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| Our Ref: | Response to INS05 & INS06 |
| Your Ref: | ADC.12 |
| Date: | 26.06.2025 |

Examination of the Ashfield Local Plan

Inspectors:

Philip Mileham BA (Hons) MA MRTPI

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Programme Officer:

Miny Schofield

Dear Inspectors,

# EXAMINATION OF THE ASHFIELD LOCAL PLAN 2023 – 2040

I write further to your letters dated 3rd December 2024 and 28th January 2025. At the Full Council meeting on 23rd June 2025, the Council resolved to:

1. approve and submit the Ashfield Local Plan 2023 to 2040 Consultation Statement and the additional sites for allocation in the submitted Local Plan in order to meet the identified level of need for the entire Plan period, for the purposes of submission to the Secretary of State for Housing, Communities and Local Government in accordance with provisions of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended and the Planning and Compulsory Purchase Act 2004.
2. approve and submit the Ashfield Local Plan 2023 to 2040: Response to Inspectors questions to the Secretary of State for Housing, Communities and Local Government in accordance with provisions of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended and the Planning and Compulsory Purchase Act 2004.

The above resolutions are subject to a 5-day call-in process. However, I am keen to provide you with an update at the earliest opportunity to ensure that the Examination process can continue as swiftly as possible.

I am therefore pleased to provide the Council’s response below to your queries as set out in your letters dated 3rd December 2024 and 28th January 2025.

## General

The Council are confident that the submitted Plan’s Spatial Strategy is appropriate and will deliver the vision for the future growth of our District.

**Inspectors question: The Council should provide, alongside any additional sites proposed to be identified, cogent reasons why the spatial strategy would be an appropriate strategy**

The Council has a duty to plan for the future needs of the community as set out throughout the [National Planning Policy Framework 2023](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf). Among other things, this requires land for housing, employment, leisure facilities and infrastructure, whilst at the same time protecting the natural environment and built heritage. This requires balancing competing needs in a sustainable and achievable manner.

The Spatial Strategy for Ashfield is set out Policy S1 of the Local Plan. It has been informed by the assessment of alternative options as set out in the Sustainability Appraisal (SA), alongside the identified housing and employment requirement for the District, and other evidence-based documents including, but not limited to the:

* Strategic Housing and Employment Land Availability Assessment (SHELAA);
* Green Belt Assessment and Green Belt Harm Report;
* Brownfield Capacity Assessment;
* Heritage Impact Assessment;
* Habitats Regulations Assessment;
* Accessible Settlements Study.

The spatial strategy and approach to growth has evolved throughout the Local Plan process and in conjunction with recommendations from the Local Plan Development Committee to Cabinet for decision making. In respect of housing growth, this means a strategy which does not rely on large scale strategic sites such as new settlements or Sustainable Urban Extensions (SUEs) and reflects Option 3 in the Sustainability Appraisal.

The Council provides the following reasons as to why the spatial strategy is an appropriate strategy. The spatial strategy

1. Is a proportionate approach for the District of Ashfield.
2. Takes advantage of the District’s location and enhances connectivity.
3. Supports the existing settlements and ensures development takes place at an appropriate scale.
4. Ensures existing communities remain sustainable.
5. Builds on the District’s learned experience that delivery of sites of less than 500 dwellings come forward in a timely manner and deliver more quickly than larger developments.
6. Proportionate approach for the District of Ashfield.

Ashfield occupies an accessible location within the East Midlands and is easily reached by road, train, bus and tram, including well-developed footpath and cycling networks. Ashfield however possesses several key constraints which limit the quantum of development that can be reasonably achieved across the District. Many of these constraints are located on the edge of, or outside of the Main Urban Areas and Named Settlements of Ashfield and include large areas of designated Green Belt, as well as undesignated countryside.

Ashfield is a Green Belt authority, with the southern part of the District located within the Green Belt. Ashfield has three towns which, including their surrounds, form the Main Urban Areas. These three towns have been identified in Strategic Policy S1: Spatial Strategy to Deliver the Vision as the most sustainable areas for growth and are identified within the first tier of the settlement hierarchy. The towns are Sutton in Ashfield, Kirkby-in-Ashfield and Hucknall. Land within Ashfield which is adjacent to Mansfield town (which is located in the adjoining local authority area) has also been identified in Strategic Policy S1 at this level.

