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# Ashfield Draft Local Plan Regulation 19 Pre-Submission Draft Consultation on behalf of Wheeldon Brothers Ltd

January 2024

## Quality Control

|                    |   |             |                |                |
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| <b>Client</b>      | Wheeldon Brothers Ltd   |             |                |                |
| <b>Title</b>       | Ashfield Draft Local Plan Regulation 19 Pre-submission Draft Consultation |             |                |                |
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## 1. Introduction

- 1.1 These representations have been prepared by Planning and Design Group (P&DG) on behalf of Wheeldon Brothers Ltd (Wheeldon) in response to the Regulation 19 Consultation on the Ashfield District Council Draft Local Plan 2023-2040.
- 1.2 These representations are made in the context of seeking to work with the Council to ensure that an effective and deliverable plan for the area is achieved.
- 1.3 Our client has interests in Land to the West of Selston Road, Jacksdale. Details of the site were submitted to the Council through its 'Call for Sites' process.
- 1.4 The land has not been allocated in the Draft Local Plan regulation 19 consultation and these representations address why the site should be included and why the current Draft Local Plan has not been fully justified (nor is it in-line with Government policy).
- 1.5 The Council has not had a new plan in place for over 20 years. The Council has submitted two previous Local Plans for examination. The Local Plan Publication 2013 was withdrawn from examination in July 2014 following an Exploratory Meeting with the Planning Inspector, who raised concerns over specific aspects of the Plan. A subsequent Local Plan was submitted for examination on the 24th February 2017. However, following a change in the political administration of the Council, the plan was withdrawn in 2018. The 2021 version of the plan which set out the Council's intention to deliver 8,814 homes between 2020 and 2038 was withdrawn by the Council in 2022 following a decision to pause work on the plan in October 2021. The current version proposes to deliver only 6,700 dwellings between 2023 and 2040 leaving an accepted shortfall of 882 dwellings against a requirement of 7,582. As such the Council is not even attempting to meet the minimum housing requirements.
- 1.6 The Government's intervention letter of December 2023 notes that: *'Your Council's persistent failure to adopt a plan has left your communities vulnerable to speculative development and has risked not delivering the economic growth and infrastructure they need.'*
- 1.7 In this woeful plan making context, the Council must ensure that this is the right plan for the district going forward in terms of growth, aspiration and a sustainable future. It cannot waste further time and public money by submitting a plan which is flawed

from the start and likely to be rejected again. There are no more chances. Wheeldon has serious concerns that this new plan is again compromised and likely to be rejected.

### The New National Planning Policy Framework December 2023

- 1.8 Since this Draft Local Plan (Regulation 19 Pre-submission version) was prepared by the Council, a new National Planning Policy Framework (NPPF) has been published by the Government. **Annex 1** of the new NPPF sets out the 'Implementation' of the new Framework. At paragraph 230 it states:

*"The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements. For Spatial Development Strategies, this Framework applies to strategies that have reached consultation under section 335(2) of the Greater London Authority Act 1999 after 19 March 2024. Strategies that reach this stage on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements. Where plans or strategies are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan or strategy produced for the area concerned."*

- 1.9 This means that in this case, the Draft Local Plan will need to be examined under the previous version of the NPPF. Therefore, the NPPF paragraphs referred to in this representation relate to that document (the previous NPPF).

## 2. The Spatial Strategy

### The Level of Housing in the Plan (Strategic Policy S7: Meeting Future Housing Provision)

- 2.1 Wheeldon supports the overall aim of the Council's 'Spatial Strategy', which recognises amongst other priorities, that Ashfield should take advantage of the district's proximity to Nottingham City, capitalise on the accessibility of the M1 transport corridor, and to locate growth in sustainable and accessible locations.
- 2.2 Notwithstanding this, Wheeldon is disappointed by the Council's lack of ambition for the district and its failure to properly get to grips with the issues it faces. The 'Vision' set out at paragraph 2.2 of the Draft Local Plan states:

*"Vision - Ashfield, a place to be proud of*

*Ashfield is a District where people of all ages are proud to live, study, work, visit and aspire to stay..."*

- 2.3 The 'Vision' is admirable and supported by Wheeldon, but reading the Draft Local Plan it becomes clear that it is hollow rhetoric as the aspirations for the district are not followed through to the strategy itself. The plan identifies several strategy objectives which include:

