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## **Teversal, Stanton Hill & Skegby Neighbourhood Plan Area – Housing Need Assessment (HNA). Review by Forward Planning, Ashfield District Council**

### **Context**

The Planning Advisory Service and AECOM have produced a PAS Neighbourhood Planning Advice Note “Housing Needs Assessment for Neighbouring Plans”. The HNA has utilised this guidance, however, it would have been useful to set the context of the HNA by setting at the start of the document the following from the Guidance:

“Neighbourhood plan housing policy needs to be underpinned by robust, objectively assessed data providing a picture of housing need at the level of the neighbourhood plan area. In most cases, this draws from, but differs in some respects from, the local authority housing needs advice base. Normally, the output is an HNA, a document performing a similar role to a Strategic Housing Market Assessment (SHMA) at local authority/housing market level. Like a SHMA, the HNA sets out evidence to inform policy rather than itself comprising policy.

It is very important to note at the outset, however, that a single town or neighbourhood almost never constitutes a housing market on its own and must be assessed in its wider context. As such, a housing needs assessment at neighbourhood plan level differs from a SHMA in that it **does not constitute a housing market assessment**; rather, it is best thought of as a locally-specific study bringing together data from a range of sources, including the SHMA itself, to determine a notional ‘fair share’ of housing development that the neighbourhood plan area can contribute within the wider context of the strategic housing market area and/or Local Plan housing target.”  
(PAS Guidance)

It would also be helpful for all parties for the HNA to emphasise that the HNA is effectively limited to the demand-side evidence on housing, and it is necessary to compare its conclusions with supply-side work, either at local authority or neighbourhood level, in relation to the SHLAAs, infrastructure studies, Green Belt studies etc.

### **Relationship between the Housing Need Assessment and Ashfield District Council’s Evidence Base.**

It is understood from the meeting between the NP Group and Ashfield Forward Plan officers that AECOM has a limited period to undertake the work under their contract with Locality. Regrettably, this has had a detrimental impact on the Study which is outside AECOM’s control. In terms of the evidence base being developed and taken forward by

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the District Council it could not have had a more detrimental timing to bringing forward the HNA. This reflects that:

- The HNA assessment uses the Draft Nottingham Outer Strategic Housing Market Assessment, June 2015. The draft SHMA was subject to a workshop for feedback/comments and to a period of consultation. Taken with a number of court decisions and PAS second edition of the Technical Advice Note on Objectively Assessed Needs and Housing Targets, this resulted in additional work being undertaken by GL Hearn particularly in relation to affordable housing. Consequently, there have been a number of amendments to the document following the consultation. TAs a result, a number of the references to the SHMA and to specific Tables from the SHMA are no longer applicable in relation to the final SHMA dated October 2015.

I have set out where the Tables in the HNS do not reflect the Tables in the SHMA, October 2015. If no changes are to be made to the HNA I would suggest that that there is a need for note to be set out with the HNA. This should identify that the HNA reflected the Draft Nottingham Outer Strategic Housing Market Assessment, June 2015. The final Nottingham Outer Strategic Housing Market Assessment, October 2015 includes additional information. Consequently, cross references in the HMA to Tables in the draft SHMA will not be applicable to the Final SHMA, October 2015.

- The Council, working alongside neighbouring authorities, has updated its employment evidence base through the Employment Land Forecasting Study (ELF Study). I suspect that this would not have been in the public domain during the period AECOM were drafting the HNA. (I do not know the dates when the HNA needed to be completed).

The SHMA October 2015 and the ELF Study are available on the Council's website at:

<http://www.ashfield-dc.gov.uk/residents/planning,-property-and-housing/forward-planning/ashfield-emerging-local-plan/additional-studies-reports.aspx>

## **Statistical Base**

The analysis in the HMA is based on the census using Ashfield Middle Super Output Area Ashfield 001 & Ashfield 002

- Ashfield 001 – Cover Teversal, Stanton Hill & parts of Skegby
- Ashfield 002 – Covers rest of Skegby and part of north eastern Sutton in Ashfield.

It does not cover Fisher Close off Stoneyford Road and part of the relatively new estate off Dalestorth Road, which are within the NP Area. In addition it includes significant parts of Ashfield 002 which are not within the NP area.

