



For and on behalf of
Bellway Homes Limited & Keith Haslam

Ashfield Local Plan Examination in Public Matter 2 Hearing Statement

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1.0 INTRODUCTION

This response to Matter 2 of the Inspector's MIQs in respect of the Ashfield Local Plan Examination has been prepared by DLP Planning Limited on behalf of Bellway Homes and Keith Haslam. This statement builds upon the objections raised previously in our response to the Regulation 19 consultation and our previous EiP statements. We have only responded to those questions that are relevant to our previous objections.

DLP Planning have also requested to appear at the Examination on behalf of Bellway Homes and Keith Haslam.

2.0 MEETING ASHFIELD'S HOUSING NEEDS

Issue 1

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

Questions

Q2.1. Has the calculation of Local Housing Need (LHN) (446 dwellings per annum) been undertaken correctly?

Point 1 of Policy S7 states that a minimum of 7,582 new dwellings will be delivered in Ashfield over the period 2023 to 2040.

The policy supporting text specifies that the housing requirement figure is based on a Local Housing Need derived from the standard method calculation, which results in a housing need figure of 446 dwellings per annum (dpa) as of April 2023.

We agree, in principle, that the Council's calculation of the annual housing requirement using the standard method is correct and that over the 17-year plan period (2023 to 2040) the total housing requirement based on the standard method would therefore be 7,582 dwellings. However, this calculation should have been updated to reflect the date of submission of the Plan, including taking account of the 2023 affordability ratio.

Q2.2. Has the correct median workplace-based affordability ratio been used to undertake the LHN calculation having regard to the date of submission of the Plan?

The correct median workplace-based affordability ratio for undertaking the LHN calculation is the 2023 figure of 6.15. This figure is higher than the 2022 figure of 5.84, which indicates that levels of affordability are worsening in Ashfield. The affordability ratio which has been used to calculate the LHN figure of 446 is the 2022 figure of 5.73 (as stated in Background Paper 2: Housing).

The LHN calculation should be updated to reflect the latest affordability ratio at the time the Plan was submitted.

Q2.3. Are there any exceptional circumstances which justify an alternative approach to using the standard method? If so, what are they, and what should the housing requirement be?

It is noted that Policy S8 (Delivering Economic Opportunities) identifies an employment land requirement of 81 ha over the plan period (2023 to 2040). As set out in Table 36 of Background Paper 3: Economy & Employment Land, this figure is based on a scenario derived from past take-up rates. This can be compared with the labour supply scenario derived from the standard method local housing need figure (446 dpa) of 16.84 ha. The amount of employment land being planned for is therefore significantly in excess of the amount of employment land required under the labour supply scenario.

Whilst it is acknowledged that some of this past take-up trend relates to wider strategic needs rather than local 'indigenous' needs of Ashfield's residents, paragraphs 8.111 and 8.112 of

Background Paper 3 identify the past take-up figure attributable to 'local needs' as being 27.5 ha. This is still in excess of the 16.84 ha that would be required based on the standard method housing requirement figure of 446 dpa.

Paragraph 8.112 of Background Paper 3 states that "planning for this higher figure will help to ensure a choice of employment land supply by size, type, location and quality of sites and premises for businesses, and maximising future job opportunities for the local workforce (including those who may currently commute elsewhere)". However, in planning for this higher figure it is also necessary for the Council to consider whether there is sufficient housing available to meet the identified growth in jobs. Paragraph 61 of the Framework states that the outcome of the standard method is 'an advisory starting-point for establishing a housing requirement for the area' and that there may be exceptional circumstances which justify an alternative approach to assessing housing need, including an approach that reflects 'market signals'.

In light of the above, we consider that the proposed additional allocations are required to ensure that the amounts of land allocated for employment and housing growth within the Plan are not misaligned. The allocation of additional housing land which meets the housing requirement for the whole plan period, together with a potential uplift to reflect anticipated levels of jobs growth, is required in order to ensure the Plan has been positively prepared.

Q2.4. 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)?

