



For and on behalf of
Bellway Homes Limited & Keith Haslam

Ashfield Local Plan Examination in Public Matter 3 Hearing Statement

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CONTENTS	PAGE
1.0 INTRODUCTION.....	3
2.0 THE SPATIAL STRATEGY AND THE DISTRIBUTION OF DEVELOPMENT	4

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1.0 INTRODUCTION

This response to Matter 3 of the Inspector's MIQs in respect of the Ashfield Local Plan Examination has been prepared by DLP Planning Limited on behalf of Bellway Homes and Keith Haslam. This statement builds upon the objections raised previously in our response to the Regulation 19 consultation and our previous EiP statements. We have only responded to those questions that are relevant to our previous objections.

DLP Planning have also requested to appear at the Examination on behalf of Bellway Homes and Keith Haslam.

2.0 THE SPATIAL STRATEGY AND THE DISTRIBUTION OF DEVELOPMENT

Issue

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?

Questions

Q3.1. 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?

The previous Regulation 18 version of the Ashfield Local Plan had a large focus on new settlement delivery, with the aim to place 35% of all housing to be developed and delivered on new settlement sites. Whilst the deliverability of such sites was questioned, and we fully support their removal from the current Regulation 19 draft, large-scale allocations in sustainable locations next to adjoining settlements can make an important contribution to housing supply, as supported by paragraph 74 of the Framework.

Whilst we do not object to the overarching Spatial Strategy that is proposed, point 5 of Policy S1 supports delivery of homes 'via dispersed development, focusing on sites of less than 500 dwellings'. The Council's justification for focusing development on sites of less than 500 dwellings is unclear and unjustified. In particular, it is unclear whether this applies to adjoining sites where the combined total number of units may be greater than 500. We therefore suggest that point 5 of Policy S1 is re-worded as follows: "...focusing mainly on sites of less than 500 dwellings, except where there is evidence that conjoined sites can deliver in the plan period".

The emphasis in point 5 of Policy S1 on delivering homes 'via dispersed development' also contradicts the prioritisation of sites 'within and adjoining the Main Urban Areas', as stated in point 3. It is not possible to focus growth in certain areas whilst also pursuing a dispersed pattern of development. Clarification of the Council's overall strategic spatial approach to development should be provided in this policy; as currently worded the policy is not effective.

We therefore object to Policy S1 as currently worded on the basis that it is neither fully justified nor effective.

Q3.1.1 What effect would the proposed additional sites have on the distribution of new housing development across the plan area?

We consider that the proposed additional sites continue to conform with the spatial strategy and provide balanced distribution of housing across the District. As also confirmed by the Council in document ADC.12 the proposed sites are concentrated in and adjacent to the larger more accessible towns with growth centred around the Main Urban Area.

Q3.1.2 Is the Spatial Strategy effective having regard to the scale and location of the proposed additional sites?

We consider the strategy to be effective. However, we reiterate our position outlined above

regarding the arbitrary 500 dwelling cap. The Council's justification for focusing development on sites of less than 500 dwellings is unclear and unjustified. In particular, it is unclear whether this applies to adjoining sites where the combined total number of units may be greater than 500. We therefore suggest that point 5 of Policy S1 is re-worded as follows: *"...focusing mainly on sites of less than 500 dwellings, except where there is evidence that conjoined sites can deliver in the plan period".*

Furthermore, we consider that there is potential for further site allocations to support a wider, well-planned sustainable urban extension to the north of Sutton to link the existing draft allocations and proposed new allocation sites together. Therefore, we deem that the comprehensive development of a sustainable extension to the north of Sutton, incorporating sites to the west of Beck Lane, to be vital to prevent unsustainable patterns of growth and development across Ashfield.

Q3.3. Why was the submitted approach to disperse development chosen and is it an appropriate strategy having regard to reasonable alternatives?

The dispersed approach to development is considered to be a justified spatial strategy on the basis that the majority of the site allocations are located within or adjacent to the Main Urban Areas, which are considered to be sustainable locations.

Q3.5. Does the submitted Plan's approach strike an appropriate balance between the identification of land for new homes and employment?

It is noted that Policy S8 (Delivering Economic Opportunities) identifies an employment land requirement of 81 ha over the plan period (2023 to 2040). As set out in Table 36 of Background Paper 3: Economy & Employment Land, this figure is based on a scenario derived from past take-up rates. This can be compared with the labour supply scenario derived from the previous standard method local housing need figure (446 dpa) of 16.84 ha. The amount of employment land being planned for is therefore significantly in excess of the amount of employment land required under the labour supply scenario.

Whilst it is acknowledged that some of this past take-up trend relates to wider strategic needs rather than local 'indigenous' needs of Ashfield's residents, paragraphs 8.111 and 8.112 of Background Paper 3 identify the past take-up figure attributable to 'local needs' as being 27.5 ha. This is still in excess of the 16.84 ha that would be required based on the standard method housing requirement figure of 446 dpa. Paragraph 8.112 of Background Paper 3 states that *"planning for this higher figure will help to ensure a choice of employment land supply by size, type, location and quality of sites and premises for businesses, and maximising future job opportunities for the local workforce (including those who may currently commute elsewhere)".* However, in planning for this higher figure it is also necessary for the Council to consider whether there is sufficient housing available to meet the identified growth in jobs. Paragraph 61 of the Framework states that the outcome of the standard method is 'an advisory starting-point for establishing a housing requirement for the area' and that there may be exceptional circumstances which justify an alternative approach to assessing housing need, including an approach that reflects 'market signals'.