The Council would agree with AECOM in that the Census statistics will not neatly fit the NP Area. In these circumstances, the PAS Guidance sets out that it is necessary to use a 'best fit' study area from the ONS hierarchy. By using A001 & A002 the HNA will cover a wider area than the neighbourhood plan area but not include small additional parts of the NP area. Consequently, by implication all the figures in the analysis will not be specific for

the NP area. However, given the NP boundary this is unavoidable to some extent as the boundary does not fit ONS data.

The Census reflects Middle Layer Super Output Areas and this is broken down into Lower Layer Super Output Areas. Based on the boundary of the NP Area and looking at the geographic boundaries of the Lower Layer Super Output Areas an alternative approach may have been to utilise the following:

- Ashfield 001 (Middle Layer Super Output Area)
- Ashfield 002c (Lower Layer Super Output Area)
- Ashfield 002d (Lower Layer Super Output Area)

Ashfield 002d goes beyond the NP Area but to some extent this is balanced by the fact that part of Ashfield 004e (estates off Dalestorth Road) and Ashfield 005a (Fisher Close, Stoneyford Road), which are within the neighbourhood plan area. However, the area included within A002d but outside the NP Area is largely an established residential estate probably dating back into the 1940/50s. In contrast the estates excluded off Dalestorth Road and Fisher Close are likely to have been built in the last 15 years. Consequently, there may be some differences in the nature of the households occupy these properties.

In terms of looking at the characteristics of population in the HNA, and percentage figures it may not make a significant difference. However, this could only be established by some testing of the tables and figures using the alternative statistical base. However, in looking at statistical evidence for smaller areas in relation to percentage figures there is a danger of assuming that there are substantial differences from the wider area, when practically the differences are minimal and not significant.

### **Neighbourhood Plan Period**

- It is not clear where the figure of 86 dwellings completed from 2011 to 2015 has been derived from? It appears to reflect a figure given by the Neighbourhood Plan Group but it would be helpful to identify the source of the information so it can be verified.

### **Housing projections over the proposed Neighbourhood Plan period**

#### **Option 1 - SHMA**

- 550 dwellings.
- A figure derived from the draft Nottingham Outer Strategic Housing Market Assessment (June 2015) from 2013 to 2033 which gives a total of 1,100 dwellings. However, the figure is reduced by 50%.

#### Comments

- The Council has not been able to determine from where a figure of 1,100 is derived and how this has been determined does not appear to be set out in the HNA?
- No explanation is provided why a specific figure of a 50% reduction has been applied to the SHMA figure. (Why not 10% or 25% or zero?) Given the starting point for housing need is the Population Projections I am unclear why any figure drops below the Option 2 figure?
- The executive summary states that "Evidence from the Census on dwelling completion rates and an ageing population, alongside evidence from W. A. Barnes and the SEP,

suggest that the demand assessed by the SHMA will be met to a greater extent in those parts of Sutton and Kirkby outside the neighbourhood plan area. As such, we consider that a discount of around 50% on the indicative SHMA-based projection of 1,100 units is justified to reflect the likely uneven spread of demand across the towns. This gives a discounted SHMA-based projection of 550.”

The Council would question that there is any case for any discount and would suggest the evidence points to potentially a larger requirement for the area in question given that:

- The census completion rates reflects a significantly constrained approach to supply (see notes on Option 3). Therefore it is highly questionable to use them to set out a lower figure.
- The SHMA clearly identifies that agents considered that Sutton in Ashfield reflects a localised market identifying 80% of local sales to local residents. The NP area will be made up of different forms of market housing. Old Teversal will have a high demand. Stanton Hill where there are significant rows of terraced properties can be anticipated to have a lower demand. This could be established by looking at typical house prices in the various areas of the LP area as is identified as a recommendation in the PAS Guidance. Further as it is recognised that the NP area forms part of a largely a local market the emphasis on areas to the south of Sutton in Ashfield to enable access to Derby suggested by WA Barnes will not have a significant impact. (If this is the case?) Therefore, it becomes much more difficult to reach specific conclusions based on a small part of a wider market area and use this to justify a 50% decrease in the future housing requirements.
- The conclusion on the market for the NP Area reflect a conversation with one chartered surveyors practice. It is noted that the PAS guidance refers to evidence from “interviews with estate agents”. There are a number of agents which will cover the area in question with offices in both Sutton in Ashfield and Mansfield.
- The LEP Strategic Economic Plan provides support for additional housing in this area. This reflects that the Mansfield Ashfield Regeneration Route runs from Chesterfield Road (A617) at Pleasley, to the north west of Mansfield to the A617 at Rainworth, to the south east of Mansfield. Effectively it runs to the west and south of Mansfield. The MARR runs through the west part of the Neighbourhood Plan Area. In this context (as set out in HNA para 87 the LEP’s Strategic Economic Plan) there would be support for new housing targeted towards the NP areas which are within the MARR.
- Figure 2 and Para 29 identified that house prices in the north of Sutton have risen by 15% to 30%, which is evidence of an increase demand and/or constrained supply.