Two of the towns, Sutton and Kirkby, are located in the north of the District and are outside of the Green Belt. The third, Hucknall, is currently constrained by Green Belt. The exception to this lies within Gedling District where growth is planned and safeguarded land has been identified adjacent to part of Hucknall’s northern boundary.

The second tier of the settlement hierarchy includes Ashfield’s larger villages (Named Settlements). All but one of these (Fackley), out of a total of seven villages, are currently constrained by Green Belt.

Approximately 41% of the total District area is designated as Green Belt. Areas of countryside not designated as Green Belt and situated outside of the main urban areas and named settlements account for approximately 26% of the total District area, however not all of this area is considered to be suitable for development

In the areas of countryside which are not designated as Green Belt, other land-based designations such as Sites of Special Scientific Interest and Registered Parks and Gardens have a significant impact on the spatial distribution of new development. These constraints restrict the development of the land in question in such a way that they rule out larger strategic-scale development.

In addition to the above, a significant proportion of the District area is subject to other key constraints, including the need to safeguard the best quality agricultural land which is very limited in Ashfield.

In response to the above constraints, the spatial strategy of dispersed development of less than 500 dwellings distributes development proportionally across the District in line with the settlement hierarchy. The hierarchy of settlements as identified in Policy S1 supports the spatial strategy by directing development within and adjacent to the built-up areas of the District, whilst protecting rural and natural environments.

To support the spatial strategy, a new table (Table A) was prepared to demonstrate how proposed development fits with the settlement hierarchy in accordance with Policy S1 in relation to housing growth, and is included in <https://www.ashfield.gov.uk/media/1h5pd1lw/housing-land-supply-position-statement-october-2024.docx> [ADC.04]. In summary, this table demonstrates that planned housing growth is consistent and proportionate with the identified settlement hierarchy with the following distribution:

* Tier a): Main Urban Areas: 86%
* Tier c): Named Settlements: 13%
* Tier e): The Remainder of the District: 1%

Housing development will be mainly concentrated in and adjacent to the larger and more accessible towns of Hucknall, Sutton in Ashfield (Sutton) and Kirkby-in-Ashfield (Kirkby). The villages of Selston, Jacksdale and Underwood, Brinsley, Annesley/Newstead and Fackley have been allocated appropriate levels of development to support rural infrastructure and sustain vitality, whilst respecting their ‘village’ character.

1. Takes advantage of the District’s location and enhances connectivity

Ashfield is at the heart of the East Midlands, well located with strong transport links and aspirations to achieve excellence for its local communities and businesses. It is close to major centres of population including Nottingham City, Mansfield, Chesterfield and Sheffield. It is within easy access to East Midlands Airport and the planned East Midlands Freeport.

The District benefits from a number of high-quality transport links with the M1 dissecting the District, providing communities and businesses with access to the motorway network via Junctions 27 and 28 (adjacent to the District).

It has a strong A road network, with connectivity enhanced by the Robin Hood Line rail line and connections with the Nottingham Express Transit (NET).

The spatial strategy disperses new housing sites within or adjacent to the main settlements and villages. These sites bring the benefit of additional funding to support the sustainability of local services, including the development of transport hubs, (promoting interconnectivity with bus services and other forms of transport) whilst taking advantage of existing bus services and cycling / footpath networks.

Employment sites are located in proximity to existing employment areas. The two strategic sites at junction 27 are located close to the M1 corridor to take advantage of the good connectivity and transport links to rest of the country. This is evidenced by a growing need for large scale logistics and distribution warehousing sites in the region, particularly along the M1 corridor.

1. Supports the existing settlements and ensures development takes place at an appropriate scale.

The aim of the spatial development strategy is to ensure that new development takes place at the appropriate scale in the most sustainable settlements.

The spatial strategy disperses new housing sites of 500 dwellings or less within or adjacent to the main settlements and villages. A moderate level of development is needed to support key services and deliver affordable housing in these areas, and this has been recognised in the District’s neighbourhood plans. However, disproportionate growth not in accordance with the spatial strategy would threaten the existing village character of these areas. The spatial strategy is supported by Local Plan policy H1 which enables proportionate and sustainable housing growth in the Named Settlements to facilitate the retention and growth of services, and to provide affordable housing.

1. Ensures existing communities remain sustainable

The spatial strategy disperses new housing sites of 500 dwellings or less within or adjacent to the main settlements and villages, locating future development to help to achieve the most appropriate solution in providing for growth, boosting the local economy and meeting the needs of the existing population.

