



For and on behalf of  
**Keith Haslam**

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

Beck Lane, Skegby

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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, Keith Haslam who has an interest in draft allocation sites H1Su (139 Beck Lane, Skegby) and H1Saa (Land at Beck Lane, Skegby).
- 1.2 These representations reiterate that these sites remain justified allocations in a sustainable location and are suitable, available and deliverable.
- 1.3 The following section of this report set 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 is stated that the Council is currently unable to identify sufficient homes to meet the housing requirement. This letter was followed by a further letter dated 28<sup>th</sup> January 2025<sup>2</sup> in which 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 further 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 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 sites from the Green Belt is justified by illustrating that exceptional circumstances have been demonstrated.
- 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 existing 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 approximately 2% of the district's housing need.
- 2.4 However, we still consider that this updated position only provides a limited 'whole plan' buffer as well as having a few concerns regarding the deliverability of some of the proposed new allocations.
- 2.5 Therefore, we consider that further sites should be allocated alongside the 13 additional 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. We would therefore support the further allocation of Additional Land West of Beck Lane, Skegby which provides a logical continuation of allocations H1Saa and H1Su.

### **Sites H1Su and H1Saa**

- 2.6 Whilst this does not form part of this current consultation, we would like to reiterate that Land at Beck Lane, Skegby (Sites H1Su and H1Saa) is sustainably located and is suitable, available and deliverable. To date, a masterplan document has been produced and

submitted as per Appendix 2 of the Regulation 19 Proposed Site Allocations Report<sup>3</sup> which demonstrates that these sites are deliverable and suitable. We can also confirm, based on discussions with our client, that these sites are immediately available.

- 2.7 We can confirm that there are no infrastructure constraints to the delivery of site H1Su or H1Saa. The delivery of these sites is not contingent on other sites coming forward.
- 2.8 However, we do consider that the reduced capacity of H1Su is not justified, the site is still suitable for 100 dwellings. This is also the same for H1Saa, where the reduction in capacity to 293 from 322 dwellings is not justified given the site has outline permission and subsequent reserved matters approval for 322 dwellings and is currently under construction.
- 2.9 Despite the above, in the context of the current housing need and historic unmet need in the district we consider that these sites are a sustainable and justified allocation, and we support their allocation in the draft Plan. We also consider that further sites should be allocated alongside the 13 proposed additional housing 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.

### Specific Site Allocations

- 2.10 This section shall now review the specific site allocations the Council have put forward. The full list of these additional sites is shown in the table below:

**Table 1: Potential additional 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.

<sup>3</sup> DLP Planning – Ashfield Local Plan 2023-24 Regulation 19 Pre-Submission Draft Representations for Stags Limited (January 2024)

Site	Description
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.
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*

2.11 We have 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

2.12 Whilst we support the reuse of brownfield land, it does raise concerns regarding potential viability constraints due to the possible 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.

2.13 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

2.14 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 required. We also note that this allocation forms part of the wider, remaining Kirby area housing allocations which have the benefit of planning permission.

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

#### H1Km Abbey Road, Kirkby – 38 dwellings

2.16 We note that site H1Km Abbey Road, Kirkby is current designated as Green Belt land. Whilst this site was not previously 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>4</sup>

2.17 Therefore, whilst this site does not require 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 housing needs. This in turn, reinforces the positive plan-making decisions made by the Council to date in order to select the sites they already have.

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

H1Kn Southwell Lane, Kirkby – 60 dwellings

2.19 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.

2.20 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

2.21 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

2.22 This site is a vacant brownfield site used for storage purposes. It also forms part of the Kirkby

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<sup>4</sup> Sustainability Appraisal – Appendix H: Appraisal of Site Alternatives

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.

- 2.23 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

- 2.24 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.

- 2.25 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

- 2.26 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.

- 2.27 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

- 2.28 We support this allocation as it currently holds full planning permission for 12 dwellings (V/2023/0156).

- 2.29 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

- 2.30 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

- 2.31 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

- 2.32 We support this allocation as it has outline planning permission for up to 300 dwellings (V/2022/0629).
- 2.33 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

- 2.34 We support this allocation given its sustainable location between nearby emerging allocations. We consider this to be a suitable allocation which is also achievable and available.
- 2.35 The site has no significant physical constraints and is in Flood Zone 1. There are no environmental designations identified within or near the site.
- 2.36 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.
- 2.37 Furthermore, the allocation of H1Sam is a logical addition to H1Saa and H1Su. Site H1Saa already has planning permission for 322 dwellings and is currently under construction<sup>5</sup>. In addition to this, site H1Saa would provide logical and capable access into the site H1Sam. As alluded to in the Additional Housing Sites Consultation Report, these ongoing discussions between the County Council's Highway Department and third parties should allow this site to overcome the initial access constraints which previously ruled this site out alongside the

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<sup>5</sup> V/2016/0569

Sustainability Appraisal not selecting this site due to open space needing to be incorporated into the wider Beck Lane allocation (SA008). It is clear that this can be overcome as open space will be factored into the wider masterplanning of this area.

- 2.38 Thus, we support the allocation of H1Sam and can confirm that it complements the allocation of sites H1Saa and H1Su which are suitable, achievable and available immediately. Therefore, sites H1Sam could logically become a second phase of the wider development benefiting from access via site H1Saa. Our client is working collaboratively with promoters and agents to ensure that the sites are consistently planned and comprehensively brought forward, and site H1Sam could easily be incorporated within this wider masterplanning with the area being a logical and sustainable extension to the wider Sutton urban area. Site H1Sam is therefore considered to be suitable and achievable for residential development.

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

- 2.39 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.
- 2.40 Whilst this site is slightly removed from the Beck Lane draft allocations, we do consider it to be appropriate, suitable and achievable, which could also in time become part of a wider sustainable extension to the Sutton area.
- 2.41 Site H1San, together with sites H1Saa, H1Su and H1Sam, are sustainable allocations which we consider to be suitable, achievable and available. This is supported by these sites scoring similarly to sites H1Saa and H1Su in the updated Sustainability Appraisal, as shown in the table below.

**Table 2: Sustainability Appraisal Assessment of H1Saa, H1Su, H1Sam and H1San**

Proposed Allocation Ref	Housing	Health	Historic Environment	Community Safety	Social Inclusion	Biodiversity & Green Infrastructure	Landscape	Natural Resources	Air & Noise Pollution	Water Quality	Climate Change and Flood Risk	Travel and Accessibility	Employment	Economy	Town Centres
H1Saa	++	+	0	0	++	-	-	0	0	0	-	+	+	+	+
H1Su	++	0	0	0	+	-	-	0	0	0	-	+	+	+	+
H1Sam	++	+	0	0	++	-	-	0	0	0	-	+	+	+	+
H1San	++	+	-	0	++	-	-	0	0	0	0	+	+	+	+

Source 1: Sustainability Appraisal Report Appendix C (update 2025) – Proposed Housing Allocations Table pg 6 onwards.

### Key

- ++ Significant Positive Effect
- + Minor Positive Effect
- 0 Neutral
- Minor Negative Effect
- Significant Negative Effect

2.42 Thus, we support the allocation of site H1San.

### Policy H1: Housing Site Allocations

2.43 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.

2.44 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.

2.45 Currently, with the sites allocated, we consider that they only offer a limited 'whole plan' buffer

against the total housing requirement as so further sites should be allocated to strengthen this position.

- 2.46 In light of that we support draft allocation sites H1Saa and H1Su, as well as the additional proposed allocation sites H1Sam and H1San. 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 the sustainable extension of Sutton to be vital to prevent unsustainable patterns of growth and development across Ashfield.

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