- The evidence from the Agent at Phoenix Place (Para 36) suggest that future sales of larger dwellings will include “incomers”. While Phoenix Place is not in the NP Area it is located in close proximity. This again would not lend support to a substantial reduction in the SHMA figures.
  - Would not the evidence from para 102 and para 123 on an aging population lead and a fall in families and young people in the NP area lead to the conclusion that more housing is required of an appropriate type to encourage people aged 25-45 to move into the NP area?
  - The evidence from Table 8 and para 103 would suggest there is no reason to deviate from the adjusted migration figure set out the arriving at the SHMA figure for Ashfield at 480 dwellings.
  - Table 14 suggests that there are higher levels of overcrowding and concealment in the NP Area which would also suggest the requirement for more housing of a specific type.
- Work undertaken by Three Dragons in 2009 in the “Nottingham Core Affordable Housing Viability Assessment” identified sub markets across the District. The Study identified a sub market comprising the wards of Sutton Central and East; Sutton North and West; Kirkby Central and West; and Woodhouse. This would include the neighbourhood plan area and raises whether the NP area can be seen as significantly different from other areas within Sutton in Ashfield and Kirkby-in-Ashfield?

## **Option 2 – 2012 Household Projections**

- 654 dwellings.
- The Government’s 2012-based household projections, extrapolated to Teversal, translated from households to dwellings, and rebased to actual 2014 population (which gives 654 dwellings).

### Comments

AECOM have based this option on an incorrect figure. The actual figure should be 864 dwellings. (see the following).

Para 62 identifies the following:

“In 2011, Ashfield had 50,931 households and in the Census the same year, the neighbourhood plan area had 5,181 households, or 9.83% of the District total.”

The percentage figure of 9.83% is incorrect as  $5,181/50,931 \times 100 = 10.17\%$

Applying the same approach the documents needs changing to read the following

Para 63. In the 2012-based household projections, the projection for 2031 is for 59,053 households in Ashfield District. Assuming it continues to form **10.17%** of the District total, the neighbourhood plan area’s new total number of households would be **6,006** and therefore **825** new households would have formed over the Plan period.

64. Number of households does not, however, equate precisely to number of dwellings, with the latter usually slightly higher. In the 2011 census, the plan area had 5,181 households but 5,383 dwellings, giving a ratio of 0.962 households per dwelling. This means that the projection of 825 new households would entail a need for  $(825/0.962)$  858 dwellings.

66. The 2012-based projections were based on the 2012-based Sub-National Population Projections, which estimated that by 2014 there would be 121,600 people in Ashfield. The mid-2014 estimates show that there were actually 122,508 people, which is higher than the projections by 0.74%. This allows us to rebase the 858 dwellings in 2031 to a slightly increased figure of 864 dwellings within the plan area at that point.

The problem with this approach is that it fails to reflect the additional work undertaken in the SHMA in accordance with the provisions of National Planning Practice Guidance. The population projects are identified as the starting point for determining housing need. The SHMA figures set out the need to take into account:

- 12 years migration and adjusted demographics.
- Market signals on affordability.

The consequence was to move from 2012 household projects of 412 dwellings, to reflect adjusted migration etc. 57 dwellings (an additional 13.77%) and affordability 11 homes (an additional 2.67%) to give 480 dwellings. If applied to Option 2 figures they will come back approximately Option 1 (The actual figure will be higher as adjusted the population projections are adjusted to reflect 2014 population estimates).