There is an aging population in Named Settlements with dwindling services - in some parts of the rural area bus services are being reduced or removed. It is recognised that work needs to continue to support new approaches to connectivity for the rural areas. The spatial strategy recognises that a moderate level of development is needed to support key services and deliver affordable housing in these areas.

By allocating sites mainly concentrated in and adjacent to the larger and more accessible towns of Hucknall, Sutton-in-Ashfield and Kirkby-in-Ashfield under Policy H1, the strategy works to ensure growth is dispersed, bringing benefits to a number of locations within the settlements as well as overall. Policy H7 of the Local Plan supports this approach by promoting higher housing densities in areas closer to town centre services and major transport hubs.

The strategy aims for most development to be concentrated within those settlements with the largest range of shops and services with more limited development within local service centres and villages. The overall aim of the strategy and therefore the Local Plan is to create sustainable communities.

1. Builds on the District’s learned experience that delivery of sites of less than 500 dwellings come forward in a timely manner and deliver more quickly than larger developments.

The strategy avoids allocating sites which may not deliver in a timely manner. It identifies a range of site sizes and locations, whilst focusing on those which would deliver less than 500 dwellings to help to provide a steady supply of housing land to meet needs right from the start of the plan period.

Major urban extensions, whilst having the potential to bring their own merits, such as significant new infrastructure and economic benefits, also rely on a much longer lead in period. They also need to be viable and to have a forward funding mechanism in place, by which time there may be a change in circumstances and also viability. The dispersed development strategy is based in the realism of the Council’s learned experience and is also supported by caution in its housing trajectory as detailed below.

The Council has taken a cautious approach in setting the delivery rates in the housing trajectory to ensure that the Draft Local Plan provides for sufficient land to meet the Local Housing Need. Consequently, sites between 10 and 500 dwellings are assumed to be capable of delivering 35 dwellings per annum (per developer) based on past delivery rates. This is lower than the average build rates experienced locally in Ashfield but is consistent with the findings of HBF and NLP national studies.

Assessment of other spatial options and why they were discounted

Officers worked on a range of options for spatial growth and presented these to members of the Local Plan Development Committee. The options reflected a range of site sizes and combinations of site sizes. The options also involved a consideration of the impact on the Green Belt. Two new settlements at Whyburn Farm and Cauldwell Road were explored.

Ten options were considered which were:

1. Containment within existing settlements

2. Urban Concentration within/adjoining existing settlements with no Green Belt release.

3. Dispersed development (across the District) comprising of smaller sites, each with capacity for less than 500 dwellings (dwgs)).

4. One large sustainable urban extension (SUE) adjacent Sutton/Kirkby (1000+ dwgs) with smaller sites (less than 500 dwgs) within and adjacent to existing settlements, with significant Green Belt release.
4a. Sub-option 1 considers Sutton Parkway as SUE.
4b. Sub-option 2 considers Mowlands as SUE.

5. One new settlement (outside Green Belt), one large SUE adjacent Kirkby/Sutton and smaller sites in/adjacent existing settlements, including moderate Green Belt release in Hucknall and Rurals.
Sub-option 1 considers Sutton Parkway as SUE
Sub-option 2 considers Mowlands as SUE.

6. Two SUEs adjacent Kirkby/Sutton with smaller sites (less than 500 dwgs) in/adjacent existing settlements, with moderate Green Belt release.

7. One new settlement (approximately 3,000 dwgs) in Hucknall's Green Belt and smaller sites (less than 500 dwgs) in/adjoining Sutton and Kirkby, and moderate Green Belt release adjoining existing rural settlement.

8. Two new settlements (approximately 1,250 and 1,750 dwgs) and smaller sites (less than 500 dwgs) in/adjacent Sutton and Kirkby, moderate Green Belt release adjoining Hucknall and existing rural settlements.

9. Three new settlements (approximately 1,250, 1,750 and 3,000 dwgs) including one in Green Belt, with no other large sites over 500 dwellings.

10. Two new settlements with one in Hucknall’s Green Belt (approx. 3,000 dwgs with around 1,600 in the plan period) and one at Cauldwell Road (approximately 300 dwgs in plan period) with further moderate Green Belt release around Hucknall and more limited development in/adjoining Sutton and Kirkby, and existing rural settlements.

The spatial options were appraised by the Sustainability Appraisal <https://www.ashfield.gov.uk/media/qappg4h5/sd-03h-sa-appendix-g-appraisal-of-strategic-spatial-options.docx>G of the Sustainability Appraisal [SD.03h]. Of the 10 spatial options considered, only two did not propose Green Belt release.