- Facilitate Place Making
- Promote socially cohesive, healthy and active communities
- Meeting Local Housing Needs and Aspirations
- Timely and Viable Infrastructure
- Strong and Vibrant Rural Communities
- Economic Opportunity for All
- Settlement specific objectives
- To meet the global challenge of climate change
- Transport and Accessibility
- Minimising our Impact on the Environment
- Protecting and Enhancing the Quality of the Local Environment

2.4 It is undeniable that climate change is a key issue facing local and global environments. Notwithstanding this however, as identified in the plan's objectives, there are other serious social and economic challenges facing the district's residents.

2.5 The NNPF makes it clear at paragraph 8 that:

*"Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

*a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

2.6 The NNPF at paragraph 35 explains that Local Plans can be considered 'sound' if they are:

*"a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

*b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”*

- 2.7 In addition, the NPPF at paragraph 60 identifies the Government’s objective of “significantly boosting the supply of homes...”.
- 2.8 Under ‘key issues’ in the Draft Local Plan (paragraph 1.85) it states that ‘The Index of Multiple Deprivation identifies that Ashfield is within the top 25% of most deprived districts in the country’. Overall, the key issues paint a picture of a disadvantaged area that is failing to keep up with emerging economies and provide the type of jobs which are necessary to offer any hope of prosperity or a brighter future. It is sad to read that Ashfield has lower than average education attainment levels in schools and that there is a high percentage of residents with no qualifications and those working in unskilled occupations in comparison to other areas.
- 2.9 It is no coincidence that while Ashfield suffers from severe social and economic problems, it has been without a properly structured planning strategy for many years. This Draft Local Plan is an opportunity to catch-up on previous housing under delivery (the Council’s housing delivery record is historically woeful, and this has been noted by the Government) and provide real growth to address the latent need.
- 2.10 Through careful planning it is possible to allow for much needed growth which helps address social and economic problems whilst at the same time protect the natural and historic environment from serious harm and the effects of climate change. This includes suitably located allocations for development which can result in increased active travel and less unsustainable transport movements. Not only this, but development can also provide mitigation against environmental harm and deliver biodiversity net gains. This is over and above other infrastructure and services and facilities that development can bring with it.
- 2.11 Despite all of this, it is difficult to see what positive steps the Council is proposing with this Draft Local Plan. What is put forward now is an uninspired ‘will this do?’

- attempt to have some type of plan in place. It is not the much-needed ambitious planning strategy required to help address the district's many problems.
- 2.12 The Strategic Distribution and Logistics Background Paper (Sept 2023) identifies significant need and opportunity for the delivery of logistics development in the District, particularly in the vicinity of the M1. Such development, has the potential to support large numbers of jobs that match the level of skills required in the District. This in turn provides opportunity for growth and to reduce local deprivation. In order to support aspirational economic growth, a consequent level of aspirational housing growth is required.
- 2.13 A vibrant housing market can have a substantial positive impact on the local economy; and conversely social issues (this is recognised in the Council's supporting Sustainability Appraisal – see below). Positive effects are felt during the construction phase (employed workers putting money into the local economy), through the employment of local trades people carrying out ongoing maintenance work and home improvements, an uplift in retail as residents purchase new products for their new homes and a general uplift in local spending.
- 2.14 Considering the above, Wheeldon is frustrated to see that the strategy only seeks to meet the minimum housing requirements (set out in the standard housing need methodology) of 446 dwellings per annum (dpm). It is acknowledged that this target is expressed as a 'minimum' in the plan (meaning this figure is not a cap and policy compliant windfalls can still come forward even when this target is met). This however is simply not good enough. To sit in hope that windfall applications will come forward to deliver anymore housing than the bare minimum currently identified, is not a positive strategy. The Council should be proactive and identify sites in its Draft Local Plan that addresses the years of under delivery in housing and ultimately stem the decaying economic prospects for the area.
- 2.15 It is noted the need for the entire plan period up to the year 2040 is not being fully met by the current land allocations (under non-strategic policy H1) and small sites. It is estimated to fall short by the year 2038/39, with an approximate 13 years' worth of housing supply post adoption of the Draft Local Plan.
- 2.16 The Council explains however that this approach is in-line with NPPF paragraph 68 which states:

2.17 *Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*

- a) specific, deliverable sites for years one to five of the plan period; and*
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.*

2.18 The NPPF quote above makes reference to developable sites or broad locations for growth, for years 6-10 and, where possible for years 11-15 of the plan. In this case it is possible for the Council to identify a supply of specific deliverable sites. As explained below, there are other sites available and suitable which can go towards meeting this shortfall. They could come forward earlier in the Draft Local Plan period to start addressing the economic / social issues identified in this representation.

