



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

Land West of Harehill Road, Chesterfield

On Behalf of Millenium Land Limited

April 2026

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Client:

Millenium Land Limited

Project:

Land West of Harehill Road, Chesterfield

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Section 1 | Introduction

- 1.1 This Representation has been prepared by nineteen47 Ltd on behalf of Millenium Land Limited in response to the North East Derbyshire District Council ["the LPA"] Local Plan Issues and Options consultation on the strategic approach to the location of development and refined sites.
- 1.2 This Representation supports the allocation of Land West of Harehill Road, Chesterfield ["the Site"], as shown in Figure 1 below, to meet the future housing requirement of the District.



Figure 1 - Site Location (Source – Google Earth)

- 1.3 The LPA are preparing a new Local Plan to replace the current plan that was adopted in November 2021. The North East Derbyshire Local Plan Issues and Options consultation has been published for consultation between 12th March 2026 and 13th April 2026. This is in order for the LPA to consult with residents, businesses and other stakeholders and representatives of the local community about the proposed strategic approach and for comments on the sites that have passed through the initial screening.
- 1.4 This Representation provides a response to the Regulation 18 consultation questions, based on the current evidence base and recommends that the Site is retained and taken forward as a preferred housing allocation.
- 1.5 Within this context, and for the reasons set out within this Representation, nineteen47 consider that Chesterfield Golf Club's Site at Land West of Harehill Road, Chesterfield should be allocated for housing and associated infrastructure, to support housing growth in the District.

1.6 To this end, this Representation is set out as follows:

- Section 2 provides a detailed assessment of Land West of Harehill Road, Chesterfield and demonstrates how the Site is available, deliverable and suitable for development in accordance with the Framework;
- Section 3 provides a wider response to the Local Plan consultation questions raised within this specific consultation to support the drafting of the new 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 west of Harehill Road

Site Context

- 2.1 The Site extends to approximately 5.1ha and comprises a single field of agricultural land. The Site forms part of the wider Chesterfield Golf Club land ownership but is divorced from the functioning golf course and has been used historically for agricultural purposes.
- 2.2 The Site is located to the southwest of Chesterfield. While the Site falls within the administrative boundary of North East Derbyshire District Council, it is bordered by Chesterfield Borough Council on the north, east and southern boundaries.
- 2.3 The Site is bound by residential development to the north, east and south, and Chesterfield Golf Club to the west. The Site is currently accessed via an informal gateway taken from Moston Walk, which is a footpath accessed from Harehill Road.
- 2.4 The Site is well contained by existing hedgerows and mature trees along all boundaries. In terms of topography, the Site is predominantly flat, with a gentle rise towards the north.
- 2.5 The Site is located entirely within Flood Zone 1 on the Environment Agency Flood Mapping, which means that the Site has a less than 1 in 1000 annual probability of flooding. There are some small areas at risk of flooding from surface water at the east, south, and west boundaries, with most of this being a 1 in 1000 year risk, with a small area at the southwest corner of the Site being at 1 in 30 year risk.
- 2.6 There are no designated heritage assets within or immediately adjacent to the Site.
- 2.7 The northern part of the Site is defined as urban land on the Agricultural Land Classification maps, and the southern part of Grade 4 (very poor). The Site is also located in a location that has a coal mining legacy.
- 2.8 The Site is located entirely within the Green Belt.

Planning History

- 2.9 There are two historic planning applications associated with the Site, outlined in Table 1 below:

Application Reference	Description	Decision / Date
CHE/0590/0390	Use of grazing land as extension to golf course	Approved (August 1990)
CHE/1000/0589	Creation of golf course and practice ground.	Approved (December 2000)

Table 1: Planning History

- 2.10 It does not appear that either of the above applications have been implemented, due to its retained use for agricultural purposes.
- 2.11 The Site has previously been considered as part of the North East Derbyshire Green Belt Review (2017)¹ under ref: CHEST/GB/011.
- 2.12 The Green Belt Review considered the Site against each of the five purposes of the Green Belt and provided the below commentary when assessing the Site:

- a) To check the unrestricted sprawl of large built-up areas;
- b) To prevent neighbouring towns from merging into one another;
- c) To assist in safeguarding the countryside from encroachment;
- d) To preserve the setting and character of historic towns, and;
- e) To assist in urban regeneration.

