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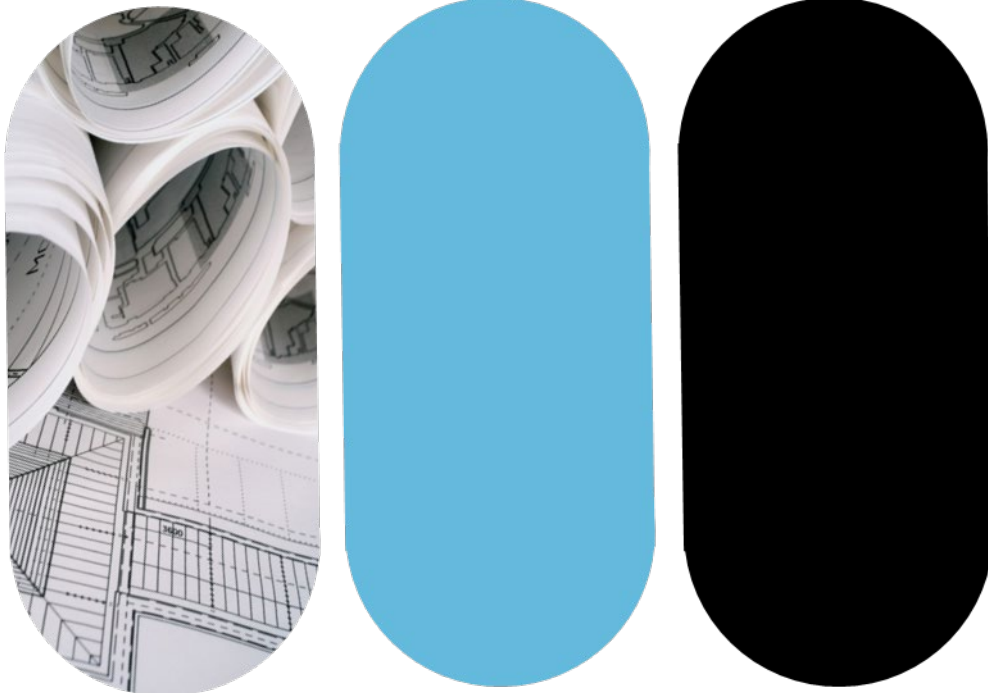
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**WRITTEN STATEMENT IN RESPECT OF THE ASHFIELD LOCAL  
PLAN 2023-2040 EXAMINATION**

**MATTER 3 – THE SPATIAL STRATEGY AND THE DISTRIBUTION  
OF DEVELOPMENT**

On Behalf of Persimmon Homes Nottingham



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## 1. INTRODUCTION

- 1.1 This Written Statement is made on behalf of our client, Persimmon Homes Nottingham, in response to the Inspectors' Matters, Issues and Questions for the examination hearings for the Ashfield District Local Plan Examination.
- 1.2 Persimmon Homes Nottingham are promoting two sites; the Land North of Fackley Road, Teversal which is identified as a residential allocation within the plan (allocation reference H1Sl) and Sunnyside Farm, Blackwell Road, Huthwaite which is identified as a residential allocation within the plan (allocation reference H1Sk).
- 1.3 Persimmon Homes Nottingham has engaged in all stages of the plan making process and previously made representations to the Regulation 19 Local Plan consultation (Marrons Representation dated January 2024, Respondent ID 223).

## 2. MATTER 3 – THE SPATIAL STRATEGY AND THE DISTRIBUTION OF DEVELOPMENT

**Issue 1 – 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?**

- 2.1 The Sustainability Appraisal (SA) (SD.03) assessed eight spatial options with Option 3 - Dispersed Development ultimately taken forward. It was concluded that this Option represents the best option to deliver sustainable development and meet the Vision for the District. The SA also sets out the reasons why other options were discounted.
- 2.2 The SA notes that Option 3: Dispersed Development would provide housing to meet local needs, including within the rural areas, and would be less reliant on longer lead-in times and the provision of infrastructure

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than options that rely on new settlements/SUEs. Development in the more viable rural areas would also support affordable housing needs. We recognise the need to balance multiple factors in determining the appropriate Spatial Strategy given the physical and environmental constraints of the district but consider the Council's approach to be justified.

- 2.3 The Spatial Strategy within the Plan, as detailed in Policy S1, is therefore based on an approach for dispersed development (SA Option 3) with no large sites of 500 or more dwellings.
- 2.4 Settlement Hierarchy, as set out within Policy S1, is supported by the Council's Spatial Strategy and Site Selection 2023 Background Paper, Sustainability Appraisal (SA) (August 2023) and Greater Nottingham (including Ashfield) Accessibility of Settlements Study (2010). This evidence, alongside a more individual site accessibility assessment undertaken as part of the SHELAA, was utilised in support of the settlement hierarchy and spatial strategy approach.
- 2.5 We agree with the general approach taken to arrive at the settlement hierarchy, but as set out in respect of Matter 2 have concerns that the housing requirement is insufficient to meet housing need and that a greater amount of development should be provided.
- 2.6 Furthermore, the level of growth across the settlements hierarchy is not clearly articulated within the Strategic Policies. Policy S7 identifies the minimum housing requirement which is further expanded within Table 2 with a reference to 3,757 dwellings on large sites from Policy H1 which is not one of the policies identified as relevant in respect of Matter 3 and is being dealt as part of Matter 10. We would therefore suggest further clarity is provided in respect of the distribution of growth within the Plan to ensure compliance with NPPF paragraph 16.d.

***Green Belt***

- 2.7 In line with NPPF paragraphs 140-142, before concluding that

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exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. The strategy should:

a) make as much use as possible of suitable brownfield sites and underutilised land;

b) optimise the density of development with minimum density standards in town and city centres and other locations well served by public transport; and

c) be informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

2.8 Background Paper 1 (BP.01) details how these three options have been addressed as part of the Local Plan process. The conclusion reached is 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. It is clear that the level of growth sought clearly justifies releasing land from the Green Belt.

2.9 Background Paper 4 – Green Belt Harm Assessment (BP.04) assesses the harm to the Green Belt purposes of potentially releasing land for development within sites and areas of search and points to the use of policy guidance or masterplans to indicate development areas, new permanent Green Belt boundaries and appropriate considerations for the layout and design of new developments. We recognise that such an approach may help to minimise harm to the Green Belt.