2.19 The Council also states that whilst this shortfall is acknowledged, the approach taken to site allocation is considered to be 'sound' for the following reasons (Wheeldon's responses are in italics):

- It is consistent with the Council's spatial strategy for dispersed development focussing on sites of less than 500 dwellings within and adjacent to existing urban areas – *Other sites can be allocated which are less than 500 dwellings (see below).*
- It supports the towns and key villages in a proportionate manner whilst minimising impact on the Green Belt – *The Council has been underdelivering in housing terms for years. This has resulted in a lack of support for towns and key villages - this needs to be made up for now. The decision has already been made that exceptional circumstances exist sufficient to amend the Green Belt to accommodate housing growth. It is still possible to allocate further sites through Green Belt amendment (sites which have limited impacts on the Green Belt – see below) whilst still retaining large amounts of it.*

- It maximises the use of available brownfield land and utilises increased densities in the most sustainable locations – *Further allocations can be made in answer to years of under supply in housing.*
- It focusses development towards sustainable locations, in particular capitalising on existing and planned public transport and active travel infrastructure – *Additional sites are available on the edge of Jacksdale which capitalise on existing infrastructure.*
- It maximises the use of available and developable sites outside of the Green Belt which comply with the Council’s strategic approach – *The Council’s strategic approach is to also develop in the Green Belt is the least impactful locations. This has not been fully realised.*
- It reflects the Council’s response to the significant level of objections to new settlement proposals in the Regulation 18 Draft Local Plan – *Other sites available are not the size of a new settlement. This point does not address years of under supply in housing and the resulting issues.*
- It takes account of the uncertainty of future Government approach to assessing housing need which is currently under review – *This is not a robust reason for the under supply of housing.*
- It will provide a supply of specific, deliverable sites for years one to five of the plan periods, and also years 6-10 of the Plan and beyond – *But not for the full plan period. This should be provided where possible and, in this case, it is possible (or least get closer to the full target than the Draft Local Plan currently does).*
- It meets the NPPF requirement for identifying land to accommodate at least 10% of their housing requirement on sites no larger than one hectare - *This is not a robust reason for the under supply of housing.*
- It reflects the district’s key characteristics and constraints which are fundamental in considering the overall scale and location of new development – *This is not evidenced. As already explained, the Council has been under delivering in housing for years. There are resultant economic and social issues in the district which need to be addressed now.*
- Neighbouring local authorities have confirmed that they do not have capacity to meet any of Ashfield’s housing need for this Plan period (included in Statements of Common Ground) – *This is not evidenced. These are not currently available to view on the Council’s website and had not been signed*

*off as of 24/01/24. There is an apparent lack of co-operation between Nottingham City and Gedling.*

- 2.20 In terms of affordable housing, it is noted that for 'rented' affordable, the need is 247 dwellings per annum. Considering that the overall housing supply in the Draft Local Plan is 446 dwellings per annum, there is no chance of this need even closely being met. Where there is a desperate need for affordable housing there is a strong justification to up overall numbers in order to ensure delivery and increase supply to reduce values.
- 2.21 It is unclear within the spatial strategy, why the Council considers nearby settlements such as Annesley Woodhouse, Huthwaite, Stanton Hill, and Skegby as being within the Main Urban Areas of Sutton & Kirkby. They are small settlements with reduced facilities and not capable of accommodating higher levels of growth (as set out in the spatial strategy). To ensure proper planning and that development is steered towards the most sustainable locations, they should be considered as distinct settlements with their own functional centres in the spatial strategy.

