Research & Analysis

For and on behalf of
Bellway Homes Limited & Keith Haslam

Ashfield Local Plan Examination in Public Matter 10 Hearing Statement

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1.0 INTRODUCTION

This response to Matter 10 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.

Bellway Homes are interested in site H1Hc and Keith Haslam is interested in sites H1Su, H1Saa and Additional Land to the North of Beck Lane.

2.0 SITE ALLOCATIONS

a) Site Allocations Overall

Whether the proposed site allocations are justified and deliverable/ developable at the point envisaged

Relevant Policies –H1, S6a and S6b

Questions

Site allocations overall

Q10.1 How were the site allocations chosen? What factors were considered? Is the approach justified? Is it evidence-based?

The Council has chosen site allocations by following the sequential approach outlined below (Background Paper 1: Spatial Strategy and Site Selection):

- Stage 1: Sites with planning permission;
- Stage 2: Sites with a resolution to grant planning permission subject to signing a Section 106 legal agreement;
- Stage 3: Brownfield (previously developed) sites assessed through the SHELAA as 'achievable' or 'potentially achievable' and consistent with the Council's strategic approach for sustainable growth;
- Stage 4: Greenfield sites assessed through the SHELAA as 'achievable' or 'potentially achievable' and consistent with the Council's strategic approach for sustainable growth;
- Stage 5: Green Belt sites assessed through the SHELAA as 'achievable' or 'potentially achievable' and consistent with the Council's strategic approach for sustainable growth.

Therefore, the key factors which informed site selection are the likely social, economic and environmental effects, deliverability, conformity with national policy, consultation responses and effect on Green Belts.

We also support and consider the approach to selecting the Additional Sites to be justified. It is clear that the additional sites were re-appraised against the criteria set out within the Sustainability Appraisal and the ones which were deemed to have the least harm were taken forward. We believe this approach is justified and evidence based. We support the additional allocations as they help ensure the Plan is found to be sound.

Q10.2 In deciding whether to allocate sites for development, how did the Council take into account the effects of development on:

- ***Landscape character,***
- ***The availability of best and most versatile agricultural land;***
- ***The local and strategic road network;***
- ***The need for new and improved infrastructure (including community facilities);***
- ***Heritage assets; and***

- ***Nature conservation.***

Within the Background Paper 1 Spatial Strategy and Site Selection, it is apparent that the Council has taken account of the effects of development.

In regard to landscape character this can be seen within Table 9 whereby sites have been assessed against their impact on historic landscape character and this has informed the removal of some sites from allocation.

The versatility of agricultural land has been referred to as part of the Character of the District and Constraints to Housing Growth. Here the ranking of agricultural land has formed part of the Analysis of Constraints study where the District primarily contains an element of Grade 2 Agricultural land.

As seen within paragraph 5.12 of the Background Paper 1 the Council has assessed sites on the potential for significant highway access constraints. Thus, showing that the road network has formed part of the decision making process.

The need for new and improved infrastructure is a core theme of the Local Plan and has clearly been assessed throughout the site selection process. This is reflected in Policy S9: Aligning Growth and Infrastructure.

The designation of nearby local nature conservation areas has been pivotal in the allocation (and non allocation of sites). This has been a key constraint for not taking sites forward for development as expressed in Background Paper 1.

Thus, it is clear that these factors have influenced the decision-making process of which sites to allocate. We therefore broadly support the Council's decision making process of site allocations.

Q10.3 How did the Council take into account flood risk? Has the Plan applied a sequential, risk-based approach to the location of development, taking into account all sources of flood risk and the current and future impacts of climate change so as to avoid, where possible, flood risk to people and property as required by paragraph 161 of the Framework?

The Council has taken flood risk into account by compiling a Strategic Flood Risk Assessment. As a result of this data, coupled with the Environment Agency flood zone data for each site, the Plan has applied a sequential, risk-based approach to the location of development. It has taken into account future flood risk and climate change impacts as per paragraph 161 of the NPPF.

Q10.4 Do the Plan's policies provide sufficient specificity of the requirements expected of the larger site allocations (i.e. those of 100 dwellings and above), particularly for sites where there is no planning permission in place?

Yes, it is clear from the Pre Submission Draft of the Local Plan that this level of specificity is being provided. For large sites comprising of multiple parcels without the benefit of planning permission the Council are progressing with a concise masterplan on a site by site basis. Whilst, to date, we have not seen a draft of this masterplan we are confident that this will provide specific, detail advice and guidance.