These were:

* **Option 1:** Containment within existing settlements; and
* **Option 2:** Urban Concentration within/adjoining existing settlements with NO Green Belt release.

Neither Option 1 nor 2 were able to meet the minimum housing required in the District. In SA terms, it was therefore considered that these two options were not ‘reasonable alternatives’ as they would not deliver the Local Plan’s growth objectives. The SA details in Table 5.5 of the Sustainability Appraisal report SA.03 the main reasons why Options 4 -10 were rejected. These were as follows:

* **Option 4.** Option 4a would rely on the release of a sustainable urban extension at Sutton Parkway in Kirkby in Ashfield along with the release of smaller sites within and adjacent to existing settlements including significant Green Belt release. Option 4b would rely on the release of a sustainable urban extension at Mowlands in Kirkby in Ashfield along with the release of smaller sites within and adjacent to existing settlements including **significant Green Belt release.**
* **Option 5.** Option 5a considers the development of one new settlement outside of the Green Belt, one sustainable urban extension at Sutton Parkway, Kirkby in Ashfield, and smaller sites in / adjacent to existing settlements including **significant Green Belt release** in Hucknall and the rural areas. Option 5b considers the development of one new settlement outside of the Green Belt, one sustainable urban extension at Mowlands, and smaller sites in / adjacent to existing settlements including **significant Green Belt release** in Hucknall and the rural areas.
* **Option 6**. This option considers the release of two large sustainable urban extensions with smaller sites in / adjacent to existing settlements with **moderate Green Belt release.**
* **Option 7**. This option proposes one new settlement in Hucknall’s Green Belt and smaller sites, less than 500 dwellings in / adjoining Sutton and Kirkby and **moderate Green Belt release** adjoining existing rural settlements. This option however would also see the release of smaller sites in and adjoining the Sutton and Kirkby area, along with **moderate Green Belt release** in Hucknall, Kirkby and adjoining rural settlements. There are limited smaller sites in the SHELAA that are available, deliverable and suitable to meet this need and cumulatively, the impact on the Green Belt will need to be justified.
* **Option 8.** This option proposes two new settlements, not in the Green Belt and smaller sites in / adjacent to Sutton and Kirkby with **moderate Green Belt release** in Hucknall and rural settlements. This strategy would rely on the delivery of two large new settlements with no immediate prosect of delivering on these sites in the early years of the plan. Therefore, there is a substantial risk of not meeting the housing need in the short to medium term.
* **Option 9.** This option proposes three new settlements, one in the Green Belt and the other two not in the Green Belt. Whilst this option could deliver a significant amount of new growth, the site in Hucknall would not deliver 3,000 dwellings in the plan period, this coupled with the other two new settlements not being immediately available would result in a **shortfall of development land to meet the identified requirements in the short and medium term.**
* **Option 10.** The Council received a significant number of objections to the proposed new settlements identified in the 2021 Regulation 18 Draft Local Plan, with many objections about the allocation of land to meet housing needs further into the future where this required the release of Green Belt land (in relation to Whyburn Farm), the loss of countryside and heritage impacts. Reflecting the iterative nature of plan development, based on careful consideration of the public consultation outcomes, together with the uncertainty surrounding future Government policy for plan making **the Council made the decision to progress with the plan, but to exclude the proposed new settlements**, preferring an approach in line with Option 3 (dispersed development).

The preferred spatial strategy (Option 3 – Dispersed development) proposes to allocate sites of less than 500 dwellings. The less than 500 dwellings size threshold is identified to minimise the risk of longer delivery times on larger sites and to enable early delivery of new homes. Sites which can be delivered early in the plan period will support the Council in maintaining a post adoption five-year housing land supply and in enabling the delivery of new homes in line with the Government’s Housing Delivery Test, as well as supporting the Council’s economic aspirations.

