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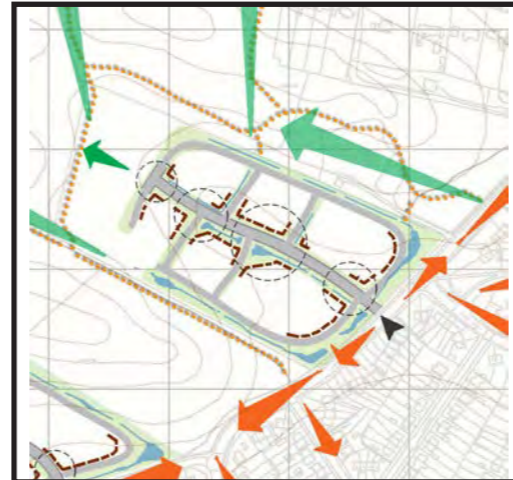
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HUCKNALL

COMMON LANE - A HOUSING DEVELOPMENT OPPORTUNITY

PROMOTION DOCUMENT



NOVEMBER 2021

PROJECT DETAILS

Client: Aldergate Properties
Project Name: Common Lane, Hucknall
Reference Number: 21.113
Date: November 2021

This document was prepared by: TC / RJ
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LAND OFF COMMON LANE, HUCKNALL

INTRODUCTION

Planning & Design Group (P&DG) is working with Aldergate Properties to assist in the promotion of residential development on land to the north west of Common Lane, Hucknall, Nottinghamshire.

All the land contained within the blue line shown on figure 1 is owned and controlled by Aldergate Properties. However, given the landform constraints of the site the site lends itself to only the area. These areas have been promoted for residential development through the previous Local Plan process in 2016 (withdrawn in 2018) and the latest call for sites as part of the Emerging Draft Local Plan 2020-2038.

Within the emerging Local Plan the site is not allocated for residential development and remains as part of the Green Belt.

This Promotion Document has been prepared as part of representations made to the Submission Draft Local Plan. The purpose of this document is to demonstrate that the land can be released from the Green Belt and form a sustainable extension to the built-up area of Hucknall with minimal impact on any of the purposes of Green Belt.

This document not only addresses Green Belt issues but also landscape, transport and ecology and develops a concept masterplan to illustrate how the site could be developed. This demonstrates that the site is deliverable and gives confidence to decision makers that the site can be brought forward.

Aldergate have the development credibility and desire to bring forward a development that would bring with it numerous benefits including:

- Opportunities for new homes in a sustainable and accessible location;
- 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 Hucknall.



Figure 1: Proposed Site Location Plan



LAND OFF COMMON LANE, HUCKNALL

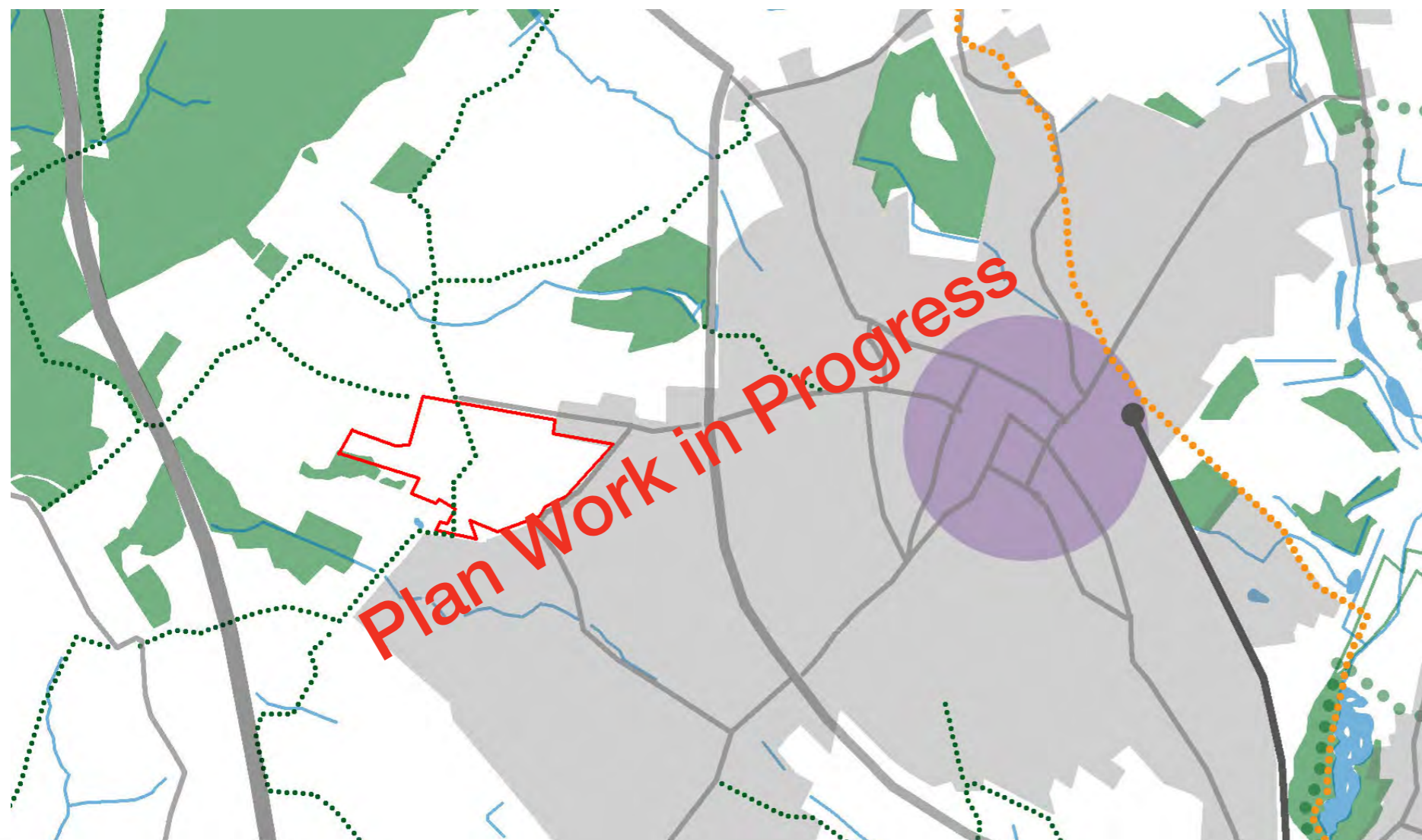
SITE CONTEXT

Wider Site Context

The site lies on the North Western edge of Hucknall. Hucknall is one of the three main urban areas in Ashfield District, it lies to the south of the district and to the immediate north of Nottingham. Hucknall has excellent public transport links via the Robin Hood rail line and the NET tram service. It is also well connected to the road network with the A611 running through the town and close proximity to the M1.

Hucknall provides a range of services including a leisure centre, cinema, and a central high street with market days and a number of national retailers alongside independents and markets days. As one of the main urban areas it has been identified by Ashfield District council as a sustainable location for growth. The emerging Local Plan identifies that Sutton, Hucknall, and Kirkby offer the best opportunities for existing residential, employment, services, and facilities within the District.

Figure 2: Development Area Context Plan



KEY

Local Site Context

As can be seen in Figure... the site forms part of the urban fringe of Hucknall and is well connected to the existing residential area with residential development immediately to the south and east. The land rises to the northwest towards Misk Hill, and includes Lever's Hill and Long Hill creating an undulating landform, with some level area between the hills. The land is currently in agricultural use.

Within 500m of the site are a local parade of shops, and a secondary school and within 1km there are 3 primary schools and two formal open spaces/play areas, and a larger parade of shops including a Sainsburys Local and Co-Op.

The site is only 550m from the A611 the major link road through Hucknall and within ... there are x bus stops. (to update with CB report) The site is approximately 1.5km from the District Centre shopping area and approximately 2.5km to the train and Tram stop, which is less than a 10minute drive from the site.



