



For and on behalf of  
**Bellway Homes Limited (East Midlands)**

**Representations to the Ashfield Local Plan (2023 – 2040)  
Consultation on Additional Housing Site Allocations**

**Broomhill Farm, Hucknall**

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## 1.0 INTRODUCTION

- 1.1 These representations to the Ashfield Additional Housing Sites consultation have been prepared by DLP Planning Limited on behalf of our client, Bellway Homes Limited (East Midlands), who have an interest in Land North of A611 / South of Broomhill Farm, Hucknall (site ref. H1Hc). We agree with the Council that this site is a justified allocation in a sustainable location which is suitable, available and deliverable.
- 1.2 The following section of this report sets out comments on the Additional Housing Site Allocations Consultation. We understand that this consultation follows the Inspectors' Letter dated 3<sup>rd</sup> December 2024<sup>1</sup>. Within this letter it stated that the Council is currently unable to identify sufficient homes to meet the housing requirement. This letter was subsequently followed by a letter dated 28<sup>th</sup> January 2025<sup>2</sup> whereby the Inspectors stated that further justification of Green Belt release is required. Therefore, the Additional Housing Site Allocations Consultation is a direct response to the Inspectors' concerns regarding the effectiveness and soundness of the Plan's strategy in relation to housing need with the aim of allocating more land for housing.

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<sup>1</sup> INS05 – 3<sup>rd</sup> December 2024

<sup>2</sup> INS06 – 28<sup>th</sup> January 2025

## 2.0 ADDITIONAL HOUSING SITE ALLOCATIONS

- 2.1 Overall, we support the Council's decision to allocate additional sites for housing. We consider that this decision will help go towards ensuring that housing needs are met in full over the whole Plan period and to ensure the Plan is positively prepared and sound.
- 2.2 To help ensure that this is done, the release of some Green Belt land is required. It is important that the release of these Green Belt sites is justified by illustrating that exceptional circumstances have been demonstrated. This is the case for draft allocation H1Hc and we can confirm that this site is a justified Green Belt release, which is in a sustainable location that is suitable, available and deliverable.
- 2.3 As outlined in the Inspectors' letter, dated 3<sup>rd</sup> December 2024, and the more recent Ashfield Additional Housing Site Allocations Report, we note that the identified housing need for the period 2023 to 2040 is 7,582 dwellings. Prior to the allocation of additional sites, it was apparent that the Council had a shortfall of 882 dwellings over the Plan period (as referenced in the Inspectors' Letter INS05). We note that when incorporating the new 13 additional sites this now leads to a marginal oversupply of 136 dwellings over the Plan period, which equates to around 2% of the district's housing need.
- 2.4 Whilst the proposed allocation of additional sites is supported, we consider that this updated position still only provides a limited 'whole plan' buffer. We also have a few concerns regarding the deliverability of some of the proposed new allocations.
- 2.5 We therefore consider that further sites should be allocated alongside the 13 proposed additional allocation sites to help ensure that the Plan is positively prepared and consistent with national policy and that housing needs over the full Plan period are met.

### **Green Belt Release and Site H1Hc**

- 2.6 In regard to the Green Belt, we note that none of the additional sites warrants Green Belt release. Whilst Site H1Km is located in the Green Belt, it does not include Green Belt release, instead it is pending planning permission in the Green Belt. However, we do acknowledge that in the Inspectors' letter it is stated that the Council needs to provide further justification for the release of Green Belt that is currently proposed.
- 2.7 Whilst this does not form part of this current consultation, we would like to reiterate that

Broomhill Farm, Hucknall (including site H1Hc) is sustainably located and is suitable, available and deliverable. It represents a justified allocation in the south of the district amidst the submission of additional, majority non-Green Belt sites.