### **Sustainability Appraisal (SA)**

- 2.22 Local plans and spatial development strategies should be informed throughout their preparation by a Sustainability Appraisal (SA). The SA should help ensure that the proposals in the plan are appropriate and sustainable given the reasonable alternatives. It can be used to test the evidence underpinning the Draft Local Plan and help to demonstrate how the tests of soundness have been met.
- 2.23 The SA in this case looks at two housing growth options. One a minimum growth Standard Methodology approach of 446 dwellings per annum (which, as set out above is the Council's preferred option). Second, an alternative option which allows for a 20% uplift (535 dwellings per annum).
- 2.24 The SA assess both options against 17 objectives.
- 2.25 The higher growth option scores higher on housing and economy objectives, but lower on natural resources and travel and accessibility than the Council's preferred lower option (see table below).

| Option                          | 1. Housing | 2. Health | 3. Historic Environment | 4. Community Safety | 5. Social Inclusion Deprivation | 6. Biodiversity & Green Infrastructure | 7. Landscape | 8. Natural Resources | 9. Air & noise pollution | 10. Water Quality | 11. Waste | 12. Climate Change and Flood Risk | 13. Climate Change and Energy Efficiency | 14. Travel and accessibility | 15. Employment | 16. Economy | 17. Town Centres |
|---------------------------------|------------|-----------|-------------------------|---------------------|---------------------------------|--|--------------|----------------------|--------------------------|-------------------|-----------|-----------------------------------|--|------------------------------|----------------|-------------|------------------|
| <b>Preferred Option</b>         | +          | +/        | -/?                     | 0                   | +                               | -/?                                    | +/           | +                    | -/?                      | -                 | -         | 0/?                               | +/                                       | +                            | +              | +           | +                |
| <b>Standard Methodology 446</b> | +          | -         | -/?                     | 0                   | +                               | -/?                                    | +/           | +                    | -/?                      | -                 | -         | 0/?                               | +/                                       | +                            | +              | +           | +                |
| <b>Flexible Buffer 535</b>      | +          | +/        | -/?                     | 0                   | +                               | -/?                                    | +/           | +                    | -/?                      | -                 | -         | 0/?                               | +/                                       | +                            | +              | +           | +                |

| Score                              | Description   | Symbol |
|------------------------------------|---|--------|
| <b>Significant Positive Effect</b> | The option contributes significantly to the achievement of the objective.         | ++     |
| <b>Minor Positive Effect</b>       | The option contributes to the achievement of the objective but not significantly. | +      |
| <b>Neutral</b>                     | The option does not have any effect on the achievement of the objective           | 0      |
| <b>Minor Negative Effect</b>       | The option detracts from the achievement of the objective but not significantly.  | -      |

|                                    |   |    |
|------------------------------------|---|----|
| <b>Significant Negative Effect</b> | The option detracts significantly from the achievement of the objective.  | -- |
| <b>No Relationship</b>             | There is no clear relationship between the option and the achievement of the objective or the relationship is negligible.   | ~  |
| <b>Uncertain</b>                   | The option has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made. | ?  |

NB: where more than one symbol/colour is presented in a box it indicates that the appraisal has identified both positive and negative effects. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.

Table 1: Summary SA of strategic housing growth options

2.26 The analysis in the main SA report of the results set out in Table 1 above, and the ultimate conclusions are somewhat confusing, however.

2.27 Paragraph 53.14 of the SA Report states:

*The higher growth option of 535 dpa is considered to perform similarly to the lower figure against most of the SA objectives. Significant positive effects have been*

*assessed against housing (SA Objective 1), and such effects may be enhanced by a larger supply of housing, but some uncertainty has also been identified. Providing a housing growth figure with a 20% buffer above the standard methodology would enable a greater supply of housing in the district on plan adoption; however, there is some uncertainty over where housing delivery can meet the higher growth figure. In the period 2011-2023, net housing completions have not reached the figure in two of the monitoring years (the highest being 558 net completions in 2015/16 and 544 in 2016/17). In summary, increasing the housing growth figure may not deliver the same number of actual houses on the ground.*

2.28 Wheeldon would say that it is no surprise that the Council has struggled to meet its housing supply targets since it has not had a new plan in place for more than 20 years. The Council in recent years has had to rely purely on windfalls for housing delivery. There are further sites which are available and suitable which could be allocated (over and above those already done so – see below) thereby significantly increasing the prospects of housing delivery in this new plan period. It is noted that higher completion rates were recorded in 2015/16 and 2016/17. It is assumed that this was the end of the period for the current Local Plan (which was adopted in November 2002) and allocations in the former plan were finally providing increased housing completions.

