Ashfield District Local Plan Examination

P&DG on behalf of Aldergate Property Group

Hearing Statement: Matter 10 - Site Allocations

Quality Control

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Client	Aldergate Property Group			
Title	Ashfield District Local Plan EiP: Matter 10 Hearing Statement – Site allocations			
Location	Land off Common Lane, Hucknall			
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1.0 Introduction

1.1 This statement responds to Matter 10 of the Ashfield District Local Plan Examination, focusing on the proposed site allocations and their justification, deliverability, and development timeline. This submission builds upon previous responses regarding spatial strategy and housing needs, providing an in-depth analysis of the Plan's approach to site allocations and their consistency with sustainable development principles.

1.2 This statement has been updated to respond to the Inspectors Additional Matters, Issues and Questions (INS03A) and in particular the additional housing allocations. 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 Property Group ("Aldergate") own "Land off Common Lane, Hucknall' that is not currently allocated within the emerging Local Plan. It comprises land considered in the SHELAA as Sites A (HK001), B (HK002), C (HK003) and D (HK004).

1.5 Part of the site (Sites HK 001 and HK 002) is subject of an outline planning application for up to 100 no. dwellings under planning application reference (ref: V/2024/0288). This application is a resubmission of an earlier application which was refused solely on Green Belt grounds (see Decision Notice attached). This application is now subject to a non-determination appeal (ref: APP/W3005/W/25/3369440).

2.0 Matter 10: Site Allocations

Issues and Responses

Issue 1: Approach to Site Allocations and Site Selection

It is not clear how Ashfield has determined which sites should be selected as proposed allocations. See our comments below under "Hucknall Sites". There are a number of sites noted in the SHELAA as "potentially deliverable", "potentially available" or "potentially suitable". Some of those sites are proposed allocations and one of those is a large site of more than 23 hectares (Land north of A611 /South of Broomhill Farm, Hucknall) which is noted as having ground stability concerns with a major fault line running through it (Allocation H1Hc SHELAA site reference HK 016).

We are not aware that the potential issues with these sites have been resolved, but in respect of the Aldergate land at Common Lane, the short-term tenancy noted does not affect delivery or availability (see enclosed Letter from Fisher German).

The Council's approach to site allocations does not adequately address the need for a balanced and sustainable distribution of housing across the District. There is an over-reliance on large sites, which have not yet secured planning permission. This raises concerns about the deliverability of these sites and the Council's ability to meet housing needs.

Aldergate strongly believe that the allocation strategy should be revised to ensure a more effective and fairer distribution of development. Land at Common Lane, Hucknall, is an example of viable sites that has been overlooked. Hucknall is a highly sustainable location with excellent connectivity and a strong functional relationship with Nottingham. Allocating land here would allow the Council to distribute growth more evenly and support genuinely sustainable development, rather than focusing disproportionately on constrained areas.

Issue 2: Requirements for Larger Sites Without Planning Permission

The Plan places considerable emphasis on large sites that currently lack planning permission. This reliance is problematic as it introduces significant risks regarding

delivery, including uncertainty around timescales, viability, and market interest. The Housing Land Supply Position Statement indicates a shortfall against the Local Housing Need, yet the Plan relies on sites without planning permission to fill this gap.

The absence of a coherent and realistic approach to the timely delivery of these larger sites is a major concern. Aldergate proposes that the Council should diversify its allocation strategy to include smaller, more readily deliverable sites, particularly in the Hucknall area. This would mitigate the risks associated with relying on large, unconsented sites. Land at Common Lane, Hucknall, is an example of a smaller site that could be developed promptly, providing certainty of delivery and contributing to a more effective housing land supply.

Issue 3: Hucknall Site Allocations

The site allocations in Hucknall are insufficient given the area's strategic importance and capacity to support sustainable growth. Despite Hucknall's strong infrastructure and connectivity to Nottingham, the Plan allocates less than a quarter of the total new housing to this area, which undermines the potential for sustainable development.