In light of the above, we consider that the proposed additional allocations are required to ensure that the amounts of land allocated for employment and housing growth within the Plan are not misaligned. The allocation of additional housing land which meets the housing

requirement for the whole plan period, together with a potential uplift to reflect anticipated levels of jobs growth, is required in order to ensure the Plan has been positively prepared.

Q3.6. Is the settlement hierarchy set out in Policy S1 Justified?

The settlement hierarchy set out in Policy S1 is considered to be justified, with the Main Urban Areas of Sutton-in-Ashfield, Kirkby-in-Ashfield, Hucknall and the areas directly adjacent to Mansfield being the areas in which the largest levels of growth should be accommodated. This is justified on the basis that these are sustainable locations for growth and will ensure that the growth is distributed across the District.

Q3.11. Not all of Ashfield District is within the Green Belt. Could the need for new housing and employment be met by locating such uses outside Green Belt? If not, why is this the case?

It is considered that the release of Green Belt land is justified and necessary in order to ensure that housing needs are met in the south of the District. However, this should be focused in sustainable locations around the Main Urban Areas, such as Hucknall, where exceptional circumstances can be demonstrated.

We support the proposed additional growth around the Main Urban Areas and on Green Belt land where exceptional circumstances have been justified, such as site H1Hc. We also consider that to ensure an appropriate whole plan buffer is in place further allocations should be included, such as sites in Sutton, which would enable the comprehensive development of a sustainable extension to Sutton.

Q3.13. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, paragraph 141 of the Framework states that strategic policy-making authorities should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for housing. This will be assessed through the examination and will consider whether the strategy:

- **Makes as much use as possible of suitable brownfield sites and underutilised land;**
- **Optimises the density of development, and**
- **Has been informed by discussions with neighbouring authorities about whether they can accommodate some of the identified need. How has the preparation of the Plan sought to make as much use as possible of suitable brownfield sites and optimise the density of development?**

It is considered that the Council has fully considered all other options for meeting its identified housing need before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, as set out in section 9 of Background Paper 1: Spatial Strategy & Site Selection. The Council should continue to seek to meet their needs in full through the allocation of further land to ensure there is sufficient flexibility in the Plan via a substantial whole plan buffer to ensure sufficient housing is delivered within the first five years of the Plan period.

Q3.14. How would the proposed release of land maintain the openness and permanence of the Green Belt?

The proposed allocation sites to the south of Hucknall, including site H1Hc, will be bounded to the south by the A611 which will form a permanent defensible boundary to the remaining Green Belt to the south. The development of this site and its removal from the Green Belt will ensure that the built urban form of Hucknall extends no further south into the Green Belt than the existing development which runs along Nottingham Road to the east, thereby maintaining the openness of the Green Belt to the south of Hucknall. This permanent defensible boundary is evidently still preserved when reviewing the current, pending application for site H1Hc under reference V/2025/0405.

Q3.15. How has the Green Belt assessment considered the potential for mitigation?

The delivery of site H1Hc, which is proposed for release from the Green Belt, would help to deliver additional benefits including landscape buffer, new allotment provision, nature walks, green infrastructure corridor and open space. These details are shown within the submitted site layout for application reference V/2025/0405, outlining the commitment to these measures.

Q3.16. Do the Plan's strategic policies set out the scale and need for the release of land from the Green Belt as required by paragraph 140 of the Framework?

Yes, we consider the scale and need for release of land from the Green Belt has been set out within the strategic policies in line with paragraph 140 of the Framework.

Q3.17. 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?

In order to ensure the Plan is sound, we support that the Council has identified further housing allocations to meet their identified housing needs in full and ensure there is not a shortfall in housing provision over the plan period to 2040. It is, however, necessary to allocate further sites to ensure the Plan is sound and has a sufficient buffer in place to ensure choice and flexibility in the market (in line with the Framework paragraph 74).

Q3.18. 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?

Exceptional circumstances for the release of allocation site H1Hc (Land north of A611 / South of Broomhill Farm, Hucknall) from the Green Belt are clearly set out in Background Paper 1: Spatial Strategy & Site Selection. Paragraphs 9.16 to 9.20 in particular highlight this site's low overall rating in terms of Green Belt harm, the defensible boundary that would be formed by the A611 to the south, and the potential to enhance access to open space and biodiversity through the creation of a new green infrastructure corridor, nature walks and landscape buffer. Development of this site would also ensure that local housing needs in Hucknall are

met in a sustainable location, which would also include new allotment provision.

This site currently has a pending planning application under reference V/2025/0405 demonstrating that this site is deliverable.

Green Belt

Q3.19 Is the Spatial Strategy effective if any further proposed sites would be required to be released from the Green Belt?

Yes, we consider that the strategy would continue to be effective even if further Green Belt release occurred.

Q3.20 Is the release of Green Belt land necessary to address the shortfall in housing across the plan period?

Yes, we consider that the release of Green Belt land necessary to address the shortfall in housing across the plan period. It is clear that the Council have exhausted other reasonable alternatives and that exceptional circumstances are present.

We consider that the release of Green Belt land is required to ensure that growth is distributed sustainably across the district and to ensure housing needs in the Green Belt areas are still being met. Currently this is being done in a way that aligns with the Spatial Strategy, including prioritising growth within or adjoining the main urban areas, such as Hucknall, where Green Belt release is justified and exceptional circumstances have been demonstrated.

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