2.29 Paragraphs 53.16 / 17 / 18 of the SA Report state:

*“Significant positive effects have been found for the economy (SA Objective 16). The higher amount of growth is considered to provide additional benefits to the economy due to the additional construction jobs but also the additional potential to stimulate growth in a diversified economy.*

*The option is considered to have potential for mixed minor positive and significant negative effects on natural resources (SA Objective 8), given the higher growth figure would likely include greater release of greenfield land and a reduced ability to avoid the best and most versatile agricultural land (Grades 1 to 3). A similar score was also found for travel and accessibility (SA Objective 14) given the likelihood that higher growth would increase travel and congestion across the District. However, the magnitude of these effects is dependent on the location of development to some extent, and therefore some uncertainty remains at this stage. No other significant negative effects have been assessed for this option.*

*The flexible buffer option (535 dpa) is considered to perform similarly to the Preferred Option figure (446 dpa) for the remaining objectives.”*

- 2.30 The above shows that the higher growth option has 'significant positive effects' on the SA economic objective (number 16). This is not caveated or disputed in the SA report (as a reminder, the Council, in the plan, identifies severe economic problems in the district).
- 2.31 The scoring for the higher growth option shows negative impacts on 'Natural Resources' and 'Travel and Accessibility' objectives. The SA report states however *"the magnitude of these effects is dependent on the location of development to some extent, and therefore some uncertainty remains at this stage."*
- 2.32 Wheeldon would suggest that the whole point of planning and the Draft Local Plan allocation process is to ensure that development is located in sustainable areas which limits impacts on the environment through unsustainable travel patterns etc...
- 2.33 Furthermore, in respect of travel and accessibility, Ashfield benefits from a location along the M1 corridor which is extremely attractive to employment and logistics development. Ashfield has the potential to create more jobs in the district so retaining and supporting the local workforce is vital.
- 2.34 The district also has excellent public transport links between the three main settlements and the larger centres of Nottingham and Derby (NET Tram, Bus and Robin Hood rail).
- 2.35 The Spatial Strategy should be capitalising on its attractive and accessible location and seeking to align its housing growth alongside its potential as a strategic employment location and improved public transport links.
- 2.36 It is Wheeldon's view that there is no clear reason as to why the Council is not allocating a level of housing any higher than the basic minimum (particularly considering the district's economic problems).
- 2.37 Although the SA is right to consider the effects of higher housing growth figure, on natural resources, it is important to note that a significant amount of the district is allocated as Green Belt (approximately half of the land outside the urban area in Ashfield forms part of the Green Belt).
- 2.38 Table 2 below breaks down the housing allocations in the Draft Local Plan:

| Site Selection Stage                                   | Estimated Yield (Dwellings) | % Supply    |
|--|-----------------------------|-------------|
| Stage 1 - Sites with planning Permission               | 1950                        | 34%         |
| Stage 2 - Sites subject to s106                        | 315                         | 6%          |
| Stage 3 - Brownfield sites without planning permission | 189                         | 3%          |
| Stage 4 - Greenfield sites without planning permission | 2016                        | 35%         |
| Stage 5 - Greenbelt sites (brownfield and Greenfield)  | 1246                        | 22%         |
| <b>Total dwellings from allocations</b>                | <b>5716</b>                 | <b>100%</b> |

Table 2: Summary of housing allocations from all site selection stages (from Background Paper 1- Spatial Strategy and Site Selection)

- 2.39 The table shows that the principle of allocating greenfield sites (including in the Green Belt) has already been established. Even if a higher proportion were to be released, a significant amount of greenfield / Green Belt would remain.
- 2.40 It is only through the Local Plan process that Green Belt boundaries can be amended. The NPPF states at paragraph 140 that *“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.”*
- 2.41 Wheeldon believe that the severe social and economic problems facing the Council must be addressed now. The SA shows that these can be helped by additional housing growth. Wheeldon would say that if this means the potential loss of further Green Belt, then so be it. The easing of the problems identified above would provide the required ‘exceptional circumstances’ (particularly when considered in the context that Green Belt boundaries and social / economic problems haven’t been considered through the Local Plan process for more than 20 years).
- 2.42 It is also relevant to consider that Ashfield does not have any other significant development constraints e.g. AONB, WHS, National Parks that would act as a barrier to development. In addition, the Green Belt has not stopped the surrounding Greater Nottingham Authorities from delivering above minimum growth through strategic reviews of their Green Belt boundaries and a similar approach should be applied in Ashfield.
- 2.43 In conclusion, Wheeldon has serious concerns over the approach to provide for the minimum number of homes required. The ‘significant boost’ to housing delivery required by the NPPF will not be achieved through a minimum delivery position.

