

Keyland

North East Derbyshire District Council: Local Plan Review 2024-2044

Regulation 18 Representation on the Strategic
Approach to Location of Development and
Refined Sites

April 2026



01 Introduction

Introduction

- 1.1 North East Derbyshire District Council (hereafter referred to as 'the Council') are reviewing the current local plan to ensure that it reflects changes to the district's housing requirements along with new legislation and guidance introduced by the government. The Council is seeking to engage with key stakeholders, including individuals and organisations who have an interest in the district (in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012).
- 1.2 Spawforths have been instructed by Keyland Developments Ltd (Keyland) to submit representations to the North East Derbyshire District Council Local Plan Review Regulation 18 Consultation on the Strategic Approach to the Location of Development and Refined Sites.
- 1.3 Keyland have significant interest within North East Derbyshire, which can positively contribute to the housing and economic growth agenda, and therefore welcome the opportunity to engage with the Council in the preparation of an updated Local Plan. Keyland's site is at Furnace Hillock Way, Hasland, Chesterfield (Site 45065):



- 1.4 Keyland would like to make comments on the following topics and sections of the North East Derbyshire District Local Plan Review:
- General Comments
 - Strategic Approach
 - Refined Schedule of Sites: Site 45065 – Land around Furnace Hillock Way, Hasland
- 1.5 In each case, observations are set out with reference to the provisions of the National Planning Policy Framework (hereafter referred to as “the Framework”) and where necessary, amendments are suggested to ensure that the Local Plan Update is found sound.
- 1.6 Keyland welcomes the opportunity for further engagement and the opportunity to appear at Examination in Public.
- 1.7 We trust that you will confirm that these representations are duly made and will give due consideration to these comments. Please do not hesitate to contact us to discuss any issues raised in this Representation further.

National Planning Policy context and Tests of Soundness

- 1.8 The Government's core objectives as established through the 2024 National Planning Policy Framework are sustainable development and growth. Paragraph 11 of the 2024 Framework stresses the need for Local Plans to meet, as a minimum, the objectively assessed needs of an area. The 2024 Framework sets out to boost significantly the supply of homes and ensure that a sufficient amount and variety of land can come forward where it is needed. The Local Housing Need identified through the standard method in the National Planning Practice Guidance should be met as a minimum. In terms of building a strong and competitive economy the 2024 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2024 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes and well-designed places.
- 1.9 In relation to Local Plan formulation, paragraphs 15 to 38 of the 2024 Framework state that Local Plans are the key to delivering sustainable development which reflect the vision and aspirations of the local community. The 2024 Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where. Paragraph 22 is clear that the Strategic policies should look ahead over a minimum period of 15 year period, and

where larger scale development such as new settlements or significant extensions to existing villages and towns form part of the areas strategy, then policies should look ahead over a period of at least 30 years.

- 1.10 In relation to the examination of Local Plans, paragraph 36 of the 2024 Framework sets out the tests of soundness and establishes that:

Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:

- ***Positively prepared*** – *providing a strategy which as a minimum, seeks to meet the area’s objectively assessed need; and is informed by agreements with other authorities, so that unmet needs from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.*
- ***Justified*** – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- ***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*
- ***Consistent with national policy*** – *enabling the delivery of sustainable development in accordance with policies in this Framework and other statements of national planning policy, where relevant.*

- 1.11 The Local Planning Authority must demonstrate that the Local Plan Update complies with the legal and regulatory framework, including the legal requirements in ss19 and 24(1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004), Regulations under s.17 and any regulations under s. 36 relating to the preparation of DPD’s, and that the Local Plan Update is ‘Sound’, and that it complies with the Duty to Cooperate.

- 1.12 The PCPA 2004 requires the LPA to demonstrate that regard has been given to national policies and advice, development plan documents, and must undertake a sustainability appraisal. Plan making authorities are also required to have regard to the resources that are likely to be available for implementing the proposals¹. As confirmed with legal judgements “resources” includes resources in the private sector “*thus the viability and deliverability of the*

¹ PCPA Section 19 (2)(i)

proposals are considerations to which the authority should have regard when preparing its policies”².

- 1.13** This document therefore considers the content of the consultation on behalf of Keyland in the light of this legal and planning policy context.

² West Berkshire District Council and Reading Borough Council v. DCLG, 2015 EWHC 2222 (Admin)

02 General Comments

General Comments

- 2.1 Keyland consider that the Council needs to fully reflect the new 2024 Framework in relation to ambition and growth.

Justification

Housing and Economic Growth

- 2.2 Keyland welcomes a further opportunity to engage on the spatial strategy and locations for development.
- 2.3 The North East Derbyshire Local Plan was adopted in November 2021 and covered the period 2014-2034, which is now approaching 5 years ago. National planning policy and guidance has changed significantly in that time, with latest National Planning Policy Framework published in December 2024. This includes a refreshed approach to the standard methodology for calculating housing need.
- 2.4 The Framework establishes a more positive and pro-development policy framework to address the concern that the planning system is a major constraint to growth. The July 2024 Written Ministerial Statement (30th July 2024) confirms the Government's position on restoring and raising housing targets; focussing new development into the '*right places*' including within the Green Belt; moving towards strategic planning; building infrastructure to grow the economy; and supporting local planning.
- 2.5 The Framework is the immediate tool to unlock the planning system and reflects the new Labour Government's aspirations for growth. Rachel Reeves gave a speech soon after the election to emphasise that "*sustained growth is the only route to improving prosperity of our country*"; that "*nowhere is decisive reform needed more urgently than in our planning system*"; and importantly "*economic benefits of development will be a central consideration*".
- 2.6 Chapter 5 is all about '*Delivering a sufficient supply of homes*' and the changes to the Framework reinforce and emphasise that local authorities should meet the identified housing need as a minimum and the baseline is the standard method. Para 62 of the NPPF states that "*to determine the minimum number of homes needed, strategic policies should be informed*

by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

- 2.7 Under the standard method for calculating housing need, North East Derbyshire District Council’s local housing need requirement is set at a minimum of 605 new homes per year.
- 2.8 The proposed changes to the NPPF were published for consultation on 16th December 2025. The Ministerial Statement that accompanied the proposed changes states that the overhaul of the NPPF is designed “to facilitate the delivery of high and sustainable rates of housebuilding” and to “boost the housing supply and unlock economic growth”. The proposed changes create a “permanent presumption in favour of sustainable development”, secure a diverse mix of homes and streamline local standards to speed up decision making. It is appreciated that the proposed changes are out for consultation, but they are a direction of travel contained in an accompanying Written Ministerial Statement.
- 2.9 Therefore, there is a need for the emerging Local Plan to address the updated national planning position and provide for the housing and employment needs for the area.