Countryside looking west from Hucknall (Google)



Hucknall Town Centre

LAND OFF COMMON LANE, HUCKNALL

CONSIDERATIONS AND OPPORTUNITIES

Green Belt

The site falls within the Nottingham and Derby Green Belt as can be seen on Figure 3

The main purpose of the Nottingham – Derby Green Belt is to contain the outward growth of Nottingham City and Derby City and to prevent the coalescence of these and other settlements within it by keeping land permanently open.

In order to accommodate growth Ashfield, recognise that land will need to be released from the Green Belt. In respect of housing development only circa 1,100 of the 8,226 houses identified as required in the emerging plan can be built on existing and available brownfield sites. This means that the remaining 7,000 homes must be accommodated on greenfield and green belt land to meet the target. In this regard Ashfield District Council undertook a Strategic Green Belt Review in 2016 and more recently a Green Belt Harm Assessment was undertaken in July 2021.

Only sites which scored well in terms of their development potential in the 2016 study were assessed as part of the 2021 study. This site was considered as part of both these reviews.

The 2021 study assesses the sites in respect of the potential degree of harm that their release would cause to the purposes of the Green Belt. The results of the 2021 assessment can be seen on Figure 4 As can be seen the Council consider that the potential harm of releasing this parcel of Green Belt land for development is relatively low.

In respect of the 5 purposes of Green Belt land, the site only scored highly in respect of encroachment into the countryside. In regard to all other purposes the score was moderate or low. The high score for encroachment into the countryside given by the Council to this site seems at odds with their approach to other sites, for example Whyburn farm which covers a much wider area to the north of this site only scores as ‘relatively high’ in respect of this criteria .Given the smaller development parcels we are promoting we do believe there is scope for the potential harm to decrease even further to Low rating.

This site is capable of being released from the Green Belt with minimal impact on the purpose of the Green Belt. The site should have been considered preferential to other sites, which have been released, which score much higher in terms of purposes of Green Belt Land and potential harm their development would cause.

Paragraph 142 of the NPPF states that where it has been concluded that it is necessary to release Green Belt land for development, plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

The updated Planning Policy Guidance (PPG) also endorses the preparation of supporting landscape, biodiversity or recreation evidence to identify appropriate compensatory improvements, including:

- new or enhanced green infrastructure;
- woodland planting;

- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity,
- habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision

As we discuss in the following sections, the development of this site can provide enhancements and compensatory improvements. Notably, the proposal presents a clear opportunity to provide compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

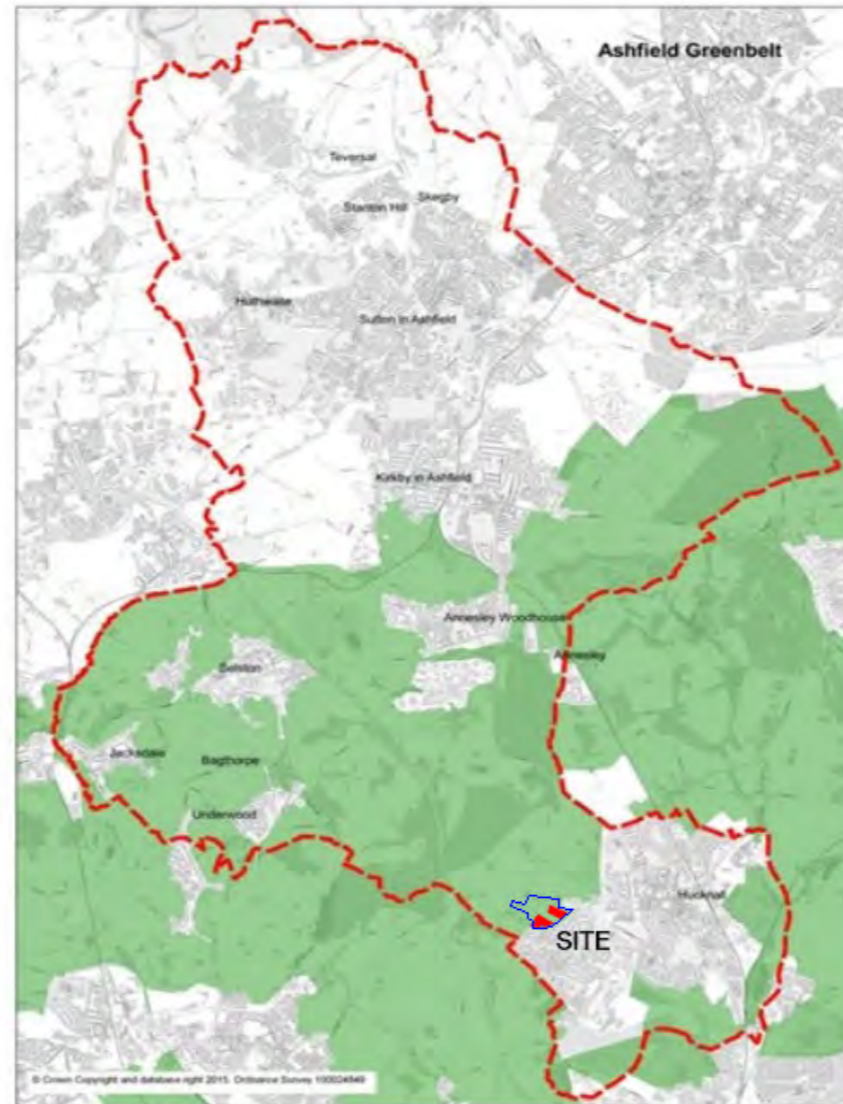


Figure 3: Green Belt Plan (Nottinghamshire CC)

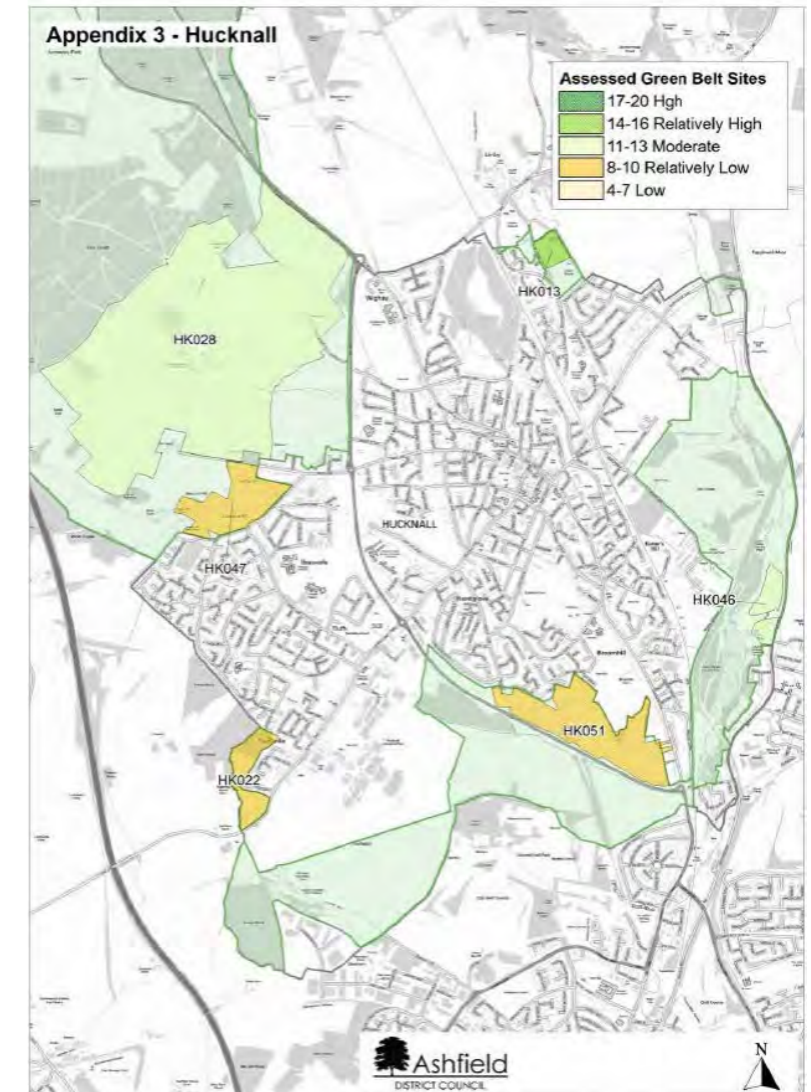


Figure 4: Green Belt Site Assessment Plan (Nottinghamshire CC)

LAND OFF COMMON LANE, HUCKNALL CONSIDERATIONS AND OPPORTUNITIES

Landscape

As can be seen on figure .. the site is divided naturally into separate enclosed areas by the high ridgeline of Leivers Hill and Beacon Hill. This has the effect of creating development parcels which are only visible from the urban area of Hucknall. The ridgeline also provides a natural defensible boundary against further development into the Green Belt.

