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WRITTEN STATEMENT IN RESPECT OF THE ASHFIELD LOCAL PLAN 2023-2040 EXAMINATION

MATTER 9 – THE SUPPLY AND DELIVERY OF HOUSING LAND

On Behalf of Persimmon Homes Nottingham

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1. INTRODUCTION

1.1 This Written Statement is made on behalf of our client, Persimmon Homes Nottingham, in response to the Inspectors' Matters, Issues and Questions for the examination hearings for the Ashfield District Local Plan Examination.

1.2 Persimmon Homes Nottingham are promoting two sites; the Land North of Fackley Road (Phase 2), Teversal, following planning permission being granted on appeal in respect of Phase 1 (appeal reference APP/W3005/W/24/3345033) which was identified as a residential allocation within the plan (allocation reference H1Sl) and Sunnyside Farm, Blackwell Road, Huthwaite which is identified as a residential allocation within the plan (allocation reference H1Sk).

1.3 Persimmon Homes Nottingham has engaged in all stages of the plan making process and previously made representations to the Regulation 19 Local Plan consultation (Marrons Representation dated January 2024, Respondent ID 223) and to the Consultation on Additional Housing Site Allocations (Marrons Representation dated March 2025, Respondent ID 223).

2. MATTER 9 – THE SUPPLY AND DELIVERY OF HOUSING LAND

Whether there would be a deliverable housing land supply in years 1-5 and developable supply in years 6-15.

Overall Supply

9.1 What is the estimated total supply of new housing over the period 2023/24-2039/40? How has this been determined? Is the housing trajectory justified?

2.1 ADC.20 sets out an updated Housing Trajectory as of October 2025 and includes the 13 additional proposed housing sites consulted upon in

February to April 2025. The Trajectory Table 2023-2040, as at October 2025, indicates a total dwelling supply across the plan period of 8,312 dwellings. This represents an oversupply of 730 dwellings against the local housing need of 446 dwellings per annum. When a lapse rate is included, as set out within the Dwelling Requirement and Provision 2023-2040 at October 2025 table on page 12, this is reduced to a surplus of 591 dwellings.

2.2 Important, no lapse rate is applied to the delivery of the allocated sites without planning permission under Policy H1 with all 3,710 dwellings considered deliverable within the plan period. This is considered to be unrealistic and risks a significant likelihood that the minimum local housing need will not be met.

2.3 Furthermore, as a result of the ongoing delays associated with the Examination process the Local Plan will not likely be adopted until mid-2026, noting the Hearings continue until 13th January and there will be the need to a further consultation on Main Modifications. These continued delays and the current plan period ending in 2040 risk falling short of the required minimum 15-year period for strategic policies from adoption, as required by NPPF Paragraph 22, which is a significant failure. As a result, an extended period is required and suitable further sites identified and allocated to meet the additional need within these further plan period. It is suggested that an additional 2-year extension is explored given the potential adoption date which would require a further 892 dwellings to be identified.

9.2 What is the estimated supply from site allocations? What is the evidence to support their deliverability? Are the estimates of dwelling completions and their timing justified?

2.4 As set out in respect of Question 9.1, 3,710 dwellings are expected to be delivered from allocated sites without planning permission. A limited level of supporting information is contained within the Schedule of Anticipated Annual Housing Delivery by Site Allocation table within ADC.20 and the 'Summary Notes' column. How and why sites have been deemed

deliverable within the trajectory period is unclear. The trajectory seems to indicate a presumption that delivery would occur within the 6-10 year period without any further supporting evidence or agreements with developers or landowners.

2.5 There is a significant risk that even marginal delays to delivery or reduction in delivery numbers at allocated sites would remove the limited buffer in supply at 591 dwellings. Additionally, there are a number of site allocations which are dependent on the delivery of further infrastructure (e.g. the cricket pitch associated with H1Hb) or collaboration between developers/landowners without such an agreement in place (e.g.H1Hc). The limited buffer being sought leaves no margin for delay in delivery or indeed non-delivery of allocations.

2.6 As such, it is considered that further supporting information and evidence is required to justify the identified housing trajectory and ensure that the local housing need is met.

9.3 What evidence is there to support the timing of projected completions from each of the large sites (50 dwellings and above) without planning permission that are relied upon within the housing trajectory?

2.7 We would refer to our response in respect of Question 9.2 and the lack of evidence to support the identified projected completions.

9.4 Is there compelling evidence that demonstrates windfall development will provide a reliable source of supply as anticipated?

