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Ashfield District Local Plan Examination.

Matter 9 Hearing Statement Addendum

November 2025.

On behalf of Harworth Group.

10 November 2025 | Pegasus Ref: P23-2712

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Introduction

This hearing statement addendum for Matter 9 has been prepared by Pegasus Group on behalf of Harworth Group in respect of Harworth's interests north of Sutton-in-Ashfield.

1. Matter 9

Issue 1

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

Overall Supply

- 1.1. **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?**

In document HSC.01 (Ashfield Local Plan 2023 to 2040 Consultation on additional housing allocations February 2024) at paragraph 4.5, the Council states that it has an over provision of 136 dwellings which implies a total supply of 7718 over the whole Plan period.

The Council have since published an updated Housing Land Monitoring Report (ADC.13) including the monitoring from the most recent complete monitoring year 2024/2025. Appendix 1: “Expected Delivery of Sites – Trajectory 2023 to 2040” and Table 1: summarises the total delivery of 2023/24–2039/40 is homes 5,391. This figure includes completions 1/4/2023 to 31/3/2025 of 907 homes and future supply sources of 4,484.

On 7th November 2025, the Council published an updated Housing Trajectory October 2025 to the Council’s documents page as ADC.20. This material should have been available when the agenda and Inspectors’ updated instructions were published on 6th October to avoid abortive work on behalf of participants.

The table on page 12 of ADC.20 shows that the Council has made provision for over the plan period 8173 dwellings which is 591 dwellings above the requirement over the plan period of 7582. This amounts to 7.8% flexibility.

As we have set down in answer to later questions, and in other Matters statements, the Council’s supply is made up of sites which it has previously dismissed because the sites were not considered deliverable.

Furthermore, the Council has not provided evidence of deliverability in the form of Statements of Common Ground or written agreements with site developers. Therefore the trajectory is not justified by evidence to demonstrate that housing can be delivered at the necessary rates .

There are significant risks that sites may will not be delivered or will not deliver at rates stated by the Council and so the purported supply figure does not provide sufficient flexibility to ensure that the housing needs of the district are met in full.

- 1.2. **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?**

As noted above, the Council's evidence on housing supply does not include Statements of Common Ground with the promoters of allocated or those delivering the larger sites with planning permission. Similarly, there is no other evidence supporting assumptions around delivery of smaller sites such as proforma with site owners or promoters. As such the assumptions on deliverability and estimates of dwelling completions and timing are not justified.

- 1.3. **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?**

There are no Statements of Common Ground provided in the Examination Library between the Council and the developers of the allocations of large sites with permission, which would be expected to support the trajectory.

Should the Council produce further evidence in this respect we reserve the right to comment on this additional material.

- 1.4. **Is there compelling evidence that demonstrates windfall development will provide a reliable source of supply as anticipated?**

We note that the Council has provided evidence of windfall in ADC.13 Appendix 6. (Housing Land supply update 2025) This effectively replicates the approach in ADC.04 (Ashfield Local Plan 2023–2040 Housing Land Supply Position Statement October 2024). The concerns raised in our original Matter 9 Hearing Statement remain, notably that the level of windfall is not justified, and the Council's decision to include windfall allowance in the first 5 year from the adoption of the Plan includes double counting.

- 1.5. **Is the inclusion of housing falling within Class C2 of the Use Classes Order as part of the housing requirement justified?**

No comment.

- 1.6. **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?**

No comment.

Five Year Housing Supply

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

The requirement for the first five years following the anticipated adoption of the plan is therefore 2,230 homes plus any under delivery from the start of the plan period.

Housing Delivery Test Results

The latest Housing Delivery Test Results (2023 Measurement) indicate a measurement of 86% with the consequence that the Council needs to prepare an Action Plan, but also that a 5% buffer is added to the requirement over 5 years for the purposes of calculating housing land supply.

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

The Council has provided a trajectory within Trajectory Table in ADC.20. Within the period, 2025/26 to 2029/30, the Council claim a supply of 2,850 homes over the first five years of the plan; this is challenged.

1.9. What is the estimated supply from each source for this?

Questions 9.9 and 9.10 are responded to together.

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

Questions 9.9 and 9.10 are responded to together.

A total of 182 dwellings is identified from a windfall allowance for small sites despite the updated trajectory in ADC.13 showing that a total of 58 homes are already being counted from small sites with full and outline permission during the first five years. This is double counting.

A supply of 485 homes is identified from large sites without planning permission, presumably from draft allocations. It would be expected that a Statement of Common Ground would be available in the Examination Library between the Council and the developers delivering the relevant allocations in the first five years, to provide the evidence that these sites can be included in first five year.

The supply included from outline permissions needs to be justified and evidenced.

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?

ADC.13 Table 2 shows that there have been completions of 907 dwellings over the first two years of the plan period against a requirement of 892 over this period, resulting in a surplus of 15 dwellings.

The five-year land requirement on the adoption of the plan, including 5 % buffer will be 2342 from which the previous surplus will be deducted, resulting in a figure of 2327.

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

Since the publication of the 2020 annual measurement, the Council's housing delivery has consistently fallen below 75%, with the following results recorded: 65% in 2020, 66% in 2021 and 74% in 2022. Indeed, over the 5 monitoring years, the total number of homes required

stands at 2,185. Against this requirement, 1,642 homes were delivered. This equates to an under-delivery of some 543 homes.

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

Based on adoption of the Plan in 2025/26 monitoring year, ADC.20 Trajectory Table shows that there will be 2,850 dwelling delivered in the first 5 years of the plan.

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

No, the calculation has over estimated the supply of windfalls and not provided sufficient evidence to count supply from large sites without planning permission.

Developable Supply in Years 6–15

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

The trajectory with ADC.20 shows supply of 3,022 dwellings in years 6–10 and 1,533 in years 11–15.

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

The Council has not provided any Statements of Common Ground to support the housing delivery of large sites. For the Council to answer but we reserve our right to comment on the answers provided.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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