- 2.13 In terms of Green Belt purpose a, the Site is contained by existing development on 3 sides: to the north, east and south. Each of these boundaries represent strong and defensible boundaries. While the Site is not bound by existing development to the west, a dense and continuous line of mature trees provide a strong and robust boundary to the west, which would assist in screening any future residential development on the Site. Consequently, development on this Site would result in an amended Green Belt boundary that is neither stronger nor weaker than the existing.
- 2.14 Regarding Green Belt purpose b, the closest town to the Site is Chesterfield, the edge of which bounds the Site to the east. The nearest large settlement to the Site is Wingerworth, approximately 1km to the south. It is not considered that development of the Site would bring development any closer to Wingerworth than the existing residential area to the south.
- 2.15 In relation to Green Belt purpose c, the Site is undeveloped and is used for agricultural purposes, which represents an appropriate countryside use. The Site is considered to assist in safeguarding the countryside from encroachment.
- 2.16 The Site is not located near any heritage assets or within a conservation area, therefore Green Belt purpose d is not considered relevant to this parcel
- 2.17 As for Green Belt purpose e, all sites assessed as part of the Green Belt Review were awarded a consistent baseline score of 'amber', as it is considered that all parcels in the Green Belt assist in urban regeneration.
- 2.18 Overall, when the Site was assessed previously for its contribution to the purposes of the Green Belt, the Site ranked poorly in terms of purposes a, b and d, neutrally for purpose e, and strong for purpose c. It was therefore considered in the Green Belt Review that the Site does not meet the Green Belt purposes which indicates its suitability for future development. This is covered further at paragraphs 3.23 to 3.43 and the potential of the Site as a Grey Belt site is also assessed.

Land Availability Assessment (2026)

- 2.19 Following the LPA's Call for Sites exercise in 2025, the Site has been assessed in the Housing Land Availability Assessment ["LAA"] (March 2026). This assessment reviews the availability, achievability and suitability of the Site to meet the identified need for housing over the plan period.
- 2.20 The LAA ranked the Site as 'amber' for overall suitability for residential development, with 'green' ratings for availability and achievability, indicating that the LPA consider the site to be readily available for development and capable of being delivered, subject to further consideration of the matters set out below.

Proposed Housing Allocation

- 2.21 Our representation to the July 2025 Regulation 18 consultation, suggested a residential capacity of 139no. dwellings on the Site.
- 2.22 The LAA identifies a residential working capacity of 176no. dwellings, derived from an assumed density of 50dph, which reflects an average of nearby residential densities. For plan-making purposes, the LPA applied a 20% uplift due to the Site location on the edge of Chesterfield, which is considered to be a highly sustainable location, resulting in a policy-on residential working capacity of 211 dwellings, as recorded in the LAA.
- 2.23 We welcome the LPA's recognition of the Site's location within a highly sustainable location. We are currently preparing an Indicative Layout for the Site which will be submitted with supporting technical documents demonstrating the likely residential capacity on the Site based on a more detailed assessment of any opportunities and constraints.
- 2.24 The LAA flags the Site's location within the Green Belt, but reiterates that, as set out above, the 2016 Green Belt Review identified the Site as only partially meeting Green Belt purposes 1 and 2, and notes that the site adjoins the built-up area of Chesterfield. We therefore await the outcome of the 2026 Green Belt review.
- 2.25 The LAA produced an automated 'amber rating' with regard to Landscape Character, due to the sites location within an Area of Multiple Environmental Sensitivity. However, Officer assessment of the Site considers there is a minor landscape impact, and therefore the Landscape Character rating has been officer-adjusted to 'green'.
- 2.26 The automated Biodiversity and Geodiversity rating is 'amber' due to part of the Site including priority habitat (approximately 33%) and Local Wildlife Site (approximately 11%). Ecology Officer comments note that the Site primarily comprises modified or neutral grassland, with other broad-leaved woodland plantations bordering the northern, eastern, and southern boundaries. The Ecology Officer concludes that potential impacts are low to moderate, with no reference to significant or prohibitive ecological constraints.
- 2.27 In addition, the landowner has instructed ecology surveys of the Site to better understand the BNG baseline, which will inform an Indicative Site Layout.
- 2.28 The LAA confirms that there are no recorded flooding incidents within 100 metres of the Site. The landowner has instructed a Flood Risk Assessment and Indicative Drainage Strategy for the Site, in order to understand how limited areas of surface water flood risk across the Site can be mitigated in the Indicative Layout.
- 2.29 The LAA records a 'green' rating for transport. The Highway Authority comments confirm that a satisfactory access can be achieved from Harehill Road which is a two-way single lane carriageway with 30mph speed limit, provision of footways and visibility splays can be achieved.
- 2.30 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.
- 2.31 The LAA assigns 'green' ratings to historic and cultural heritage, water, air quality, natural resources and waste, economy, health and wellbeing, and amenity and utilities.
- 2.32 In summary, and for the reasons set out above, the Site is confirmed to be available, suitable and deliverable for housing.