- 2.8 Site H1Hc represents a change to the Green Belt boundary which is clearly defined and will continue to enable the revised Green Belt boundary to have permanence in the long term and endure beyond the plan period. This site also has a long-term defensible boundary formed by the Hucknall by-pass.
- 2.9 Furthermore, we consider that the proposed change to the Green Belt boundary in this location would result in relatively low harm (as agreed by the Council). The Council is also preparing a site development brief to help create a substantial landscape buffer between the development and the by-pass. Any potential 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.
- 2.10 This is further supported within the Council's Green Belt Harm Assessment Background Paper, which concludes that the wider site (HK051), which includes site H1Hc, has a 'relatively low' Green Belt rating.
- 2.11 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 circa 22% of the overall supply. Therefore, we believe that harm has already been minimised and mitigated.
- 2.12 Site H1Hc was assessed within the Strategic Green Belt Review (2016) and the Background Paper 4: Green Belt Harm Assessment. These assessments identified that the site scored 'relatively low' against the five purposes of the Green Belt as set out in the NPPF at paragraph 143. The site was therefore considered appropriate for Green Belt release.
- 2.13 Furthermore, when site HK051 (containing site H1Hc) is compared to other Green Belt sites in Hucknall, it has the joint lowest Green Belt score, meaning it is a poor performing Green Belt site. 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

Source: Background Paper 4: Green Belt Harm Assessment

- 2.14 Therefore, we can confirm that this site is sustainably located and immediately available. The site is in a sustainable location, with Hucknall town centre lying approximately 1.3km to the north of the site, providing an extensive range of services, facilities and amenities, including employment opportunities, shops, banks, restaurants, and transport connections at Hucknall Train and Tram stations. Additional facilities lie in closer proximity to the site, including schools, nurseries, bus stops (350m to the north west) and the Butler's Hill tram stop (770m to the east).
- 2.15 The site is approximately 2.75 hectares in size and is located to the south of Lime Tree Road. To the north lies residential development, with new residential development under construction by Bellway Homes lying to the east, agricultural land to the south with the A611 Hucknall bypass beyond, and residential development to the west.
- 2.16 The site itself consists of former allotments and features a number of outbuildings as would be expected in conjunction with such a use, as well as boundary separating features and access tracks.
- 2.17 In regard to the NPPF tests for Green Belt release we consider that this site conforms with this and is an exceptional circumstances case. The reasons for this are outlined below:

(a) there is no dispute the Plan still is not meeting its housing requirement without Green Belt release; and

(b) there is the need to consider the consequences for sustainable development of releasing land from the Green Belt or pushing development beyond the Green Belt boundaries. In this case, the location of Hucknall is highly sustainable and the location is deliverable with mitigation of harm to the Green Belt. The proposed allocation of additional housing sites does not change those conclusions and so reinforces the exceptional circumstances case.

2.18 Therefore, in the context of the current housing need and historic unmet need in the district we consider that site H1Hc is a sustainable and justified allocation, and we support its allocation in the draft Plan. We are confident that the Council has adequately demonstrated exceptional circumstances for Green Belt release for this site and in general within the Plan.

### **Proposed Additional Housing Site Allocations**

2.19 This section shall now review the specific additional proposed site allocations the Council has put forward as part of this consultation. The full list of these additional sites is summarised in the table below:

**Table 2: Potential additional housing allocation sites**

Site	Description
Central Avenue, Kirkby	Council owned site where 16 new council houses are currently being constructed.
Abbey Road, Kirkby	Approved by Planning Committee for 38 new homes, subject to the signing of a section 106 legal agreement in respect of developer contributions.
Southwell Lane, Kirkby	Brownfield site, potential to build 60 homes.
Former Kirkland's Care Home, Fairhaven, Kirkby	Council is bringing forward this site for construction of 20 new council houses.
Pond Hole, Kirkby	Part of the Kirkby Town Masterplan and our town centre regeneration programme, intention to build 54 homes.
Former Wyvern Club site, Lane End, Kirkby	Part of the Kirkby Town Masterplan and our town centre regeneration programme, intention to build 12 homes.
Ellis Street, Kirkby	Part of the Kirkby Town Masterplan and our town centre regeneration programme, intention to build 24 homes.
Pendean Way	Planning permission granted to build 12 homes.



Site	Description
Between Redcliffe St and Leyton Avenue, Sutton	Approved by Planning Committee for 18 new homes, subject to the signing of a section 106 legal agreement in respect of developer contributions.
Rookery Lane, Sutton	Approved by Planning Committee for 78 new homes, subject to the signing of a section 106 legal agreement in respect of developer contributions.
Newark Road/ Coxmoor Road	Planning approval issued by the Government's Planning Inspector in February 2025.
Beck Lane South, Skegby	Additional site, potential to build 106 new homes.
Radford's Farm, Dawgates Lane, Skegby	Approved by Planning Committee for 90 new homes, subject to the signing of a section 106 legal agreement in respect of developer contributions.