There are no landscape designations which cover the development parcels.

A Landscape Sensitivity Study of the site has been undertaken by DSA and is included with our representations. This seeks to understand the sensitivity of the landscape and visual receptors to new residential development and to help inform the most appropriate locations for future development on the site.

Parcel A comprises a small, relatively flat development parcel that is visually well contained in the local area. Exposed only to the two immediately adjacent properties. The report concludes that sensitive development of the site which takes into account the existing character of neighbouring properties, would allow the site to tie into the existing area. Overall the parcel has a low rating for landscape character and low sensitivity to residential development.

Parcel B is a well contained parcel visually. Low hedges allow clear views in, but only from very proximal locations. Landform to the north restricts visibility further. This parcel has great potential for development to break down the abrupt urban edge to the northwest of Hucknall and integrate the settlement into the existing landscape. Overall the parcel has a low rating for landscape character and medium sensitivity to residential development.

Parcel C is a visually well contained parcel, exposed only to a small part of Hucknall to the east. Neighbouring landform greatly restricts views. There is the possibility for any development to address the existing street frontage and mitigation would involve planting around the boundaries to break down the rigid

form of the urban edge of Hucknall. Overall this site has a low rating for landscape character and low sensitivity to residential development.

The landscape assessment also considers Parcel D which is an extended area of Parcel B, however it was felt that this may cause additional visual intrusion into the landscape and impact onto Beacon Hill Farm. Therefore, although part of the development area this will be used for environmental and landscape improvements.

Overall, the development plots shown would be contained within the landscape, and views of the sites restricted to immediate residential properties on the edge of Hucknall and occasional glimpses of the site from the right of way to the north.

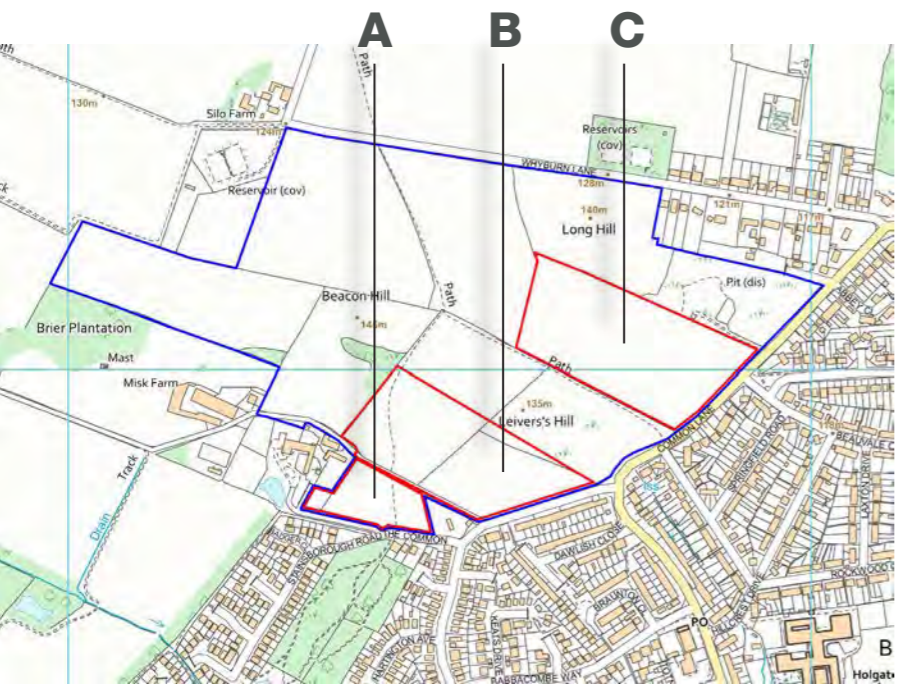


Figure 5: Development Parcels Plan



Figure 6: Topography and Landscape Plan

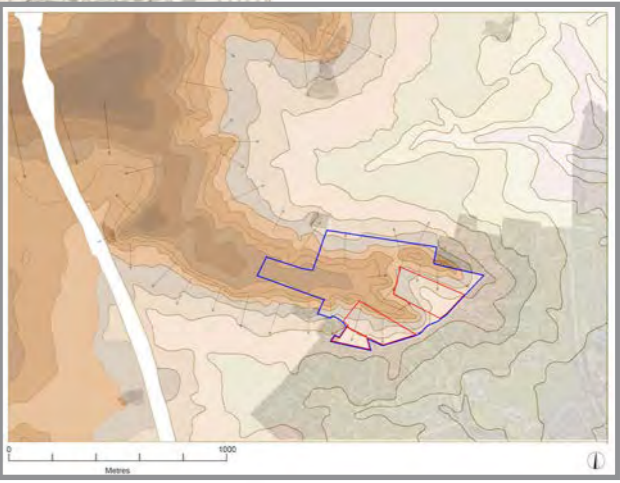


Figure 7: Landform Inset Plan

LAND OFF COMMON LANE, HUCKNALL

CONSIDERATIONS AND OPPORTUNITIES

Ecology

The closest designated sites to the study area are Bulwell Wood SSSI and Sledder Wood and Meadows SSSI. Both sites are geographically separated from the survey area by urban development and farmland so a direct impact arising from residential development is not anticipated.

Within the site area is a designated Local Wildlife Site Long Hill Disused Pit as shown on figure 8.

When Long Hill was designated as a Local Wildlife Site, the extent of acid grassland was much greater than it is now. Lack of management and natural succession has reduced the grassland resource to very small patches of mesotrophic grassland, with most of the grassland being replaced by bracken, scrub and woodland.

None of the woodland within the survey area is ancient. The woodland and scrub habitats within the LWS are of relatively recent origin and are at the thicket stage of development. The stand of dense scrub on Levers Hill is also of low botanical diversity.

The proposals will ensure that the LWS is outside of the proposed development zones, but we recognise that an indirect effect could occur if visitor pressure increases. However, site visits indicate that the area is currently being used for informal recreation and is already subject to littering and arson. Formalising footpaths and providing more natural surveillance could improve this.

Although most of the hedgerows are species-poor and of simple structure, they are linked to each other within the survey area and are part of the local network connecting with woodland and scrub habitats therefore their retention and enhancement would be desirable.

There is scope for improvements to the natural habitat as a result of the development. Some of these improvements are shown on figure... and include; increased tree planting adding and strengthening hedgerows, restoring some of the grassland using bracken/bramble control, management of the LWS to control anti-social behaviour. In addition, given the extent of the landownership, which far exceeds the development parcels, there is significant potential for biodiversity net gains on the adjoining land.