Wheeldon therefore does not agree with the strategy put forward in the Draft Local Plan and the resultant Policy S7 which sets out the housing figures.

2.44 Overall, Wheeldon, in this regard, believe that the Draft Local Plan is not sound because it is not:

- Justified – It does not have an appropriate strategy which takes into account the reasonable alternatives and based on proportionate evidence. It has been identified that years of under delivery in housing and not having an up-to-date Local Plan in place has contributed to severe social and economic problems in the district. The Councils SA shows that that a reasonable alternative of delivering a higher level of housing (as opposed to just the minimum) can help address these issues. The evidence supports the provision of a higher level of housing, but this has been ignored by the Council in creating the Draft Local Plan.
- Consistent with national policy – The strategy is not in-line with the Government’s aim to significantly boost the supply of homes. Nor does it properly deliver sustainable development as it does not robustly consider social and economic objectives.

#### **Distribution of Housing (Strategic Policy S1: Spatial Strategy to Deliver the Vision / Policy H1: Housing Allocations)**

2.45 Wheeldon is pleased to see that the Council has dropped its previous approach of allocating two new settlements in the Green Belt for housing delivery. It now focuses on strengthening its existing centres with housing and employment growth. Strategic Policy S1: Spatial Strategy to Deliver the Vision Section 9 c) is supported by Wheeldon as it identifies Jacksdale as a ‘Named Settlements to accommodate smaller scale growth which meets the needs of the community and sustains services and facilities’. This is considered a sustainable approach to development delivery as it focuses growth in an area which already has a good level of existing services and facilities thereby supporting active travel and reducing travel patterns requiring the use of a private car.

2.46 Wheeldon also note that allocations are made in Jacksdale under Policy H1: Housing Allocations. In this respect the policy is supported but the Council should be aware that other suitable sites are available in Jacksdale which would allow the Council to



deliver more housing thereby having a significant positive effect on the economy as identified in its SA.

### 3. Land to the west of Selston Road, Jacksdale

- 3.1 As a means of delivering further housing at Ashfield, Wheeldon respectfully requests the Inspector to consider its site at Land to the west of Selston Road, Jacksdale – see Map 1 below showing site:



Map 1: Proposed Site Location Plan

- 3.2 The development of this site would bring with it numerous benefits including:

- Opportunities for new homes, including affordable homes in a sustainable and accessible location.
- Opportunities for deliverable housing in the short to medium term to meet the 5-year housing land supply.
- Opportunities for improvements to biodiversity and green infrastructure.
- Opportunities for health and wellbeing by improving access to the adjacent open countryside.
- Opportunities for regeneration in Jacksdale (helping to address existing social and economic issues).

- 3.3 The site is closely related to the settlement pattern of Jacksdale and in walking distance to a range of local services, whilst being located on a good public transport corridor.

- 3.4 It can be developed in a way that is respectful of the environmental context, with the potential to include a mixture of good quality market and affordable homes, open space, ecological habitats and landscaping.

### Strategic Housing and Employment Land Availability Assessment (SHELAA)

- 3.5 The site is assessed in the Council's current (2023) Strategic Housing and Employment Land Availability Assessment (SHELAA). Figure 1 below is a map extract from the assessment showing the reference numbers:

