 10 year small site delivery of 770 dwellings, equating to 169 dwellings. This gives an estimated net delivery on sites which exclude garden land development of 601, or **60 dpa**.

<u>Total small site delivery 2006 – 2016</u>	<u>Less 22% garden development</u>	<u>Net development on non-garden Land</u>	<u>Estimated development per annum (non- garden land)</u>
<b>770 dwellings</b>	<b>169 dwellings</b>	<b>601 dwellings</b>	<b>60 dwellings</b>

- 1.10 The HLMR 2016 and submitted Local Plan includes supply from small site planning permissions which amount to 273 dwellings as of 1<sup>st</sup> April 2016. These are included in the 5 year housing land supply, but have been discounted by 62 dwellings to give a net potential supply of **211** after applying a lapse rate<sup>1</sup>. In comparison, projecting forward the historic rate of 60 dpa would provide around **300** dwellings over 5 years. Although the estimated delivery from small site permissions is lower than the projected historic delivery figure, an additional small site windfall allowance has not been included in the first 5 years supply. This approach is more site specific and avoids double-counting.
- 1.11 It is considered appropriate however to include an allowance beyond 5 years, (for the period 2021 to 2032), since small unallocated sites have consistently formed part of past supply and there is no justification to assume this source will cease in future. Projecting forward the 60 dpa will give an additional supply of **660** towards meeting the overall housing requirement for the period 2021 to 2032.
- 1.12 It should be noted that the submitted Local Plan (Publication September 2016) includes a small site windfall allowance of **62** dpa for the period 2021 to 2032 (beyond 5 years). The reason this differs from the 60 dpa outlined above comes as a result of updating evidence and re-basing historic supply data to cover the most recent 10 years from the period 2005-2015 to 2006-2016. This does not represent a significant

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<sup>1</sup> See section 2.

change to the windfall allowance made in the submitted Plan and the 62 dpa is therefore considered justified and in accordance with national policy.

### **Large Site Windfalls**

- 1.13 In this context large sites refer to those of 10 dwellings and above. It is not considered that there is any justification to make an allowance for large windfall sites as part of the housing supply.
- 1.14 The Housing Land Monitoring Report 2016 includes an allowance for large sites from the SHLAA which have been assessed as deliverable without requiring any change to current policy. The submitted Local Plan counts all proposed sites allocated under policies H3, SKA3 and R2 towards future supply (this includes SHLAA sites counted in the HLMR plus additional sites of 10 or more dwellings). Those considered to be deliverable for the period 2016 to 2032 have been counted towards the overall supply, whilst only those deliverable 2016 to 2020 have been counted towards the 5 year supply calculations.
- 1.15 The SHLAA identifies sites which are available and deliverable, but do not yet have the benefit of planning permission. This source is more reliable than a relying on projecting forward a historic windfall rate as detailed information has been obtained on a site-by-site basis. Where available, the anticipated rates of delivery are as provided by the developer/landowner. Where delivery information has not been provided, assumptions have been used (see Section 4).
- 1.16 Including a large site windfall rate in addition to the identified deliverable SHLAA sites/allocations would result in an element of double counting, particularly towards the beginning /middle of the accounting period.
- 1.17 At present there is no justification to include any additional large site windfall allowance in the submitted Local Plan (or the HLMR) since all appropriate large sites are expected to have been picked up through the site selection process. This approach avoids the risk of over-estimating future supply from large sites. It is reasonable to expect 'large' windfall sites to come forward in future, but these will of course be counted as commitments.

## 2. Discounting Delivery from Existing Planning Permissions

### Background

- 2.1. The Housing Land Monitoring Report 2016 (HLMR) sets out the supply of housing sites deliverable without policy change against the Objectively Assessed Housing Need (OAHN) for the District, and demonstrates how the District performs with regard to the 5 year supply requirement. Table 1 and Appendix 2 of the submitted Ashfield Local Plan 2017 sets out the 5 year Housing Land Supply at the point of submission (i.e., including new site allocations). The OAHN is identified as 480 dwellings per annum in both cases.
- 2.2. The calculations include all residential C3 planning permissions towards future supply. This is offset by and proposals for demolition. Whilst there is no reason to believe that any specific permission may not be implemented, it is accepted that there will be a number which will never come to fruition.
- 2.3. In order to determine a rate for discounting the potential supply from this source, a comparison has been drawn with the number of dwellings on permissions granted against those lapsing over the past 10 years. The assessment has been undertaken separately for small and large sites – see Table 3 below.