Figure 8: Ecology and Habitat Biodiversity Plan

LAND OFF COMMON LANE, HUCKNALL CONSIDERATIONS AND OPPORTUNITIES

Figure 6: Connectivity and Linkage Plan




Movement and Connectivity

TEXT TO FOLLOW

TEXT TO FOLLOW



Good Countryside Access

- KEY**
-  Urban connectivity
 -  Countryside connectivity
 -  Public rights of way

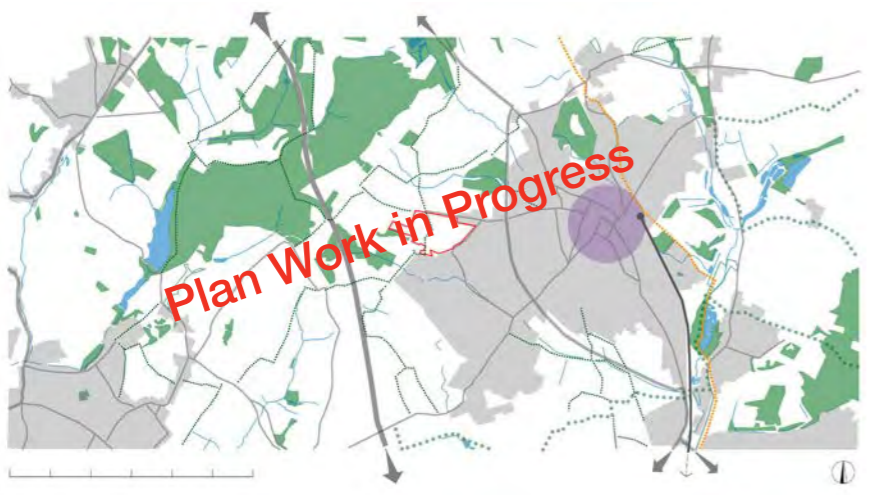
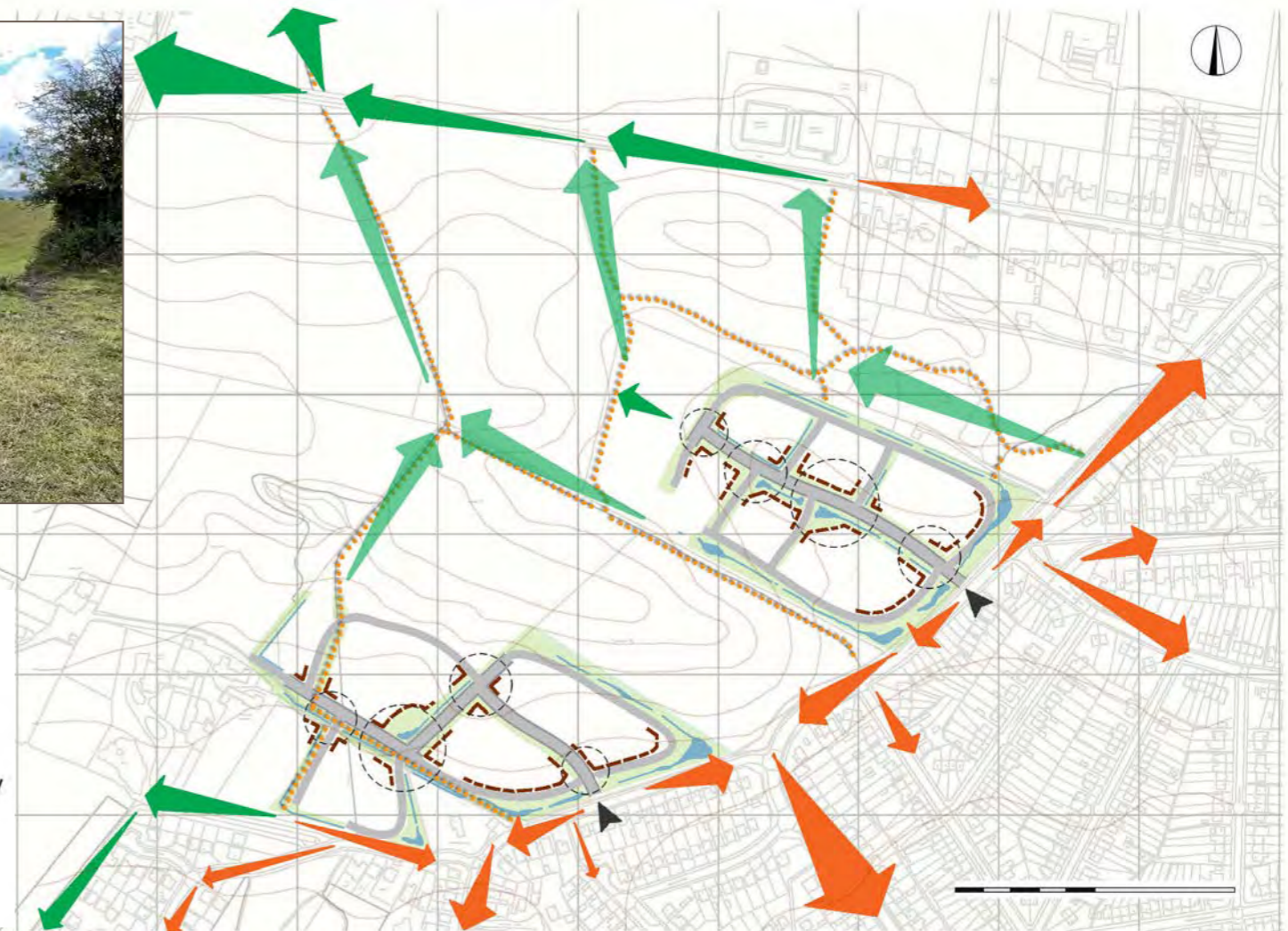


Figure 7 :Urban Fringe Context Plan



Sustainable Movement Linkage - Tram, Bus and Cycle Network

LAND OFF COMMON LANE, HUCKNALL

SITE DESIGN AND CHARACTER

Figure 9: Green Infrastructure Plan

Green and Blue infrastructure Framework

The green infrastructure provision proposed is significant. Aldergate Properties will ensure that a development is designed to accommodate Green Belt offset provision and ecological mitigation from the outset.

The development parcels will relate to the existing urban envelope and will ensure a fully integrated and balanced urban fringe. Green infrastructure is a significant recreational, amenity and educational asset.

Green Infrastructure will interrelate with new built development contributing to street pattern, creating a movement network throughout the site and destinations for recreational use. The green infrastructure facilitates gains in biodiversity; it will enrich the land, supporting a variety of existing with improved and new habitats. In particular the former quarry site to the north is a significant habitat and biodiversity opportunity. Importantly, pedestrian and cycle route will link the development to the settlement; and the settlement to the wider countryside and footpath network in an attractive and accessible way.

It is our premise that drainage attenuation will be located along the eastern boundary of the site of the site in a narrow corridor alongside Common Lane. There are further opportunities for drainage in combination with ecological provisions across the site especially along the existing field boundaries and for linked wetland areas accessible to the public.



KEY	
	Proposed woodland
	Existing woodland
	Existing and improved hedgerows
	Green open space and SUDS
	Existing grassland
	Improved grassland
	Local Wildlife Area (Management)

(Below)
Development contained within the landscape, Woodland areas safeguarded and extended where appropriate and damage and lost hedgerows reinstated and managed.

(Below)
Existing landscape features and habitat safeguarded and managed



(Left)
Existing scrubland opportunity for new woodland habitat enhancement to provide landscape backdrop to screening to proposed housing in the urban fringe setting.

LAND OFF COMMON LANE, HUCKNALL

SITE DESIGN AND CHARACTER

Development, Density and Landscape Interface

The site is not located within an area at risk of flooding, and comprises undulating arable land defined by two ridges and a single valley. The land rises from Common Lane towards the west and M1. Topography and slope determine which parts of the site are suitable for development and will also screen and contain built form and the urban fringe in the landscape.

The potential development areas are shown on the plan below.

Site A is a well contained within the urban envelope. It is relatively flat and provides a building platform and would be suited to a medium density housing (35 dph).

Site B is a land parcel on the southern side of the central ridges suited to medium density (35dph) on the area immediately adjacent to Common Lane and lower density (30dph) , further into the site on the countryside edge.

Site C is located in the valley between the two ridges with steeper slopes to the west. Again, we anticipate medium density (35dph) on the eastern part of the site, fronting Common Land with lower density (30 dph) as the development moves up the valley. Critical will be the decision on how far it is suitable to develop toward the west.