We implore that any masterplans published by the Council should be developed in conjunction with the landowners and site promoters especially where proposals for these

sites are already in the process of being developed. For example, for sites H1Saa and H1Su (Land to the West of Beck Lane, Skegby) a masterplan document has already produced and submitted as per Appendix 2 of the Regulation 19 Proposed Site Allocations Report for H1Saa and H1Su. Whilst for site H1Hc a site masterplan has been submitted under application reference V/2025/0405.

Q10.5 Do the Plan's policies relating to the site allocations contain sufficient requirements to ensure that sites, particularly those comprised of multiple parcels of land, will be developed in a comprehensive manner?

Yes, it is clear from the Pre Submission Draft of the Local Plan that comprehensive delivery of sites is being taken into account. As outlined above, the Council is progressing with a concise masterplan to ensure that the sites which contain multiple parcels are developed comprehensively. We are also confident that this can be dealt with via a suitably wording planning condition if Outline consent was granted.

Furthermore, in relation to sites H1Su, H1Saa and H1Hc the landowners are working collaboration with promoters of adjoining sites to ensure comprehensive delivery is achieved.

For site H1Hc Bellway are ensuring that the site links up comprehensively with the existing allotments site to the East and to the remainder of the emerging allocation to the South. This is being undertaken via various Section 73 applications, condition wording and via a well thought out layout which distils the risk of ransom strips when the further allocation comes forward.

For sites H1Su and H1Saa the landowners are working with housebuilders to ensure a comprehensive development of the land off Beck Lane occurs. The landowners are also keen to explore opportunities to maximise delivery in the immediate area as a potential sustainable urban extension to the north of Sutton-in-Ashfield which could potentially also incorporate further land to the north-west of site H1Su (see response to Question 10.66 below).

Q10.6 What is the justification for the proposed restriction on development within 400m of the Sherwood Forest Possible Potential Special Protection Area (ppSPA)? Overall, will it be effective?

No response.

Changes to the Green Belt boundary

Q10.7 Why has the Green Belt Assessment not considered sites against the Green Belt purpose of 'assisting with urban regeneration' as set out at paragraph 138(e) of the Framework? Is this justified?

We are confident that the Council's approach is justified. The Council consider that all the sites in the Green Belt assist in urban regeneration and so is not considered to be a difference between the sites. We agree with this approach.

Q10.8 Taking each site proposed to be released from the Green Belt in turn, what would be the extent of the harm to the Green Belt if the boundaries were changed in the locations as proposed? Are there any ways in which harms could be minimised or

mitigated?

In relation to our client Bellway Homes' site, which is parcel of the wider allocation, H1Hc, which forms part of Land north of A611 / south of Broomhill Farm, we consider that the change to the Green Belt boundary here has relatively low harm. The site is well contained by the Hucknall by-pass with this providing a strong long term defensible boundary. The Council are also preparing a site development brief to help create a substantial landscape buffer between the development and the by-pass. Harm is also proposed to be mitigated and minimised by the site allowing the public to benefit from the biodiversity net gain which will be provided, the increase in green infrastructure as a result of its allocation and with the estimated yield of the site being reduced to take into account Local Wildlife Sites.

This is further supported within the Green Belt Harm Assessment Background Paper, whereby it concludes that the wider site (HK051), which includes H1Hc, has a 'relatively low' Green Belt rating.

Whilst we agree that Green Belt release is required, we also agree with the Council's assessment that the extent of harm across the authority would be low as the majority of sites do not require Green Belt release, with it only equating to a small percentage of overall supply. Therefore, we believe that harm has already been minimised and mitigated.

We have no comments to make on other proposed Green Belt release sites.

Q10.9 Taking each proposed change to the Green Belt boundary as set out in document ADC.02a in turn, has it been clearly defined, using physical features that are readily recognisable and likely to be permanent as required by paragraph 143 of the Framework?

In relation to our client Bellway Homes' site, which forms part of Land north of A611 / south of Broomhill Farm (H1Hc), we consider that the changes to the boundary are clearly defined and will enable the revised Green Belt boundary to have permanence in the long term and endure beyond the plan period. As outlined above our site has a long-term defensible boundary of the Hucknall by-pass.

Hucknall site allocations

H1Hc: Land north of A611/ South of Broomhill Farm, Hucknall

Q10.14 How will the Plan ensure the site comes forward comprehensively, particularly having regard to highway matters?

As outlined in our previous representations, we agree that careful consideration in regard to its integration to the surrounding area and highway network should be undertaken. We agree that the site should come forward comprehensively especially in regard to highway matters.