Plan period

- 2.10 Keyland welcomes the extension of the Plan period from the consultation undertaken in August 2025. The consultation material now suggests the emerging Local Plan will cover a Plan period from 2024-2044. The Framework is clear that all strategic policies should look ahead for a minimum of 15 years from the date of adoption. However, if there are large scale urban extensions / new towns then this should be over a 30 year period. Therefore, Keyland considers that there is potential for the Local Plan to cover a longer period and plan accordingly to drive economic and housing growth that the area needs.

Ambition

- 2.11 The Government’s ambition is to deliver sustained economic growth, improve prospective and enhance living standards. To deliver this ambition growth needs to be created throughout the country. The emerging Local Plan needs to reflect the Government’s ambition and recognise the housing crisis.
- 2.12 Furthermore, the Local Plan Update needs to reflect the ambitions both nationally, and for the sub-region. The East Midlands Vision for Growth (May 2025) sets out the region’s bold plan which will transform the region. Delivery of the vision will create 100,000 new jobs, deliver and add £4 billion to the East Midlands economy.
- 2.13 This vision sets out a clear direction for the region and establishes long-term objectives that will make the East Midlands an even greater place to live, work, and visit. The plan focuses on seven key locations where there are opportunities for growth, across the region’s cities, towns, villages, and natural spaces.

- 2.14 This approach needs to be reflected and enshrined within the emerging Local Plan for North East Derbyshire.

Proposed Approach

- 2.15 To address the comments, the following approach is proposed:

- Reflect the new National Planning Policy Framework.
- With the economic ambitions and affordable housing need, the housing requirement should be set above the standard method Local Housing Need.
- Reflect the region's ambitions and growth strategies.

03 Strategic Approach

Strategic Approach to the Location of Development

- 3.1 Keyland consider that the Council's approach to the emerging Local Plan needs to reflect national policy and guidance and deliver the ambitions for housing and economic growth. The emerging Local Plan should not just be trying to achieve the minimum number of homes required.
- 3.2 The emerging Local Plan needs to address the big strategic issues of providing for new homes and businesses and supporting infrastructure.

Justification

Development Needs

- 3.3 The Vision needs to reflect national and regional policy ambitions. Nationally, the Government is seeking to deliver 1.5 million new homes and the housing crisis is a key policy issue to address over this parliamentary period. This flows through Written Ministerial Statements and the new Framework, which includes updated guidance and minimum housing targets, which the Vision should set out to achieve.
- 3.4 Furthermore, the Government seeks to increase economic growth, which is important to address prosperity and living standards, consistently highlighting that *"sustained growth is the only route to improving prosperity of our country"*.
- 3.5 Keyland considers that the Local Plan review must ensure that housing delivery targets are suitably ambitious and above the standard method. Housing requirement is different to housing need and should also cater for economic growth. The standard method introduced by the NPPF should only be a minimum requirement.
- 3.6 Keyland considers that the Local Plan review must ensure that housing delivery targets are suitably ambitious and above the standard method. Housing requirement is different to housing need and should also cater for economic growth. The standard method introduced by the NPPF should only be a minimum requirement.

- 3.7 The standard method calculates for North East Derbyshire that the housing need is 605 new homes per annum, or 12,100 over the 20 years of the Local Plan period. Furthermore, national policy and guidance states that Councils can choose to plan for more homes if they want to support things like economic growth or help meet housing needs in nearby areas.
- 3.8 The standard method represents a baseline for calculating housing need, and should not be seen as a ceiling for delivering housing. Whilst the standard method provides a minimum starting point for housing need, using household projections and affordability. It also fails to account for local economic growth, job creation, infrastructure changes, or specific demographic shifts.
- 3.9 Providing ambitious housing targets above the standard methodology also supports economic growth. This would match the East Midlands Vision for Growth (May 2025) which sets out the vision for transformative and ambitious growth within the region. Where significant employment growth is planned, housing supply must match job creation to avoid commuting issues and labour shortages.
- 3.10 At Examination, the Planning Inspectors may find the Local Plan unsound if it fails adequately address all sources of housing need. A higher target for housing will demonstrate that the Local Plan is positively prepared, justified, and effective, which are key NPPF soundness tests.
- 3.11 **The Local Plan should therefore establish a housing requirement above the standard method to reflect the economic ambitions for the area and affordable housing needs.**

Spatial Distribution of Development

- 3.12 The location of development is a critical aspect of achieving sustainable development. As a general principle development should be located in areas that are accessible, sustainable, and benefit the local community.
- 3.13 The feedback from the August 2025 consultation shows the largest proportion of support (24%) was towards sites around the edge of Chesterfield. Keyland supports this approach. Chesterfield is the largest and most sustainable settlement in the area, which is surrounded by North East Derbyshire on three sides.
- 3.14 Furthermore, local government reorganisation is proceeding which is likely to merge Chesterfield with North East Derbyshire in the near future.
- 3.15 Therefore, through engagement and dialogue appropriate sustainable opportunities should be identified on the edge of Chesterfield, such as Keyland's site at Furnace Hollock Way, Hasland (Site Ref 45065).

Proposed Approach to the Location of Development

- 3.16 Keyland support the proposed approach which identifies Priority Locations with Priority 1 including Edge of Chesterfield/Sheffield locations.

- 3.17 Keyland consider that this is an appropriate option in identifying land required to deliver sustainable growth within the district. Development around Chesterfield should be prioritised. Chesterfield is the most sustainable settlement in the area, which is surrounded by North East Derbyshire on three sides. Locating development on the edge of Chesterfield will ensure that new development has access to services, facilities, employment opportunities and access to public transport.
- 3.18 It is welcomed that higher positions in the spatial locations will be prioritised. However, it is slightly concerning that the consultation document states that “this does not override Green Belt or other desirable policy restrictions such as Local Settlement Gaps, provided that sufficient suitable sites can be found elsewhere in appropriate locations”. The consultation then states that the broad strategy is to “involve maximising allocations in areas outside of the Green Belt before considering sites within it; and then only where it can be shown to be necessary”. Given Chesterfield is surrounded by Green Belt, the Priority Locations and the spatial strategy are contrary.
- 3.19 The Council needs to recognise and accept that a Green Belt Review needs to occur and that the exceptional circumstances for releasing Green Belt is to meet housing needs in the most sustainable locations in accordance with the Priority Locations for development.