Based on Figure.. we anticipate that the site could accommodate the following new dwellings;

- Parcel A - 36 dwellings
- Parcel B - 95 dwellings
- Parcel C - 100 dwellings

SITE C
Mixed density contained in the valley



SITE A
Medium density contained in the urban envelope

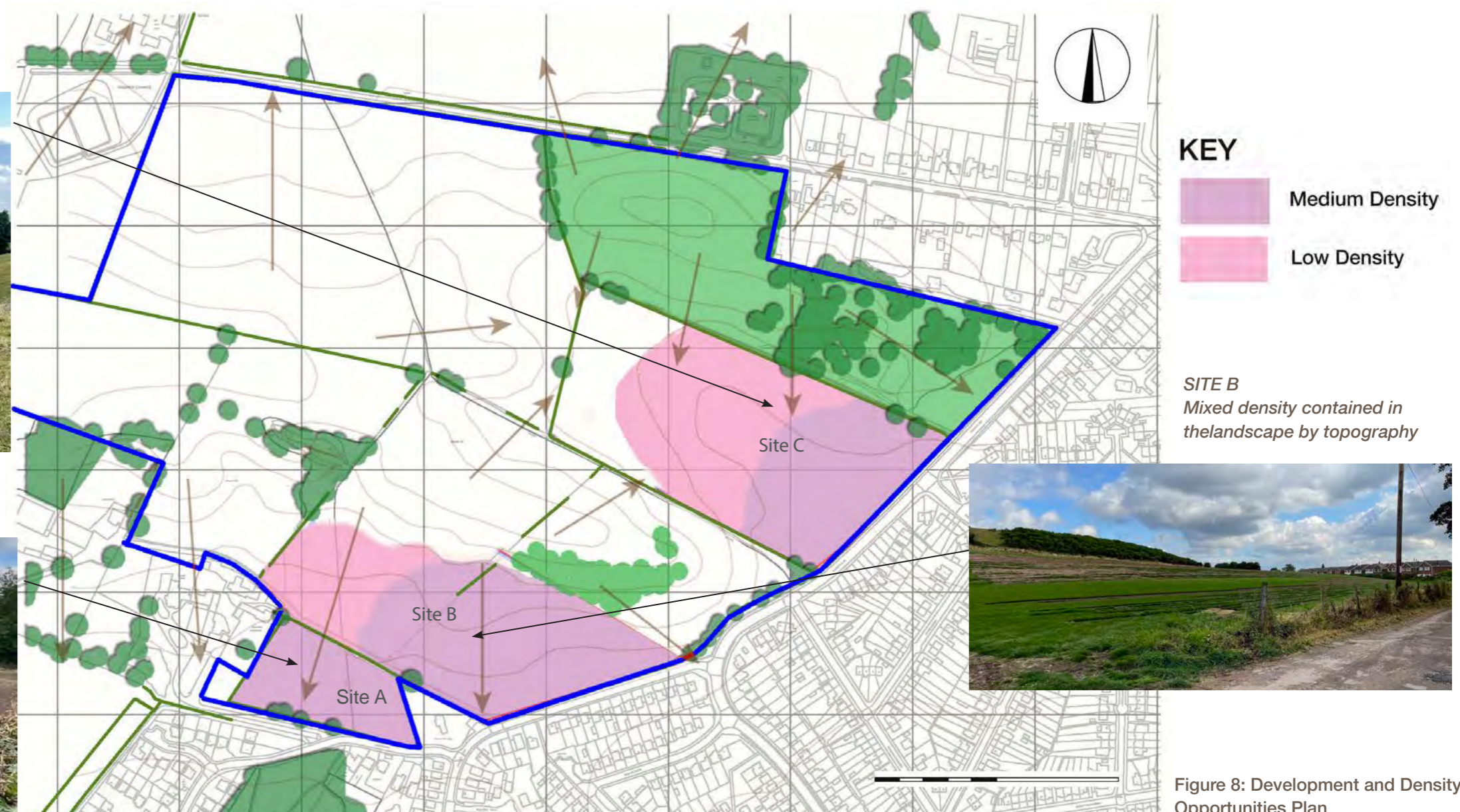


Figure 8: Development and Density Opportunities Plan

LAND OFF COMMON LANE, HUCKNALL

MASTER PLAN

Indicative Concept Layout

The proposed Masterplan has evolved as a result of close consultation between Aldergate and third party consultants.

The masterplan has been prepared to demonstrate that the site can be allocated either in its entirety for circa 231 new homes or as separate parcels of land with numbers ranging from 36-100 on each parcel. The aim being to provide confidence on site deliverability and some indicative solutions for local infrastructure.

The intention at this initial stage would be to confirm the principle of residential development on this site and the acceptable levels of development within the defined development land parcels. We then anticipate that we would technically appraise and shape the Masterplan further by scoping with the relevant authorities further technical work to include highways, drainage, contamination, green infrastructure, landscape and ecology.

Design Elements and Principles

A masterplanned approach to the development of the site has complemented the technical work undertaken, clearly demonstrating how the site's sensitive integration can make a positive improvement to this edge of Hucknall. The plan (right) is an indicative sketch layout that clearly set out design principles that can be used to inform and brief a more detailed design layout

The concept design as shown follows sustainable place making principles as prescribed by The National Design Guide (October 2019) and Living with Beauty (January 2020). The relationship between public and private spaces can be clearly defined, contributing to a positive sense of place. The perimeter block structure of the development enables a well-connected and accessible neighbourhood. The broad parameters of the scheme are reflective of adjoining residential streets with variations in character areas to be incorporated across the development. Where possible, residential dwellings will be outward facing to address Common Lane and key corners can be addressed by active property frontages.



Figure 11: Proposed Masterplan

LAND OFF COMMON LANE, HUCKNALL

MASTER PLAN

Site Development Concept and Urban Design Principles

Built development on the site will be restricted to 3 land parcels which directly relate to the existing urban envelope. It is central to the development ethos of Aldergate Properties to capture the spirit of good placemaking through careful planning, holistic design and improved accessibility. Also a commitment to improving habitats and biodiversity gain through green infrastructure management will integrate and improve the urban countryside interface along this edge of Hucknall.

A Design Led Approach

The development of the site will be led by a sustainable mix of dwellings, connected by strong and accessible linkages between the countryside and Hucknall. We anticipate that provision could be made within the overall development for large amounts of publicly accessible open space, including: recreational open space, improved hedgerows, woodland, grassland, wetland and a series of mosaic habitat areas.

Placemaking and Character

We see the site as deliverable within the immediate – medium term housing supply period and the development of this site will deliver the following benefits;

- Job creation through the support of existing businesses and new employment uses;
- Provide opportunities for environmental, townscape improvements and regeneration within Hucknall;
- Foster health and wellbeing;
- Create mixed and balanced communities; and
- Provide for informal recreation opportunities with improved countryside access



Site C



Site B



Site A



Figure 10: Place Making Plans

LAND OFF COMMON LANE, HUCKNALL

SUMMARY AND CONCLUSION

The site is suitable for residential development without any material harm to the purposes of the Nottingham – Derby Green Belt. The Council have identified that developing this site would have a relatively low impact on harm to the Green Belt.

Through our initial work we have demonstrated that development can be accommodated on parcels within this area without having any visual impact on landscape.

The development of the site can secure net public and environmental benefits whilst sustainably addressing the shortfall in housing supply, in the short to medium term.

Land to the north of Common Lane is a prime example of a site that can be readily identified in the Local Plan and evolve through additional technical appraisal and scoping with the relevant authorities. At the forefront of this proposal would be the inclusion and enhancement of the green infrastructure; biodiversity gains and increased and improved footpath access to the open countryside to the north.