Our client has engaged positively and proactively with the Council and the Highways Authority to ensure the full allocation can come forward comprehensively. This is further illustrated by current, pending application V/2025/0405 which is moving positively through the determination process for 84 units.

Q10.15 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Yes, exceptional circumstances to justify amending the Green Belt boundary in this location do exist.

Within the Strategic Green Belt Review (2016) and the Background Paper 4: Green Belt Harm Assessment the site was assessed. These assessments identified that the site scored 'relatively low' against the 5 purposes of the Green Belt as set out in the NPPF at paragraph 143. The site was therefore considered appropriate for Green Belt release.

Furthermore, when HK051 (containing H1Hc) is compared to other Green Belt sites in Hucknall has the joint lowest Green Belt score, meaning it is one of the poorest performing Green Belt sites. This is summarised below:

Table 1. Green Belt Harm Score Comparisons for Hucknall

SHELAA Ref	Site Address	Green Belt Overall Harm Score
HK013	Linby Boarding Kennels, East of Church Lane	15
HK022	Land adj. Stubbin Wood Farm, Watnall Road	9
HK028	Whyburn Farm	13
HK046	West of Moor Road, Bestwood	13
HK047	Common Lane, Hucknall (Site includes HK001, HK002, HK003 & HK004)	10
HK051	Land north of A611/south of Broomhill Farm (Site includes HK016, HK034, HK043 & HK050)	9

Sourced from Background Paper 4: Green Belt Harm Assessment

Sutton area site allocations

H1Su – Rear 113 – 139 Beck Lane, Skegby

Q10.66 Is this allocation justified?

This allocation is justified. It is a greenfield site situated immediately north of H1Saa. Our client, Keith Haslam, who is the landowner has confirmed this site is available immediately for development and a planning application is currently being prepared. The site is still suitable for 100 dwellings. Our client has been in communication with landowners regarding the delivery of this site and Homes by Honey are likely to be the delivery partner for this parcel.

The site has no significant physical constraints and is in Flood Zone 1. There are no environmental designations identified within or near the site. A group of trees to the north east of the site is identified as being subject to a Tree Preservation Order (TPO 302) which would be taken into consideration in any future layout.

The site is in a sustainable location, just north of Skegby and in close proximity to facilities, services and employment opportunities in Sutton-in-Ashfield and Mansfield. The site is within

walking distance of existing bus routes on Mansfield Road (B6104), which provide services to Mansfield, Sutton-in-Ashfield and Kirkby-in-Ashfield. The site is located approximately 3 kilometres to the west of Mansfield town centre and Mansfield railway station, 2.4 kilometres north of Sutton-in-Ashfield town centre and 3.2 kilometres north of Sutton Parkway railway station.

This allocation is further supported by the site, in our view, being deemed suitable of delivering up to 134 units and with the SHELAA assessing the site as being potentially available, potentially suitable and achievable. Its immediate availability and suitability has since been confirmed through our previous representations and the site's subsequent proposed allocation in the submitted Local Plan.

Therefore, the allocation of this site is considered to be justified, and we support the allocation of H1Su in the Ashfield Local Plan.

Furthermore, to help ensure that the Plan can sufficiently meet its housing requirement with a substantial buffer, we would suggest that the Additional Land to the North of Beck Lane which is also in our client Keith Haslam's ownership should be considered for allocation. This parcel of land, as shown in Figure 1 below, makes a logical extension to the residential development which is currently being delivered on allocation site H1Saa (a means of access from this site is in place) and could enable a logical future link into Land off Penniment Lane, Sutton-in-Ashfield which is currently being promoted for residential development by Harworth.