## Identification of further sites for allocation in accordance with the submitted plan’s spatial strategy

The Council acknowledges that the submitted Local Plan did not identify sufficient specific sites to meet the full housing requirement to 2040. As such, officers have worked with Council Members to identify a further 13 housing sites for allocation, in accordance with the submitted plan’s spatial strategy. These were subject to a six-week consultation period between 20th February and 3rd April 2025. The following was received:

* No of representors – 42
* No of representations – 263
* No of ‘objections’ (Not Sound) – 100
* No of ‘supports’ (Sound) – 153
* No of comments – 10

The 13 additional sites are as follows:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| New Site Ref. | Site Name | Greenfield/ Brownfield | Planning Permission | Potential Yield (Dwellings) |
| H1Kl | Central Avenue, Kirkby | B | Yes | 16 |
| H1Km | Abbey Road, Kirkby | G | No^ | 38 |
| H1Kn | Southwell Lane, Kirkby | B | No | 60 |
| H1Ko | Former Kirkland’s Care Home, Fairhaven, Kirkby | B | No | 20 |
| H1Kp | Pond Hole, Kirkby | B | No | 54 |
| H1Kq | Former Wyvern Club site, Lane End, Kirkby | B | No | 12 |
| H1Kr | Ellis Street, Kirkby | B | No | 24 |
| H1Sai | Pendean Way | G | Yes | 12 |
| H1Saj | Between Redcliffe St & Leyton Avenue, Sutton  | B | No^ | 18 |
| H1Sak | Rookery Lane, Sutton | G | No^ | 78 |
| H1Sal | Newark Road/ Coxmoor Road | G | Yes | 300 |
| H1Sam | Beck Lane South, Skegby | G | No | 106 |
| H1San | Radford's Farm, Dawgates Lane, Skegby | G | No^ | 90 |

^ Site has had a resolution to grant planning permission subject to the signing of a section 106 legal agreement in respect of developer contributions

Three of the sites have planning permission and an additional four have a resolution to grant planning permission subject to the signing of a section 106 legal agreement in respect of developer contributions. One site forms part of Ashfield Council’s Housing Strategy and is in the pipeline for 100% affordable housing delivery.

The timeframe for delivery of these sites is currently estimated to be as follows:

* 2 sites are expected to deliver entirely within years 1-5 (H1Kl, H1Sai).
* 2 sites are expected to commence within years 5 – 10, but to continue delivering beyond into the next 5-year tranche (H1Sal. H1Sam).
* The remaining 9 sites are expected to delivery entirely within years 5 – 10.

I have attached a copy of the Statement of Consultation for the Ashfield Local Plan 2023-2040: Additional Housing Site Allocations April 2025. The links to the submitted responses to the Additional Housing Site Allocations consultation will be provided to you by separate email by the 4th July 2025.

## What does the spatial strategy look like with the additional sites included?

The additional sites locate growth in sustainable and accessible locations by prioritising development within and adjoining the Main Urban Areas of Sutton in Ashfield and Kirkby in Ashfield. This reflects the settlement hierarchy.

There are no additional sites located in Hucknall or in Ashfield’s villages. Only one of the additional sites is in the Green Belt. The site is H1Km Abbey Road in Kirkby. The Council has resolved on 5th February 2025 to grant planning permission subject to signing a Section106 agreement and referral to the Secretary of State for the Ministry of Housing, Communities and Local Government, due to the site’s location in Green Belt. The Secretary of State confirmed in a letter dated 14 March 2025 that she has decided not to call in this application and is content that it should be determined by the local planning authority.

## How the additional sites conform with the spatial strategy

The additional sites align with the spatial strategy and strategic policy S1. They locate growth in sustainable and accessible locations by prioritising sites for development within and adjoining the Main Urban Areas of Sutton in Ashfield and Kirkby in Ashfield.

The additional proposed housing sites all conform to the spatial strategy of sites of 500 dwellings or less within or adjacent to the main settlements and villages.

They also ensure a strong regeneration focus for our towns, including maximising the use of previously developed (Brownfield) land. A number of the additional sites are part of the Council’s Towns Fund project work in Kirkby in Ashfield and Sutton in Ashfield. Although these sites contain a housing element, they also contribute to the wider regeneration of

the town centres. The Council is in receipt of Town Fund monies and is proceeding with these projects.

## Justification for the release of Green Belt land

Ashfield is a Green Belt authority, with approximately 4,513 ha (41%) of the District designated as Green Belt. The proposed Submitted Local Plan allocations will release 75.4ha (1.67%) of Green Belt land for housing and 57.3 ha (1.27%) of Green Belt land to accommodate 2 strategic employment sites adjacent to junction 27 of the M1 Motorway. These employment sites were allocated to meet the wider regional need for logistics and now have the benefit of full planning permission.

Of the 1.67% of Green Belt land to be allocated for housing, 100% is deemed to be Grey Belt.