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Ashfield Draft Local Plan Regulation 19 Pre-Submission Draft Consultation on behalf of Aldergate Property Group

January 2024

Quality Control

Project No.	21.113			
Client	Aldergate Property Group			
Title	Ashfield Draft Local Plan Regulation 19 Pre-submission Draft Consultation			
Location	Land to the North of Common Lane, Hucknall			
File Ref	21.113 Local Plan Reg 19 Rep JW 150124			
Issue	Date	Prepared By	Reviewed By	Authorised By
1.	17/01/24	JW	enter initials	enter initials



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1. Introduction

- 1.1 These representations have been prepared by Planning and Design Group (P&DG) on behalf of Aldergate Property Group (Aldergate) 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 promoted the Land at Common Lane, Hucknall for residential development through the previous Local Plan process in 2016 (withdrawn by the LPA in 2018), the most recent call for sites (as part of the Emerging Draft Local Plan 2020 – 2038) and the withdrawn 2021 Reg 18 consultation.
- 1.4 The land has not been allocated in the Draft Local Plan regulation 19 consultation and these representations address why the current Draft Local Plan has not been fully justified (nor is it in-line with Government policy) and why there is a need to further consider the inclusion of additional well located and sustainable site such as that at Common Lane.
- 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 Leaving aside the wasted time and public/private money, this has left the district “rudderless” with dire consequences for the supply of housing (including Affordable Housing).
- 1.8 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. Aldergate has serious concerns that this new plan is likely to be rejected.
- 1.9 A further key concern for Aldergate is the Draft Local Plan’s failure to recognise Hucknall as a highly sustainable location for further necessary growth. Map 1 below shows Hucknall’s relationship with the city of Nottingham (spatially and functionally, Hucknall is part of the Nottingham urban area).
- 1.10 Nottingham is a core city and provides a wide range of key services and facilities (including health, education, culture, and a range of employment opportunities - alongside excellent transport routes directly into the centre of Nottingham (NET, rail & bus)). As such many of the residents of Hucknall are functionally reliant on the city for employment, service and retail opportunities.
- 1.11 In addition, it is noted that a new £15.7m office building north of Hucknall (at Top Wighay Farm) has been approved (this will include the new Head Quarters for Nottinghamshire County Council) This will create further demand for housing having shifted the administrative centre of the County to Hucknall. There is no reference in the supporting evidence that the Council has considered this in its Draft Local Plan.



Map 1: Map demonstrating the relationship of Hucknall to Nottingham (source: google maps)

1.12 It is Aldersgate’s understanding that Hucknall was previously included in the Nottingham Core HMA but latterly excluded for “administrative reasons”.

- 1.13 In 2018 Opinion Research Services (ORS) was commissioned by the Nottingham Core HMA, comprising Broxtowe, Gedling, Erewash, Nottingham City and Rushcliffe to undertake a study to confirm the Nottingham Core Housing Market Area (HMA) boundary. The purpose of the study was to confirm the boundary of the Nottingham Core HMA and Functional Economic Market Area (FEMA) based on Council boundaries.
- 1.14 The report found that there is no single correct definition of an HMA and FEMA, but that the Nottingham Core HMA authorities of Broxtowe, Gedling, Erewash, Nottingham City and Rushcliffe are all located within the same HMA and FEMA.
- 1.15 The report however also states at paragraph 2.41 that:
- “This does not prevent overlaps occurring between the area, with for example the town of Hucknall being in the administrative area of Ashfield, but is within the functional HMA and FEMA for Nottingham Core HMA...”*
- 1.16 This important (and evidenced) connection has not been followed through to the Draft Local Plan which takes the more ‘simplistic’ view of the whole of Ashfield being in the Nottingham Outer Housing Market Area. Aldergate believe that previously Hucknall was included within the Nottingham Core Housing Market Area but now has been excluded for “administrative reasons”. Its housing need must be met in Hucknall or same housing market area (especially given that it is said that each adjoining authority will only be meeting its own need - then it must be in Hucknall).
- 1.17 Aldergate recognise there may be complexities with overlapping HMAs within the same district, but this should not stop an authority recognising (when considering the best and most sustainable areas for growth) the relationship between one of its settlements and a key, accessible, higher functioning, settlement just outside of its boundary. That is simply robust, informed and proper planning.
- 1.18 Added to this, in 2021, Nottingham became one of the 20 authorities with a 35% ‘uplift’ in housing numbers to boost housing supply in sustainable areas.
- 1.19 Nottingham City Council will find it virtually impossible to meet the uplifted housing figure within its administrative boundary when it starts work on its next plan. Housing delivery in the functional Nottingham HMA and FEMA can start now by actively planning for greater housing delivery in Hucknall in this flawed Draft Local Plan.

- 1.20 Aldergate has an in-depth knowledge of the Ashfield housing market and is aware that market demand in Hucknall is higher than north Ashfield. Prices in Ashfield increase the closer you get to Nottingham and demand already exceeds supply. This position will only worsen with the Draft Local Plan as drafted. Hucknall will run out of supply.

The New National Planning Policy Framework December 2023

- 1.21 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."

- 1.22 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 September 2023).

2. The Spatial Strategy

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

- 2.1 The stated aim of the Council's 'Spatial Strategy' 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. However, the plan fails to support this stated aim.
- 2.2 The plan betrays a complete lack of ambition for the district and an abject 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, 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 NPPF 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 amongst the most deprived areas in the Country - within the top 25% of most deprived districts. 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 fails to grasp an opportunity to catch-up on previous housing under delivery and provide real growth to address the latent need.
- 2.10 The Council’s housing delivery record is historically woeful (having failed the Housing Delivery Test in the last three assessments, with delivery only at 74%, 66% & 65%. As a result, it remains a “presumption in favour authority” by the imposition of). This has been noted by the Government as Ashfield is one of only a few Authorities singled out for its poor performance in plan making.
- 2.11 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.

- 2.12 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, including its abysmal housing delivery record and resulting price and affordability issues for residents.
- 2.13 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.
- 2.14 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.
- 2.15 Considering the above, it is frustrating 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) and even then, only allocates sufficient sites to provide homes at that rate for less than the plan period. 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 may still come forward even when this target is met). This however is simply not good enough and to sit in hope that windfall applications will come forward to deliver more than the bare minimum housing currently identified, is not a positive strategy. That is particularly so given Ashfield's failure to meet its housing delivery targets over the last three assessments and its failure to allocate

enough sites to provide even that minimum for the whole plan period. 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.

- 2.16 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. That approach cannot be justified. The risk of under or non delivery of allocated sites will only exacerbate this shortfall. It is pertinent to note that, on the Councils own admission, a number of sites are only considered "potentially deliverable" and one is even noted as only "potentially available".
- 2.17 The Council seeks to explain however that this approach is in-line with NPPF paragraph 68 which states:

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 which are 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. The Council in this respect should be pro-active and allocate further land rather than hope the shortfall will be made up through windfalls. Linked to this the Council has confirmed that brownfield land is no longer available in Hucknall and this has been a major source of recent windfalls.

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 (responses are in bold 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 – ***On the Council’s own evidence there is not further brown field land available. 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 – ***Sites are available on the edge of Hucknall which capitalise on existing and planned public transport and active travel infrastructure and which are more sustainable.***
- 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 in 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 are available which are not the size of a new settlement. This point does not address years of under supply in housing and the resulting issues, nor does it bode well for the future of the Hucknall area in particular which is effectively strangled by Green Belt despite its obvious sustainability.***

- 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 period, 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 (to at least get closer to the full target than the Draft Local Plan currently does).***
- 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 homes 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 237 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 being met. Where there is a desperate need for affordable housing there is a strong justification to increase 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 (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 according to their own facilities and character 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. 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
Preferred Option	+	+/-	-/?	0	+	-/?	+/- /?	+ - /?	-/?	-	-	0/?	+/-	+ -/?	+	+	+
Standard Methodology 446																	
Flexible Buffer 535	+	+/-	-/?	0	+	-/?	+/- /?	+ - /?	-/?	-	-	0/?	+/-	+ -/?	+	+	+

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

Significant Negative Effect	The option detracts significantly from the achievement of the objective.	--
No Relationship	There is no clear relationship between the option and the achievement of the <u>objective</u> or the relationship is negligible.	~
Uncertain	The option has an uncertain relationship to the <u>objective</u> 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

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

2.26 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.

2.27 Aldergate 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 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.

2.28 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.”

2.29 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).

2.30 The scoring for the higher growth option shows negative impacts on ‘Natural Resources’ and ‘Travel and Accessibility’ objectives. However, the SA report confirms *“the magnitude of these effects is dependent on the location of development to some extent, and therefore some uncertainty remains at this stage.”*

- 2.31 Aldergate 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...(Hucknall is a highly sustainable location).
- 2.32 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.
- 2.33 Hucknall in particular has excellent public transport links between the cities of Nottingham and Derby (NET Tram, Bus and Robin Hood rail).
- 2.34 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.
- 2.35 It is Aldergate'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).
- 2.36 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).
- 2.37 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%
Total dwellings from allocations	5716	100%

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

- 2.38 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.
- 2.39 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.”*
- 2.40 Aldergate 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. Aldergate would say that proper consideration of sites within the Green Belt which do not meet the key Green Belt functions would lead to sustainable sites being released. 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).
- 2.41 Surrounding Greater Nottingham Authorities have met their growth needs through strategic reviews of their Green Belt boundaries and a similar approach should be applied in Ashfield.