Settlement Hierarchy

- 3.20 The Settlement Hierarchy Study 2025 provides up to date information about settlements in North East Derbyshire District and the services and facilities they provide. One of the primary aims of establishing a settlement hierarchy is to promote sustainable communities by bringing housing, jobs and services closer together in an attempt to maintain and promote the viability of local facilities and reduce the need to travel to services and facilities elsewhere.

Sustainability Appraisal

- 3.21 It is welcomed that the Sustainability Appraisal has been published. However, the methodology and approach appears confused and it is unclear how the scoring, ranking and assessment has been applied.
- 3.22 For example, it is implied that Table 3.2 is summary of the Sustainability Appraisal for each site, however it portrays an inaccurate picture. Keyland’s site at Furnace Hillock Way, Hasland (Site 45065) is considered to have a negative score on transport. However, in the individual table it has a positive for buses and negative for railway station.
- 3.23 Nevertheless, the Sustainability Appraisal has not reflected the DfT connectivity tool which assesses the area to be extremely accessible and therefore the negative score is confusing.
- 3.24 The overall approach of the Sustainability Appraisal is confused and the methodology should be reviewed.

Proposed Approach

3.25 To address the comments, the following approach is proposed:

- Reflect national and regional policy ambitions.
- Set housing targets which are above the standard method baseline, and exceed for affordable housing and economic growth.
- Undertake a Green Belt Review that identifies grey belt.
- Amend approach to site identification that focusses on the most appropriate and sustainable locations first.
- Review the methodology and approach of the Sustainability Appraisal.

04 Refined Schedule of Sites

Site 45065 – Land around Furnace Hillock Way, Hasland

- 4.1 Keyland supports Site 45065 being short listed as a potential future housing allocation.
- 4.2 Keyland controls the site at Furnace Hillock Way, Hasland, which is available, suitable and achievable and therefore deliverable in accordance with national planning policy and guidance.
- 4.3 A Vision Report is attached to these representations, which explains the deliverability of the site.
- 4.4 Keyland considers the site can come forward in the short term and make a valuable contribution to the housing land supply.

Justification

- 4.1 Keyland considers that their Site at Furnace Hillock Way, Hasland should be allocated for housing use within the emerging Local Plan.
- 4.2 A Vision Report has been prepared and is attached at Appendix 1 to support the allocation of the site within the Local Plan. The Vision Report demonstrates that the site is available, suitable and achievable and therefore deliverable in accordance with the Framework and PPG. The Vision Report includes an illustrative masterplan and shows the vision for the site and how it could be delivered.
- 4.3 Keyland's vision for the site is to create a logical extension to Chesterfield, creating a well-designed residential area that complements the existing community and enhances local character. The development of the site will support the Council's and the East Midlands Region's ambition to promote opportunities for growth, across the region's cities, towns, villages, and natural spaces.
- 4.4 Furnace Hillock Way, Hasland, presents an opportunity to make a significant contribution to the housing need in North East Derbyshire. The site creates an opportunity with Keyland's Six Capitals philosophy to bring forward an exemplar residential scheme to meet a diverse range of occupiers and stakeholders.

- 4.5 The Six Capitals approach has therefore shaped the illustrative masterplan. As the starting point of the proposed scheme is different this leads to a different outcome. The development has been designed from the outset to meet the differing housing needs in the area. Furthermore, to meet the social, human and environmental ambitions a significant proportion of the site has been identified for a range of environmental, recreational and water management activities.
- 4.6 The site presents an opportunity to provide housing in a sustainable location. The site is contained on all sides, bounded by roads, residential development and a golf course.
- 4.7 Overall, this is a scheme that has strong potential to balance connectivity, sustainability, and community well-being. It will create a vibrant, healthy, and resilient place for people to live, work and thrive.



- 4.8 In response to the bulleted list in the consultation document relating to Site 45065 the Vision Report has been informed by technical assessments:
- Green Belt: Spawforths has undertaken a High Level Grey Belt Assessment which Assessment shows that against all five purposes of the Green Belt concludes that the site performs a WEAK/MODERATE role against the five purposes of the Green Belt. The site at Furnace Hillock

Way, Hasland has the potential to be Grey Belt as it does not perform strongly against purposes (a), (b) and (d) and it does not contain any Footnote 7 matters. In addition the Assessment has shown to a high level that the boundary to the site is formed by recognisable features and is effectively contained, has urban influences on character with urban form on three sides and a golf course to the south.

- Heritage: Adept has undertaken a Heritage Appraisal and there are no archaeological or heritage constraints to the scheme.
- Ecology and Trees: Brooks has undertaken a Preliminary Ecological Appraisal and BNG assessment and there are no ecological or arboricultural constraints to the scheme.
- Public Rights of Way and Green Space: the illustrative masterplan within the Vision Report demonstrates that the PROW's and green spaces can be accommodated within the proposed scheme.
- Flood Risk and Drainage: OEC has undertaken a preliminary Flood Risk and Drainage Assessment and there are no flood risk or drainage constraints.
- Geo-Environmental: Lithos has undertaken a preliminary ground investigation and there are no geo-environmental constraints.

- 4.9 The technical reports and Vision Report demonstrate that there are no major constraints to the development of the site and that the site can be delivered in the Local Plan period. The site is therefore “achievable” in accordance with the Framework.

Availability

- 4.10 Keyland has a legal agreement with the landowners to promote and develop the land for housing. Keyland is proud of their reputation for working with local and national builders to deliver high-quality desirable homes in sustainable locations. The site is currently available for residential development which can be brought forward early within the local plan period, representing a short term opportunity.
- 4.11 The land is therefore “available” in accordance with the Framework and the Planning Practice Guidance.