Site size	Permissions Granted 2006-2016 (Dwellings)	Lapsed Permissions 2006-2016 (Dwellings)	Lapse Rate %
Large	6535	421	<b>6.4%</b>
Small	1011	272	<b>26.9%</b>

- 2.4. The percentage rates for lapsed permissions have been applied to large site planning permissions where development has not yet commenced since once a site has started it becomes 'extant' and can no longer lapse. Importantly, an analysis of large sites which have commenced in the last 10 years shows that none have stalled in their delivery. In contrast, **all** of the outstanding permissions on small sites have been discounted. The effect of discounting is illustrated in Table 4. As a consequence, the delivery of planning permissions could potentially be reduced by **113** over the plan period.

Area/Site size	Outstanding permissions (Dwellings on sites not started)	Lapse rate applicable	Discounted outstanding permissions	Dwellings deducted over whole plan period
Hucknall Large	144	6.4%	135	9
Hucknall Small	68	26.9%	50	18
Kirkby/Sutton Large	678	6.4%	635	43
Kirkby/Sutton Small	120	26.9%	88	32
Villages Large	0	6.4%	0	0
Villages Small	38	26.9%	28	10
<b>Total Large</b>	<b>822</b>	<b>6.4%</b>	<b>769</b>	<b>53</b>
<b>Total Small</b>	<b>226</b>	<b>26.9%</b>	<b>165</b>	<b>61</b>
<b>TOTAL ALL SITES</b>	<b>1048</b>	<b>n/a</b>	<b>935</b>	<b>113</b>

2.5. With regard to the 5 year housing supply, Table 5 below illustrates that delivery of planning permissions could potentially reduce by **109** over the period 2016-2021.

Area/Site size	Outstanding permissions (Dwellings on sites not started) DELIVERABLE IN 5 YEAR SUPPLY	Lapse rate applicable	Discounted outstanding permissions (deliverable in first 5 years)	Dwellings deducted over first 5 years
Hucknall Large	144	6.4%	135	9
Hucknall Small	68	26.9%	50	18
Kirkby/Sutton Large	615	6.4%	576	39
Kirkby/Sutton Small	120	26.9%	88	32
Villages Large	0	6.4%	0	0
Villages Small	38	26.9%	28	10
<b>Total Large</b>	<b>759</b>	<b>6.4%</b>	<b>710</b>	<b>49</b>
<b>Total Small</b>	<b>226</b>	<b>26.9%</b>	<b>165</b>	<b>61</b>
<b>TOTAL ALL SITES</b>	<b>985</b>	<b>n/a</b>	<b>876</b>	<b>109</b>

2.6. It should be noted that the submitted Local Plan includes a deduction to account for lapsed permissions of **116** for the whole plan period, and **112** in respect of the 5 year supply. The reason these differ from the **113/109** figures outlined above comes as a result of re-basing historic data from the period 2005-2015, to 2006-2016 to reflect the most recent 10 year period. The lapse rate has fallen marginally as a result. The rates based on 2005-2015 evidence (as used in the submitted Local Plan) are set out in table 6 below. This does not represent a significant change to the lapse rate made in

the submitted Plan and is therefore considered justified and in accordance with national policy.

<b>TABLE 6: Historical Lapse Rate for Large and Small Residential Permissions 2005-2015</b>			
<b>Site size</b>	<b>Permissions Granted 2005-2015 (Dwellings)</b>	<b>Lapsed Permissions 2005-2015 (Dwellings)</b>	<b>Lapse Rate %</b>
Large	5974	392	<b>6.6%</b>
Small	1277	353	<b>27.6%</b>

### 3.0 Record of Past Performance and Justification for 5% Buffer

3.1 Table 7 overleaf illustrates how historic delivery compares against housing requirements for the period 2002 to 2016. The table considers 2 different scenarios i.e., including the now revoked EMRP requirement, and also excluding it.