*Source: Ashfield Additional Housing Sites Allocations Consultation*

2.20 We have a few concerns regarding a number of the proposed additional allocations. It is clear that seven of the proposed sites are on brownfield land as listed below:

- Central Avenue, Kirkby
- Southwell Lane, Kirkby
- Former Kirkland's Care Home, Fairhaven, Kirkby
- Pond Hole, Kirkby
- Former Wyvern Club site, Lane End, Kirkby
- Ellis Street, Kirkby
- Between Redcliffe St and Leyton Avenue, Sutton

2.21 Whilst we support the reuse of brownfield land, it does raise concerns regarding possible viability constraints due to the potential requirement for significant and costly site remediation work and biodiversity net gain constraints. Furthermore, it raises the likelihood that development of these sites would lead to flats or other high-density dwellings being constructed which may result in a less diverse housing mix. Arguably, this also increases the significance of the exceptional circumstances for Green Belt release, as given a high proportion of the additional sites are on brownfield land this means the likelihood of sites having a potentially compromised housing mix is increased.

2.22 Below we will critically assess each of the additional allocations. We provide commentary,

outline our concerns where relevant and consider whether we deem it to be achievable, suitable and available.

H1KI Central Avenue, Kirkby – 16 dwellings

2.23 We note that this site is brownfield land with already acquired full planning permission for 16no. 100% affordable dwellings. We support this allocation despite it previously not being selected as it was below the size threshold and despite there being potential viability concerns due to brownfield remediation likely to be required. We also note that this allocation forms part of the wider, remaining Kirby area housing allocations which have the benefit of planning permission.

2.24 Overall, we consider it to be achievable, suitable and available given it now has full planning permission.

H1Km Abbey Road, Kirkby – 38 dwellings

2.25 We note that site H1Km Abbey Road, Kirkby is current designated as Green Belt land. Whilst this site was not originally selected in the original Sustainability Appraisal for the following reasons, we do consider that the allocation of this site is warranted to allow Ashfield to meet its housing needs.

*“Located in the countryside on the Main Urban Area fringe. The site serves a Green Belt function and it is not considered there is a justification for exceptional circumstances to take the site out of the Green Belt.”<sup>3</sup>*

2.26 Therefore, whilst this site does not warrant Green Belt release, we do consider that very special circumstances exist for this site to come forward in the Green Belt. We consider that this reliance on speculative very special circumstance sites to make up the housing shortfall as proposed allocations, enforces that there aren't other viable options to meet the district's housing needs. This in turn reinforces the positive plan-making decisions made to date in order to select the sites they already have.

2.27 Thus, we support this allocation as it has resolution to grant permission subject to the s106 and so is available, achievable and suitable.

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<sup>3</sup> Sustainability Appraisal – Appendix H: Appraisal of Site Alternatives

- 2.28 In light of this we also continue to support the allocation of Land at Broomhill Farm, H1Hc alongside H1Km. These sites represent a sustainable and viable option in the context of being able to meet the Council's identified housing needs. Their allocation will also allow balanced growth and the overall spatial strategy to be delivered given the Green Belt development and release will be in both the north and south of the district.

H1Kn Southwell Lane, Kirkby – 60 dwellings

- 2.29 We note that this site is on the brownfield register and is located on a former reclaimed, employment site. We object to this allocation as we do not deem there to be compelling evidence that it is suitable, achievable or available. This site does not contain a live residential permission and would likely require brownfield remediation to develop which may have viability implications.
- 2.30 This concern is also outlined in the updated Sustainability Appraisal which states the likely existence of contamination and ground stability issues coupled with the S10 walking and cycling route crossing the site. Thus, this site is highly constrained and we do not deem it to be suitable, achievable or available.

H1Ko Former Kirkland's Care Home, Fairhaven, Kirkby – 20 dwellings

- 2.31 Site H1Ko is a vacant brownfield site with a former nursing home having been demolished on site. It is stated that the Council will be bringing this site forward to construct 20 new council houses. We object to this allocation as we do not consider there to be compelling evidence that it is achievable as it does not contain any relevant planning history, contains areas of high-risk surface water flooding, alongside requiring potential brownfield remediation which has the potential to reduce its viability further.

H1Kp Pond Hole, Kirkby – 54 dwellings

- 2.32 This site is a vacant brownfield site used for storage purposes. It also forms part of the Kirkby Town Centre Spatial Masterplan. We support this allocation given its policy backing via the Masterplan despite concerns regarding potential brownfield remediation required and lack of relevant planning history.
- 2.33 The site also forms part of the western 'station' gateway for town centre redevelopment, thus further supporting its development prospects.