Suitability

- 4.12 Keyland believe that the site is suitable for residential development, with no constraints that cannot be appropriately mitigated or that would represent the site being unsuitable.
- 4.13 The proposed development can make an efficient and attractive use of the land. Although greenfield land, the site represents an excellent opportunity for future housing and development. This site would allow housing to be delivered within an appropriate and sustainable location at Hasland, Chesterfield. The development of this site would assist in creating a logical extension to the built up urban area.

- 4.14 The site occupies a highly sustainable location on the edge of Hasland, adjoining the existing built-up area and forming a logical extension to Chesterfield. It benefits from strong access to local services, education, and transport infrastructure, including proximity to Chesterfield and its wider employment opportunities.
- 4.15 Furnace Hillock Way provides direct connectivity through the site, linking key routes and supporting accessibility. The surrounding context, including residential areas, green spaces, and community facilities, reinforces its suitability for residential development.
- 4.1 While the site lies within the Green Belt, it is well contained and relates closely to the existing urban edge. It makes a limited contribution to Green Belt purposes and should be considered through the emerging Local Plan Review as a 'grey belt' opportunity.
- 4.2 Spawforths has undertaken a High Level Grey Belt Assessment (Appendix 2) and considers the site is capable of being 'grey belt'. The site is bound by Chesterfield, B6039 Mansfield Road, B6038 Churchside, residential properties, a golf course, woodland, and tree belts. These existing conditions provide containment to the site, and provide significant urban influence on the character of the site. Partial enclosure leads to an assessment of weak to moderate contribution to the purposes of the Green Belt, and therefore presents a positive opportunity for residential growth as a grey belt site.
- 4.3 There is a clear need for new sites to come forward for housing to support the growth ambitions for the East Midlands region. The site provides an important opportunity to meet local housing needs. The proposed residential development would be developed to a high-quality design standard that respects the nature of the surrounding area. The development of the site for housing presents an ideal opportunity to address local housing needs by providing a diverse range of affordable and aspirational homes for families, older adults, and young professionals.
- 4.4 The site provides a unique opportunity that will benefit the area and wider district with economic, environmental and social benefits. The technical work that underpins the masterplan confirms that there are no known constraints to development. It is therefore considered that the proposed allocation of the site is suitable, in accordance with national guidance and PPG
- 4.5 The land is therefore "suitable" in accordance with the Framework and the Planning Practice Guidance.

Deliverability

- 4.6 Keyland consider that the Site can come forward immediately and be delivered within the Plan period. The Vision Report shows that there are no significant issues preventing the site coming forward.
- 4.7 The proposed development is located within close proximity to existing services and facilities. The indicative masterplan represents an efficient use of the land available. The scheme is therefore making an efficient and effective use of land and infrastructure.

- 4.8 The site provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by Keyland and is deliverable within the Plan period.

Achievable

- 4.9 A range of technical work has been undertaken and is ongoing. From these initial assessments there are no technical issues that would prevent the delivery of the site for residential purposes. The technical reports have informed the illustrative masterplan within the Vision Report and shows how a mix of housing can be accommodated within the site, alongside connectivity, landscaping and drainage features.
- 4.10 The Framework requires Local Planning Authorities to meet their full objectively assessed housing need. Keyland considers that the site is deliverable and will reinforce the housing supply and address the Council's housing needs in the Local Plan period. Development of this site will support the delivery of a range of housing types and contribute towards meeting identified needs.
- 4.11 The Vision Report demonstrates that there are no major constraints to the development of the site and that the site can be delivered in the Local Plan period. The site is therefore "achievable" in accordance with the Framework.

A Positive Response to the Key Objectives of the Framework

- 4.12 The Framework sets out that the Governments key housing policy goal of significantly boosting the supply of housing and proactively driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. The Framework explains that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as extensions to towns, and creating mixed and sustainable communities with good access to jobs, key services and infrastructure. Sites should also make effective use of land and existing infrastructure.
- 4.13 In relation to the Framework:
- The proposal responds positively towards national guidance.
 - The site is appropriate for accommodating housing growth, being an expansion of an existing settlement.
 - The proposed site is accessible to existing employment, local community facilities, infrastructure and services, including public transport.
 - The site has been assessed as being available, suitable and achievable for development.

Benefits of Site Reference ID45065 – Land at Furnace Hillock Way, Hasland

- 4.14** The development of the site would provide significant economic, social and environmental benefits. The site would provide housing that would meet the needs of the North East Derbyshire District Council's housing market in a sustainable location.
- 4.15** In accordance with the Framework this representation has shown that:
- The site is suitable for housing and can deliver circa 850 new homes.
 - The site can deliver a new local centre and school.
 - The proposal can provide a good mix of housing commensurate to the demand and need in the area and diversify the housing stock
 - The site is within a sustainable location situated in close proximity to facilities and services and also to bus stops for local bus routes.
 - The scheme uses land efficiently and effectively.
 - The proposal is in line with planning for housing objectives.
 - The scheme will create direct and indirect job opportunities both during and after construction, plus employment opportunities with a local centre and school.
 - The site can deliver new areas of public open space.
- 4.16** The proposal is an appropriate site to provide for the housing needs of North East Derbyshire and the wider East Midlands region during the local plan period. Confirmation of the allocation will contribute positively to a balanced housing supply in the area in sustainable locations. The site can deliver a full range and mix of housing as part of a sustainable community. Development of the site would deliver affordable housing. North East Derbyshire District Council needs to have a robust housing trajectory with a sufficient supply of deliverable sites. The site will assist with this delivery in the medium term. The site is situated within a prime location suitable for residential development and as such would facilitate the development of land in an effective and efficient manner. Development of the site would not harm or undermine the area's wider policy objectives but seeks to reinforce the need to develop sites within sustainable locations as a priority.
- 4.17** The site is available, suitable and achievable and therefore deliverable in accordance with the Framework.

Proposed Approach

- 4.18** To address the comments, the following approach is proposed:

- Allocate the site at Furnace Hillock Way, Hasland for housing purposes.

Appendix 1: Vision Report

Appendix 2: High Level Grey Belt Assessment

Furnace Hillock Way, Hasland

High Level Grey Belt Assessment

Introduction

- 1.1 Spawforths have been instructed by Keyland to prepare a high level Grey Belt Assessment for their Site at Furnace Hillock Way, Hasland.