Establishing the need for changes to the Green Belt boundary

As set out above, <https://www.ashfield.gov.uk/media/qappg4h5/sd-03h-sa-appendix-g-appraisal-of-strategic-spatial-options.docx> [SD.03h] appraises the spatial options considered by the Council. Of the 10 spatial options considered, only two did not propose Green Belt release. These were:

* Option 1: Containment within existing settlements; and
* Option 2: Urban Concentration within/adjoining existing settlements with NO Green Belt release.

Neither Option 1 nor 2 were able to meet the minimum housing required in the District. In SA terms, it was therefore considered that these two options were not ‘reasonable alternatives’ as they would not deliver the Local Plan’s growth objectives. The preferred spatial strategy (option 3 – Dispersed development) and 7 alternative options were appraised in the Sustainability Appraisal (SA).

It has been determined throughout the emerging Local Plan process that a certain level of Green Belt release will be required to deliver the local strategic approach alongside contributing towards a regional solution for employment sites, and ultimately the future Vision for the District. This includes:

* Taking advantage of the accessible links direct to Nottingham City through the Nottingham Express Transit (NET) and the Robin Hood Rail Line;
* Strategic employment development adjacent to land safeguarded for HS2 and existing Sherwood Business Park around the M1 junction 27 transport hub;
* Supporting our larger villages through additional growth to keep schools and local services.

Chapter 9 of <https://www.ashfield.gov.uk/media/pv2jfhjj/bp01-background-paper-1-spatial-strategy-and-site-section-adc-links-amended.docx> (BP.01) discusses each of the 3 Green Belt areas (Hucknall, Kirkby and the Rurals) in which the Council is

proposing the release of Green Belt land, together with individual site-specific site boundaries. It also identifies site specific public benefits which would result from development on each allocation. In summary:

## Hucknall – 3 proposed sites

As set out in the settlement hierarchy, 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.

## Kirkby – 2 proposed sites, plus Abbey Road (proposed new allocation)

As set out in the settlement hierarchy, Kirkby is one of three towns in the District with good access to a range of services and facilities to serve a local need. The northern half of Kirkby lies beyond the Green Belt outer edge, with the southern part (including Annesley and Kirkby Woodhouse) being constrained by Green Belt.

## Rurals Area (Villages west of M1) – 5 proposed sites

As set out in the settlement hierarchy, the villages of Selston, Jacksdale, Underwood and Brinsley have all been identified as ‘Named Settlements’. These areas, whilst more rural in character and scale to the towns, accommodate over 10% of the resident population. These villages are all tightly constrained by Green Belt with little scope for future growth within the current settlement boundaries. Only three sites submitted to the SHELAA were located within the existing named settlement boundaries in this area, all of which have been put forward for housing allocations (H1Vb, H1Vh, H1Vi).

The (JUSt) Neighbourhood Plan 2017 - 2032 which covers this area accepts that there will be housing development in the Parish to meet local needs. Statistical evidence identifies that there are issues in ‘The Rurals’ (Selston Parish area) relating to an increasing elderly population and falling secondary school rolls. It is considered that a moderate level of growth is appropriate within these areas to meet the needs of the community and support/enhance existing services and facilities, and to ensure provision of affordable housing.

Assessment of all other reasonable options for meeting the identified need for development

The Council took into account the need to promote sustainable patterns of development locating growth in sustainable and accessible locations by prioritising development within and adjoining the Main Urban Areas of Sutton in Ashfield and Kirkby in Ashfield. This reflects the settlement hierarchy. First consideration was given to land which has been previously developed and/or is well-served by public transport. This is set out on a site-by-site basis in paragraphs 9.9 onwards in Section 9 of Background Paper 1 (BP.01).

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council examined fully all other reasonable options for meeting its identified need for development (Para.9.5 of BP.01) by undertaking the following approach with reference to Paragraph 141 of the NPPF:

* 1. *Makes as much use as possible of suitable brownfield sites & underutilised land*
	2. *Optimises the density of development*
	3. *Has been informed by discussions with neighbouring authorities about whether they can accommodate some of the identified need*

The requirements of the NPPF as set out above have all been addressed.

Chapter 5 of BP.01 demonstrates full consideration of available and suitably located brownfield land to accommodate future growth and concludes that any capacity falls significantly short of meeting the identified future housing and employment needs. Brownfield site allocations are set out in Chapter 8 of BP.01.

