



## Ashfield District Local Plan Examination

P&DG on behalf of Aldergate Property Group

Hearing Statement: Matter 3 –  
The Spatial Strategy and the Distribution of Development

## Quality Control

<b>Project No.</b>	21.113			
<b>Client</b>	Aldergate Property Group			
<b>Title</b>	Ashfield District Local Plan EiP: Matter 3 Hearing Statement – The Spatial Strategy and the Distribution of Development			
<b>Location</b>	Land off Common Lane, Hucknall			
<b>File Ref</b>	21.113 ADC EiP Matter 3 Hearing Statement			
<b>Issue</b>	Date	Prepared By	Reviewed By	Authorised By
1.	October 2024	DH	enter initials	enter initials

## 1.0 Introduction

- 1.1 This Hearing Statement sets out submissions made by Planning and Design Group (UK) Ltd on behalf of Aldergate Property Group.
- 1.2 They are submitted in response to the 'Matters, Issues and Questions' (MIQs) for the Ashfield District Local Plan Examination. This statement specifically relates to Matter 3 – The Spatial Strategy and the Distribution of Development.
- 1.3 This statement should be read in conjunction with our previous representations and supporting evidence that has been submitted throughout the Ashfield District Local Plan consultation process.
- 1.4 Aldergate own 'Land off Common Lane, Hucknall' that is not currently allocated within the emerging Local Plan. However, it is subject of an outline planning application for up to 100 no. dwellings under planning application reference (ref: V/2024/0288).

## 2.0 Matter 3: The Spatial Strategy

**Issue 1 – Whether the Spatial Strategy and the distribution of development are justified and can be accommodated without releasing land from the Green Belt? If not, do exceptional circumstances exist that would justify altering the Green Belt boundary?**

### **Spatial Distribution of Development**

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

- 2.1 Aldergate Property Group have consistently raised concerns with regards to the proposed spatial distribution of development across the Borough throughout the Local Plan consultation process. It is considered that the spatial strategy is not fully justified and that there are a number of fundamental flaws that need to be addressed.
- 2.2 The spatial strategy does not sufficiently recognise the functional relationship that parts of the District shares with the city of Nottingham, such as Hucknall. Hucknall shares a strong and well-established functional relationship with the city of Nottingham with sustainable public transport links to and from the city. This includes the NET tram service and the Robin Hood Rail Line with a station in Hucknall and direct connections into Nottingham.
- 2.3 The Local Plan does not, however, direct enough housing growth towards Hucknall (less than 30%), despite the excellent connectivity (public transport and infrastructure links) and reliance on the city of Nottingham for employment and local services and facilities. It is considered that the failure to recognise Hucknall as a sustainable location that can accommodate a larger proportion of housing growth in the plan period is a fundamental flaw in the spatial strategy. Additionally, it is a significant missed opportunity to deliver genuinely sustainable development.
- 2.4 In respect of the above (and as set out in our response to Matter 2), clearly the emerging Local Plan falls short in meeting the District's housing needs over the plan period, which will need to be addressed as part of the examination process. It is clear that additional allocations will need to be identified within the District. In that

respect, the proposed spatial strategy is not effective enough to be able to identify a sufficient number of sustainable development sites and must be revisited. It would, therefore, be prudent for the Council to look towards the most sustainable areas, such as Hucknall, to identify additional housing allocations.

### **3.6 Is the settlement hierarchy set out in Policy S1 Justified?**

- 2.5 On the basis of the above, it is considered that the settlement hierarchy set out in Policy S1 is not fully justified as it does not take into account the functional relationships that areas of the District, such as Hucknall, share with neighbouring authorities. It is considered that the spatial strategy must recognise the role that Hucknall plays in the wider Nottingham Core HMA and allocate additional housing allocations in Hucknall accordingly.

### **Green Belt**

### **3.9 What proportion of new housing and employment proposed in the Plan would be on land currently designated as Green Belt?**

- 2.6 Aldergate Property Group support the principle of releasing Green Belt land in order to meet the District's housing requirements over the plan period.
- 2.7 It is considered there are exceptional circumstances within the District to justify the release of Green Belt land. Given the scale of land in the District that is subject to the Green Belt designation (particular around Hucknall) and the very limited availability of brownfield land. There is no reasonable alternative to deliver the District's housing requirement without the release of land within the Green Belt. Additionally, the authority has spent a substantial amount of time without an up-to-date development plan, which has resulted in a historical under delivery of housing that must be addressed in the preparation of the new Local Plan.
- 2.8 Given the above, Aldergate Property Group question why the Council is not proposing to release further Green Belt land to fully meet its housing requirement over the plan period. This approach has not been fully justified and must be addressed as part of the examination. The Council have clearly found it appropriate to release Green Belt land to deliver housing yet there is a current shortfall of 882 dwellings within the current version of the Local Plan.

2.9 There are clear opportunities in the District for further Green Belt land release that would have limited impact on the purposes of retaining it as such. For example, Aldergate Property Group own 'Land at Common Lane Hucknall' that forms part of the 'HK047 – Common Lane, Hucknall' assessment area in the Council's Stage 2 Green Belt Harm Assessment. The assessment concludes that the overall harm rating of taking the site out of the Green Belt is 'relatively low'.

2.10 In releasing Land at Common Lane, Hucknall from the Green Belt, there is substantial opportunity to provide mitigation measures, such as additional landscape planting and green infrastructure network, improve public access to the open countryside and deliver biodiversity enhancements. These measures will ensure that the impacts of releasing land from the Green Belt are minimised and the benefits fully realised.

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

2.11 In respect of Paragraph 143(e) of the NPPF it is clear that the approach taken by Ashfield District Council needs to be revisited as a matter of urgency for the plan to be found sound. Given the recognised shortfall of 882 dwellings, it is clear that the Council will need to release further land from the Green Belt to ensure consistency with the NPPF.

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

2.12 As noted above, it is considered there are exceptional circumstances within the District to justify the release of Green Belt land. Given the scale of land in the District that is subject to the Green Belt designation and the limited availability of brownfield land. There is no reasonable alternative to deliver the District's housing requirement without further release of the Green Belt.

2.13 The Greater Nottingham Core Strategy, which covers Broxtowe, Gedling and Nottingham City was found sound on the basis of the exceptional circumstances that justified Green Belt release. The subsequent part 2 plans for each of those

authorities were also found to be sound on the basis that there were exceptional circumstances to justify Green Belt release to accommodate housing needs. Rushcliffe Borough Council also produced a sound development plan predicated on the exceptional circumstances to justify Green Belt release. Erewash Borough Council and Amber Valley Borough Council are also at EiP with plans that seek to release Green Belt based on the exceptional circumstances that apply. The nature of urban hinterland Green Belt authorities with tightly drawn historic Green Belt boundaries and urgent housing needs ensures that the exceptional circumstances to release Green Belt exist. It would be untenable to consider that every other authority within the Nottingham-Derby Green Belt has had to release Green Belt to accommodate housing needs but for Ashfield to be the exception.



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