National Planning Policy and Guidance

National Planning Policy Framework, December 2024 (The Framework)

- 1.2 The Framework sets out the Governments' planning policies for England and how it expects these to be applied. It contains a presumption in favour of sustainable development, which it defines as having three dimensions: economic, social and environmental. The Framework must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in planning decisions.
- 1.3 Government policy on the protection of Green Belt is set out in section 13 of the Framework. Key paragraphs are detailed as follows:
- 1.4 Paragraphs 142 and 143:
- "142. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence.*
- 143. Green Belt serves five purposes:*

to check the unrestricted sprawl of large built-up areas.

to prevent neighbouring towns merging into one another.

to assist in safeguarding the countryside from encroachment.

to preserve the setting and special character of historic towns; and

to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."

1.5 Paragraph 144 advises that:

"144. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions."

1.6 Paragraph 145 advises that existing Green Belt boundaries should only be altered where exceptional circumstances are fully justified and evidenced through preparation or updating of Plans. The new boundaries should have permanence in the long term and be capable of enduring beyond the plan period.

1.7 Paragraph 148 confirms that:

"148. Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a Site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework."

1.8 In relation to boundaries, paragraph 149 advises that:

"149. When defining Green Belt boundaries, plans should:

a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development.

b) not include land which it is unnecessary to keep permanently open.

c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period.

d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development.

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”

1.9 Paragraph 155 states that “*the development of homes, commercial and other development in the Green Belt should not be regarded as in appropriate where all of the following apply:*

- a) The development would utilise grey belt land and would not fundamentally undermine the purposes (Taken together) of the remaining Green Belt across the area of the plan;*
- b) There is a demonstrable unmet need for the type of development proposed*
- c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d) Where applicable the development meets the ‘Golden Rules’ requirements set out in paragraph 156 - `57 below”*

1.10 Paragraph 156 goes on to establish the ‘Golden Rules’ that apply where development involves the provision of housing (major). This includes the provision of affordable housing, necessary improvements to infrastructure, and provision of or improvements to existing green spaces.

1.11 The scale of the affordable housing contribution is set out within Paragraph 157.

1.12 Paragraph 158 is clear that developments that comply “*with the Golden Rules should be given significant weight in favour of the grant of planning permission*”.

1.13 A definition of “Grey Belt” land is set out in the Framework, in Annex 2: Glossary, and is as follows:

“Grey Belt: For the purposes of Plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. Grey belt excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”

National Planning Practice Guidance (PPG)

1.14 The PPG provides guidance to support and expand on policies within the Framework, and in that sense does not provide additional policy but rather more detailed consideration of how policies within the NPPF should be approached and met. The guidance on the role of the Green Belt in the planning system was published on 22 July 2019 and updated on 27th February 2025.

1.15 The update provides new guidance in relation to the assessment of Green Belt land to identify grey belt land, how to consider the impact of release of an area on the remaining Green Belt in the Plan area, how proposals on grey belt land should be approached, how

to identify sustainable locations, golden rules and consideration of the potential impact of development on openness of the Green Belt.

1.16 PPG¹ reiterates the need for a green belt assessment to aid the identification of grey belt land. The PPG² sets out the key steps in a Green Belt Assessment, this includes:

- Identify the area to be assessed
- Assess the contribution of each assessment area makes to Green Belt purposes (a), (b) and (d).
- Consider whether applying the policies in relation to Footnote 7 of the NPPF would provide a strong reason for refusing or restricting development.
- Identify Grey Belt land
- Identify in the release/development of an area/parcel/Site would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt in the Plan area.

1.17 With regards to identifying areas to be assessed, the PPG³ is clear that “*assessment areas should be sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes*”. The PPG does not provide any further guidance with respect to the qualities/features to be used to determine the appropriate boundaries to assessment areas.

1.18 Paragraph 005, Reference ID 64-005-20250225 provides guidance on the assessment of purposes (a), (b) and (d) and sets out a series of considerations for informing judgements. It is clear that “*villages should not be considered large built up areas*” and likewise that purpose (b) and (d) relates to ‘towns’ and not ‘villages’.

1.19 The PPG goes on to set out how footnote 7 should be considered when identifying grey belt land. The PPG⁴ is clear where any area not judged to perform strongly against purposes (a), (b) and (d) and where policies relating to assets/areas in footnote 7 would not provide a strong reason for refusing or restricting development that land can be identified as grey belt.

1.20 To determine whether development of Grey Belt would not be inappropriate in the context of paragraph 155 of the NPPF, the PPG states that: the Site needs to be grey belt; that development of the Site would not fundamentally undermine the purposes of the Green Belt; the Site should be in a sustainable location; should provide the ‘Golden Rules’ where applicable; and that there needs to be a demonstrable unmet need for the proposed

¹ Paragraph 002 Reference ID: 64-002-20250225

² Paragraph 003 Reference ID: 63-003-20250225

³ Paragraph 004 Reference ID: 64-004-20250225

⁴ Paragraph 007 Reference ID: 64-007-20250225

development. The PPG provides some guidance in relation to consideration of these matters.

1.21 Paragraph 012 Reference Id 64-012-20250225 sets out the contributions to accessible green space that should be considered where major housing development on land released from Green Belt:

- Access to good quality green spaces which are safe, 'visually stunning' and attractive, well designed, managed and maintained and meet needs of the communities they serve.
- Accessible green space is area of vegetation (and blue space) available for public use (free).
- Access should include safe active travel routes, served by public transport, and means providing the necessary infrastructure (footpaths/bridleways).
- Consider how the creation or enhancement of existing green spaces can contribute to the priorities for nature recovery set out within local nature recovery strategies.
- Consider the use of conditions/planning obligations. CIL can also be used to fund improvements.

1.22 Paragraph 013 deals with the factors that are to be taken into account when considering the potential impact of development on openness. These include but are not limited to:

- *Openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume.*
- *The duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness.*
- *The degree of activity likely to be generated, such as traffic generation.*

1.23 Importantly Paragraph 014 Ref ID: 64 – 014-20250225 confirms that *“if development is considered to be not inappropriate on previously developed land or grey belt, then this is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including its openness. This is consistent with rulings from the courts on these matters that, where development (of any kind, now including development on grey belt or previously developed land) is not considered to be inappropriate in the Green Belt, it follows that the test of impacts to openness or to Green Belt purposes are addressed and that therefore a proposal does not have to be justified by “very special circumstances”.*

Planning Advisory Service: Planning on the Doorstep: Green Belt (Planning Advisory Service (PAS), updated 2015.