- The Executive Summary sets out that “ Likewise, for the same reasons, the DCLG Household Projections figure is considered higher than the actual plan area demand figure because it also assumes even growth across Ashfield, whereas our data, as summarised above, suggests the plan area will grow at a rate lower than the Ashfield average- for example, evidence on house prices from the SHMA suggest higher rates of growth in more southern parts of the district, such as Hucknall, most likely driven by jobs growth in Nottingham. This suggests a final assessment of demand that is lower than 654.”
  - See comments on Option 1 why we disagree with this conclusion.
  - The Council is unclear why house prices in the southern area of the District suggest higher growth rates in the south and lower growth rates in the north? In para 67 of the HNA it acknowledges that the population projections are the unconstrained figures. Clearly a factor for Hucknall is the Green Belt and the close links with the Nottingham Core Housing Market Area where earnings are higher. However, I cannot see how this translates into a lower demand for housing for the rest of Ashfield where the evidence suggest is largely based on a local market?

### **Options 3 - Projections forward from Completion rates 2001 to 2011**

- 300 dwellings.
- 5,235 Census 2001 5,383 Census 2011. Increase 148 dwellings, 15 dwellings per year.
- A projection forward of (gross) dwelling completion rates 2001-2011 of 20 years, which gives 300 dwellings.

#### Comments

- The problem with this approach is that it will largely reflect what is allocated in the Ashfield Local Plan 1995 and the Ashfield Local Plan Review 2002:
  - Housing development largely takes place on allocated sites. The larger sites in the Plans in question were identified at Calladine Lane, Sutton in Ashfield and Lindleys Lane, Kirkby in Ashfield and Papplewick Lane at Hucknall. The former two sites were relatively well related to the respective town centres.  
In the Ashfield Local Plan Review 2002 there were limited housing allocations comprising HG1Sx 1.0ha off Stoneyford Road, (Fisher Close) HG1Rd Fackley Road 0.5 ha off Fackley Road, Teversal and HG1Sab 0.6 ha part of a development between Meden Bank/ Brand Lane, Stanton Hill. Any sites outside the Main Urban Boundaries or settlement boundaries defined by the Ashfield Local Plan Review 2002 Proposals Map fell within Policy EV2 Green Belt or Policy EV2 Countryside. Under these policy general housing development would have been inappropriate development and provide grounds for refusal of any planning application. On this basis the housing supply in the NP Area would have been substantially constrained. Therefore, while development in the NP area should be identified it needs to be caveated that it reflects a highly constrained supply.
  - A number of employment sites in Ashfield have been redeveloped for housing but these tend to reflect former colliery sites such as Annesley or former textile sites such as Unwin Road (Phoenix Park). Colliery sites in NP Area comprises Sutton Colliery, developed for employment as Brierley Industrial Park, and Silverhill Colliery, which was greened over. As far as I am aware, there are no textiles sites within the Neighbourhood Plan Area which would facilitate development in the area.

### **Option 4 - A projection forward from dwelling completion rates 2011-2015**

- 420 dwellings.
- A projection forward of (gross) dwelling completion rates 2011-2015 from figures given to AECOM from the Neighbourhood For. 86 dwellings to give 21 completions per year rounded down (which gives 420 Dwellings).

#### Comments

- It is not clear where the figure of 86 dwellings completed from 2011 to 2015 has been derived from? It appears to reflect a figure given by the Neighbourhood Plan but it would be helpful to identify the source of the information so it can be verified.
- A period of four years is a very limited timescale to derive any projections from.
- See comments above regarding the policy aspects of the Ashfield Local Plan Review, 2002. It is acknowledged that the NPPF does change the position regarding Policy

EV2 but there is still a high risk element in terms of potentially abortive costs in applying for planning permission in areas outside the main urban boundaries.

While acknowledging Options 3 and 4, the Council considers that the HNA fail to identify that these Options reflects a constrained supply. By including them within the mid-point drivers as set out in the Executive Summary they are being utilised to conclude that a lower potential housing required. Based on AECOM's Options 1 and 2 and including the correct Option 2 figure, would give a mid-point requirement of 982 dwellings.

