



Representation to the North East Derbyshire Local Plan Issues and Options Regulation 18 Consultation

Land East of Little Morton Road, North Wingfield

On Behalf of Keepmoat Homes

April 2026

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Client:

Keepmoat

Project:

Land East of Little Morton Road, North Wingfield

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Section 1 | Introduction

- 1.1 This Representation has been prepared by nineteen47 on behalf of Keepmoat ["our Client"] in response to the North East Derbyshire District Council Local Plan Issues and Options Consultation on the Strategic Approach to the Location of Development and a Refined Schedule of Sites ["the Consultation"].
- 1.2 North East Derbyshire District Council ["the Council"] adopted the North East Derbyshire Local Plan 2014–2034 in November 2021. In advance of the statutory requirement to review the adopted Plan by November 2026, the Council has commenced early engagement to inform preparation of its emerging Local Plan. This process began with an Issues and Options Consultation (Regulation 18) undertaken between June and August 2025, representing the first stage of formal public consultation.
- 1.3 The Consultation runs from 12th March to 30th April 2026 and follows the completion of an earlier Issues and Options Consultation by the Council in Summer 2025, seeking to engage with residents, businesses, stakeholders and representatives of the local community on the proposed strategic approach to the location of new development in the district and a refined schedule of sites which have passed through the initial screening.
- 1.4 Our Client's representations place particular focus on the promotion of a parcel of land located to the east of Little Morton Road, North Wingfield ["the Site"] as shown edged in red in the extract shown in Figure 2.1 of Section 2.
- 1.5 The Site has previously been submitted for consideration within the Council's Strategic Housing and Economic Land Availability Assessment ["SHELAA"], which is available on the Council's website. The Site was also promoted through the Council's Call for Sites exercise undertaken in 2025. This Representation constitutes a continuation of that promotion, now submitted on behalf of Keepmoat as the landowner's preferred developer for the Site. Details of the Site's prior promotion and assessment history are addressed further in Section 2 of this Representation.
- 1.6 In accordance with Paragraph 36 of the National Planning Policy Framework ["the NPPF"], plans should be:
 - a) ***Positively prepared*** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) ***Justified*** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) ***Effective*** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) ***Consistent with national policy*** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 1.7 To this end, this Representation is set out as follows:

- Section 2 provides a detailed assessment of Land East of Little Morton Road, North Wingfield and demonstrates how the Site is available, deliverable and suitable for development in accordance with the NPPF;
- Section 3 provides a wider response to the questions raised within this Consultation to support the drafting of the Emerging Local Plan;
- Section 4 provides concluding recommendations to ensure the soundness of the Plan to promote sustainable growth in the District.

Section 2 | Site Assessment – Land East of Little Morton Road

Site Context

- 2.1 The Site, as edged in red in Figure 2.1 below, extends to 16.48 hectares and is located on the south-eastern edge of North Wingfield, approximately 2km north-east of the town of Clay Cross, and approximately 6km south of Chesterfield.
- 2.2 The Site comprises 5no. interconnected grazing fields and arable farmland, separated by hedgerows. The topography of the Site is generally flat, sloping inwards from the east and west into the centre of the Site.



Figure 2.1: Site Location Plan *(Source: Google Earth)*

- 2.3 In terms of existing landscape features, field boundaries predominantly consist of hedgerows interspersed with occasional trees. A brook, known as Locko Brook, runs north to south within the centre of the Site, set within a mostly vegetated context identifiable from a distinct belt of trees and shrub.
- 2.4 North Wingfield Public Footpath 15 runs through the Site on a north-south alignment, broadly following the route of Locko Brook. The footpath forms part of a wider network of Public Right of Way ["PRoW"] footpaths extending across the surrounding countryside, with connections to the north, south and east. North Wingfield Public Footpath 19 branches from Public Footpath 15 within the Site, crossing in an east-west direction and providing a direct link to Little Morton Road.
- 2.5 The Site is bound by residential properties fronting Little Morton Road to the west, and by open countryside to the north, south and east. The Site is set within a wider landscape context of undulating countryside interspersed with settlements and built development.
- 2.6 The Site is predominantly located within Flood Zone 1 on the Environment Agency's Flood Mapping for Planning, which means that the Site has a low probability of flooding from fluvial sources. Immediately adjacent to Locko Brook, which runs on a north-south alignment through the Site, are areas located within Flood Zones 2 and 3, representing a medium and high probability of fluvial flooding, respectively. The land within Flood Zones 2 and 3 is largely

concentrated along the central corridor of the Site following Locko Brook, with the most extensive areas limited towards the southern tip of the Site. There are also some small areas at risk of flooding from surface water within the Site, including a narrow section running west to east within the western half of the Site - mostly identified as being of low risk of surface water flooding, with some limited areas of medium-high risk.

