



Ashfield District Local Plan Examination

P&DG on behalf of Aldergate Property Group

Hearing Statement: Matter 2 – Meeting Ashfield's Housing
Needs

Quality Control

Project No.	21.113			
Client	Aldergate Property Group			
Title	Ashfield District Local Plan EiP: Matter 2 Hearing Statement – Meeting Ashfield’s Housing Needs			
Location	Land off Common Lane, Hucknall			
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Issue	Date	Prepared By	Reviewed By	Authorised By
1.	October 2024	DH	BW	BW
2.	October 2025	DH	BW	BW

1.0 Introduction

- 1.1 This Hearing Statement sets out submissions made by Planning and Design Group (UK) Ltd on behalf of Aldergate Property Group in response to the 'Matters, Issues and Questions' (MIQs) for the Ashfield District Local Plan Examination.
- 1.2 This statement specifically relates to Matter 2 – Meeting Ashfield's Housing Needs and has been updated to respond to the Inspectors Additional Matters, Issues and Questions (INS03A). For ease of reference, the additional responses are highlighted in [blue](#).
- 1.3 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.
- 1.4 Aldergate own 'Land off Common Lane, Hucknall' that is not currently allocated within the emerging Local Plan. However, it is subject of an outline planning application for up to 100no. dwellings under planning application reference (ref: V/2024/0288). This application is now subject to a non-determination appeal (ref: APP/W3005/W/25/3369440).

2.0 Matter 2: Meeting Ashfield's Housing Needs

Issue 1 – Whether the Local Plan has been positively prepared and where it is justified, effective and consistent with national policy in relation to meeting housing needs.

2.3 Are there any exceptional circumstances which justify an alternative approach to using the standard method? If so, what should the housing requirement be?

- 2.1 Aldergate Property Group consider that there are very clear exceptional circumstances that would justify an alternative approach to the standard method.
- 2.2 Ashfield District Council have been without a new plan for over 20 years. In that time, the Council have persistently failed to prepare and adopt a new Local Plan. This failure has left them without an appropriate strategy for delivering housing and economic growth, which has led to a historical under-delivery of homes and undermine its ability to attract investment and economic growth. This has contributed to severe social and economic challenges within the District that must be remedied through the preparation of the new Local Plan.
- 2.3 In respect of the above, it is clear that an alternative approach that addresses the historical under-delivery of housing and appropriately aims to deliver growth and the associated social and economic benefits must be identified.
- 2.4 Indeed, it is well-established that the outcome of the standard method for assessing local housing needs should be interpreted as a minimum starting point in determining the number of homes needed in an area.
- 2.5 The PPG is clear that there are circumstances where local authorities should consider planning for such as economic growth or to take into account affordable housing needs. Additionally, this also includes where previous levels of housing delivery in area significantly greater than the outcome from the standard method.
- 2.6 Notwithstanding this, the Council aren't even attempting to meet their minimum housing requirements over the plan period. As such, it cannot reasonably be concluded that the plan is, therefore, positively prepared, justified or effective in accordance with the NPPF.

2.7 On the basis of the above, it is considered that a thorough assessment of the Council's housing needs should be undertaken as part of the examination of the Local Plan to fully establish the housing requirement that should be planned for over the plan period.

2.8 Once the housing requirement has been established, the Council should then identify sufficient deliverable housing sites to meet that requirement to ensure that the plan is sound in NPPF terms.

2.4 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)?

2.9 As considered above, in the context that the District Council have not had a plan in place for over 20 years and have persistently failed to adopt a new plan, the approach to not even attempt to meet their minimum housing requirements over the plan period presents a complete mockery of the planning system.

2.10 There is absolutely no reasonable justification why the Council is not allocating a level of housing higher than the basic minimum.

2.11 Indeed, It is clear that the authority need to plan for the delivery of additional homes in order for the emerging Local Plan to be found sound in NPPF terms. This is to not only meet their current housing needs but to also address the historic under delivery of housing over the past 20 years. Moreover, it is clear that in order for the Council to achieve this they will need to consider releasing additional green belt sites for residential development.

2.12 As such, it cannot be reasonably concluded that the emerging Ashfield District Local Plan is positively prepared, justified, effective, and consistent with the National Planning Policy Framework.

2.5 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?

- 2.13 It is clear that the approach taken by Ashfield District Council in this respect is entirely inconsistent with Paragraph 143(e) of the NPPF and needs to be revisited as a matter of urgency in order for the plan to be found sound.
- 2.14 It is obvious that the Green Belt boundaries will need to be altered again at the end of the plan period. As such, the Council need to consider the release of further land from the Green Belt not only to meet the housing requirement over the plan period but to also ensure consistency with the NPPF.