H1Kq Former Wyvern Club Site, Lane End, Kirkby – 12 dwellings

- 2.34 We support the allocation of this brownfield site as it is located in Kirkby Town Centre and identified within the Spatial Masterplan, despite concerns regarding potential brownfield remediation and lack of relevant planning history.
- 2.35 Similar to site H1Kp, this site also forms part of the western station 'gateway' for town centre redevelopment, thus further supporting its development prospects.

H1Kr Ellis Street, Kirkby – 24 dwellings

- 2.36 We support this allocation as it is identified in the Kirkby Town Centre Spatial Masterplan. However, we do have some reservations regarding its deliverability given it is currently used as a car park, leisure and commercial units and has a lack of relevant, residential planning history.
- 2.37 Despite this concern, the site is identified as a Priority Project in the Kirkby Town Centre Spatial Masterplan and so can capitalise on its town centre location.

H1Sai Pendean Way – 12 dwellings

- 2.38 We support this allocation as it currently has full planning permission for 12 dwellings (V/2023/0156).
- 2.39 This site also forms part of the Sutton area housing allocations which all benefit from planning permission. Therefore, we consider it to be achievable, suitable and available.

H1Saj Between Redcliffe Street & Leyton Avenue, Sutton – 18 dwellings

- 2.40 We support the allocation of this brownfield site given it has resolution to grant planning permission for residential development, subjecting to the signing of the s106. The site is also bounded by existing residential development; therefore we consider it to be achievable, suitable and available.

H1Sak Rookery Lane, Sutton – 78 dwellings

- 2.41 We support the allocation of this greenfield site given it forms Phase 2 of the adjacent H1Sx residential development has resolution to grant planning permission subject to the s106 (V/2022/0612). We therefore consider it to be achievable, available and suitable.

H1Sal Newark Road / Coxmoor Road – 300 dwellings

- 2.42 We support this allocation as it has outline planning permission for up to 300 dwellings

(V/2022/0629).

- 2.43 This site also forms part of the Sutton area housing allocations which all benefit from planning permission. Therefore, we consider it to be achievable, suitable and available.

H1Sam – Beck Lane South, Skegby – 106 dwellings

- 2.44 We support this allocation given its sustainable location between nearby emerging allocations.
- 2.45 This greenfield site is adjacent to the existing urban area and is directly south of allocation H1Saa which is currently under construction for residential development. This would place this site in an excellent position for phased residential development.
- 2.46 We note that access is not supported via Beck Lane. This is a constraint which can easily be overcome given current site wide masterplan and third-party discussions currently taking place. Thus, we consider this to be a suitable allocation which is achievable and available.

H1San Radford's Farm, Dawgates Lane, Skegby – 90 dwellings

- 2.47 We support this allocation given the site has resolution to grant outline permission (V/2024/0489). Therefore, we consider it to be achievable, available and suitable.

**a) Policy H1: Housing Site Allocations**

- 2.48 Based on the above analysis we consider that the updated draft Policy H1 is sound. However, we do consider that the Council should reassess the additional allocations in light of our comments above to ensure that this policy is consistent with national policy, justified and effective.
- 2.49 It is likely that in order to ensure the plan is positively prepared and consistent with national policy, the Council should ensure that sufficient sites are identified which, as a minimum, meet the housing requirement for the whole plan period (7,582 dwellings), including through allocating further deliverable and developable sites, as required.
- 2.50 Currently, with the sites allocated, we consider that they only offer a limited 'whole plan' buffer against the total housing requirement, so further sites should be allocated to strengthen this position.

- 2.51 In light of that we continue to support the existing draft allocation site H1Hc. We consider that whilst some of the further allocated sites are supported, these would not, by themselves, adequately provide a sustainable level of growth in the south of the district.
- 2.52 Thus, we consider that exceptional circumstances for Green Belt release have been demonstrated. We deem that this has justified Green Belt release at both a District-wide and site-specific level. The reduction of harm and the consideration of layout design to maximise beneficial use of land has been placed in the forefront of these considerations.
- 2.53 Therefore, the allocation of site H1Hc should be retained within the Plan to avoid unsustainable patterns of growth and development across Ashfield.

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