- 2.7 There are no designated heritage assets within or immediately adjacent to the Site. There are a cluster of Grade II Listed Buildings within the North Wingfield Conservation Area, which is itself located approximately 150m north-west of the Site. In terms of archaeological significance, it is understood that the Site is classified as 'an ancient enclosure - fossilised strip system', with the potential for substantial archaeological interest.
- 2.8 The Site is not within, or in immediate proximity to, any statutory or non-statutory ecological designations, and is not the subject of any specific landscape designations.
- 2.9 A National Grid Electricity Distribution (NGED) overhead line passes through the Site. Whilst emerging proposals associated with National Grid's 'Great Grid Upgrade (Chesterfield – Willington)', as consulted on in January 2025, indicated a potential pylon corridor that could have affected land at the edge of the Site and adjoining land also in the same ownership, the subsequent Stage 2 consultation launched in March 2026 confirmed a revised route alignment that would not come within several miles of North Wingfield. National Grid has confirmed that there is now a negligible likelihood of further route changes, and the emerging Great Grid Upgrade proposals no longer present any constraint to the Site.
- 2.10 The Site is defined on the Agricultural Land Classification maps as being Grade 4 (Very Poor) agricultural land. The Site is also located in a location that has a coal mining legacy.
- 2.11 As confirmed in the Council's adopted Policy Map, the Site is located immediately adjacent to the Development Limits for North Wingfield, and runs largely adjacent to a Local Settlement Gap on the southern boundary of the Site.
- 2.12 The Site is in an accessible location, within close proximity to the centre of the village which provides access to a number of services and facilities including a post office, a supermarket, a medical centre and pharmacy, convenience shops, nurseries and a primary school, pubs and a restaurant.
- 2.13 The Site benefits from strong accessibility to a range of sustainable transport modes. Bus stops are located on Little Morton Road, providing access to hourly services between Chesterfield and Alfreton via Clay Cross. Additional bus stops are situated on St. Lawrence Road within 500m of the Site. These connections provide convenient and reliable access to nearby settlements, including Clay Cross and Chesterfield, which offer a wide range of shops and services, employment opportunities, and educational facilities.
- 2.14 The Site is well connected to the strategic highway network, being located close to the A6175 which runs through North Wingfield and provides direct access to the M1 motorway approximately 5km to the north-west of the Site.

Planning History

- 2.15 There is one planning application associated with the Site, outlined in Table 2.1 below:

Reference	Description	Decision / Date
18/00505/OL	Outline application (all matters reserved except access) for residential development and associated infrastructure (Major Development /Departure from development plan/Affecting a public right of way)	Refused 4 th October 2018
APP/R1038/W/18/3216245	Outline application (all matters reserved except access) for residential development and associated infrastructure (Major Development /Departure from development plan/Affecting a public right of way)	Appeal Dismissed 6 th September 2019

Table 2.1: Planning History

- 2.16 In May 2018, an outline application was submitted to the Council for the residential development of the Site with associated infrastructure. This is herein referred to as 'the Outline Application'. The Outline Application was supported by an Illustrative Masterplan, which is shown in Figure 2.2 below.