Policy H7 of the Local Plan promotes efficient use of land by optimising densities for new housing development. The Council recognises the importance of respecting the existing character of the area and the need to create beautiful places to live which reflects the Government’s own agenda, in addition to promoting sustainable development. With this in mind, all sites within 400m of a major transport node or town centre are required to have a minimum of 40 dwellings per hectare (dph). This falls to a minimum of 34 dph for sites within 1 km of such areas, and a minimum of 30 dph elsewhere. The distance of 400m has been established as the distance within which many people will chose to walk or cycle to their destination, whereas the 1km zone is considered to be the principal catchment of the public transport corridor. Outside of these 2 zones a higher proportion of people are likely to use a private motor vehicle. The policy therefore aims to concentrate more development in the most sustainably located areas with good access to services and facilities.

Ashfield has a history of joint working with neighbouring authorities and statutory consultees on strategic planning matters. It has a close working relationship with the authorities in both the Nottingham Outer HMA and Nottingham Core HMA. Ashfield is one of the constituent authorities of the D2N2 Local Enterprise Partnership (LEP) which covers Nottinghamshire, Nottingham, Derby and Derbyshire and supports economic growth. It is identified by national planning policy that the D2N2 Local Industrial Strategy should inform local policies for economic development and regeneration. There are a number of established joint working groups in Nottinghamshire of which Ashfield is a member. These are set out in the Statements of Common Ground (SoCG) which has been prepared to support the Local Plan. The SoCG identifies that each Local authority will meet their own identified housing need, and that there is no capacity to meet any of Ashfield’s needs within neighbouring authority boundaries.

Table 21 on the following page, is taken from BP.01 and compares the distribution of future housing development proposals across the District by geographical area. The figures include pipeline projects which already have planning permission and in many cases are under construction, in addition to new sites proposed in the emerging Local Plan. When compared with the existing population, the level of growth directed to each area is broadly comparable and supports the Council’s spatial strategy for dispersed development

## Table 21: Distribution of housing development by geographical area

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Geographical Area | Housing Sites with planning permission (Dwellings)\* | Housing Sites without planning permission (Dwellings) | All Housing Sites (Dwellings) | % Distribution by Area | % Existing Population (2021 Census) |
| Northern Towns Area | 1600 | 2418 | 4018 | 65.8% | 61.1% |
| Rural Villages west of M1 (Green Belt constrained) | 38 | 580 | 618 | 10.1% | 10.1% |
| Southern Town Area (Green Belt constrained) | 710 | 759 | 1469 | 24.1% | 28.8% |
| **Ashfield District Total** | **2348** | **3757** | **6105** | **100.0%** | **100.0%** |

\* Sites with planning permission, PIP or Prior approval - including losses

The intended permanence of the proposed changes to the Green Belt boundary

In order to deliver the vision for the future of the District via the preferred spatial strategy, the Council have reviewed and considered long term defensible Green Belt boundaries. This has been achieved through 2 Green Belt Assessment Stages include:

* **Stage 1:** [**https://www.ashfield.gov.uk/media/rnxj51iz/sev07-strategic-green-belt-review-methodology.docx**](https://www.ashfield.gov.uk/media/rnxj51iz/sev07-strategic-green-belt-review-methodology.docx) **(SEV.07)** An assessment of the whole of Ashfield’s Green Belt and provides a means of identifying the most important areas, when assessed against the purposes of Green Belt as set out in national policy - National Planning Policy Framework (NPPF); and
* **Stage 2:** [**https://www.ashfield.gov.uk/media/q2ofbgyx/2021-green-belt-harm-assessment-updated.docx**](https://www.ashfield.gov.uk/media/q2ofbgyx/2021-green-belt-harm-assessment-updated.docx) **(BP.04)** An assessment of the potential harm to the Green Belt when assessed against the purposes of Green Belt as set out in the NPPF.

The Council is confident that the District’s full housing and employment land needs up to 2040 can be met under this preferred strategy. Future requirements for the District beyond 2040 are unclear, particularly given the potential implications of Local Government reorganisation.

Regardless of the above, it is not expected that development in and around the Green Belt settlements would be wholly constrained by this policy at the end of the plan period for the following reasons:

* Safeguarded land/growth exists to the north of Hucknall which currently falls within the adjoining authority but nonetheless forms an urban extension to the town;
* The named settlements are identified as a lower tier in the settlement hierarchy and as such are identified for a lower level of growth. The Rural exceptions policy will permit additional growth to meet local needs for affordable homes moving forwards within the Green Belt where appropriate. The introduction of Grey Belt may similarly enable additional future growth. Furthermore, small windfalls are likely to continue via re-use of land and new homes created under Permitted Development rights.