3.2 The period used is taken from the adoption date of the ‘saved’ Ashfield Local Plan Review (2002) up to present (2016). This is consistent with paragraph 35 of the National Planning Guidance which states:

*“the assessment of local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle.”*

3.3 The annual requirement is derived for each period as follows:

<b>Period</b>	<b>Scenario A</b> (including EMRP requirement)	<b>Scenario B</b> (excluding EMRP requirement)
<b>4/2002 - 4/2006</b>	<b>405 dpa</b> Sourced from adopted local plan (ALPR 2002)	<b>405 dpa</b> sourced from adopted local plan (ALPR 2002)
<b>4/2006 - 4/2011</b>	<b>560 dpa</b> Sourced from the EMRP 2009 (RSS) <sup>2</sup>	<b>405 dpa</b> sourced from adopted local plan (ALPR 2002) <sup>3</sup>
<b>4/2011 - 4/2013</b>	<b>314 dpa</b> Sourced from CLG household projections plus an uplift to account for vacancy rates <sup>4</sup>	<b>314 dpa</b> Sourced from CLG household projections plus an uplift to account for vacancy rates
<b>4/2013 - 4/2016</b>	<b>480 dpa</b> OAN sourced from GL Hearne SHMA 2015 <sup>5</sup> (OAN ‘mops up’ any under supply for the period 2011-2013)	<b>480 dpa</b> OAN sourced from GL Hearne SHMA 2015 <sup>4</sup> (OAN ‘mops up’ any under supply for the period 2011-2013)

<sup>2</sup> East Midlands Regional Plan was formally adopted in March 2009 and set housing requirements from 2006-2026. This plan was revoked in 2013.

<sup>3</sup> The Ashfield Local Plan Review (2002). This Plan had an end date of 2011 with a housing requirement derived from the Structure Plan. Policies relating to housing supply were ‘saved’.

<sup>4</sup> 2015 published CLG household projections, based on 2012 sub national population projection/2011 census data. An additional allowance of 14 dpa has been included to account for vacancies. This is more appropriate than the EMRP requirement as it is based on the most up to date government projections as set out in Planning Practice Guidance paragraph 15.

<sup>5</sup> Nottingham Outer 2015 Strategic Housing Market Assessment sets an OAN for the period 2013 to 2033. It ‘mops up’ any previous under supply for the period 2011 to 2013.

- 3.4 Although the East Midlands Regional Plan (EMRP) was not revoked until 2013, it is considered more appropriate to use the most up to date government projections for the period 2011 to 2013 rather than the EMRP figure. This is consistent with advice set out in Planning Practice Guidance paragraph 15 with regard to using DCLG projections as the starting point for estimating housing need. The EMRP figure was not a measure of objectively assessed housing need (OAHN), whereas DCLG household projections represent the most appropriate and adequate assessment of need at that time. An additional allowance of 14 dpa has also been included to account for vacancies. Importantly, the OAHN used in the submitted Plan which has a base date of 2013 'mops up' any under provision which may have occurred between 2011 and 2013.
- 3.5 Table 7 shows an **under-provision** using **Scenario A** of **86** dwellings (or **1.3%**) over the 14 year period. **Scenario B** shows an **over-provision** of **688** dwellings (or **12.0%**) over the 14 year period.
- 3.6 The table also illustrates a marked fall in delivery in 2008, almost certainly as a direct consequence of the recession and subsequent downward turn in the housing market. However, increased delivery in subsequent years demonstrates that Ashfield is experiencing a period of steady recovery.
- 3.7 The Council has assessed past housing delivery against housing requirement and has also undertaken a comparison with annual completions at a national level (see Appendix A). In this context it is evident that past performance cannot be described as 'persistent under delivery' as it is only in recent years, following the credit crunch and collapse of the housing market nationally, that delivery has slipped below the District requirement. At a very basic level, it can be seen that out of the 14 years, 7 years have delivered above and 7 below the target. Consequently an additional 5% buffer (moved from later in the plan period) has been applied to the 5 year supply calculations, consistent with the requirements of the NPPF. Only where local authorities have a record of persistent under delivery should this buffer increase to 20%. Delivery will continue to be monitored on an annual basis and the buffer adjusted if necessary.
- 3.8 The direction of travel for Government policy is set out in the Housing White Paper 'Fixing Our Broken Housing Market' February 2017. Paragraphs 2.47-2.50 introduce the proposed model for a 'housing delivery test' which will highlight whether the number of homes being built is below target. It is intended that delivery will be measured using net additional dwellings over a rolling three year average, with the first assessment period being for the financial years 2014/15 to 2016/17. From November 2017, if delivery falls below 85% of the housing requirement, authorities would be expected to plan for a 20% buffer on their five-year land supply. There is no mention of a 5% buffer as currently set out in NPPF paragraph 47.

