



## Ashfield District Local Plan Examination

P&DG on behalf of Aldergate Property Group

Hearing Statement: Matter 1 - Procedural and Legal  
Requirements including Duty to Co-operate

## Quality Control

<b>Project No.</b>	21.113			
<b>Client</b>	Aldergate Property Group			
<b>Title</b>	Ashfield District Local Plan EiP: Matter 1 Hearing Statement – Procedural and Legal Requirements including Duty to Co-operate			
<b>Location</b>	Land off Common Lane, Hucknall			
<b>File Ref</b>	21.113 ADC EiP Matter 1 Hearing Statement			
<b>Issue</b>	Date	Prepared By	Reviewed By	Authorised By
1.	October 2024	DH	enter initials	enter initials

## 1.0 Introduction

- 1.1 This Hearing Statement sets out submissions made by Planning and Design Group (UK) Ltd on behalf of Aldergate Property Group in response to the 'Matters, Issues and Questions' (MIQs) for the Ashfield District Local Plan Examination.
- 1.2 This statement specifically relates to Matter 1: Procedural and Legal Requirements including the Duty to Co-operate with response to questions relating to the Duty to Co-operate, the Sustainability Appraisal (SA) and other strategic matters.
- 1.3 This statement should be read in conjunction with our previous representations and supporting evidence that has been submitted throughout the Ashfield District Local Plan consultation process.
- 1.4 Aldergate own 'Land off Common Lane, Hucknall' that is not currently allocated within the emerging Local Plan. However, it is subject of an outline planning application for up to 100no. dwellings under planning application reference (ref: V/2024/0288).

## **2.0 Matter 1: Procedural and Legal Requirements**

**Issue 1 – Whether the Council has complied with the Duty to Co-operate in the preparation of the Ashfield Local Plan**

### **Duty to Cooperate**

**1.1 Having regard to the proposed release of land from the Green Belt, what discussions have been held with neighbouring authorities as to whether they could accommodate some of the identified need for housing and employment development?**

- 2.1 Aldergate Property Group consider that the proposed release of land from the Green Belt is absolutely necessary in order to meet the housing requirements of the District over the plan period.
- 2.2 Given that all of the neighbouring authorities have released land within the Green Belt in order to meet their own housing requirements, it is entirely reasonable for Ashfield District Council to do the same. It is not for the neighbouring authorities to shoulder the burden of over 20 years of a failure to appropriately plan for housing and economic growth within the District.
- 2.3 Aldergate comments on the Duty-to-Cooperate and the effective engagement with neighbouring authorities, is set out in response to Question 1.5 below.

### **Other Strategic Matters**

**1.5 Are there any other relevant strategic matters in relation to the Duty to Cooperate?**

- 2.4 A key concern raised by Aldergate throughout the consultation process is that Ashfield District is considered to be located outside of the Nottingham Core Housing Market Area (HMA). This represents a significant shortcoming in the preparation of the Local Plan, as it fails to recognise the role of areas within Ashfield that share a close relationship with the wider HMA, such as Hucknall.
- 2.5 Indeed, Hucknall shares a strong and well-established functional relationship with the city of Nottingham with sustainable public transport links to and from the city. This includes the NET tram service and the Robin Hood Rail Line with a station in

Hucknall and direct connections into Nottingham. As such, It is entirely reasonable to conclude that Hucknall will be a focus for population growth and housing demand, and therefore, where additional housing should be directed in the plan period.

- 2.6 The failure to recognise the role of Hucknall within the Core HMA indicates a lack of effective engagement between the Nottingham Core Housing Market Area authorities and Ashfield District Council. This must be addressed as a matter of urgency through the examination process.
- 2.7 Moreover, the Statement of Common Ground between Ashfield District Council and the Nottingham Core HMA concludes that Ashfield is not required to accommodate any unmet housing requirements which may arise within the Nottingham Core HMA. It is considered that this further demonstrates a lack of co-operation and effective engagement in addressing cross-boundary housing needs.
- 2.8 Aldergate Property Group consider that a more nuanced understanding of the functional relationship between Ashfield and Nottingham is needed to ensure the delivery of an effective spatial strategy that genuinely reflects the actual demand for housing within the area and the sustainable growth potential between the neighbouring authorities.

### Overall

- 2.9 **1.8 Overall, has the Council maximised the effectiveness of the Local Plan by engaging constructively, actively and on an ongoing basis with the prescribed bodies on relevant strategic matters during the preparation of the Local Plan?**
- 2.10 For the reasons, as set out in response to the above, it is not considered that the Council have maximised the effectiveness of the Local Plan by engaging constructively on relevant strategic matters during the preparation of the Local Plan.
- 2.11 These matters must be addressed and more effective co-operation between the District Council and the Nottingham Core HMA authorities must be undertaken.

**Issue 2 – Whether the Council has complied with relevant procedural, legal and other requirements.**

## Sustainability Appraisal

### 1.16 How has the SA informed the preparation of the Local Plan at each stage and how were options considered?

- 2.12 The Sustainability Appraisal undertaken in the preparation of the Local Plan indicated the higher growth option of 535dpa would have significant positive effects on the economy. It states (Paragraph 53.16-53.18):

*'The higher amount of growth is considered to provide additional benefits to the economy due to the additional construction jobs but also the additional potential to stimulate growth in a diversified economy.'*

- 2.13 On the basis, the Council has not clearly evidenced why they are not seeking to plan for a higher level of housing growth. This is particularly pertinent where the Council recognises that they are one of the most deprived areas in the Country (Paragraph 1.85 of the Local Plan).
- 2.14 Clearly, however, this has not been taken into consideration in the preparation of the Local Plan, which would present a significant missed opportunity to deliver social and economic benefits through the preparation of the Local Plan.



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