Hucknall is the only sub regional centre in Ashfield and is recognised within the Reg 19 Greater Nottingham Strategic Plan as a highly sustainable location and which lies within the functional housing market area of Nottingham. We also note that the Hucknall area of Ashfield was previously included within the Core Housing Market area. Aldergate have objected to Hucknall's exclusion from the Nottingham Core HMA and observe that the decision to exclude Hucknall, seemingly for administrative (because Hucknall falls within the boundary of Ashfield) reasons is unsound and unjustified.

That exclusion is not because Hucknall is no longer part of the core HMA because it is clear from the background papers to the Reg 19 GNSP that Hucknall continues to function as part of the core Nottingham HMA.

Hucknall is well placed with Tram access to a range of jobs and higher education facilities in Nottingham City. The GNSP includes a strategic allocation adjacent to Hucknall (Top Wighay Farm - which lies on Gedling Borough), in recognition of

Hucknall's sustainability credentials but it is important to take into account that this site is not intended to serve Hucknall housing need but that of Gedling. Gedling has confirmed that it will only seek meet its own housing need and that it cannot meet the need of its neighbouring authorities. Gedling has now withdrawn from the GNSP and the Top Wighay Strategic allocation may be in doubt.

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There are concerns that sites in and around Hucknall have not been adequately considered. Whilst the S.A. contains an assessment of sites, it is not clear how those assessments were utilised to select the Hucknall allocations.

We enclose a table which uses all of the data in the recently added SA Excel spreadsheet (Document ADC 08 in the Examination Library). This table uses incorporates a "score" & "ranking" for each of the allocated and "reasonable alternative" sites.

The scores are derived from inputting numeric values to the Traffic Light system of the SA (Green Amber Red) conclusions across all sites data. This includes all of the Red Amber Green boxes (proximity to schools, post offices etc) set out in Document ADC 08, rather than the much more limited sample boxes used in Appendix H of the S.A. (Document SD.03i).

A Dark Green box (double +) is scored as 2, a Light Green box is scored as 1, whilst an Amber box is -1 and Red box (double "-") is counted as –2.

Using this method allows comparison across the sites and as shown in the table, that many of the "reasonable alternatives" rank higher than most of the "allocated" sites.

Aldergate believe that allocating additional land in Hucknall would better meet local and strategic housing needs. The land at Common Lane is ideally placed to contribute to this growth, with a low impact on the function of the Green Belt and significant potential for mitigation, including enhanced green infrastructure and biodiversity improvements. By increasing allocations in Hucknall, the Council could help ensure that the Plan is positively prepared and aligned with the principles of sustainable development.

The Plan also fails to provide any "safeguarded land" and that is considered to be an unsound particularly for Hucknall which is essentially strangled by Green Belt such that it is inevitable that the limits of the Green Belt will need to be further amended at the end of this Plan's period.

Issue 4: Kirkby and Sutton Site Allocations

While the Plan directs significant development to Sutton-in-Ashfield and Kirkby-in-Ashfield, the approach to site selection lacks transparency and does not fully take into account the functional relationships between settlements and their surroundings. The emphasis on large, unconsented sites in these areas presents delivery risks, especially given the limited progress towards securing permissions. In addition, Aldergate have concerns that the definition of the urban areas of Sutton and Kirkby is too widely drawn to include what are in reality smaller settlements with more limited facilities.

Aldergate suggests that the allocation strategy should be revisited to include sites that are not subject to the same planning and environmental constraints. Allocating additional sites, such as Common Lane, would provide a more balanced approach, reducing over-reliance on a few large sites and ensuring a steadier supply of housing in the right place throughout the plan period.

Issue 5: Employment Allocations

The proposed employment allocations at Junction 27 of the M1 are intended to support economic growth, but the associated housing provision does not sufficiently reflect the scale of employment land being brought forward. There is a clear disconnect between employment and housing growth.,

Allocating additional housing in Hucknall, which is well connected to employment opportunities both within Ashfield, including at Junction 27, and in Nottingham, would help to address this imbalance. A more integrated approach to employment and housing allocations is required to support sustainable economic growth and meet the needs of both businesses and residents.

National Policy Alignment

The National Planning Policy Framework (NPPF) requires Local Plans to allocate sufficient sites to meet identified housing needs in a way that supports sustainable development. The current Plan's over-reliance on a few large sites fails to meet this requirement. By not allocating enough land in Hucknall, the Council misses an opportunity to provide sustainable, well-connected development that aligns with the principles set out in the NPPF.