3.9 To give some context to Ashfield’s position in this respect, if the Government proposals were applied at this point, i.e., net delivery over the past 3 years set against the housing target, it can be seen that delivery is currently at 99.8% (3 year requirement of 1440, net completions of 1437).

<b>TABLE 7: Comparison of past delivery against requirement</b>					
<b>Year on Year Completions (1st April to 31st March)</b>					
<b>Year</b>	<b>Net Dwelling Completions</b>	<b>Scenario A Annual requirement including EMRP</b>	<b>Difference (Scenario A)</b>	<b>Scenario B Annual requirement excluding EMRP</b>	<b>Difference (Scenario B)</b>
1/4/2002 - 31/3/2003	582	405	177	405	177
1/4/2003 - 31/3/2004	404	405	-1	405	-1
1/4/2004 - 31/3/2005	361	405	-44	405	-44
1/4/2005 - 31/3/2006	548	405	143	405	143
1/4/2006 - 31/3/2007	652	560	92	405	247
1/4/2007 - 31/3/2008	575	560	15	405	170
1/4/2008 - 31/3/2009	283	560	-277	405	-122
1/4/2009 - 31/3/2010	362	560	-198	405	-43
1/4/2010 - 31/3/2011	352	560	-208	405	-53
1/4/2011 - 31/3/2012	412	314	98	314	98
1/4/2012 - 31/3/2013	434	314	120	314	120
1/4/2013 - 31/3/2014	454	480	-26	480	-26
1/4/2014 - 31/3/2015	425	480	-55	480	-55
1/4/2015 - 31/3/2016	558	480	78	481	77
<b>Total 2002 - 2016</b>	<b>6402</b>	<b>6488</b>	<b>-86</b>	<b>5714</b>	<b>688</b>
		Shortfall	-1.3%	Oversupply	12.0%

## 4.0 Housing Site Delivery Assumptions

- 4.1 In order to ensure that the Council maintains a sufficient supply of housing to meet the objectively assessed housing needs (OAN) of Ashfield District<sup>6</sup> for the Plan period (2013 to 2032), it has been necessary to undertake a review of housing delivery in Ashfield district over the past 3 years. This analysis has formed the main basis for the assumptions made in relation to the timescale of housing delivery and the annual build rates included in Ashfield District's Housing Trajectory<sup>7</sup>. The table included at Appendix B illustrates delivery rates on large sites in Ashfield between 1<sup>st</sup> April 2013 and 31<sup>st</sup> March 2016.
- 4.2 In addition to this, the Council has liaised with landowners, agents and developers of sites submitted for consideration as housing allocations in the emerging Local Plan. Studies undertaken by the HBF<sup>8</sup>, Nathaniel Lichfield and Partners<sup>9</sup>, and Savills<sup>10</sup> have also informed the approach taken. Through this process the Council has developed a realistic timetable of future housing delivery, justified through the assessment of past delivery rates and expert evidence, and due to the ongoing dialogue with developers and landowners of allocated sites.