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

- 2.15 The SA does not appear to fully consider the under-allocation of housing compared to the housing requirement over the full plan period. This must be addressed to fully determine that the under-allocation of housing is a sustainable approach. Indeed, the SA forms an important part of evidencing that the proposals in the plan are appropriate and sustainable given the reasonable alternatives. As such, the SA is a valuable tool in demonstrating that the test of soundness have been met.
- 2.16 For reasons as set out in the responses above regarding this matter, it is considered that the District Council must plan for a higher level of housing growth to address their historic under delivery of homes but also to meet their current housing needs. As a matter of urgency, the correct number of homes the Council should be planning for needs to be fully determined, evidenced and justified. Following this, the Council needs to identify sufficient deliverable housing sites to meet the requirements.

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

- 2.17 The Council's recent Housing Delivery Test results indicate significant underperformance, failing to meet its housing targets in previous assessments. This record of under-delivery suggests that the housing trajectory expectations in the

submitted plan need to be revisited to present a more realistic timeframe that is based on past performance.

- 2.18 Additionally, it would be prudent for the Council to apply an appropriate buffer of at least 20% to their housing land supply in order to help mitigate unexpected delays to delivery.

2.7.1 Would the proposed additional sites put forward by the Council provide sufficient capacity to address the housing shortfall over the plan period?

- 2.19 The Council stipulate that the 828 dwellings provided by the additional sites together with proposed amendments to the residential yields of existing sites would result in an over provision of 136 dwellings, which would equate to a buffer of 2% on the overall housing supply.
- 2.20 The Council have not, however, provided robust and justified evidence to demonstrate that all of the proposed additional housing sites are genuinely available, deliverable and suitable in accordance with the NPPF. Notably, there are a number of additional sites that have out-of-date lapsed planning permissions, question marks over their availability and significant site constraints (such as access), which demonstrate deliverability issues that would preclude their development.
- 2.21 Moreover, it is not clear whether all of the additional housing sites have been subject of a thorough capacity analysis taking into account identified site constraints and design considerations. There is, therefore, a significant question mark as to whether the sites will actually deliver the residential yields stipulated by the Council. The Council must provide this evidence to be able to justify the inclusion of the additional housing sites.
- 2.22 The Council previously stipulated that all available and developable brownfield sites had been allocated for residential development (please refer to Background Paper 1 Spatial Strategy and Site Selection Paragraph 11.2). However, the Council have now subsequently identified several brownfield sites in the Kirkby area. These sites were clearly previously discounted by the Council, and there is no clear evidence provided by the Council that now supports their inclusion.

- 2.23 Overall, the Council have not taken a robust and justified approach to identifying the additional housing sites in a manner that is based on clear and sound evidence. This, therefore, draws into question whether the identified sites are capable of providing sufficient capacity to address the housing shortfall over the plan period.
- 2.24 Notwithstanding the above, it must be noted that even without detailed scrutiny of the additional sites, the provision of 2% buffer on the overall housing supply is insufficient and is not in accordance with Paragraph 74 of the NPPF (September 2023). The Council must consider a more appropriate buffer to demonstrate a five-year land supply on adoption. We consider this buffer should be at least 20% to take into consideration the historic under delivery of housing and substantial out-of-datedness of the extant Local Plan.
- 2.25 Additionally, it should also be noted that the Council have not provided any compelling evidence to support the proposed windfall allowance of 60 dwellings per annum (equating to 1,183 dwellings over the plan period in the Council's latest position statement). In absence of any compelling evidence, there remains a question mark as to whether the proposed windfall allowance is a reliable source of supply. As such, the housing shortfall over the plan period is likely to be higher than stated and that places further strain on the proposed additional housing sites to actually address this shortfall.
- 2.26 On the basis of the above, it is considered that the concerns of the Inspectors regarding the identified housing shortfall have not been fully addressed by the Council. The Council must firstly include an appropriate buffer on their overall housing supply and provide a justified and evidenced windfall allowance. Once this is established the Council will need identify further additional housing sites accordingly. The Council must then provide full evidence that the proposed additional site are all genuinely available, deliverable and suitable in accordance with the NPPF.

Issue 2 – Whether the plan will deliver an appropriate mix of housing to meet the various housing needs over the plan period and whether these are justified, effective and consistent with national policy.

2.8 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?

- 2.27 Clearly, the affordable housing needs of the District will not be met through the housing allocations identified in the emerging Local Plan. The annual need for affordable housing is 237 dwellings per annum, which represents over 50% of the overall housing supply target of 446 dwellings per annum.
- 2.28 As a percentage of affordable housing provision that would be delivered through Policy H3 on allocated housing sites, this would represent a significant shortfall. As such, the Council must consider planning for a higher level of housing in order to be able to effectively address their affordable housing needs over the plan period.

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