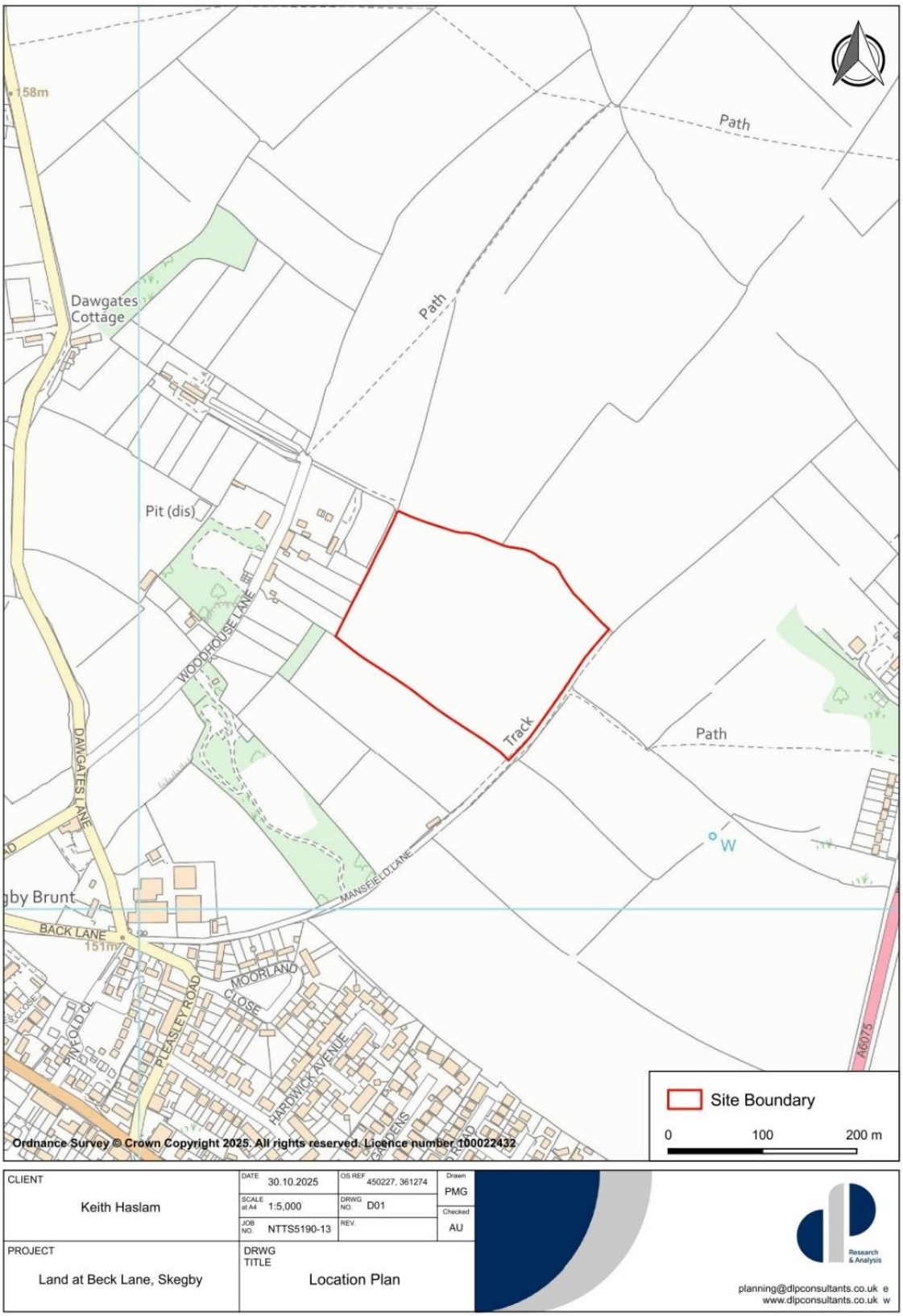

Figure 1: Map showing the Additional Land to the North of Beck Lane, Skegby

Furthermore, given it is unclear if the Council can demonstrate a five year supply on adoption as their latest Housing Trajectory does not include the additional proposed allocations, we would suggest that this site should be included as an additional allocation as it could be delivered within the first five years of the Plan and would ensure the Plan contains a sufficient 'buffer' to meet needs over the plan period. This would go a long way towards Ashfield being able to meet its chronic unmet housing need.

H1Saa - Land at Beck Lane, Skegby

We support this allocation. However, we do not consider the reduction in capacity from 293 from 322 dwellings to be justified given the site has outline permission and subsequent reserved matters approval for 322 dwellings and is currently under construction.

Q10.67 Provide an update on the status of each of the above site's planning permissions.

Site H1Saa is a greenfield site which benefits from extant reserved matters planning permission for 322 residential dwellings (planning reference V/2021/0089, pursuant to outline application V/2016/0569 which was granted following appeal APP/W3005/W/18/3213342). This permission was granted in April 2022, and construction on site has commenced. The site is therefore considered to be immediately available and deliverable.

Site H1Su currently has a planning application being prepared for residential development.

Site H1Hc currently has a pending full application awaiting determination for 84 dwellings. This is under reference number V/2025/0405.

H1Sam – Beck Lane South, Skegby

Q10.67.5 Would the proposed additional site have any effects on the Teversal Pastures SSSI? If so, what mitigation measures would be required to avoid harm to the designated site? How would these be secured?

The allocation of H1Sam is a logical extension of proposed allocation sites H1Saa and H1Su. We consider that the site would not have a detrimental effect on the SSSI, and that required mitigation can be secured where required.

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