Figure 2.2: Indicative Site Layout (Source: 18/00505/OL)

- 2.17 At the time of submission of the Outline Application, the Site was indicated as having the potential to accommodate up to 265no. dwellings. However, it was subsequently agreed between the parties that reference to a specific housing quantum should be removed, reflecting concerns that the indicative layout did not sufficiently demonstrate the Site's capacity to accommodate the level of development proposed. The Outline Application sought approval for a single point of vehicular access from Little Morton Road, with all other matters reserved for future consideration. The proposals included the provision of 20% affordable housing, delivered across a mix of tenures and dwelling sizes, comprising 1, 2, 3 and 4-bedroom homes.
- 2.18 The Outline Application was refused by the Council in October 2018 for the following reasons ["the Reasons for Refusal"]:
1. The site is positioned beyond the Settlement Development Limit for North Wingfield. The proposed residential development would be unacceptable development in the countryside. There are no overriding exceptional circumstances that would justify the proposal. The development is, therefore, contrary to policies GS1, GS6 and H3 of the North East Derbyshire Local Plan and policies SS1, SS2 and SS9 of the North East Derbyshire Local Plan Publication Draft and the NPPF when read as whole.
 2. The development would result in significant harm to local landscape character. It would form a prominent intrusion into the countryside and would not conserve local distinctiveness. It would result in the loss of distinctive characteristics and features such as historic field patterns and areas of hedgerow, which add value to the local landscape. It would not protect or enhance the landscape setting to North Wingfield or the local Public Rights of Way Network. The development is therefore contrary to policies GS1, GS6, NE1 and NE7 of the North East Derbyshire Local Plan and policies SS1, SS9, SDC2 and SDC3 of the North East Derbyshire Local Plan Publication Draft.
- 2.19 The Council's refusal of the Outline Application was appealed to the Planning Inspectorate and was subsequently heard at a Public Inquiry in June 2019. The appeal was ultimately dismissed in September 2019. For clarity, during the Inquiry it was agreed that the Council would not defend the first Reason for Refusal, thereby focusing matters on character and visual impact of the proposals.
- 2.20 The Site was considered to be a well-preserved example of remnant fossilised medieval strip fields, which were found to be a distinctive and locally important feature of the landscape around North Wingfield. This is despite the Inspector's confirmation that the Site is not located within a valued landscape and, as such, is not protected by the NPPF.
- 2.21 The hedgerows on the Site were also confirmed to not hold the character of ancient hedgerows, although well-preserved. This was supported by the Council's Archaeologist, who considered that the hedgerows had likely been replanted, as opposed to being original, historic hedgerow. It was nevertheless considered that the proposed development would have resulted in the irreversible loss of this historic field pattern, which could not have been satisfactorily mitigated.
- 2.22 The Inspector also concluded that the proposals would have a significant urbanising effect on open countryside which would fundamentally alter the rural character of the Site, which had historically remained free from built development. Furthermore, it was found that the Site did not represent a logical or natural extension of the existing settlement. On the contrary, the proposals were considered to extend the settlement into the open countryside, increasing its visual prominence when viewed from surrounding land and nearby public viewpoints.

- 2.23 Additionally, the appeal decision placed particular weight on the effect of the development on the PRoW network and the brook within the Site. The footpaths crossing and adjoining the Site were found to offer a tranquil and accessible countryside setting, which would be affected by the proposals, with users transitioning through a new urban environment. Although the scheme included areas of public open space and green infrastructure, the Inspector considered these measures to be insufficient to offset the harm identified.
- 2.24 At the time of determination the of the Appeal, the Council were able to demonstrate a minimum 5-year housing land supply, and as such the Appeal was determined on a level planning balance. When undertaking the level planning balance, the Inspector acknowledged that the Site was reasonably accessible and that the scheme would deliver housing, including affordable housing, and economic benefits. However, these benefits were not considered to outweigh the substantial harm to the character and appearance of the area. Consequently, the development was held to conflict with saved local plan policies and national policy objectives aimed at protecting the intrinsic character and beauty of the countryside.

Land Availability Assessment (2026)

- 2.25 Following the Council's Call for Sites exercise in 2025, the Site has been assessed in the Council's Housing Land Availability Assessment ["LAA"] of March 2026. This assessment reviews the availability, achievability and suitability of the Site to meet the identified need for housing over the plan period.
- 2.26 The LAA ranked the Site as 'red' for overall suitability for residential development, but with 'green' ratings for availability and achievability, indicating that the Council consider the Site to be readily available for development and capable of being delivered, but with concerns regarding its suitability for residential development, which is discussed further below.
- 2.27 Prior to this, the Site was assessed within the North East Derbyshire District Council Housing Land Availability Assessment and Policy Assessment of November 2017 [the "SHLAA"] under site reference NW/1603, which related to the western portion of the Site only (approximately 10.70ha). The SHLAA identified significant landscape constraints affecting the Site and concluded that large-scale development may not be appropriate. Overall, the Site was assigned an 'orange' rating, indicating that it was subject to policy constraints only.