Although this Plan is examined by reference to the September 2023 NPPF, it is in our view entirely appropriate to have regard to the new NPPF that was published on 12th December 2024. This places an even greater emphasis on housebuilding to meet the Government's aim of building 1,500,000 new homes. Critically, this includes Paragraph 155 that states that the development of homes in the Green Belt should not be regarded as inappropriate where it would utilise 'grey belt', there is a demonstrable need for the type of development proposed (i.e. lack of five-year supply of deliverable housing sites) and where the development would be in a sustainable location.

Aldergate believe that the Plan must be revised to allocate additional, deliverable sites in sustainable locations such as Hucknall. It should also allocate "safeguarded" land particularly around Hucknall which is entirely surrounded by Green Belt, where it is inevitable that further GB amendments will be necessary at the end of the Plan period, and to ensure that sustainable development can continue in a highly sustainable "first tier" settlement.

Matter 10 – Additional Site Allocations

Aldergate Property Group's overarching concern is that the Council have not provided robust and justified evidence to demonstrate that all of the proposed additional housing sites are genuinely available, deliverable and suitable in accordance with the NPPF. This is set out further in our Matter 2 statement (Question 2.7.1).

Indeed, five of the proposed additional housing allocations are brownfield sites that were previously discounted by the Council. However, the Council have not provided

any justification to now support the allocation of these sites. This is pertinent given the fact that the Council have previously stipulated that all available and developable brownfield sites had been allocated (please refer to Background Paper 1 Spatial Strategy and Site Selection Paragraph 11.2). The justification for these allocations is, therefore, questioned.

Additionally, the Council have only identified one new greenfield site for allocation at Beck Lane South, Skegby for 106 dwellings. The Council note in the consultation document that this site was previously not taken forward due to access constraints. However, subject to a satisfactory position being reached with a third party and the County Council's highways department (our emphasis added) they now envisage that the land is available in the medium term. There is, therefore, a question mark as to whether the site access constraint can be resolved, which has not yet been fully justified or evidenced.

The remaining sites are all either existing or new commitments or have a resolution to grant subject to the signing of a Section 106 agreement. As such, they are not positive decisions made by the Council to address the identified housing shortfall in a meaningful way. A process that should have involved a considered identification of additional sites across the settlement hierarchy in accordance with the spatial strategy.

It should be noted that of those commitments, 90 homes at Radfords Farm, Dawgates Lane in Sutton-in-Ashfield has been identified. This site was approved by the Council despite the Officer's recommendation for refusal due to the highway impact including unsafe access, unsustainable location, increased traffic risk and inadequate mitigation measures. The Officer also cited the significant harm to the character and appearance of the surrounding area through the visual impact of the built form on green fields and the further encroachment of development into the open countryside. The approval of this site and its subsequent allocation completely undermines the planning and local plan process.

This is particular pertinent when there are sites, such as Common Lane, Hucknall, that are entirely appropriate for residential development other than the fact that they are currently within the Green Belt. The site does not have any highway issues, nor would it result in significant harm to the character and appearance of the surrounding area.

As set out in our response to Matter 3, the additional housing sites identified by the Council do not include any sites within Hucknall, which further contributes to our concern that the sustainability of Hucknall is not being fully recognised by the Council.

The presence of the Green Belt is a key factor that is influencing this decision, which is resulting in the Council directing development to less sustainable areas of the District outside of the Green Belt. The Council have not provided any evidence or justification to explain why the Hucknall area was not considered for additional housing allocation.

Conclusion

Aldergate strongly urges the Council to revisit the site allocation strategy. The current approach, which relies heavily on large, unconsented sites, is fraught with risks regarding deliverability and alignment with sustainable development principles.

Allocating additional sites in Hucknall, such as Land at Common Lane, would help to address these issues by providing a more balanced and deliverable approach to meeting housing needs.

The proposed changes would enhance the Plan's ability to meet housing requirements, support sustainable economic growth, and ensure that the Plan is positively prepared, justified, effective, and consistent with national planning policy. These adjustments are essential for delivering a sound and sustainable Local Plan that meets the needs of the communities in Ashfield District.

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