### Assumptions Regarding Lead-in Timescales

- 4.3 From the granting of full planning permission to the completion of the first dwelling (the lead-in time), the table in Appendix B indicates that development has commenced fairly swiftly in Ashfield over the past 3 years. Lead in times have been relatively short, ranging from 5 months up to 3 years, averaging out at **14** months.
- 4.4 However, for the purposes of estimating future delivery in the trajectory, the Council have adopted a cautious approach to assumptions on lead-in times. For sites with full or reserved matters planning permission, the Council assumes that it will take 9 months for the discharging of conditions and a further 15 months from the granting of planning permission to the commencement of development. Taking this into consideration, the Council has assumed that development will commence in Year 3 of the Local Plan. For sites with outline planning permission, development is assumed to commence in Year 4 of the Local Plan to take account of the Reserved Matters planning process. Unless site specific information has been submitted by landowners or developers, lead in times for sites without planning permission (i.e. those which are allocated) have also been set at 4 years.
- 4.5 The Council has assumed the following lead in periods in the absence of site specific information which would indicate otherwise.

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<sup>6</sup> Identified in the Nottingham Outer Strategic Housing Market Assessment (2015) and in the Ashfield Local Plan Submission (2013-2032)

<sup>7</sup> Included in Appendix 2 of Ashfield Local Plan Submission (2017-2032)

<sup>8</sup> HBF Policy Conference, 22nd March 2016 – Speaker: John Stewart, Director Economic Affairs  
<http://www.house-builder.co.uk/UserFiles/File/JohnStewart-Policy16.pdf>

<sup>9</sup> <http://nlpplanning.com/nlp-insight/start-to-finish-how-quickly-do-large-scale-housing-sites-deliver>

<sup>10</sup> [http://www.savills.co.uk/research\\_articles/141285/209239-0](http://www.savills.co.uk/research_articles/141285/209239-0) Spotlight New Build Homes 2016/17

Planning Status	Commencement Year
Full planning permission (development commenced)	Current Year
Full planning permission not started	Year 3
Outline permission	Year 4
Allocated sites without planning permission	Year 4

## Annual Delivery Rate Assumptions

### Historic Annual Delivery in Ashfield

- 4.6 An analysis of large site (sites over 10 dwellings) with full or reserved matters planning permission has been undertaken which looks at annual build rates over the past 3 years (Appendix B). Results demonstrate that, on average, large sites have delivered between 39 dwellings per annum (dpa) in 2013/14 and 44 dpa in 2015/16 which reflects the gradual recovery in the local housing market. Over the three year period, this averages out at 42 dpa. Delivery rates have varied from 25 dwellings per annum up to 66 dwellings on individual sites (looking at full years only).
- 4.7 However, these figures are skewed by 2 sites at Brook Street and Portland road of 25 and 30 dwellings respectively. In both cases the whole site has been completed within 1 year, but delivery has clearly been limited by the total site capacity. If these are excluded from the calculations, delivery rates increase to between 41 and 46 dpa, averaging out at **44** dpa.
- 4.8 It is notable that the larger site at Papplewick Lane (799 dwellings) has delivered between 57 and 129 dpa over the past 3 years. This averages a substantial 87 dpa across the site. However, 2 developers/sales outlets were active on site at the time, consequently resulting in an average of **44** dpa per developer being achieved on the larger site.

## Expert Studies/Research

- 4.9 A recent survey, undertaken by the HBF<sup>11</sup> in February/March 2016 on ‘large sites’ over 350 dwellings, indicated that on average **70** dwellings per annum were delivered. Nathaniel Lichfield and Partners’ (NLP) study “Start to Finish - How quickly do large-scale housing sites deliver? (November 2016)” also indicates that, on average, sites with a capacity of between 500 and 999 dwellings deliver approximately **70** dwellings per annum. This study also implies that sites of 1000-1499 dwellings average out at a delivery of approximately **105** dwellings per annum. These are similar findings to the Council’s own conclusions on the delivery of development on urban extensions over 500 dwellings (see Appendix 1 of the Housing Options Spatial Approach Paper which shows that **81** dwellings per annum have typically been delivered).
- 4.10 NLP have more recently published a study “Stock and Flow: Planning Permissions and Housing Output, January 2017”<sup>12</sup> which sets out that each sales outlet typically generates **30 to 40** sales per annum.
- 4.11 According to Savills, nationally the supply of new housing has been increasing over the past 3 years. Latest data for net additional dwellings shows 189,940 extra homes were delivered in the year to March 2016, 163,940 were new build homes. Given the incentives available to home buyers, such as the Help-to-Buy scheme, this trend is expected to continue. It is therefore anticipated that the positive build rates of the past 3 years in Ashfield should continue along the same trend. There are no indications from a local, regional or national level that this trend is likely to change. Indeed the Government since summer 2016 has repeatedly expressed its desire to accelerate house building in England. Government hope to achieve this through the Housing White Paper and any subsequent changes to guidance and regulation. Furthermore Government has announced several funding streams; £1.5bn loan finance Home Building Fund and the £3bn Accelerated Construction scheme where Government hope to take direction action in the construction of homes.