Proposed Housing Allocation

- 2.28 NPPF Paragraph 72 outlines that, in order to ensure that there is a sufficient and suitable supply of land to deliver their housing objectives, planning authorities are required at local level to identify broad locations and specific sites to enable a continuous delivery of housing for at least 15 years. Specifically, authorities should identify sufficient deliverable sites for the first five years at the point of adoption of a Local Plan. Thereafter, the local planning authority should identify specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.
- 2.29 In accordance with the NPPF's glossary, for sites to be deliverable they need to be available, suitable and achievable.
- 2.30 The Call for Sites submission of the Site in April 2025, suggested a residential capacity of between 150-200no. dwellings, but with the Indicative Masterplan submitted as part of the Call for Sites submission in April 2025 indicating capacity for up to 230no. dwellings on the Site. This is based upon the development of only the western half of the Site, extending to approximately 10.80ha.

- 2.31 The LAA identifies a residential working capacity of 167no. dwellings, derived from an assumed density of 17-21dph. For plan-making purposes, the Council applied a 20% uplift due to the Site's location in a Tier 2 Settlement, which is considered to be a highly sustainable location, resulting in a policy-on residential working capacity of 200no. dwellings, as recorded in the LAA. Our Client welcomes the Council's recognition of the Site being within a highly sustainable location.
- 2.32 The LAA follows a traffic-light rating system whereby 'green' = the site is deliverable, and without constraints / constraints that can be satisfactorily mitigated against; 'amber' = the site may be developable; constraints need to be addressed through the Local Plan and/or planning application process, and 'red' = the site is unlikely developable.
- 2.33 When assessing the Site, the LAA produced an automated 'green' rating with regard to Biodiversity and Geodiversity, indicating that, whilst some ecological features are present, these were not considered to represent significant constraints to development and could be appropriately addressed through appropriate design, alongside mitigation and enhancement measures. The rating was subsequently reduced to 'amber' by officers.
- 2.34 With regard to Landscape Character, the Council's Landscape Officer considered that the Site is well-screened locally by existing development and in the wider landscape by the undulating topography and intervening vegetation. Notwithstanding this, it is noted that the area would be visible in wider views to the east, particularly from the PRow network and occasional dwellings. The Officer notes that visibility would be significantly restricted if development was resisted beyond the existing tree belt to the east of the first field enclosures, where new development would be more closely aligned with the existing built edge, and this area was developed further as part of an enhanced green infrastructure asset. It was also noted that the adjacent land to the north had been put forward as potential development sites, which would need to be considered strategically if the sites in question came forward as a large allocation. Whilst the LAA gives the Site an automated 'green' rating for Landscape Character, the rating has been officer-adjusted to 'amber' following the comments received.
- 2.35 The LAA records a 'red' officer-adjusted rating for Historic and Cultural Significance, with the Archaeological Officer finding that the Site represents approximately 40% of important historical landscape relating to remnant fossilised strip fields, which although not pristine has significant local historic landscape value. As these issues are not capable of being addressed through site-specific policy, it was recommended that the rating be adjusted from an automatic 'amber' to 'red'.
- 2.36 The LAA records a 'green' rating for Transport. The Local Highway Authority comments confirm that a satisfactory access can be achieved from Little Morton Road or Fairfield Drive based on suitable visibility splays. The LAA notes that the Site benefits from access to local amenities, including healthcare facilities, schools, and bus stops, and that opportunities exist to promote active travel and sustainable transport modes.
- 2.37 The LAA assigns 'green' ratings to Water, Air Quality, Natural Resources and Waste, Sustainable Communities, Economy, and Health and Wellbeing; with an 'amber' rating for Climate Change Adaption and Amenity and Utilities, the latter of which relates to the location of the Site within a Coal Authority Development High Risk Area.
- 2.38 The majority of LAA assessments result in 'green' outcomes. Any 'amber' ratings are considered to reflect the need for further assessment rather than fundamental barriers to development. The sole 'red' outcome reflects the presence of areas of local historic landscape interest, which our Client does not consider in itself should preclude development, as

discussed later in this Representation, but which signals the need for a strategic and proportionate approach to site layout and mitigation as part of the plan-making and application process.