- 2.33 The majority of LAA assessments result in 'green' outcomes. Any 'amber' ratings reflect the need for further assessment rather than fundamental barriers to development. As set out above, the landowner is currently undertaking additional assessment in terms of ecology and flood risk/drainage, in order to inform an Indicative Site Layout, to confirm an appropriate development quantum, demonstrate how site-specific constraints can be mitigated and support robust decision making at Regulation 19 stage.

Section 3 | Response to Consultation

3.1 This Section considers and responds to questions posed by North East Derbyshire District Council in their Local Plan Regulation 18 Consultation: Issues and Options Consultation on the strategic approach to the location of development and refined schedule of sites. This stage of the Regulation 18 consultation sets out the LPA's proposed strategic approach for where development should be located and invites feedback on a refined list of potential sites, ahead of further evidence including the updated Green Belt Review, informing the draft Local Plan later in 2026.

3.2 The Sections we consider most relevant to this Representation are listed below with our responses set out beneath each subheading.

Proposed Approach to the Location of Development

3.3 We strongly support the LPA's proposed approach to location of development, particularly the identification of "Edges of Chesterfield / Sheffield" as Priority 1 locations. This reflects the functional geography of the district, where both Chesterfield and Sheffield act as the principle economic, social and transport centres for a significant proportion of residents within North East Derbyshire.

3.4 Site 45190 (land west of Harehill Road) is located directly on the edge of Chesterfield and therefore falls within the highest-priority location for development, alongside strategic sites and the districts main towns.

3.5 We consider this designation entirely appropriate given the Site's close proximity to Chesterfield's services, infrastructure and public transport corridors, and allocation of this Site would be consistent with the principles of sustainable development, as outline in Paragraph 8 of the Framework, as it represents a logical and contained extension to the existing built-up area, capable of supporting planned growth in a sustainable manner.

Settlement Hierarchy

3.6 We welcome the retention of a four-tier settlement hierarchy, which combined with the priority levels for growth, provides a robust framework for directing development.

3.7 The LPA acknowledges 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 Green Belt.

3.8 We welcome the update to the Settlement Hierarchy to support the LPA's objective of ensuring that the new Local Plan is informed by an accurate understanding of settlement roles. We note that the hierarchy is intended to provide a strategic framework rather than an allocation tool and therefore must be read alongside site-specific evidence.

3.9 In this context, significant weight should be given to sites located on the edge of Chesterfield and Sheffield, where they exhibit clear spatial and functional relationships, are demonstrably deliverable, and will help reduce reliance on more dispersed patterns of growth in smaller settlements. These characteristics apply to the Site at land west of Harehill Road.

3.10 Sustainability Appraisal

- 3.11 We welcome the LPA's publication of an updated Sustainability Appraisal ["SA"] which assesses the reasonable alternative sites for potential allocation in the Local Plan.
- 3.12 Site 45190, land west of Harehill Road, is identified as a reasonable alternative residential site, having passed the Council's initial sieving process and been subject to full appraisal against the 13 Sustainability Appraisal Objectives.
- 3.13 We acknowledge 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.
- 3.14 Whilst the Site is directly adjacent to the built-up area of Chesterfield, 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.
- 3.15 As with other Green Belt sites, the SA has a degree of uncertainty due to the absence of an updated Green Belt Review forming part of the evidence base at this stage.
- 3.16 It is considered that the Green Belt Review needs to be published before any allocations are confirmed, in order to ensure that decisions are based on a complete and robust evidence base. In the meantime, we reserve the right to comment further at Regulation 19 stage upon receipt of the updated evidence.
- 3.17 We note that the SA emphasises that pre-mitigation negative effects should not be treated as determinative. In this context and given the Site's edge-of-settlement location and strong relationship with Chesterfield, the recorded minor adverse effects are considered to be reflective of the strategic methodology applied rather than any inherent constraint of the Site.
- 3.18 We would therefore welcome the preparation of an updated SA Addendum, taking into account further information being prepared in support of the allocation of Site 45190.