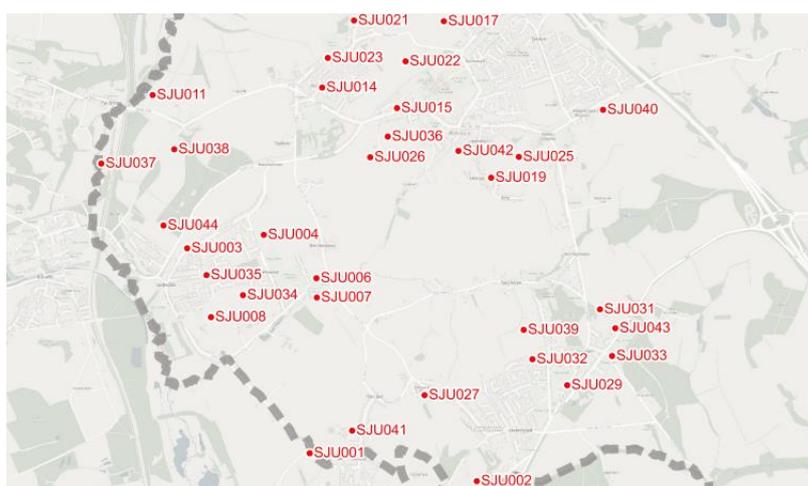


Figure 1: Rural SHELAA sites

- 3.6 As shown above, the corresponding numbers for Wheeldon's site is SJU044.
- 3.7 The site assessment for SJU044 confirms that the site is 'Available'. In terms of whether the site is 'Suitable' the assessment states:
- The site is potentially suitable.
  - It is located in the Green Belt. Under the National Planning Policy Framework, paragraph 136 it is necessary to demonstrate that there are exceptional circumstances, for the site to be taken out of the Green Belt.
  - High pressure gas main crosses site. adjacent to the south-western boundary. The vast majority of the site falls within a 25m buffer zone with a requirement to contact HSE.
  - Likely ground stability issues - Coal high risk area.
- 3.8 In response to these points Wheeldon would say:
- That the site is suitable.

- Green Belt sites are already allocated in the Draft Local Plan so the case for exceptional circumstances has already been made.
- Even with the 25m buffer zone, a large part of the site remains developable.
- Large parts of the district are coal high risk areas and is not considered a barrier to development.

3.9 Under 'Achievability' the assessment states:

*"The site is assumed to be potentially achievable at this time, pending the outcome of a Whole Plan Viability assessment to be undertaken as the emerging Local Plan progresses and the impact of policies can be fully considered."*

### Green Belt Harm Assessment 2023

3.10 As part of the consultation the Council has published an updated Green Belt Assessment. It states that the overall purpose of the study is to provide a robust and transparent assessment of the potential harm of releasing Green Belt land in line with national policy, guidance and case law. It also considers potential mitigation measures to minimise harm.

3.11 Table 3 below sets out the findings for of the Green Belt Harm Assessment in relation to site SJU044 :

| SHELAA Ref. | Site Address                         | Site Area (ha) | Release Scenario  | Purpose 1 (Unrestricted Sprawl) | Purpose 2 (Prevent Settlements Merging) | Purpose 3 (Safeguard from Encroachment) | Purpose 4 (Preserve Historic Settlements) | Purpose 5 (Urban Regeneration) | Overall Harm Score | Overall Harm Rating | Green Belt Assessment Area (* Please refer to Stage 1: SGBR) |
|-------------|--------------------------------------|----------------|---|---------------------------------|---|---|---|--------------------------------|--------------------|---------------------|--|
| SJU044      | Land West of Selston Road, Jacksdale | 3.65           | Release of SJU044 as an expansion of Jacksdale North/West | Moderate                        | Low                                     | High                                    | Low                                       | N/A                            | 10                 | Relatively Low      | J04 / 4*   |

Table 3: Findings for the Green Belt Harm Assessment

3.12 It shows that the overall harm to the Green Belt if site SJU044 was released as an expansion of Jacksdale North West would be 'relatively low'.

## **4. Conclusion**

- 4.1 These representations have set out why Wheeldon does not agree with the strategy chosen for housing delivery. As such the plan has not been fully justified nor is it in-line with national policy.
- 4.2 Meeting the requirement for only the minimum number of houses is not the right approach. It does not help address the significant social and economic issues worsened by years of housing under delivery in the district.
- 4.3 Wheeldon agree with the Council that 'Exceptional Circumstances' do exist to release land from the Green Belt for development.
- 4.4 The Land to the west of Selston Road, Jacksdale is a highly deliverable site that can be brought forward in the short to medium term as a comprehensive development.



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