



**MAIN MATTER 4 EXAMINATION STATEMENT**

**DUNTHORNE & MORLEY**

**WHETHER OR NOT THE APPROACH TO  
ASSESSING HOUSING AND EMPLOYMENT NEEDS  
AND THE HOUSING AND EMPLOYMENT LAND  
REQUIREMENTS ARE ROBUSTLY BASED AND  
CONSISTENT WITH NATIONAL POLICY**



**Main Matter 4 – Whether or not the approach to assessing housing and employment needs and the housing and employment land requirements are robustly based and consistent with national policy**

***Issue – Is the objective assessment of housing need (OAN) and the housing requirement in Policy S2 soundly based?***

***2. How has the plan's housing requirement of 6500 dwellings (325 dwellings per year) set out in Policy S2 been arrived at having regard to the 'starting point' of 279 dwellings per year set by the standard methodology?***

***3. Is the housing requirement of 325 dwellings per year justified when the OAN set out in the Strategic Housing Market Assessment (SHMA) (H4) and Demographic Update Paper (H5) is a different figure?***

***5. Is the housing requirement of 325 dwellings per year aligned with the plan's economic strategy and jobs growth? How much of the figure can be attributed to needs arising from demographic change and how much to jobs growth? Does the evidence justify that approach?***

1. Claremont Planning Consultancy Ltd act on behalf of Dunthorne & Morley who own land that forms part of the wider draft strategic allocation at Pleasley Hill Farm, identified as SUE1 in the emerging Local Plan. It should be noted that the land under the control of Dunthorne & Morley, does not represent the strategic allocation in its entirety, rather it covers an area approximately 3.56ha in size to the north of Wharmby Avenue. As such, the site forms part of the wider development and it is advanced that taking into account the existing highway capacity of Stacey Road and its self-enclosed urban edge position, that the site can be delivered as part of the SUE as an early phase, or entirely separately as an independent element to the emerging allocation. This independence and opportunity for early delivery should be recognised by the Council with respect of their housing trajectory and focus upon delivering strategic allocations.
2. In the first instance, the Plan's approach in calculating housing need is sound. The National Planning Policy Framework (2018) dictates that those Plans submitted for examination prior to 24 January 2019 can be assessed against the previous Framework, of 2012 and therefore are not subject to the methodologies or requirements of the revised Framework. As such, the strategy in calculating the need of Mansfield District, as advanced through the emerging Local Plan is sound, given that the Plan was submitted to the Secretary of State for Housing, Communities and Local Government on 19 December 2018. It would therefore be inappropriate to find the Plan unsound in its calculation of the housing need of the District on the basis that an older version of the Framework was utilised, but in fact the Plan was submitted prior to the date provided within the reviewed NPPF (2018).
3. It is acknowledged by Claremont Planning that the figures as proposed in the Nottingham Outer Demographic Update Paper (Submission reference H5) as 376 dwellings per annum and in the 2015 Nottingham Outer Strategic Housing Market Assessment (Submission reference H4) as 328 dwellings per annum. Whilst the emerging Local Plan identifies a yearly requirement of 325 dwellings, which would demonstrate insufficient delivery to meet the established needs as shown in these technical documents, it is advanced that the Plan's housing supply trajectory provides an over-delivery that goes beyond the minimum number of 325 dwellings. This number, 8,597 dwellings to be delivered up to the period 2033, represents a significant over-



delivery of the minimum gross number of 6,500. As such, whilst technical assessments have demonstrated that the OAN is a higher figure than that to be provided through the spatial strategy, given that the recognised gross numbers exceed this number significantly.

4. Furthermore, it should be noted that whilst the emerging Plan has calculated its need using the previous versions of the housing need methodology (NPPF 2012), when the revised methodology is applied to the need calculation, a lower OAN results, standing at 279 homes per year (Local Plan paragraph 5.13). Therefore, whilst the technical assessments establish a somewhat increased figure, the Local Plan's position of 325 dwellings per year represents the middle-ground between these calculated figures. Claremont Planning therefore are of the position that the Plan has soundly assessed the minimum needs of the District but that there is the potential to boost provision through the application of an increased buffer and slightly higher annual housing requirement – that would be required over the whole of the plan period notwithstanding any initial peak in provisions.
5. A primary motivation for the Council's selection of 325 dwellings per year is to ensure that this meets the economic and growth aspirations for the District, as without such growth this will not promote economic prosperity which the Council wishes to see implemented across the District area. Given that the figure which has been incorporated into the spatial strategy represents a deliverable figure, but not necessarily seeking to boost the delivery of housing sufficient to match the economic provision that is expected. Although the Plan does seek to ensure a wide range of sites will form part of the spatial strategy, with identified numbers to be delivered across the timeframe of the housing trajectory; the artificial delaying of allocated sites to maintain the annual delivery rate across the whole period of the plan is counterproductive and instead should be seeking to boost housing provision at every opportunity.
6. Claremont Planning does welcome that the Plan does not inappropriately rely on the delivery of largescale strategic sites, instead incorporating a diversity of allocated sites that represent differing timeframes for delivery. It is therefore considered that the Plan has successfully recognised that the housing level it requires can be practically delivered over the period that has been established. Claremont Planning would prefer for the annual housing requirement to be increased to 350dw however, to ensure that housing delivery is sustained by a presumption in favour and attempts to boost provision. This reflects the intentions to boost economic growth and the requirement for the Council to sustain housing delivery above previous levels of supply.
7. The inclusion of strategic sites such as Pleasley Hill Farm as a draft allocation, SUE1, demonstrates a justified and sound approach in ensuring that the housing requirements of the Local Plan can be realised. The Plan must continue to include such sites that are the primary routes in delivering strategic housing numbers to meet the identified need of the Plan period, but it should also continue to be recognised that these strategic sites should be supported by more robustly deliverable, smaller non-strategic sites. However, components of the strategic sites can also demonstrate similar deliverability, such as the site under the control of Dunthorne & Morley at Wharmby Avenue and therefore these components can also provide a complementary strategy in ensuring that the need of the Local Plan can be satisfied.