### **Conclusions on housing demand figures**

As set out above Option 2 figures are incorrect and Options 3 and 4 reflect a constrained supply. SHMA figures have been reduced by 50% on incorrect grounds and there is no justification for using a 50% figures. On this basis the Council do not agree with the conclusions of the HNA in relation to the projections for housing demand in the HNA.

### **Specific Paragraphs**

Title before Para 25

- It may help with clarification if June is added to the date of the Draft SHMA.

Para 28 and Figure 1 sets out that "Figure 1 shows that the neighbourhood plan area is centrally located within an area of lower than average house prices. This indicates that housing demand is relatively constrained in Teversal, Stanton Hill and Skegby".

Comment

- From Figure 1 the NP Area is part of a wider area where house prices are lower, which includes Sutton in Ashfield and Kirkby-in-Ashfield. Based on the Figure 1 part of the NP Area shows higher average prices than most of Sutton in Ashfield. Therefore, the prices in parts of the NP Area will be higher than the majority of Sutton in Ashfield and Kirkby-in-Ashfield.
- Can it be assume that housing demand is constrained from simply looking at house prices? It is already acknowledged in the HNA that this is a local market area. It is more likely to reflect that earnings levels for Ashfield are relatively lower than the East Midlands and UK average? (See the Council's Employment Land Forecasting Study para 2.64 and 2.65).
- The rise in house prices set out in Para 29 and Figure 2 would suggest there is a demand for housing in the NP area? Although this is likely to be a factor of limited supply?

This impacts on the conclusion In Table 22 House Prices relative to surrounds.

### **Sub-Area Projections**

Para 40 and Table 1.

- The Council considers that para 40 and Table should make it clear that Table 1 reflects the figure for Ashfield using trend based demographic projections from the 2012-based subnational population projections which are adjusted for 12 year migration levels. These figures forms the starting point for considering the demographic dwelling requirements for the Housing Market Area including Ashfield and the final figure reflects an adjustment upwards for the reasons identified in the SHMA.



Para 43

- If the paragraph is to state that the justification is inconsistent it needs to set out why this conclusion is arrived at in the HNA?

Para 47 and Table 2

- The HNA is based on the Nottingham Outer SHMA at June 2015. The final version of the SHMA, which is on the Council's website, set out additional information particularly on the affordable housing element of SHMA. The approach taken examines affordable need based on income thresholds of 25% to 40%. Table 62 (page 181) in the SHLA identifies the "Estimated level of affordable housing need per annum by location".

Table 3

- These figure have been amended and are reflected in Table 68 of the SHMA Oct 2015.

Table 4

- These figure have been amended and are reflected in Table 69 of the SHMA Oct 2015.

Para 50

- The specialised housing units set out in Table 77 of the SHMA Oct 2015 is 1,279.

Para 51

- The specialise set out in Table 77 of the SHMA Oct 2015 is 1,279
- Para 10.50 of the SHMA Oct 2015 sets out a requirement for 650 bed spaces in residential care homes.

## **DCLG Household Projections & Dwelling growth**

Para 61 to 71

- See comments on Housing Options previously set out.

## **Nottingham Outer SHLAA Update 2013**

Para 73

The para is based on the SHLAA 2013. As you are aware, there are additional sites which will be reflected in the SHLAA update when it comes into the public domain shortly. In this context it would be helpful for the HNA to identify the sites it has identified within the figure of 904 dwellings.

## **Local Waiting Lists**

Para 77 Waiting lists

- Based on AECOM's figures the percentage figure of 9.83% is incorrect as  $5,181/50,931 = 10.17\%$ . Therefore, the figures in the para are incorrect.

Para 78

The para is a little contradictory, in that it suggests discounting the lowest 3 categories of applicants, bands 3,4,5, but it then goes on to talk about including the top 3 bands as an accurate picture of immediate housing need. My understanding is that band 3 contains applicants with a housing need (e.g. people with no fixed address, those overcrowded, low level medical and welfare need for rehousing, etc.). Does this not provide grounds for inclusion?

Para 79.