- 1.24 The Planning Advisory Service (PAS) guidance reflects Inspector's Reports and Planning Practice Guidance at that time. The Guidance states that the purpose of a review is for the identification of the most appropriate land to be used for development, through a local plan.
- 1.25 This guidance reiterates that any review of the Green Belt boundaries should involve an assessment of how the land still contributes to the five purposes of the Green Belt. It indicates how the five purposes might be used when undertaking a Green Belt Review:
- 1.26 ***"Purpose: To check the unrestricted sprawl of large built up areas"***
- 1.27 *The terminology sprawl comes from the 1930s when Green Belt was conceived. Has this meaning changed? Is development that is planned positively through a local plan and well designed with good master planning, sprawl?*
- 1.28 ***Purpose: To prevent neighbouring towns from merging into one another***
- 1.29 *Green Belt is frequently said to maintain the separation of small settlements near to towns, but this is not strictly what the purpose says. This will be different for each case. A scale rule approach should be avoided. The identity of a settlement is not really determined just by the distance to another settlement; the character of the place and of the land in between must be taken into account. Landscape character assessment is a useful tool for undertaking this.*
- 1.30 ***Purpose: To assist in safeguarding the countryside from encroachment***
- 1.31 *Presumably all Green Belt does this, making the purpose difficult to distinguish the contribution of different areas. The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area- and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved.*
- 1.32 ***Purpose: To preserve the setting and special character of historic towns***
- 1.33 *This purpose is generally accepted as relating to very few settlements in practice. In most towns there already are more recent developments between the historic core, and the countryside between the edges of the town.*
- 1.34 ***Purpose: To assist in urban regeneration by encouraging the recycling of derelict and other urban land***
- 1.35 *With this one, it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt Land. If Green Belt achieves this purpose, then all Green Belt does so to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose.*
- 1.36 The guidance considers that the types of area of land that might seem to make a relatively limited contribution to the overall Green Belt, or might be considered for development through a review of the Green Belt would be:

- Effectively infill, with the land partially enclosed by development
- The development would be well contained by the landscape e.g. with rising land
- There would be little harm to the qualities that contributed to the distinct identity of separate settlements in reality.
- A strong boundary could be created with clear distinction between 'town' and 'country'.

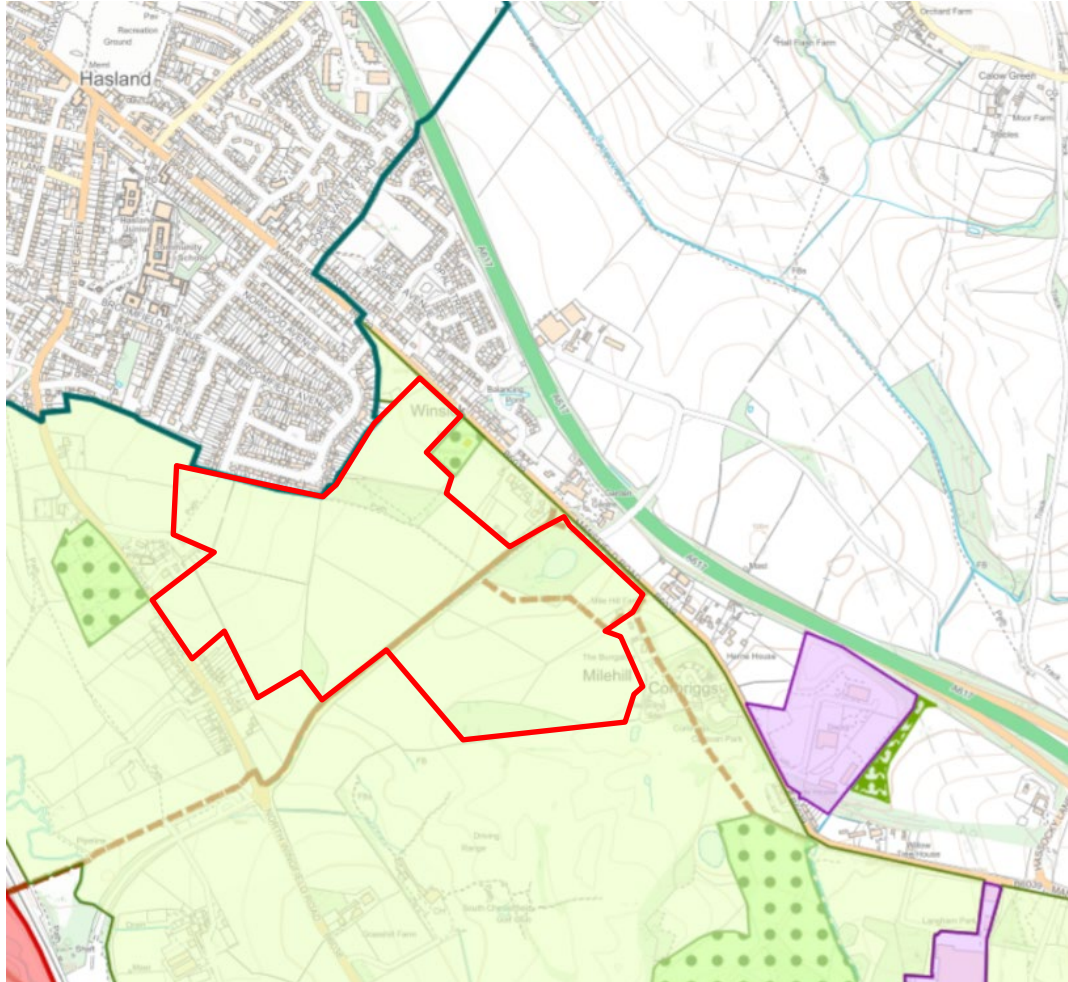
1.37 The guidance states that there is a need to be mindful of all the other planning matters, in particular sustainability and the overall spatial strategy. Plans should identify for development, the most sustainable locations, unless outweighed by effect on the overall integrity of the Green Belt, according to an assessment of the whole of the Green Belt.