Habitats Regulations Assessment (HRA)

- 3.19 Site 45190 forms part of the refined list of potential housing allocations and has therefore been screened within the HRA alongside all other Sites.
- 3.20 The HRA confirms that the Site is not located within 400m of any European Site, and there is no direct land take, loss of habitat, or physical encroachment affecting any SAC or SPA. Overall, the HRA does not identify any site-specific constraints associated with Site 45190 that would make it less suitable than other reasonable alternative sites at this stage of the process.

Edge of Chesterfield

- 3.21 Having reviewed shortlisted edge of settlement sites, and in particular edge of Chesterfield sites, clear distinctions can be drawn between the shortlisted Sites, in terms of their suitability and deliverability.
- 3.22 The Site, when compared with other options, directly adjoins the built-up area of Chesterfield and, when considered in the context of the surrounding development, represents a logical and coherent extension to the existing residential area.

- 3.23 In the context of edge-of-Chesterfield sites, the Site would deliver a valuable and proportionate contribution to meeting identified housing needs without giving rise to significant adverse impacts. Furthermore, given its separation from other potential allocation sites, it is unlikely to result in harmful cumulative effects.
- 3.24 Sites 45042 and 45043, which are also located on the edge of Chesterfield, would each make only a modest contribution to housing supply, with an estimated capacity of 10 dwellings per site. Whilst such sites may have a role to play, particularly given that the edge of Chesterfield is identified as a priority 1 location, it is important that sites capable of delivering more meaningful contributions to housing supply are given appropriate weight in the site selection process.
- 3.25 It is noted that site 45065, also located on the edge of Chesterfield, has the potential to deliver approximately 800 dwellings. We would note that sites of this scale are typically more complex to bring forward and are unlikely to contribute to housing delivery in the early years of the plan period due to the need for masterplans and design codes, infrastructure provision, phasing and the need to consider potential cumulative impacts. As such, reliance on larger strategic sites alone is unlikely to ensure consistent and deliverable supply of housing in the short term.
- 3.26 It is therefore concluded that Site 45190 represents the most appropriate edge of Chesterfield option, due to its strong relationship with the adjacent built-up area, the appropriate and deliverable scale of development proposed, and its clear potential to come forward in the short term. The Site is well placed to contribute to housing delivery in the early part of the plan period.

45190 – Land west of Harehill Road, Chesterfield

- 3.27 The LPA's assessment of the Site indicates that the Site may be able to support approximately 210 dwellings, based on prevailing neighbouring densities, and a 20% density uplift for towns and cities. However, mitigation measures have not yet been applied to Site capacity.
- 3.28 We would note that the landowner has instructed additional ecology, flood risk and drainage assessments on the Site, and we are currently preparing an Indicative Layout which will take into account any required mitigation as a result of these initial assessments. This will give the LPA a more evidence-based assessment to indicate the appropriate capacity on this Site. This information will be submitted to the Local Plan team before the deadline of 1st June 2026.
- 3.29 In terms of the Site's Green Belt designation, the LPA acknowledge that the 2016/17 Green Belt review performed weakly against Green Belt purposes a), b) and d).
- 3.30 We expect the outcome of the 2026 Green Belt Review to reach a similar conclusion and when considering the Site against the updated Planning Practice Guidance (February 2025) relating to assessing Green Belt and grey belt sites, we would make the following observations.
- 3.31 Purpose a is to check the unrestricted sprawl of large built-up areas. This purpose was considered as part of the 2017 Green Belt Review and the Site was confirmed to be contained by existing development on 3 sides: to the north, east and south. Each of these boundaries represent strong and defensible boundaries. While the Site is not bound by existing development to the west, a dense and continuous line of mature trees provide a strong and robust boundary to the west, which would assist in screening any future residential

development on the Site. Consequently, development on this Site would result in an amended Green Belt boundary that is neither stronger nor weaker than the existing.