- 2.42 In conclusion, Aldergate have 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. Aldergate does not agree with the strategy put forward in the Draft Local Plan and the resultant Policy S7 which sets out the housing figures.
- 2.43 Overall, Aldergate, 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)

- 2.44 Aldergate is pleased to see that the Council has dropped its previous approach of allocating two undeliverable new settlements in the Green Belt for housing delivery. Unsurprisingly the previous approach was hugely controversial locally with fears of heavily increased traffic and under provision of infrastructure. It soon became clear that this was not the most sustainable approach to deliver much needed housing in a timely manner. It must now focus on strengthening its existing and most sustainable centres with housing and employment growth. Strategic Policy S1: Spatial Strategy to Deliver the Vision Section 9 a) is supported by Aldergate as it identifies Hucknall as a 'Main Urban Areas to accommodate the largest scale of growth'. This is considered a sustainable approach to development delivery as it focuses growth in an

area which already has a high level of existing services and facilities thereby supporting active travel and reducing travel patterns requiring the use of a private car. However, the execution of the policy does not reflect the spatial strategy, directing only 28% of the housing need to Hucknall. The existing adopted Local Plan of 2002, in line with the then Structure Plan, directed around 40% of the Ashfield housing requirement to Hucknall recognising its status within the South Nottinghamshire Sub Area. While the housing market areas may have altered, the functional relationship between Hucknall and Nottingham has not, and the identified housing allocation do not reflect the spatial aim of direct the majority of growth to the most sustainable locations.

- 2.45 It is clear that there are other suitable sites available now in Hucknall which would allow the Council to deliver more housing thereby having a significant positive effect on the economy as identified in its SA. It is a concern that some of the housing allocations identified e.g. HK051 are identified as only 'potentially achievable' and that it is understood to be in multiple ownership. In this context we must question the deliverability of the site and its inclusion in the plan.
- 2.46 The Background Paper 1: 'Spatial Strategy and Site Section' sets out that *'Hucknall is one of three towns in the District with its own services and facilities. It has excellent public transport connectivity (bus, train and NET tram) and a close economic relationship with Nottingham City. The Council believes that there are exceptional circumstances to allocate sites in this area based on the proximity of Hucknall to Nottingham and the sustainability benefits that are associated with this on a strategic level such as access to education, skills and jobs in the City, as well as the frequency and availability of public transport. There are also opportunities to continue to improve the infrastructure in and around Hucknall as a result of these allocations.'* However the document fails to consider developable land associated with Common Lane, instead, amalgamating field parcels into a single SHELAA site (HK047), which it dismisses without further consideration despite recognising its 'relatively low' overall Green Belt harm. This represents a significant omission in the evidence base that fails to justify the plan.

3. Land off Common Lane, Hucknall

- 3.1 To reiterate, it is Aldergate’s view that the Draft Local Plan does not fully recognise Hucknall’s sustainable location. It is uniquely placed close to Nottingham with its existing infrastructure. There are direct links to Nottingham (NET, rail & bus) which provide access to the city’s wider range of services and facilities (including employment).
- 3.2 Furthermore, Hucknall (as explained in the introduction section to this representation) sits within the functional HMA and FEMA of the Nottingham Core HMA. This has not been recognised in the Draft Local Plan which severely compromises the Council in delivering properly evidenced (necessary) sustainable growth.
- 3.3 In addition, it is noted that a new £15.7m office building between Hucknall and Linby (at Top Wighay Farm) has been approved (this will include the new Head Quarters for Nottinghamshire County Council) This will create further demand for housing. There is no reference in the supporting evidence that the Council has considered this in its Draft Local Plan. As a means of delivering further housing at Hucknall, Aldergate respectfully requests the Inspector to consider its site at Land off Common Lane, Hucknall – see Figure 1 below showing site:



Figure 1: Proposed Site Location Plan (redline denotes land submitted now for consideration whilst the blue shows other land under the same control)

- 3.4 At this point it should be noted that there is limited scope for brownfield development in Hucknall so growth into the Green Belt is inevitable. As explained above however, the decision to build in the Green Belt has already been taken by the Council and Hucknall can sustain further development in the Green Belt whilst leaving large areas of it remaining.
- 3.5 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 Hucknall (helping to address existing social and economic issues).
- 3.6 Full details can be found for the site in the 'Promotion Document' at **Appendix 1** of this representation.
- 3.7 It explains that it is a highly deliverable site that can be brought forward in the short to medium term as a comprehensive development, or in parcels.
- 3.8 The site is closely related to the settlement pattern of Hucknall and in walking distance to a range of local services, whilst being located on a good public transport corridor.
- 3.9 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. It should be noted that the inclusion and enhancement of green space linkages, landscaping and blue infrastructure is key to the concept masterplan as it adds variety to the public realm and encourages a sensitive transition between the urban fringe and its rural hinterland.

Strategic Housing and Employment Land Availability Assessment (SHELAA)

- 3.10 The site is assessed in the Council's current (2023) Strategic Housing and Employment Land Availability Assessment (SHELAA). Figure 2 below is a map extract from the assessment showing the reference numbers:



Figure 2: Hucknall SHELLA sites

- 3.11 As shown in Figure 2 above, the corresponding numbers for Aldergate's site are HK002 and part of HK047.
- 3.12 The site assessment for HK002 confirms that the site is 'Potentially Available'. In terms of whether the site is 'Suitable' the assessment states:
- The site is potentially suitable. (forms part of HK004)
 - The site is located in the Green Belt and as such it is necessary to demonstrate that there are exceptional circumstances for the site to be taken out of the Green Belt.
 - Highway comments identify that the site should not be developed in isolation.
 - To the northeastern boundary of the site ground levels increase substantially to form a steep slope forming the rise to Leivers Hill and consequently not all the site area is potentially developable.

3.13 In response to these points Aldergate would say:

- Aldergate would agree 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.
- Highway comments are incorrect and appear to relate to the whole of HK047.
- Topography is covered in the submitted 'Promotion Document' at **Appendix 1**, and again seems to erroneously refer to the whole of Aldersgate's ownership.

3.14 Under 'Achievability' the assessment states:

"The site is assumed to be 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."

3.15 The site assessment for HK047 (the form refers to it as a composite site of - HK001, HK002, HK003 & HK004 and an additional area) confirms that the site is 'Potentially Available'. In terms of whether the site is 'Suitable' the assessment states:

- The site is potentially suitable.
- The site is located in the Green Belt and as such it is necessary to demonstrate that there are exceptional circumstances for the site to be taken out of the Green Belt.
- Highway comments identify that the site should not be developed in isolation. The site includes a Local Wildlife Site and Leiver's Hill and land to the north of the LWS is a Priority Habitat - Lowland Dry Acid Grassland. Any potential development will need to take into account the scope to avoid or mitigate any impacts on biodiversity.
- Severn Trent have identified that network improvements to the foul sewers is likely to be required.

3.16 In response to these points Aldergate would say:

- Aldergate would agree that the site is suitable.
- Again, Green Belt sites are already allocated in the Draft Local Plan so the case for exceptional circumstances has already been made.
- Again these comments appear to relate to the whole site. The Local Wildlife Site is outside of the proposed development boundary. Biodiversity and landscape are covered in the submitted 'Promotion Document' at **Appendix 1**.
- Many new developments require utility upgrades, and this is not a barrier to development. It is noted that similar comments have been made in respect of a number of sites allocated in the plan.

3.17 Under 'Achievability' the assessment states:

"The site is assumed to be 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."

3.18 It is unclear why most of the Hucknall sites allocated in the Draft Local Plan are designated in the SHEELA as 'available' and Aldergate's sites identified above are 'potentially available'. To be clear, as set out in the submitted 'Call for Sites' forms, Aldergate's sites ARE available now. The word 'potentially' is not required in the SHEELA site analysis.