- 2.39 In summary, the LAA confirms the Site to be available and deliverable for housing, but with concerns raised in relation to its suitability for development as a result of its Historic and Cultural Significance. The deliverability of the Site is assessed further below.

Available

- 2.40 The Site currently comprises agricultural land (arable and grazing) is available in the short-term onwards for residential development. Whilst currently falling outside Development Settlement Limits as defined in the adopted Development Plan, the Site offers a logical rounding off of the settlement at the south-eastern edge of North Wingfield, adjacent to Refined Sites:

- 45260 - Land to the East Side of St Lawrence Road, North Wingfield
- 45892 - 5 Little Morton Road, North Wingfield
- 45126 - Land off 5 Little Morton Road, North Wingfield

- 2.41 The Site has been promoted through multiple consultations including the recent Call for Sites in 2025 and the SHLAA of 2017, as well as being proposed for development in the Outline Application. Promotion through those consultations and this Representation confirm a continued commitment to bring the Site forward for development at the earliest opportunity.

Suitable

- 2.42 Our Client considers the development of the Site will create a sustainable rounding off to the existing settlement in North Wingfield alongside the development of the Refined Sites as set out in Paragraph 2.40 above. North Wingfield is designated as a Level 2 Settlement (Larger Village) in the Consultation (NEDDC Local Plan Issues and Options Consultation on the Strategic Approach to the Location of Development and Refined Sites, March 2026), and as a Level 2 Settlement in the adopted Local Plan, which refers to 'settlements with good level of sustainability'. North Wingfield is therefore considered to be a very sustainable location, with good access to a broad range of services and facilities, which make it a suitable location for new residential development. This was also recognised in the LAA.
- 2.43 The Site is not subject to any site-specific designations which would preclude its development. In terms of the local historic landscape-related matters raised within the September 2019 Appeal and the Council's recent LAA, the landowner is progressing work to address those comments, which we will share with the Council once completed.
- 2.44 Notwithstanding this, it is considered that the Illustrative Masterplan submitted as part of the Call for Sites submission in April 2025, clearly demonstrates how the Site's existing field pattern can be sensitively retained and positively reinforced through future development proposals. Unlike the September 2019 Appeal scheme, the Masterplan illustrates how development could be distributed across individual field parcels, allowing the historic landscape structure to be respected and integrated into the layout. This approach directly responds to, and appropriately addresses, the concerns previously raised by the Inspector in this regard.

Achievable

- 2.45 The developable area of the Site provides the opportunity to deliver a mix of market and affordable housing, subject to viability, alongside new public open space and biodiversity enhancements. It is anticipated that the Site will deliver a broad range of family housing, in accordance with the Council's most recent Housing Needs Assessment, at a density appropriate to its edge-of-settlement location. On this basis, the Site is considered capable of accommodating in the region of 230no. dwellings.

Conclusion

- 2.46 For the reasons set out above, and those discussed later in this Representation, the Site is considered to be available, suitable and achievable for new residential development. Alongside other adjoining Refined Sites, it forms a logical and sustainable rounding off to the existing community within North Wingfield, in close proximity to the village centre, and offers the opportunity to secure a number of socio-economic and environmental benefits in accordance with the objectives for sustainable development as set out in the NPPF.

Section 3 | Response to Consultation

- 3.1 This Section considers and responds to questions posed by the Council in the Consultation, which sets out its proposed strategic approach for determining where development should be located and invites feedback on a refined list of potential sites, informing subsequent stages of the Emerging Local Plan later in 2026.
- 3.2 The Sections our Client consider most relevant to this Representation are listed below with our responses set out beneath each subheading.