- 3.32 Purpose b is to prevent neighbouring towns merging into one another. As the 2017 Green Belt Review acknowledged, the closest neighbouring town to the site is Wingerworth, approximately 1km to the south. It is not considered that development of this Site would bring development any closer to the neighbouring settlement than the existing residential area to the south.
- 3.33 Purpose d is in place to preserve the setting and special character of historic towns. The Site is not located near any heritage assets or within a conservation area, therefore Green Belt purpose d is not considered relevant to this Site.
- 3.34 After considering the above criteria, the PPG states that any assessment area which is not judged to strongly contribute to any one of purposes a, b, or d can be identified as grey belt land, subject to the exclusion of land where the application of the policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development. None of the footnote 7 policies apply to this Site.
- 3.35 When considering the impact on the remaining Green Belt in the plan area, the PPG states that a Green Belt assessment should also consider the extent to which release or development of Green Belt land (including but not limited to grey belt land) would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole.
- 3.36 It is considered that the remaining Green Belt land across the District; which is a significant swathe in this location, would continue to fulfil its purposes and would not be compromised by the development of this Site as grey belt land. The Site is also contained by built form already on three sides, and the land to the west is used as a golf course by the landowner (Chesterfield Golf Club) who are committed to continuing this use and plan to invest any funds released from the development of the land back into the Golf Club to protect its future use. This is critical to the future of the Golf Club which is in severe need of renovation and will secure its viable use for years to come
- 3.37 It is therefore considered that the Site meets this appropriateness test.
- 3.38 The second appropriateness tests asks whether the development in the grey belt would be in a sustainable location. The Site is located on the edge of Chesterfield, which is a sustainable location with numerous facilities and amenities, including good public transport links. It is therefore considered that the Site meets this appropriateness test for development in the grey belt.
- 3.39 Overall, it is considered that the Representation Site makes little contribution to Green Belt purposes a), b) and d) and does not raise issues in relation to footnote 7 constraints. When assessed against the updated PPG guidance, the Site meets the criteria for identification as grey belt land and represents an appropriate location for release. Importantly, the release of this parcel would not undermine the overall integrity of the remaining Green Belt
- 3.40 We acknowledge that the Site is located within a Coal Authority high risk area. Any future planning application would be accompanied by a Coal Mining Risk Assessment and Site Investigation. The findings of these reports would of inform the layout of residential development.

- 3.41 For the reasons set out throughout this Representation, the Site is confirmed to be available, suitable and deliverable for residential development. The Site is situated on the western edge of Chesterfield, is strongly related to the existing built form, and benefits from a sustainable location with access to a range of services, facilities and public transport links.
- 3.42 Whilst designated as Green Belt, the Site makes a limited contribution to the purposes of the Green Belt, and when considered against updated PPG guidance, could fall under the definition of grey belt land. In addition, there are no insurmountable technical constraints which would prevent development.
- 3.43 As stated above, additional technical assessment is currently underway, alongside the preparation of an Indicative Masterplan. This work will refine understanding of site constraints and opportunities and will inform an appropriate development capacity and layout for the Site. The outputs of this work will be submitted to the Local Plan team prior to the relevant deadline in June 2026 and will assist in further demonstrating the Site's suitability and deliverability.

Section 4 | Conclusion

- 4.1 This Local Plan representation has been prepared by nineteen47 on behalf of Millenium Land Limited 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 West of Harehill Road, Chesterfield is available, suitable and achievable to provide approximately 175-210 no. dwellings, which will assist the LPA in meeting the emerging housing target. The LPA has seen a significant increase in their housing requirement following the publication of the revised standard methodology in 2024 and this Site would 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 for housing, including a provision of a range of housing as well as environment enhancements.
- 4.4 The Site makes a logical extension to the settlement of Chesterfield, and it is within a sustainable location; benefitting from the services and amenities of Chesterfield. 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 Framework. The Site is also available, suitable and achievable as is set out in Section 2 of this Representation, and can be delivered in the short-term, subject to securing planning permission.
- 4.5 Section 3 considers the Regulation 18 'Strategic Approach to the Location of Development and a Refined Schedule of Sites' and recommends that the LPA consider the additional evidence currently being prepared as part of the next stage of the Local Plan process, which will be submitted to the Local Plans team before the deadline on 1st June 2026. Upon receipt and review of this evidence, the LPA should revisit the evidence base in order to ensure a robust and comprehensive assessment of sites.
- 4.6 We reserve the right to respond to and make further comments on other matters as the Local Plan progresses.



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