Green Belt Harm Assessment 2023

- 3.19 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.
- 3.20 Figure 3 below is a map from the study, and it shows that Aldergate's site is within site reference HK047. Please note however that this is larger than the parcels promoted now (as identified in Figure 1 above).

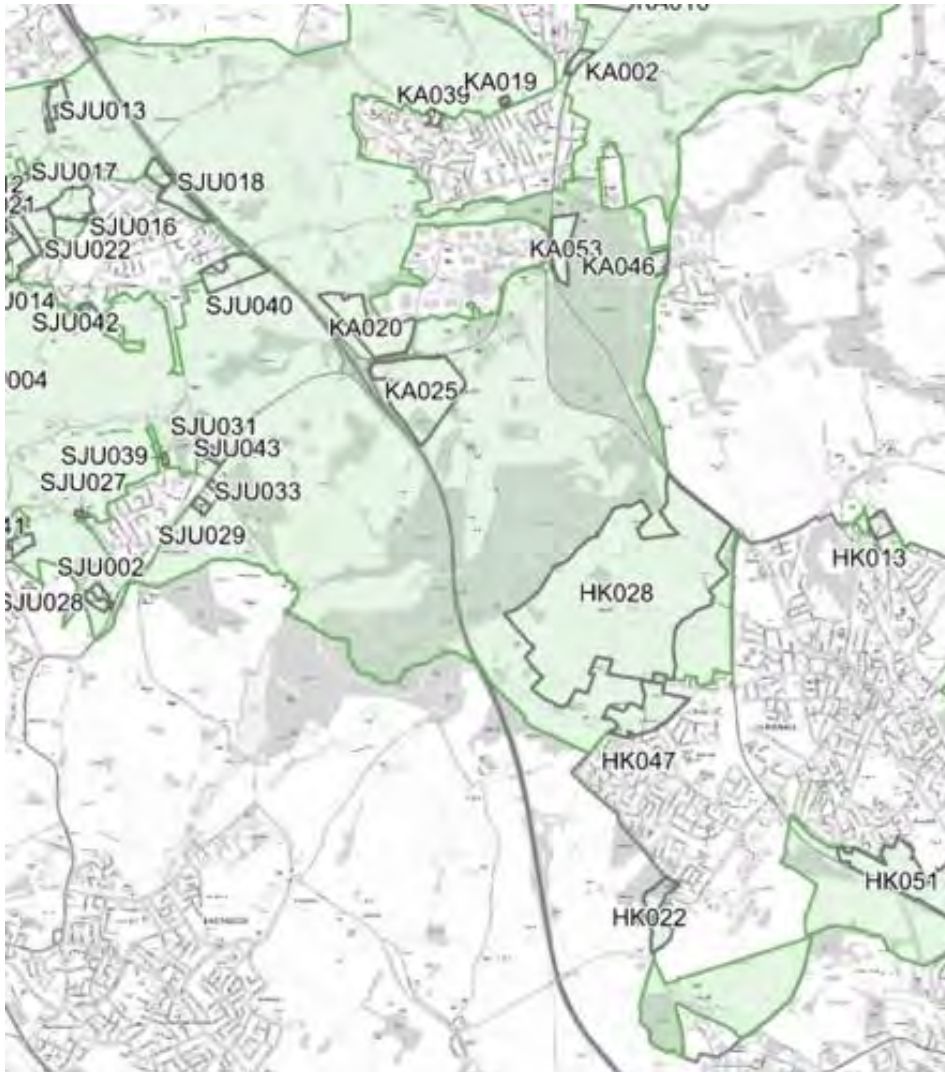


Figure 3: Map from Green Belt Harm Assessment 2023

3.21 Table 3 below sets out the findings for of the Green Belt Harm Assessment in relation to sites in Hucknall:

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)
HK013	Linby Boarding Kennels, East of Church Lane	3.32	Release of HK013 as an expansion to Hucknall North	Relatively High	High	Relatively High	Relatively Low	N/A	15	Relatively High	H01 / 2*
HK022	Land adj. Stubbin Wood Farm, Watnall Road	8.82	Release of HK022 as an expansion to Hucknall South/West	Relatively Low	Low	High	Low	N/A	9	Relatively Low	H08 / 1 & 2*
HK028	Whyburn Farm	205.80	Release of HK028 as a New Settlement	High	Moderate	Relatively High	Low	N/A	13	Moderate	HK09 / 16 (New Assessment in Appendix 2)
HK046	West of Moor Road, Bestwood	5.95	Release of HK046 as an expansion of Bestwood North	Relatively High	High	Moderate	Low	N/A	13	Moderate	Part of H04 / 1*
HK047	Common Lane, Hucknall (Site includes HK001, HK002, HK003 & HK004)	17.69	Release of HK047 as an expansion of Hucknall North/West	Moderate	Low	High	Low	N/A	10	Relatively Low	Majority of H09 / 4*
HK051	Land north of A611/south of Broomhill Farm (Site includes HK016, HK034, HK043 & HK050)	31.02	Release of HK051 as an expansion of Hucknall South	Low	Moderate	Relatively High	Low	N/A	9	Relatively Low	H05*

Table 3: Findings for the Green Belt Harm Assessment

- 3.22 It shows that the overall harm to the Green Belt if site HK047 was released as an extension of Hucknall North West would be 'relatively low' (again note that the parcels being promoted now are even smaller than the whole of HK047 meaning the actual harm would be even lower). It is noted that the other sites identified as 'relatively low' are allocated in the Draft Local Plan. It is unclear why a smaller version of HK047 hasn't been.

Overall Site Assessment

- 3.23 Paragraph 8.16 of 'Background Ground Paper 1: Spatial Strategy and Site Selection states:

"The majority of the remaining sites which have not been put forward as allocations are located within the existing Green Belt and are listed in Appendix 3. The Green Belt Harm results (see Chapter 7) were considered in addition to site location attributes and other key constraints, e.g., flooding issues and wildlife sites, in determining those most appropriate for Green Belt release to meet local needs in the Named Settlements and Hucknall. The Council resolved to keep Green Belt release to that which is necessary to maintain and enhance local services and provide for the needs of the community, whilst minimising the impacts on the purpose and openness of the Green Belt."

- 3.24 Table 4 below is an extract from 'Appendix 3' of Background Paper 1 showing the unallocated Hucknall Green Belt sites.

SHELAA site ref.	Site Name	Potential Yield (dwellings)
HK046	West of Moor Road, <u>Bestwood</u>	152
HK047	Common Lane, Hucknall	318

Table 4: SHELAA Sites – Unallocated Green Belt Sites

- 3.25 The above is hugely frustrating for Aldergate as it shows the Council’s site analysis to be rushed, incomplete and effectively ‘half a job’. As explained above, site HK047 is a far larger piece of land than that currently proposed for development by Aldergate. Sites proposed by Aldergate cover HK002 and only a small part HK047.
- 3.26 This makes the area of development proposed by Aldergate far smaller and only a part of HK047. As such, Aldersgate’s sites have not been properly considered. If they had been, it would be clear that there are no LWS or flooding issues with their parcels of land. Moreover, any harm to the Green Belt would be even less (even than that identified for the larger HK047 site – which is already ‘relatively low’).
- 3.27 It is unclear how many times this has happened elsewhere in the site selection process, but Aldergate would say that it is only fair that the Council steps back and does the analysis properly and thoroughly.

4. Conclusion

- 4.1 These representations have set out why Aldergate do 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 Hucknall is a highly sustainable location for growth due to its proximity to the city of Nottingham. The Draft Local Plan fails to recognise this and does not allocate enough growth and development to the settlement.
- 4.3 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.
- 4.4 Aldergate agree with the Council that 'Exceptional Circumstances' do exist to release land from the Green Belt for development.
- 4.5 The Land off Common Lane is a highly deliverable site that can be brought forward in the short to medium term as a comprehensive development.
- 4.6 There are issues and anomalies in the Council's site selection process including that of the SHELAA and the Green Belt impact assessment.



Appendix 1 – Promotion Document



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