## Future Annual Delivery Assumptions

- 4.12 **Large sites (allocations and permissions):**  
The Council has taken a cautious approach in setting the delivery rates in the housing trajectory in order to ensure that the Local Plan will deliver enough development to meet the Objectively Assessed Housing Need (480 dwellings per annum). Consequently, sites between 10 and 500 dwellings are assumed to be capable of delivering **35** dwellings per annum (per developer) based on past delivery rates. This is lower than the average build rates recently experienced locally in Ashfield, but is consistent with the findings of recent HBF and NLP national studies.

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<sup>11</sup> HBF Policy Conference, 22nd March 2016 – Speaker: John Stewart, Director Economic Affairs

<http://www.house-builder.co.uk/UserFiles/File/JohnStewart-Policy16.pdf>

<sup>12</sup><http://lichfields.uk/media/2517/stock-and-flow-planning-permissions-and-housing-output.pdf>

- 4.13 The NLP findings, together with typical large site delivery in Ashfield, support the Council’s approach to the delivery of development on larger sites which assumes that sites of 500 or more dwellings will deliver **80** dwellings per annum (based on an assumption of 2 developers/sales outlets). The HBF’s report “Responding to demand; Understanding private housing supply (August 2015)’ also indicates that larger sites are likely to have more sales units on site. Indeed it is often the case that landowners will seek to realise their return sooner and request that large sites are built out in partnership.
- 4.14 **Small Site Permissions:**  
Sites below 10 dwellings are not allocated in the submitted Ashfield Local Plan, but do count towards overall supply as commitments. The anticipated delivery of housing from this source is summarised in the Housing Trajectory in Appendix 2 of the Local Plan.
- 4.15 Assumptions applied in respect of annual delivery were initially drawn up with input from the development industry and historic evidence. Developments consisting entirely of flats are assumed to have a quicker build out rate due to the nature of construction.
- 4.16 A table illustrating Ashfield’s approach to annual delivery rates is set out below. These are applied in the absence of any alternative site specific information being made available to the Council.

Site size/house types	Dwellings per Year
1 - 4 houses	2
1 - 4 flats	4
5 - 10 houses	5
5 - 10 flats	10
10 – 499 houses	35
>10 flats	50
>500 dwellings	80

## Density

- 4.17 Full or Reserved Matters applications are based on the approved details. Outline applications based on Ashfield Local Plan Review (2002) policy HG3 (saved policy), i.e., 30/34/40 dwellings per hectare for large sites.
- 4.18 In terms of allocated sites without planning consent, some of the largest sites have masterplans or have been subject to a planning application that is in the process of being determined. This has helped inform the site capacity. For the remaining sites, the densities applied accord with Policy HG3 (Housing densities) of the ALPR (2002). This Policy is consistent with paragraph 95 of the National Planning Policy Framework and with the new Housing Density Policy in the submitted Ashfield Local Plan 2017 (Policy HG5). Policy HG5 promotes densities of above 30 dwellings per hectare for locations which have good access to services and facilities, such as public transport and town centres.
- 4.19 A conservative approach to site densities has been applied in order to avoid over estimating delivery and to ensure enough development to meet the needs of the district. Consequently, the following density multiplier has been applied to allocated sites without planning permission to establish the net developable area. Exceptions to this include sites where comments from the owner/developer have justified a different capacity.