Settlement Hierarchy

- 3.3 Our Client welcomes the retention of a tiered settlement hierarchy, which, combined with the priority levels for growth, provides a robust framework for directing development. The Council's acknowledgement that a settlement's position in the hierarchy indicates its theoretical potential to accommodate development and does not take account of land availability, land suitability, or other policy considerations such as Settlement Gaps is also welcomed.
- 3.4 Our Client welcomes the update to the Settlement Hierarchy to support the Council's objective of ensuring that the new Local Plan is informed by an accurate understanding of settlement roles, noting that the hierarchy is intended to provide a strategic framework rather than an allocation tool and therefore must be read alongside site-specific evidence.
- 3.5 As set out in the Council's Settlement Hierarchy Topic Paper (March 2026), each settlement in North East Derbyshire has been assigned a 'Sustainability Ranking' out of a possible score of 40, based on an assessment of population size, availability of facilities and services, employment opportunities, and public transport accessibility. These scores are used to establish a tiered settlement hierarchy, whereby settlements scoring 32 or above are classified as Level 1, those scoring 16–31 as Level 2, settlements scoring 7–15 as Level 3, and the remaining settlements as Level 4.
- 3.6 Within this framework, North Wingfield achieves a total Sustainability Ranking of 30 points, comprising:
- 9 points for Population;
 - 10 for Facilities and Services;
 - 2 for Employment Opportunities; and
 - 9 for Public Transport Accessibility.
- 3.7 Of the Level 2 settlements, only Wingerworth scores higher, with 31 points, placing North Wingfield at the upper end of the Level 2 tier. Neighbouring Holmewood also scores 30 points, whilst 2no. settlements score 25 and 24 points respectively, with the remaining 4no. settlements scoring below 20 points. This reinforces North Wingfield's strong sustainability credentials within the hierarchy as one of the most sustainable settlements in the District.
- 3.8 North Wingfield is recognised in the Topic Paper for its facilities and services, as well as for its public transport accessibility. Whilst it is recognised that a score of 2 has been given for employment opportunities, it is nevertheless recognised that Clay Cross is awarded a score of

10+, and with Holmewood scoring 10. Given North Wingfield's acknowledged excellent public transport accessibility, it is considered that its residents are able to readily access higher-order employment opportunities in nearby settlements such as Clay Cross and Holmewood and that, as such, the lower score attributed to employment opportunities within North Wingfield itself should therefore be afforded limited weight when considering the overall sustainability of the settlement.

- 3.9 In this context, it is considered that significant weight should be attributed to sites within the most sustainable settlements within the hierarchy, particularly those which sit at the upper end of their respective tiers. North Wingfield's strong overall Sustainability Ranking, combined with its good range of facilities and services and excellent public transport accessibility to nearby higher-order centres, indicates a strong capacity to accommodate future development in principle, subject to site-specific considerations and wider policy requirements.

Sustainability Appraisal

- 3.10 Our Client welcomes the Council's publication of an updated Sustainability Appraisal (March 2026) ["SA"] which assesses the reasonable alternative sites for potential allocation in the Emerging Local Plan.
- 3.11 The Site is identified as 'Site 45139, Land at Little Morton Road, North Wingfield, Derbyshire', and is identified as a reasonable alternative residential site, having passed the Council's initial sieving process and having been subject to full appraisal against the 13 Sustainability Appraisal Objectives.
- 3.12 Our Client acknowledges the Council's confirmation that the SA findings are based on a pre-mitigation assessment and that no site-specific design, mitigation, or policy measures have been applied at this stage.
- 3.13 Whilst the Site is directly adjacent to the built-up area of North Wingfield, which elsewhere is acknowledged as a highly sustainable settlement, the SA records minor negative effects in relation to 'sustainable communities' and 'transport'. This is understood to arise from the methodology that applies district-wide distance thresholds, and the strategic, pre-mitigation nature of the SA assessment.
- 3.14 The SA also records minor negative effects in relation to 'landscape' and 'cultural heritage', which may reflect the Site's edge of settlement, greenfield context and the potential for localised effects on landscape character and the wider historic environment, identified on a precautionary and pre-mitigation basis, rather than the presence of any fundamental constraints to development. As noted in Paragraph 2.43 of this Representation, in terms of the local historic landscape-related matters raised within the September 2019 Appeal and the Council's recent LAA, the landowner is progressing work to address those comments which we will share with the Council once completed.

North Wingfield

- 3.15 As discussed in Paragraphs 3.3 – 3.9 above, North Wingfield is acknowledged as one of the most sustainable settlements within the Settlement Hierarchy, sitting at the upper end of Level 2, and performing strongly in terms of population, facilities and services, and public transport accessibility, with good functional links to nearby higher-order centres supporting access to employment opportunities.