Strategic Policy S7 states that "*A minimum of 7,582 new dwellings will be delivered within the period 2023 to 2040, dispersed across the District in accordance with the Council's spatial strategy for growth*". However, the Trajectory which is included in Appendix 2 of the Plan only shows 6,825 dwellings as being deliverable over the plan period to 2040.

Currently it is unclear if the additional sites will be added and whether these sites are deliverable in the first five years, therefore meaning it is also unclear if the Plan can demonstrate a five-year housing land supply on adoption.

Before the Plan can be found sound, this trajectory should be updated to include the proposed additional allocations. Whilst we consider that these additional proposed allocations go some way to ensuring the Plan may be considered sound in terms of meeting housing needs (resulting in a marginal over-supply of c.130 units), the Plan should incorporate a larger whole Plan buffer to ensure it is positively prepared. This additional supply would build in flexibility and resilience to ensure the housing requirement is met and that the plan is able to demonstrate a five-year supply of deliverable housing sites upon adoption.

Q2.5. 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?

- 2.1 As noted above, we support the identification of additional housing allocations to meet their

housing needs in full over the Plan period. The release of some Green Belt land is therefore warranted, and exceptional circumstances have been demonstrated where relevant, such as site H1Hc (Land North of A611 / South of Broomhill Farm, Hucknall).

Q2.6. How has the SA considered the under-allocation of housing compared to the housing requirement over the full plan period?

Appendix E of the Sustainability Appraisal (SA) assesses the impact of the Preferred Option being the delivery of 7,582 dwellings over the plan period 2023-2040. No assessment of the under-allocation of housing compared to this Preferred Option has been undertaken, only an assessment of a higher housing delivery figure of 535 dpa, which includes a flexible buffer.

It is anticipated that were the under-allocation of housing to be assessed it would certainly score more negatively against some of the SA Objectives, namely SA Objective 1: Housing, which seeks to ensure that the housing stock meets the housing needs of Ashfield.

We note that an addendum to the SA was published as part of the Additional Sites Consultation. Whilst this focuses on the individual sites it does not assess the revised overall level of proposed housing and what impacts this strategy would have compared to previously assessed levels of growth.

Q2.7. Do the Council's latest Housing Delivery Test results have implications for the housing delivery and trajectory expectations in the submitted plan?

The latest Housing Delivery Test results for Ashfield published in December 2024 for the year 2023 indicate that over the past three years the number of homes delivered in the District was 86% of the total number of homes required, thereby triggering the need for an Action Plan.

The trajectory included at Appendix 2 of the Draft Local Plan similarly shows an under-delivery of dwellings compared with the cumulative requirement over the first five years of the Plan (2023/24 – 2027/28).

In order to ensure that the Plan continues to deliver sufficient sites needed to meet the identified housing requirement over the full plan period, the allocation of additional housing sites is supported.

Q2.7.1 Would the proposed additional sites put forward by the Council provide sufficient capacity to address the housing shortfall over the plan period?

As outlined in the Inspectors' letter dated 3rd December 2024 and the more recent Ashfield Additional Housing Site Allocations Report, we note that the identified housing need for the period 2023 to 2040 is 7,582 dwellings. Prior to the allocation of existing sites, it was apparent that the Council had a shortfall of 882 dwellings over the Plan period (as referenced in the Inspectors' Letter INS05). We note that, when incorporating the new 13 additional sites, this now leads to a marginal oversupply of 136 dwellings over the Plan period which equates to approximately 2% of the district's housing need. This assumption that the shortfall has been sufficiently addressed is also confirmed in the Council's response letter ADC.12.

However, to ensure the Plan is positively prepared and consistent with national policy, the

Council should ensure that sufficient sites are identified which provide a more substantial buffer of at least 5% in order to meet the housing requirement for the whole plan period (7,582 dwellings), including through allocating further deliverable sites. This will help ensure that Plan is in accordance with NPPF paragraphs 22, 74 and 68 as it is necessary to ensure “choice and competition in the market”.

Furthermore, we consider that it is required for the Council update their housing trajectory to include the proposed allocations as currently it is unclear when these sites are expected to deliver and whether the Plan will have a five year supply upon adoption.

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