NPPF Proposed Reforms

1.38 The proposed reforms to the NPPF were published for consultation in December 2025 until March 2026. The consultation includes amendments to the definition to grey belt to only refer to the assessment of grey belt against purposes a, b and d and does not include the consideration of footnote 7 matters. The updated NPPF is expected in Summer 2026 and therefore this assessment is considered against the current definition of grey belt.

Grey Belt Assessment

- 1.39** For the purposes of this review we have focused on the land at Furnace Hillock Way, Hasland.
- 1.40** The Site is bound by the B6039 Mansfield Road and residential properties to the north east, Chesterfield to the north, the B6038 Churchside, residential properties and distinct field boundaries to the south west, and woodland edges and golf course to the south. The Site is dissected by Furnace Hillock Way.
- 1.41** An extract from the North East Derbyshire Local Plan Proposals Map is shown below:



- 1.42** The high level assessment is based on the NPPF (December 2024) and the guidance set out in NPPG (February 2025). This considers to a high level the land at Furnace Hillock Way in three sub stages. The first two sub stages consider whether the Site is considered to be Grey Belt. The land is first evaluated for the contribution that it makes to Green Belt Purpose (a), (b), and (d). This is followed by consideration of whether the Site forms “*land where the application of the policies relating to the areas or assets in footnote 7 of the Framework (other than green Belt) would provide a strong reason for refusing or restricting development*”.
- 1.43** Finally, this is followed by a high level consideration as to the whether the release/development of the parcel/Site would “*fundamentally undermine the five Green Belt*

purposes (taken together) of the remaining Green Belt when considered across the area of the Plan.”⁵

Contribution to Green Belt Purposes

- 1.44** The land at Furnace Hillock Way is Greenfield. The definition of Grey Belt also includes both Previously Developed Land and/or land that does not contribute ‘strongly’ to the purposes a), b) or d) of the Green Belt. We consider this in respect of the Site below:
- 1.45** The Framework Annex 2 requires land to “*not strongly contribute to any of purpose a), b), or d)*”. Spawforths take this to mean that land can perform in a “limited” / “weak” or “moderate” way against any purposes a, b or d (but not strongly).
- 1.46** Spawforths high level assessment has considered the performance of the Land at Furnace Hillock Way against the Green Belt purposes (a), (b) and (d). This is set out below:

Grey Belt Key Criteria		Land at Furnace Hillock Way, Hasland
I)a	Contains PDL	The Parcel/Site is Greenfield.
Ib) Contribution to the purposes of the Green Belt		
Purpose a- to check the unrestricted sprawl of large built-up areas		MODERATE: The Site lies on the edge of the built up area of Chesterfield. The Site is bound by Chesterfield, B6039 Mansfield Road, B6038 Churchside, residential properties, golf course, woodland and tree belts. Therefore, the Site is contained, has urban influences on character with urban form on three sides and a golf course to the south. The development of the Site would not result in an incongruous pattern of development.
Purpose b - to prevent neighbouring towns merging into on another		WEAK: The Site is an extension of Chesterfield, which is a town. However, Grassmoor to the south and Wingerworth to the south west are considered Large Villages in the Local Plan. The guidance refers to towns and these are villages. Furthermore, there will continue to be intervening fields and woodland. The Site therefore does not merge any towns.
Purpose d - to preserved the setting and special character of historic towns;		WEAK: Chesterfield and Hasland is not a historic town. Very few settlements are 'historic towns' for the purposes of Green Belt assessment. The overall contribution this Site makes to this purpose is WEAK. Other aspects in the consideration of heritage are assessed elsewhere in this appraisal.
I a/b)	Conclusion Overall	The Site /Parcel does not perform strongly against purposes (a), (b), or (d).

Figure 1: Assessment against Green Belt Purposes a, b and d.

- 1.47** Based on Spawforths Green Belt Assessment we conclude that the Site at Furnace Hillock Way, Hasland does not perform strongly against purposes a) b) or d), and is capable of being considered as Grey Belt.

Consideration of NPPF Footnote 7

⁵ NPPG Paragraph 003 Reference ID:64-003-20250225

- 1.48** The current definition of Grey Belt Sites excludes “*land where the application of the policies relating to the areas or assets in footnote 7 of the Framework (other than green Belt) would provide a strong reason for refusing or restricting development*”.
- 1.49** Footnote 7 states “ *The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats Sites (and those listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change*”. The inclusions of such areas or assets and whether the policies relating to them would provide a strong reason for refusing or restricting development has been considered below.
- 1.50** To support this assessment Spawforths has undertaken a high level review of technical constraints, this includes the consideration of Flood Risk based on the Environment Agency Flood Maps, Statutory Designations (Conservation Areas, Listed Buildings Scheduled Monuments, Registered Parks and Gardens, SSSI/SPA/SAC's etc).

Constraint	Comments Relative to Site
Flood Risk Zone	There are no areas of Flood Zone 2 and 3 within the Site.
Conservation Areas	The Site is not located within or adjacent to a defined Conservation Area.
Listed Buildings	There are no known listed buildings located on the Site or within proximity to the Site which development of this parcel of land would have an impact upon. Nearby Grade II Listed Buildings are separated by existing development.
Ancient Monuments	There are no known ancient monuments located on the Site or within proximity to the Site which development of this parcel of land would have an impact upon.
Tree Preservation Orders (TPOs)	There are no TPOs within the Site.
Registered Parks and Gardens	There are no known Registered Parks and Gardens located on the Site or within proximity to the Site which development of this parcel of land would have an impact upon.

Constraint	Comments Relative to Site
SSIs/SSSIs	The Site is not identified as an SSI/SSSI. There are no known SSIs or SSSIs located on the Site.
Air Quality Management Area (AQMA)	There are no AQMA adjacent to the Site.
Other Ecological Designations	There are no other ecological designations on the Site.
Heritage Assets	There are no known heritage assets located on the Site or within proximity to the Site which the development of this parcel of land would impact upon.
Rights of Way (Including PROW, bridleways etc.)	There are a couple of PROW's through the Site.
AONB or Landscape Designation	There are no AONBs or Landscape designations on the Site.

Figure 2: Footnote 7 Assessment

- 1.51** Within the Site itself there are no elements of flood risk, heritage or ecological designations. There are a couple of PROW's through the Site, which will need to be accommodated within any potential scheme.

Is it Grey Belt ?

- 1.52** The Site at Furnace Hillock Way, Hasland has the potential to be Grey Belt as it does not perform strongly against purposes (a), (b) and (d) and it does not contain any Footnote 7 matters.

