

For and on behalf of
Mr Keith Haslam (Stags Limited)
And
Bellway Homes Limited (East Midlands)

Matter 3
Ashfield District Local Plan Examination

The Spatial Strategy and the Distribution of Development

Prepared by
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1.0 INTRODUCTION

- 1.1 This response to Matter 3 of the Inspectors' MIQs in respect of the Ashfield District Local Plan Examination has been prepared by DLP Planning Limited. DLP Planning have been instructed to appear at the Examination on behalf of Mr Keith Haslam (Stags Limited) and Bellway Homes Limited (East Midlands).
- 1.2 DLP Planning have made submissions on behalf of Stags Limited and Bellway Homes Limited to the Regulation 19 consultation (December 2023 – January 2024) on the emerging Local Plan, objecting to the Submission Version of the Ashfield District Local Plan on several grounds, including in relation to Policies S1, S2, S5 and S7. This statement should be read in conjunction with those submissions.
- 1.3 The cumulative effect of the issues raised in our previous representations and our submitted hearing statements for Matters 2 and 3 should be taken into consideration in considering the soundness of the Ashfield District Local Plan as it progresses through Examination and in any Main Modifications that may be required in order to address these soundness issues.

2.0 MATTER 3 – THE SPATIAL STRATEGY AND THE DISTRIBUTION OF DEVELOPMENT

Q3.1. Is the spatial distribution of development across the borough justified and what factors influenced the Spatial Strategy, for example physical and environmental constraints and the capacity to accommodate development?

- 2.1 The previous Regulation 18 version of the Ashfield Local Plan had a large focus on new settlement delivery, with the aim to place 35% of all housing to be developed and delivered on new settlement sites. Whilst the deliverability of such sites was questioned, and we fully support their removal from the current Regulation 19 draft, large-scale allocations in sustainable locations next to adjoining settlements can make an important contribution to housing supply, as supported by paragraph 74 of the Framework.
- 2.2 Whilst we do not object to the overarching Spatial Strategy that is proposed, point 5 of Policy S1 supports delivery of homes ‘via dispersed development, focusing on sites of less than 500 dwellings’. The Council’s justification for focusing development on sites of less than 500 dwellings is unclear and unjustified. In particular, it is unclear whether this applies to adjoining sites where the combined total number of units may be greater than 500. We therefore suggest that point 5 of Policy S1 is re-worded as follows: “...focusing mainly on sites of less than 500 dwellings, except where there is evidence that conjoined sites can deliver in the plan period”.
- 2.3 The emphasis in point 5 of Policy S1 on delivering homes ‘via dispersed development’ also contradicts the prioritisation of sites ‘within and adjoining the Main Urban Areas’, as stated in point 3. It is not possible to focus growth in certain areas whilst also pursuing a dispersed pattern of development. Clarification of the Council’s overall strategic spatial approach to development should be provided in this policy; as currently worded the policy is not effective.
- 2.4 We therefore object to Policy S1 as currently worded on the basis that it is neither fully justified nor effective.

Q3.2. What alternative options for the spatial strategy were considered?

- 2.5 No response.

Q3.3. Why was the submitted approach to disperse development chosen and is it an appropriate strategy having regard to reasonable alternatives?

- 2.6 The dispersed approach to development is considered to be a justified spatial strategy on the basis that the majority of the site allocations are located within or adjacent to the Main Urban Areas, which are considered to be sustainable locations.

Q3.4. Are the Plan’s Strategic Policies sufficiently clear about the scale of development envisaged in each settlement/ area?

- 2.7 No response.

Q3.5. Does the submitted Plan’s approach strike an appropriate balance between the identification of land for new homes and employment?

- 2.8 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 current 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.
- 2.9 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.

- 2.10 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'.
- 2.11 At present the amounts of land allocated for employment and housing growth within the Plan are 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, should therefore be considered in order to ensure the Plan has been positively prepared.

Q3.6. Is the settlement hierarchy set out in Policy S1 Justified?

- 2.12 The settlement hierarchy set out in Policy S1 is considered to be justified, with the Main Urban Areas of Sutton-in-Ashfield, Kirkby-in-Ashfield, Hucknall and the areas directly adjacent to Mansfield being the areas in which the largest levels of growth should be accommodated. This is justified on the basis that these are sustainable locations for growth and will ensure that the growth is distributed across the District.

Q3.7. What evidence is there to justify the identification of each settlement within the respective tiers of the hierarchy?

- 2.13 No response.