- 3.16 Our Client considers that this presents a strong case for North Wingfield to accommodate an appropriate level of future development, commensurate with its position at the upper end of Level 2 in the Settlement Hierarchy.
- 3.17 Having reviewed the shortlisted sites elsewhere in North Wingfield, particular consideration has been given by our Client to Site 45236 (Land North of Williamthorpe Road and East of Chesterfield Road, North Wingfield), together with the adjoining Site 45262 (Land to the West of Feld Lane, Holmewood). While noting these have come forward as separate Refined Sites, when assessed collectively, these sites represent a substantial scale of development, with a combined policy-on residential capacity of approximately 1,191no. dwellings (520no. dwellings and 671no. dwellings respectively). The magnitude of development proposed across these adjoining sites is such that it would function as a strategic urban expansion rather than incremental or proportionate growth for their respective settlements.
- 3.18 Our Client raises significant concern regarding the suitability of the aforementioned sites due to their location on the northern edge of North Wingfield and the southern edge of Holmewood. Taken together, their development would result in a clear and pronounced risk of coalescence between the two settlements. This would fundamentally erode the open and rural character of the existing gap between the settlements, which plays an important role in maintaining the separate identity and legibility of each settlement. The resulting harm would not only impact local landscape character but would also undermine the established spatial distinction between North Wingfield and Holmewood, contrary to the strategic objectives of directing development in a manner that respects settlement form and avoids unacceptable cumulative impacts.
- 3.19 In addition to these concerns, it is noted that sites of this scale are inherently more complex and challenging to deliver. Strategic allocations typically require extensive up-front infrastructure provision, including highways improvements, utilities upgrades, education and healthcare capacity, and open space delivery. Furthermore, such sites are likely to require phased delivery over a prolonged period and careful consideration of cumulative impacts. As a result, it is unlikely that these sites would make a meaningful contribution to housing delivery in the early years of the Plan period, thereby limiting their effectiveness in addressing short- to medium-term housing needs.
- 3.20 By contrast, the Site, alongside the adjoining Sites 45260 (Land to the east side of St Lawrence Road, North Wingfield), 45892 (5 Little Morton Road, North Wingfield), and 45126 (Land off Little Morton Road, North Wingfield), provides a more sustainable and proportionate approach to accommodating growth. Collectively, these sites offer a logical rounding-off of the settlement at the south-eastern edge of North Wingfield, where development is well contained by existing built form and clear, defensible boundaries, including Locko Brook. Importantly, this approach avoids outward expansion toward neighbouring settlements and respects the existing settlement structure and landscape setting.
- 3.21 When compared with the aforementioned larger strategic alternatives, the Site represents a coherent and sensitive extension to the existing residential area. It integrates effectively with surrounding development, reinforces the established settlement pattern and avoids the risk of cumulative impacts associated with large-scale edge-of-settlement growth. The scale of development proposed is appropriate to the role of North Wingfield within the Settlement Hierarchy and aligns with the objective of directing growth to sustainable locations without compromising settlement identity.
- 3.22 It is therefore concluded that the Site represents an appropriate option for allocation within the Emerging Local Plan. This conclusion is founded on the Site's strong spatial and functional

relationship with the existing built-up area, its modest and deliverable scale, and its clear potential to be brought forward in the short-term. As such, the Site is well placed to contribute positively to housing delivery in the early part of the Plan period, while avoiding the landscape character impacts and deliverability concerns associated with the larger strategic alternatives.