Site size (Ha)	Multiplier	Comments
Sites below 0.4 ha	100%	No reduction – Gross site area used to calculate yield.
Sites between 0.4 ha – 2.0 ha	90%	On sites with an area between 0.4 and 2 hectares, a 10% reduction has been applied for potential infrastructure requirements.
Sites between 2.0 ha – 10.0 ha	75%	Where sites exceed 2 hectares, 10% of the site size has been deducted to accommodate open space requirements (in accordance with Policy HG3 of the Ashfield Local Plan Submission (2017-2032)). A further 15% has been deducted to take account of additional necessary infrastructure.
Sites over 10 ha	60%	On large sites over 10 Hectares a 40% reduction has been applied to take account of larger scale infrastructure e.g. the potential need for a new primary school, local shopping centre or medical centre, etc.

## 5. Summary

- 5.1 In assessing the potential for including a windfall allowance in the future housing supply for Ashfield, it can be concluded that there is potential for an additional **660** dwellings to be brought forward from a 'small' site source between 2021 to 2032 (based on the submitted Local Plan period). It is considered inappropriate to include any allowance within the first 5 years, since it already includes small site permissions for this period and would inevitably result in an element of double counting.
- 5.2 With regard to 'large' site windfalls, whilst the Council can demonstrate that such sites have consistently become available, it is considered that sourcing deliverable sites from the SHLAA/proposed allocations presents a more robust method than projecting forward past performance. It is therefore proposed that no allowance for larger site windfalls be included in the future supply calculations. It is reasonable to expect 'large' windfall sites to come forward in future, but these will be counted as commitments in future monitoring.
- 5.3 An analysis of past lapsed rates indicates that the current supply could be reduced by **113** over the whole of the emerging Local plan period (up to 2032), including a potential reduction of **109** dwellings in the first 5 years supply.
- 5.4 The submitted Local Plan includes slightly different windfall and lapsed rate figures to those set out above due to being derived from an older dataset (see paragraphs 1.12 and 2.6). However, the difference of **2 dwellings per annum more** (682 dwellings over the whole plan period, rather than 660) for projected small windfall sites and a **total of 3 dwellings less** (116 rather than 113) over the plan period in respect of potential lapsed sites is negligible. This does not represent a significant change to the calculations in the submitted Plan which are therefore considered justified, robust and in accordance with national policy.
- 5.5 The past record of performance set out in Section 3 demonstrates that Ashfield does not have a record of persistent under-delivery. This justifies the Council's approach in applying a 5% buffer to the 5 year supply of deliverable sites in accordance with paragraph 47 of the NPPF.
- 5.6 The five year housing land supply is set out in Appendix 2 of the submitted Local Plan. The Council apply the Sedgfield approach to calculation, although the Liverpool method is also set out for comparison. This uses a 5% buffer (as set out above), a forward look approach and a lapsed rate discount. It does not include any windfall allowance. The backlog of need is a negligible 3 dwellings from the start of the plan period (2013-2016) and has been added to the baseline 5 year requirement. A 5 year housing land supply of **6.67 years** can be demonstrated on this basis.
- 5.7 The analysis undertaken as set out in Section 4 indicates that the Council's approach to determining timescales for delivery, annual build rates and site capacity is reasonable and justified. The Council is satisfied that this approach will ensure that sufficient land has been identified to meet the objectively assessed housing needs of the district within the Plan period



**Comparison of Ashfield District Housing Delivery against National Completions**

Residential completions in England and Ashfield District		
Period	England dwellings completed	Ashfield dwellings completed
2003-04	143,960	404
2004-05	155,890	361
2005-06	163,400	548
2006-07	167,680	652
2007-08	170,610	575
2008-09	140,990	283
2009-10	119,910	362
2010-11	107,870	352
2011-12	117,600	412
2012-13	107,820	434
2013-14	112,630	454
2014-15	124,640	425
2015-16	139,650	558

Data obtained from Government statistics – Table 209 Permanent dwellings completed, by tenure and country

