



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

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Client	Aldergate Property Group			
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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 Ltd in response to the 'Matters, Issues and Questions' (MIQs) for the Ashfield District Local Plan Examination.
- 1.2 This statement specifically relates to Matter 3 – The Spatial Strategy and the Distribution of Development and has been updated to respond to the Inspectors Additional Matters, Issues and Questions (INS03A). For ease of reference, the additional responses are highlighted in [blue](#).
- 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). This application is now subject to a non-determination appeal (ref: APP/W3005/W/25/3369440).

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.

3.1.1 What effect would the proposed additional sites have on the distribution of new housing development across the plan area?

- 2.5 As noted above, Aldergate Property Group have consistently raised concerns with regards to the proposed spatial distribution of development across the District through the Local Plan consultation process.
- 2.6 In particular, the spatial strategy directs a smaller proportion of growth toward Hucknall relative to other main urban areas in the District. It is close to Nottingham and its employment opportunities. The spatial strategy, therefore, fails to fully recognise the sustainability of Hucknall and its capability of accommodating further growth over the plan period.
- 2.7 The proposed additional housing sites are focused solely within the Sutton area and Kirkby area with no additional sites identified within Hucknall. The Council's approach, therefore, further exacerbates the concern that insufficient growth is being directed towards the main urban area of Hucknall.
- 2.8 Indeed, the revised housing supply figures including the additional housing sites would result in 3,846 dwellings being directed to the Sutton area with only 1,189 dwellings in Hucknall. This represents an uneven distribution of development across the plan area, which the Council must remedy by identifying further sites within the Hucknall area.
- 2.9 The Council have not provided any evidence to demonstrate that they have properly considered the potential for additional housing sites in Hucknall, or an explanation of why sites in Hucknall have been discounted. The potential for Hucknall to accommodate a proportion of the housing shortfall over the plan period has not been fully explored by the Council, resulting in an uneven distribution of development across the plan area towards other main urban areas.

3.1.2 Is the Spatial Strategy effective having regard to the scale and location of the proposed additional sites?

- 2.10 As noted above, For the same reasons as set out above, it is considered that the spatial strategy is ineffective because it distributes a smaller proportion of development to Hucknall relative to other main urban areas. The spatial strategy does not therefore fully recognise the sustainability of Hucknall as a location for residential development or its access to high level jobs in Nottingham City..
- 2.11 There are no proposed additional sites within Hucknall, and therefore, this exacerbates the concerns and further demonstrates that the spatial strategy is ineffective and is avoiding areas of the District that are genuinely sustainable and capable of accommodating additional growth.
- 2.12 Hucknall is a sustainable location that can accommodate additional growth and help address the identified shortfall, which must be recognised for the spatial strategy to be effective.

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

- 2.13 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?

- 2.14 Aldergate Property Group support the principle of releasing Green Belt land in order to meet the District's housing requirements over the plan period.
- 2.15 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 (particularly 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.

- 2.16 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.
- 2.17 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'.
- 2.18 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?

- 2.19 In respect of Paragraph 143(e) of the NPFF 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 NPFF.

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?

- 2.20 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.
- 2.21 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.

3.19 Is the Spatial Strategy effective if any further proposed sites would be required to be released from the Green Belt?

- 2.22 There is little evidence to demonstrate that further Green Belt release will not be required by the end of the plan period. As noted, the plan lacks sufficient flexibility and does not include any contingency, or buffer should housing delivery fail. As a result, the strategy cannot respond effectively to changing circumstances or higher housing requirements.
- 2.23 It is also pertinent that Ashfield District Council is now subject to increased housing targets under the revised standard method following the publication of the NPPF

(December 2024). This is likely to necessitate additional Green Belt release at the end of the plan period. There is no evidence within the current evidence base to show that the plan has adequately accounted for or mitigated this risk, as required by Paragraph 143(e) of the NPPF (September 2023).

- 2.24 The Green Belt represents a significant constraint to development within the District, particularly around Hucknall, which must be addressed by the Council. The continued reliance on an untested spatial strategy fails to demonstrate how the proposed approach will future proof the plan against the need for further Green Belt release. Consequently, the strategy is not consistent with national planning policy, nor is it justified or effective.
- 2.25 Furthermore, the current consultation appears to address only one of the concerns raised by the Inspectors following Week 1 of the Examination Hearing Sessions. It is not supported by proportionate evidence to justify the Council's approach, and the proposed additions do not resolve the fundamental weaknesses in the Spatial Strategy. Therefore, the submitted plan cannot be considered sound.

3.20 Is the release of Green Belt land necessary to address the shortfall in housing across the plan period.

- 2.26 Aldergate Property Group consider that the release of further Green Belt land is necessary to address the housing shortfall across the plan period. The presence of the Green Belt in the District is a key constraint that is limiting the Council's ability to effectively and sustainably address its identified housing needs in full over the plan period.
- 2.27 Indeed, the Council's preferred spatial strategy has been heavily influenced by the presence of the Green Belt. The dispersed development strategy seeks to allocate sites of less than 500 dwellings, and also seeks to preserve the green belt. There is no doubt that this is largely politically motivated rather than on any sound planning justification.
- 2.28 As noted in our response to Matter 2, it is our view that the Council have not properly addressed the housing shortfall through the proposed additional housing sites. The justification for the identification of the additional housing sites is questioned including whether they are genuinely available, suitable, deliverable and

at the capacities stated. The sites that have been identified are small brownfield sites or existing commitments with a single new greenfield site. This would suggest that the Council have now exhausted their suitable and available non-green belt sites.

- 2.29 In order to remedy this, the Council must, therefore, look to release further green belt land as part of the emerging Local Plan. There are clear opportunities for low-impact Green Belt release within the district. Land at Common Lane, Hucknall (HK047), owned by Aldergate Property Group, has been assessed in the Council's Stage 2 Green Belt Harm Assessment as causing 'relatively low' overall harm if released. Mitigation measures, including landscape planting, green infrastructure improvements, enhanced public access, and biodiversity enhancements, would minimise impacts and maximise benefits.

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