Q3.8. What reliance does the Plan's overall strategy have on the proposed Maid Marian line? Is there a reasonable prospect of it coming forward during the plan period? How will the Plan respond to it?

- 2.14 No response.

Q3.9. What proportion of new housing and employment proposed in the Plan would be on land currently designated as Green Belt?

- 2.15 No response.

Q3.10. What other reasonable options for meeting the identified housing requirement were considered prior to the proposed release of land from the Green Belt?

- 2.16 No response.

Q3.11. Not all of Ashfield District is within the Green Belt. Could the need for new housing and employment be met by locating such uses outside Green Belt? If not, why is this the case?

- 2.17 It is considered that the release of Green Belt land is justified and necessary in order to ensure that housing needs are met in the south of the District. However, this should be focused in sustainable locations around the Main Urban Areas, such as Hucknall, where exceptional circumstances can be demonstrated.

2.18 Where additional housing allocations are required, other than those already identified, to ensure that the Council has met its housing need in full over the whole Plan period, these sites should align with the current Spatial Strategy, which includes continuing to focus growth around the Main Urban Areas.

Q3.12. How has the assessment of sites within the Green Belt informed the Council's approach to site selection?

2.19 No response.

Q3.13. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, paragraph 141 of the Framework states that strategic policy-making authorities should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for housing. This will be assessed through the examination and will consider whether the strategy:

- **Makes as much use as possible of suitable brownfield sites and underutilised land;**
- **Optimises the density of development, and**
- **Has been informed by discussions with neighbouring authorities about whether they can accommodate some of the identified need. How has the preparation of the Plan sought to make as much use as possible of suitable brownfield sites and optimise the density of development?**

2.20 It is considered that the Council has fully considered all other options for meeting its identified housing need before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, as set out in section 9 of Background Paper 1: Spatial Strategy & Site Selection.

2.21 The Council should, however, still seek to meet their needs in full through the allocation of further land to meet their needs over the full plan period. This will likely require the release of other greenfield, and potentially Green Belt sites. Given the nature of Ashfield District and the Green Belt constraints that cover a significant portion of the authority area, exceptional circumstances do exist for the release of the allocation sites identified, particularly those in sustainable locations adjoining the Main Urban Areas, in order to ensure housing needs in these parts of the District are met.

Q3.14. How would the proposed release of land maintain the openness and permanence of the Green Belt?

2.22 The proposed allocation sites to the south of Hucknall, including site H1Hc, will be bounded to the south by the A611 which will form a permanent defensible boundary to the remaining Green Belt to the south. The development of this site and its removal from the Green Belt will ensure that the built urban form of Hucknall extends no further south into the Green Belt than the existing development which runs along Nottingham Road to the east, thereby maintaining the openness of the Green Belt to the south of Hucknall.

Q3.15. How has the Green Belt assessment considered the potential for mitigation?

2.23 The delivery of site H1Hc, which is proposed for release from the Green Belt, would help to deliver additional benefits including landscape buffer, new allotment provision, nature walks, green infrastructure corridor and open space.

Q3.16. Do the Plan's strategic policies set out the scale and need for the release of land from the Green Belt as required by paragraph 140 of the Framework?

2.24 No response.

Q3.17. Having regard to the shortfall of housing provision over the plan period, what evidence is there that the Green Belt boundary will not need to be altered at the end of the plan period as set out at paragraph 143(e) of the Framework?

- 2.25 In order to ensure the Plan is sound, the Council should identify sufficient housing allocations to meet their identified housing needs in full and ensure there is not a shortfall in housing provision over the plan period to 2040. Allocating further housing sites at this stage will further ensure that the Green Belt boundary will not need to be altered at the end of the plan period. These further allocations should be distributed across the District in accordance with the Settlement Hierarchy with a focus upon the Main Urban Areas.

Q3.18. At a strategic level, do exceptional circumstances exist to alter the Green Belt boundary, having particular regard to paragraphs 140 – 143 of the Framework? If not, how could housing and employment needs be met in other ways?

- 2.26 Exceptional circumstances for the release of allocation site H1Hc (Land north of A611 / South of Broomhill Farm, Hucknall) from the Green Belt are clearly set out in Background Paper 1: Spatial Strategy & Site Selection. Paragraphs 9.16 to 9.20 in particular highlight this site's low overall rating in terms of Green Belt harm, the defensible boundary that would be formed by the A611 to the south, and the potential to enhance access to open space and biodiversity through the creation of a new green infrastructure corridor, nature walks and landscape buffer. Development of this site would also ensure that local housing needs in Hucknall are met in a sustainable location, which would also include new allotment provision.

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