Will the Site fundamentally undermine the purposes of the Green Belt across the Plan Area?

- 1.53** This next stage considers to a high level the Site at Furnace Hillock Way, Hasland against the five purposes of the Green Belt, based on the Framework methodology.
- 1.54** The other two Green Belt purposes are:
- To assist in safeguarding the countryside from encroachment
 - To assist in urban regeneration, by encouraging the recycling of derelict land and other urban land

- 1.55** In relation to urban regeneration this has not been assessed as prior to the release of Green Belt it is necessary to have examined all other reasonable options for meeting identified needs for development, this includes PDL. PAS guidance states "If Green Belt achieves this purpose, then all Green Belt does so to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose". All areas/parcels/Sites are not assessed/neutral impact against this purpose.
- 1.56** With regards to encroachment the Site is bound by Chesterfield, B6039 Mansfield Road, B6038 Churchside, residential properties, golf course, woodland and tree belts. The Site is contained, has urban influences on character with urban form on three sides and a golf course to the south. It is therefore considered to be partly enclosed and is therefore assessed as WEAK.
- 1.57** Overall the Site at Furnace Hillock Way, Hasland is assessed to perform WEAK/MODERATE against the five purposes of the Green Belt. It does not have more than a moderate role against any one purpose. The Site is a very small component of the Derbyshire Green Belt. Spawforths considers from this High Level Assessment that **this Site does not perform strongly against any one purpose and would not fundamentally undermine the purposes of the Green Belt (taken together) across the area of the Plan** ^{6 7}.

Assessment of the potential impact on openness/Is the development not inappropriate in the Green Belt?

- 1.58** Paragraph 013, Reference ID:64-014-2025-225. Identifies the factors that can be taken into account when considering the potential impact of development on the openness of the Green Belt. It states that these include but are not limited to:
- "Openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume.*
- The duration of development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- The degree of activity likely to be generated, such as traffic generation.*
- 1.59** Spawforths highlight that Paragraph 153 is clear that *"when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt including, harm to its openness⁵⁵".* However, footnote 55 states that this does not apply in the case of previously developed land or grey belt land where development is not inappropriate. NPPG provides further confirmation and states that *"footnote 55 to the NPPF sets out that if development is considered to be not inappropriate*

⁶ Paragraph 155

⁷ The consideration of definitional harm or harm to openness is not a consideration for the purposes of determining whether a parcel or area forms Grey Belt based on the Framework, paragraph 153

development on previously development land or grey belt, then this is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including its openness. This is consistent with rulings from the courts on these matters, where development (of any kind, now including development on grey belt or previously developed land) is not considered to be inappropriate in the Green Belt, it follows that the tests of impacts to openness or to Green Belt purposes are addressed and that therefore a proposal does not have to be justified by “very special circumstances”⁸.

- 1.60** NPPF, paragraph 155, and NPPG⁹ Figure 2, identify key criteria required to determine whether development in the Green Belt is not inappropriate. This includes:
- The Site is Grey Belt;
 - Development of the Site would not fundamentally undermine the purposes of the remaining Green Belt;
 - There is a demonstrable unmet need for the development proposed.
 - The Site is in a sustainable location (paragraph 110 and 115, NPPF).
 - The Site provides Golden Rules where applicable (paragraph 157 and 157, NPPF).
- 1.61** In the case of this Site, this High Level Assessment considers that the site is capable of being Grey Belt. Although not specifically a Footnote 7 matter, the Site should accommodate the PROW's that are located within the Site.
- 1.62** Consistent with NPPF Paragraph 155, if the Site is concluded to be within a sustainable location, and there is a demonstrable need for the proposed development, and where applicable the Golden Rules are met, development is “not inappropriate” and excluded from the policy requirement to give substantial weight to any harm to the Green Belt including its openness. These matters are not assessed within this High Level Grey Belt Assessment and will need to be addressed separately. However, it is noted that from the high level analysis for the Vision Report that the Site is located on the edge of Chesterfield close to services and facilities and provides good accessibility by foot, cycle and public transport and as such is in a highly sustainable location. If there is a demonstrable need for the development and the Golden Rules can be met, Spawforths consider that development of this Site would be not inappropriate.
- 1.63** A detailed assessment on openness has not been undertaken, however having regard to the factors set out within the PPG, noting the natures and scale of the proposed development, the Site and surrounding topography, the development of the Site would have a localised impact on openness, particularly for existing residential receptors within the vicinity of the Site. Careful consideration of the layout and a suitable landscape scheme

⁸ NPPG Paragraph 014 Reference ID:64-014-20250225

⁹ NPPG Paragraph 010 Reference ID:64-010-20250225

would provide an opportunity to support the development of the Site to be assimilated into the surrounding landscape. Spawforths consider that the impact on openness is localised.

Opportunities for Compensatory Improvements/Improvements to Green Spaces

- 1.64** NPPF and NPPG¹⁰ require provision of or improvements to existing green space, that are accessible to the public. Improvements are required to contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space¹¹.
- 1.65** The illustrative masterplan and initial Vision for the Site shows the potential to create a sustainable landscape-led residential development with new areas of Public Open Space and a softer, more organic settlement edge with a reinforced Green Belt boundary.

Conclusion

- 1.66** This High Level Assessment shows that against all five purposes of the Green Belt concludes that the Site performs a WEAK/MODERATE role against the five purposes of the Green Belt.
- 1.67** The Site at Furnace Hillock Way, Hasland has the potential to be Grey Belt as it does not perform strongly against purposes (a), (b) and (d) and it does not contain any Footnote 7 matters.
- 1.68** In addition the Assessment has shown to a high level that the boundary to the Site is formed by recognisable features and is effectively contained, has urban influences on character with urban form on three sides and a golf course to the south.
- 1.69** It is also noted that the proposed scheme will need to include areas of open space and green infrastructure and is capable of delivering improvements to open space, including provision of new public open space, as required by national policy and guidance.
- 1.70** Accordingly, **Spawforths consider that the Site at Furnace Hillock Way, Hasland is capable of being Grey Belt.**

Spawforths

April 2026

¹⁰ NPPG Paragraph 012 64-013-20250225

¹¹ Paragraph 156 and 159, NPPF December 2024.