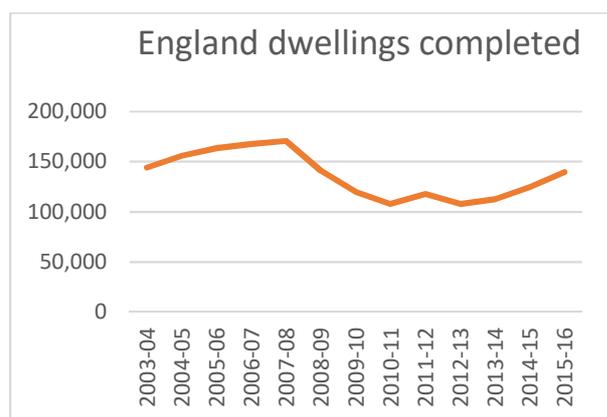


Figure 1:

England housing completions trend from 2003/2016

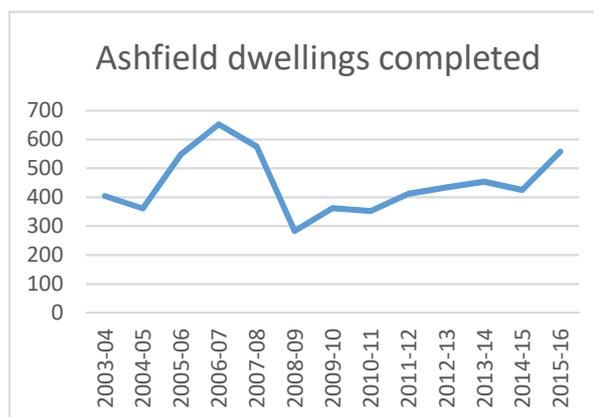


Figure 2:

Ashfield housing completions trend from 2003/2016

APPENDIX B

Delivery Rates on Large Sites between April 1 <sup>st</sup> 2013 – 31 <sup>st</sup> March 2016								
Site Name	Date full permission granted	Greenfield/ Previously Developed Land	Lead in period from date granted to start of development (months)	Total number of dwellings	Dwellings Delivered 1/4/13 to 31/4/14	Dwellings Delivered 1/4/14 to 31/4/15	Dwellings Delivered 1/4/15 to 31/4/16	Dwellings remaining to build
Brook Street, Sutton	28/02/2013	PDL	3	25	25	complete	complete	0
Lynton Drive, Sutton	19/03/2008	Greenfield	36	169	57	complete	complete	0
Sheepwash Lane, Sutton	14/10/2014	Greenfield	5	66	N/A	Not started	66	0
Former Courtaulds Factory, Unwin Road	04/03/2015	PDL	6	145	13	50	65	17
Greenwood Falls Farm, Huthwaite	21/07/2011	Greenfield	12	83	38	25	complete	0
Lindleys Lane, Kirkby	24/04/2008	Greenfield	36	148	59	44	29	39
East of Sutton Road/South of Kingsmill Road, Kirkby	04/08/2014	Greenfield	8	225	N/A	Not started	37	188
Former Annesley Colliery	13/05/2014	PDL	7	176	45	29	58	54
Portland Road, Selston	24/05/2013	Greenfield	11	30	Not started	30	complete	0
Garden Road, Hucknall	17/11/2006	Greenfield	24	217	29	23	33	6
Papplewick Lane, Hucknall*	16/08/2007	Greenfield	12	799	29	65	37	55
Papplewick Lane, Hucknall*	17/08/2007	Greenfield	12	799	28	64	37	55
Broomhill Farm, Hucknall	28/11/2013	Greenfield	9	141	Not started	15	36	90
<b>Averages:</b>			<b>14</b>	<b>N/A</b>	<b>36</b>	<b>38</b>	<b>44</b>	
<b>Whole year development averages</b>					<b>39</b>	<b>44</b>	<b>44</b>	
<b>Whole year development averages (excl. smaller sites)</b>					<b>41</b>	<b>46</b>	<b>44</b>	

\* NB Papplewick Lane development had 2 developers active within this period. Figures have therefore been divided by 2 in order to avoid over-estimating delivery.