Compensatory improvements to environmental quality & accessibility of remaining Green Belt land

Chapter 9 of Background Paper 1 (BP.01) discusses individual site-specific site boundaries and where possible the potential public benefits linked to the sites in greater detail. Where public benefits are currently not known, these will be explored at the planning application stage and secured through planning conditions, section 106 obligations and/or the Community Infrastructure Levy. Further details of potential beneficial uses of Green Belt are discussed in Background paper 4 – Green Belt Harm Assessment (BP.04).

Implications of Grey Belt

Grey Belt was introduced in the 2024 version of the NPPF. Within the glossary of the 2025 version of the NPPF, Grey Belt is defined as:

*‘Land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in Paragraph 143. Grey belt excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.’*

The Council acknowledges that the Local Plan examination is being undertaken under the September 2023 version of the NPPF where the concept of Grey Belt is not considered. However, if this plan is adopted, planning decisions will be assessed against the requirements of the 2025 version of the NPPF (or any further updated version), where the concept of Grey Belt will be a material consideration. As such, the Council have undertaken an assessment of the proposed allocated Green Belt sites in the emerging Local Plan to determine their potential to be considered Grey Belt land. The assessment reflects the recent planning practice guidance published in February 2025 Reference ID: 64-005-20250225.

Following the individual assessment of each of the 11 proposed Green Belt housing allocations (including new site H1Km – Abbey Road, Kirkby), it has been determined that

 all 11 sites are considered to constitute Grey Belt land. It should be noted that 2 of the 11 sites already benefit from planning permission:

* H1Km: Abbey Road, Kirkby-In-Ashfield
* H1Vj: Land off Main Road, Jacksdale

Consequentially, the total amount of dwellings in the Green Belt (based on the prospective yield of each site without planning permission, as listed below) is 1240. This represents 100% of proposed Green Belt housing allocations potentially being considered as a Grey Belt for decision making purposes**.**

* H1Hb – Linby Boarding Kennels, Hucknall (43 Yield)
* H1Hc – Land North of A611/South Broomhill Farm, Hucknall (499 Yield)
* H1Hd – Land adj. Stubbinwood Farm, Watnall Road, Hucknall (Yield 198)
* H1Ka – Beacon Farm, Derby Road, Kirkby (Yield 41)
* H1Kh – Land off Hucknall Road, Newstead (47 Yield)
* H1Va – Land at Plainspot Farm, New Brinsley, Underwood (42 Yield)
* H1Vc – Land Adjacent Bull & Butcher Public House, Selston (149 Yield)
* H1Ve – Land off Park Lane/Southwest M1, Selston (169 Yield)
* H1Vg – Land North of Larch Close, Underwood (52 Yield)

As previously stated, the Council acknowledges that the NPPF version that the plan is being examined through does not include the provision of Grey Belt. However, as all the proposed housing allocations can now be considered Grey Belt under the new NPPF, it should not be understated, and the above evidence should be given substantial weight in the justification for the release of Green Belt land for housing.

## Conclusion

The Council has taken a pragmatic and locally focussed approach to developing a sound spatial strategy which seeks to achieve the development needs of the District. The approach aims to balance future social, economic and environmental demands to achieve a successful and attractive District.

The Spatial Strategy is considered to be an appropriate strategy for the following reasons as it:

1. Is a proportionate approach for the District of Ashfield.
2. Takes advantage of the District’s location and enhances connectivity
3. Supports the existing settlements and ensures development takes place at an appropriate scale.
4. Ensures existing communities remain sustainable
5. Builds on the District’s learned experience that delivery of sites of less than 500 dwellings come forward on a timely manner and deliver more quickly than larger developments.

The Council considersthe Spatial Strategy is effective and sound as the Council is currently able to identify sufficient homes to meet the housing requirement in the submitted plan to 2040.

I trust the above and enclosed information provides you with the clarity on the issues raised. However, should you require any further information, please do not hesitate to contact me. We look forward to being able to move forward with the Examination in Public process at your earliest convenience.

Yours sincerely



**John Bennett**

**Executive Director – Place**

**Ashfield District Council**

cc. Christine Sarris, Assistant Director Planning

Enc. Statement of Consultation for the Ashfield Local Plan 2023-2040: Additional Housing Site Allocations April 2025.