2.8 Background Paper 2 (BP.02) contained a windfall allowance of 720 dwellings over the plan period (60dpa). The October 2024 Position Statement (ADC.04) increases the windfall allowance to 1,183 dwellings over the plan period (13 years remaining), on the basis of an average of 91 dwellings between the period of 2014/15 to 2023/24. This position is retained in the October 2025 Housing Trajectory (ADC.20), albeit reduced to 1,092 dwellings to reflect the 12 years remaining.

2.9 We have concerns of such an approach, which relies so heavily on windfall provision, is based on an assessment period when the Council's Development Plan was deemed out-of-date and the market therefore required the delivery of unplanned development sites to be brought forward, often via planning appeals.

2.10 A different planning circumstance would be in place following adoption of the new local plan, assuming a 5-year housing land supply could be demonstrated on adoption.

9.5 Is the inclusion of housing falling within Class C2 of the Use Classes Order as part of the housing requirement justified?

2.11 No comments.

9.6 Paragraph 69 of the Framework states that in order to promote the development of a good mix of sites, local planning authorities should (amongst other things) identify land to accommodate at least 10% of their housing requirement on sites no larger than 1 hectare, unless there are strong reasons why this cannot be achieved. What proportion of the housing requirement will be met from sites no larger than 1 hectare?

2.12 This is a question for the Council.

Five year housing supply

9.7 What is the requirement for the first five years following the anticipated adoption of the plan and what buffer should be applied?

2.13 In light of the 2023 Housing Delivery Test results Ashfield, at 86%, are required to prepare an Action Plan and utilise a 5% buffer for calculating their 5-year housing land supply.

2.14 Based upon the contents of ADC.20, the 5-year housing requirement on adoption would be 2,342 dwellings[1]. This equates to 468 dwellings per

[1] 446*5 = 2230 & 2230 *1.05 = 2341.5

annum.

9.8 What is the estimated total supply of specific deliverable sites for this period?

2.15 ADC.20 identifies a total supply of 2,850 dwellings within the first 5 years of adoption.

9.9 What is the estimated supply from each source for this?

2.16 ADC.20 identifies the following supply categories for the first 5 years within the Summary of Annual Housing Delivery from All Sources table on page 9:

Table 1: Trajectory Table Summary

Sources of Supply	**Supply**
Large Sites with Full Permission	1,836
Small Sites with Full Permission	284
Small Sites with outline permission	58
Completions from Prior Approval Schemes	1
Completions from C2 Schemes	7
Demolitions	-3
Large Sites without Planning Permission	485
Windfalls	182
Total Supply	**2,850**

9.10 What is the evidence to support this and are the estimates justified?

2.17 This question is primarily for the Council to respond. However, we raise concern as to the evidence of 'deliverable' utilised to support the 485 dwellings from Large Sites without Planning Permission. We recognise that individual allocations will be discussed within Matter 10 and will pick this up as part of these discussions.

9.11 Taking into account completions since the base date of the Plan, what will be the anticipated five-year housing land requirement on adoption of the plan?

2.18 Please see response to Question 9.7.

9.12 How does the five-year requirement compare to previous rates of delivery in Ashfield?

2.19 ADC.20 identifies actual completions from 2023/24 and 2024/25 at 439 and 447 dwellings respectively. This is a significant increase from the previous 3 years (2020-23) which averaged 194 dwellings[2] as contained on the Housing Land Monitoring Report (SEV.25).

9.13 Based on the housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption of the Plan?

2.20 As set out in our response to Question 9.8, ADC.20 identifies a total supply of 2,850 dwellings within the first 5 years of adoption.

9.14 Having regard to the questions above, will there be a five-year supply of deliverable housing sites on adoption of the Plan?

2.21 Utilising the supply figures contained within ADC.20, the Council can demonstrate a 5-year supply on adoption[3]. However, we have a number of concerns as to the identified delivery trajectory and the inclusion of sites without planning permission in respect of the test of 'deliverable'. The 485 dwellings without planning permission represent the vast majority of the oversupply (508 dwellings) when considered against the housing requirement.

Developable supply in years 6-15

9.15 What is the estimated total supply of specific developable sites or broad locations for growth for years 6-10 and 11-15?

2.22 ADC.20 identifies a supply breakdown for the periods 6-10 years and 11-15 years within the Summary of Annual Housing Delivery from All

[2] 2020/21 – 181, 2021/22 – 215 & 2022/23 - 187
[3] Requirement of 2,341.5 dwellings and Supply of 2,850 dwellings

Sources table on page 9. As set out earlier, we continue to raise questions as to the evidence used to support the trajectory and projected completions within the plan period.

9.16 What is the evidence to support this and are the estimates justified?

2.23 This is a question for the Council.