- The figure of 47 households reflects Bands 1 and 2. I am not clear from para 77 whether this is the correct approach or that it should include Band 3 as well in which case the figure of 47 households is incorrect.
- The paragraph sets out “This is because the emerging range of neighbourhood housing need, as per the sections above, appears to be around 600-650 dwellings” Clearly from our response on the options would do not see that 600-650 is correct and the figures need to be amended to reflect the error in calculating the percentage figure set out in para 77.

Para 80

- The Council has some concerns that the paragraph is suggesting that higher affordable housing rates may be justified. As the PAS Guidance points out determining affordable housing is a complex area. The additional work on the SHMA particularly in relation to affordable house demonstrates these difficulties. Further, viability in relation to affordable housing requirements is likely to be a substantial issues within Ashfield in the context of other infrastructure demands.

### **Local Economic Context**

Para 81.

- The Council has updated the employment evidence through the Employment Land Forecasting Study, Nottingham Core HMA & Nottingham Outer HMA, August 2015. The Options within the ELF Study take into account the job aspirations of the LEP.

Para 87

- The Council does not disagree with the paragraph. However, the conclusions within the HNA would appear to represent a misunderstanding of the location of the MARR. The MARR route does not just run to the south of Mansfield but to the south and west of Mansfield. It passes through the western part of the NP area and on this basis the SEP would suggest that it is a priority area for development.

### **Characteristics of population**

I would stress that the Council has not sought to undertake an analysis of the figures in question as effectively we would have to reproduce the Study. As has already been stressed earlier, it is considered that applying the Census data for Ashfield 001, Ashfield 002c and Ashfield 002d would geographically be more reflective of the NP Area. However, whether this will make any substantial difference in terms of the percentage figures set out in the HNA needs to be tested.

Para 90 - A minor point is that the percentage figure should be 9.94% not 9.97%  
 $11,874/119,497 \times 100 = 9.9366\%$

Para 95 - States that “This specialist dwelling need is likely therefore to be split between Teversal, Stanton Hill and Skegby and the rest of Sutton and Kirkby-in-Ashfield, which will enable the elderly to live either within or as close to the plan area as possible, taking account of the fact that the plan area itself is unlikely to be able to provide many of the specialist housing types needed within its own boundaries”.

What evidence is there for the statement that the “plan area itself is unlikely to be able to provide many of the specialist housing types needed within its own boundaries”?

Para 96 - See comments on the possible alternative Census 2011 data.

#### **Information from a local estates agent (para 136 to 141)**

- Given that there are a number of estate agents active within the Sutton in Ashfield area the Council is concerned that the information reflects only one agent, W A Barnes. It is noted that the PAS guidance refers to evidence from “interviews with estate agents”. The Council would not consider that in isolation this amounts to a view of the market which provides a sound evidence base.
- The evidence earlier in the HNA and in the SHMA clearly identifies that Sutton in Ashfield and Kirkby-in-Ashfield reflect a local market. I am unclear from the information set out whether the HNA is stating that the NP area is its own sub market whereby people will only look within the NP area for dwellings and not look at the wider Sutton in Ashfield area?
- I cannot see the justification of stating that a SHLAA site on Mansfield Road, not been subject to development at this stage, indicate a lack of demand. The Council could equally point to a number of other significant SHLAA sites around Kirkby-in-Ashfield and Sutton in Ashfield where no planning applications have been submitted. A number of sites in Sutton in Ashfield and Kirkby-in-Ashfield have been in the process of being developed over a number of years. In addition, with the emphasis on brownfield sites, former textile factory locations have been redeveloped for housing purposes. Therefore, the Council is not surprised it has not come forward given that it is not an allocated site, it is located in the “Countryside” where there are policy objections, and there are significant costs of bringing a planning application forward.

Para 139

In relation to the comments set out:

- The development to the south of Kirkby-in-Ashfield, (Lindleys Lane) is largely completed.
- There is an application for 1,800 dwellings and a business park at Mowlands to the west of Kirkby-in-Ashfield. However, there are issues associated with the development in relation to access and heritage and no permission has been granted for this development.
- Lindhurst at Mansfield has permission. However, applying the same logic it would have to be assumed that it will have an impact on demand on all of Kirkby-in-Ashfield and Sutton in Ashfield (if this is the case) not just the NP Area?