45139 - Land at Little Morton Road, North Wingfield

- 3.23 The Council's assessment of the Site identifies that it is capable of accommodating a policy-on residential capacity of approximately 200no. dwellings, derived from consideration of prevailing residential densities in the surrounding area, together with the application of a 20% density uplift reflecting its location within a highly sustainable Level 2 Settlement.
- 3.24 The landowner is currently undertaking a suite of proportionate technical assessments to further inform the Site's development potential and to refine understanding of any site-specific constraints and opportunities. Once completed, this information can be shared with the Council to support its ongoing assessment of the Site as a suitable and deliverable residential allocation within the Emerging Local Plan.
- 3.25 Notwithstanding this, it is acknowledged that concerns have been raised in relation to the potential impact of development on the Site's historic field pattern. In this regard, the Illustrative Masterplan submitted as part of the Call for Sites process clearly demonstrates how a sensitively designed scheme could be brought forward. The Masterplan shows how development could respect, retain and reinforce the existing hedgerow network and field structure through careful 'parcelling' of development across individual fields, regardless of the historic significance attributed to those features.
- 3.26 In a similar manner, the existing PROWs crossing the Site can be retained, enhanced and positively integrated within the proposed green infrastructure network. This would ensure continued public access to the surrounding countryside, improve the quality of the recreational environment, and deliver ecological enhancements alongside Locko Brook and within retained landscape features, creating a high-quality and accessible environment for future residents and the wider community.
- 3.27 In respect of visual and landscape considerations, and noting the Landscape Officer's acknowledgement within the LAA that the Site is locally screened and capable of being closely aligned with the existing settlement edge, future development proposals could appropriately address the Site's south-eastern rural interface. This could be achieved through a combination of sensitive layout, the provision of additional structural planting, reinforcement of existing vegetation, and a reduction in built density toward the outer edges of the Site, ensuring a soft transition into the surrounding countryside.
- 3.28 It is also acknowledged that the Site lies within a Coal Authority Development High Risk Area. This is a well-understood constraint within the wider District and is capable of being satisfactorily addressed through the submission of a Coal Mining Risk Assessment and intrusive site investigations at the planning application stage. The outcomes of these assessments would inform the detailed layout, foundation design and any necessary mitigation measures, but do not represent an abnormal or insurmountable constraint to development.
- 3.29 For the reasons set out throughout this Representation, the Site is considered to meet the tests of being available, suitable and achievable for residential development. It occupies a sustainable location on the south-eastern edge of North Wingfield, is well-related to the existing built form, and benefits from excellent access to local services, facilities and public

transport connections. Importantly, there are no fundamental technical or policy constraints that would prevent the Site from coming forward for development.

- 3.30 As outlined above, further technical work is currently underway to refine the understanding of site constraints and opportunities and to inform an appropriate development capacity, layout and mitigation strategy. This work will provide additional assurance in respect of the Site's suitability and deliverability and can be shared with the Council in due course to assist in the plan-making process.

Section 4 | Conclusion

- 4.1 This Local Plan Representation has been prepared by nineteen47 on behalf of Keepmoat in response to the North East Derbyshire District Council Local Plan Regulation 18 Issues and Options Consultation.
- 4.2 Section 2 of this Representation confirms that the Land East of Little Morton Road, North Wingfield is available, suitable and achievable to provide approximately 230no. dwellings, which will assist the Council in meeting its emerging housing target. The Council has seen a significant increase in its housing requirement following the publication of the revised standard methodology in 2024 and this Site will make a valuable contribution to housing growth within the new Local Plan.
- 4.3 There are a range of benefits associated within the development of the Site, including a provision of a range of housing and affordable housing, as well as environmental enhancements.
- 4.4 The Site represents a logical extension to the settlement of North Wingfield and is within a sustainable location; benefiting from the services and amenities of North Wingfield as well as those in nearby settlements, given existing public transport linkages. The development of the Site will make a viable contribution to the vitality and sustainability of the nearby area, in accordance with the aspirations of the NPPF. The Site is also available, suitable and achievable and can be delivered in the short-term, subject to securing planning permission.
- 4.5 Section 3 considers the Regulation 18 Consultation on the 'Strategic Approach to the Location of Development and a Refined Schedule of Sites' and recommends that the Council adopts a proportionate and effective site selection strategy that prioritises highly sustainable settlements and includes Land at Little Morton Road, North Wingfield as an appropriate option for allocation, given its ability to provide a logical and proportionate rounding-off of the south-eastern edge of North Wingfield. The Site's strong relationship with the existing built-up area and adjacent Refined Sites allows development to integrate coherently with the established settlement form and maintain the distinct identity of North Wingfield within the wider spatial strategy.
- 4.6 Crucially, this approach avoids the scale and spatial consequences associated with larger Refined Sites elsewhere, where cumulative development would have the potential to extend beyond natural settlement boundaries and result in the physical and perceived coalescence of neighbouring settlements, thereby eroding their distinct identities.
- 4.7 We reserve the right to respond to and make further comments on other matters as the emerging Local Plan progresses.



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