Para 140

I assume that it is WA Barnes that are stating that the level of demand for Sutton and Kirkby reflects a link to Derby. From the evidence in the HNA, Table 21, in terms of travelling to work of less than 30 km, the figures for the NP Area and Ashfield as a whole are nearly the same (NP Area 78.8%, Ashfield 79%). Therefore effectively is there any difference between the NP area and Sutton in Ashfield as a whole?

Para 147 to 156

See comments set out in “Housing projections over the proposed Neighbourhood Plan Period Options” and the SHLAA figures.

- The SHLAA capacity is based on the SHLAA 2013. There are additional sites which will be reflected in the SHLAA update when it comes into the public domain shortly and a number of sites within the NP area have planning permission. In this context it would be helpful for the HNA to identify the sites it has identified within the figure of 904 dwellings. The total SHLAA sites and planning permissions in the NP area is significantly in excess of 904 dwellings.

Table 22

It is unclear from the HMA on the context for Table 22. It is assumed that Table 22 has to be seen in the context of the Local Housing market i.e against Sutton in Ashfield and Kirkby-in-Ashfield rather than the wider regional area. On this basis we would comment as follows

- Economic performance and potential –
  - The MARR runs through the NP Area which should be reflected in additional upwards arrows.
  - It is stated that “SHMA’s strategic conclusion across Outer Nottingham is that here (unlike other locations) the local economy has little impact on housing demand.” The SHMA does not actually state this but identifies that for the District there is no need for an additional uplift on dwelling requirements based on economic forecasts.
- House prices relative to surrounds – We would disagree with a down arrow. Prices in parts of the NP Area are higher than most of Sutton in Ashfield based on Figure 1 in the HNA.
- International & UK In-migration - Clearly the evidence identifies at Sutton in Ashfield and Kirkby-in-Ashfield largely a local market. Table 8 identifies that international migrations does not have a significant effect in the NP Area or Ashfield as a whole. It also acknowledges in para 103 that figures from migration in the UK are comparable. On this basis we cannot see how this justifies three arrows and would suggest that it should be “no impact”.
- Level of New Supply - Where does the evidence of the significant rise in house prices from the SHMA and repeated in the HNA fit with this analysis?
- Overcrowding including concealed families – The conclusion is that the area is not significantly different from Ashfield as a whole. Therefore, why is this not “no impact”?

Para 157

See comments set out in “Housing projections over the proposed Neighbourhood Plan Period Options” and the SHLAA figures.

#### Para 158

- Bullet Point One - For the reasons previously outlined we do not agree that the figure is too high and rather than discounting the figure the evidence points in the opposite direction. Completion rates in the area do not provide evidence of reduced demand as they reflect a constrained supply. An aging population can be seen as a requirement for more of specific types of housing in the area to bring in younger families and single person households. We would question the evidence from WA Barnes in the context of the information in the SHMA and the HNA itself. Market evidence needs to be based on more than one agent. The SEP is supportive of new housing development in the NP Area as the MARR route runs through the western part of the NP Area.
- Bullet Point Two – The figures appear to be incorrectly calculated so that they significantly underestimate the housing requirement. For the reasons outlined in our response we disagree with this commentary. In addition, the population figures are the starting point of any Objective Housing Needs analysis and the HNA has not taken account of the additional factors identified in the final dwelling requirement set out in the SHMA.
- Bullet Point Three – We would not disagree with the commentary as it acknowledges that this is a constrained supply. However, this commentary is not reflected in the Executive Summary.
- Bullet Point 4 – For the reasons set out we would question some of the arrows.

#### Para 159

The commentary needs to be amended to reflect the incorrect figures set out in the population projections (Option 2). We would also question the value of a Mid-point approach when this is influenced by two options based on a constrained supply.

#### Para 160

It would be helpful to know the source of the 86 dwelling completions.

#### Table 23

**Need for larger/family households** - The SHMA notes a need across Outer Nottingham for larger homes for incomers, though as noted previously, this applies less to the neighbourhood plan area. However, there is an evidenced need for some larger affordable units.

It needs a slight rewording as I assume "this applies less to the NP area" is derived from the evidence in the HNA not the SHMA?

#### Para 162

The last bullet point on supply side constraints should identify that a substantial part of Ashfield is within the Nottingham and Derby Green Belt.