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- email: localplan@ashfield.gov.uk
- telephone: 01623 457381 or 01623 457382 or 01623 457383.

Ashfield Local Plan (2023-2040) Regulation 19 Pre-Submission Draft

Representation Form

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First name	Robert
Last name	Rusling
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Number of people representing (if relevant)	
Address	
Postcode	
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2. Agent Contact Details

Title	Miss
First name	Stella
Last name	Heeley
Organisation	DLP Planning Ltd
Address	Ground Floor, V1 Velocity, 2 Tenter Street, Sheffield
Postcode	S1 4BY
Telephone Number	01142289190
Email address	stella.heeley@dlpconsultants.co.uk

3. Requests for Further Notification

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Part B (Please fill a separate Part B for each individual representation)

Please fill in your Name and Organisation here for every Part B sheet that you submit:

Name: Miss Stella Heeley Organisation: DLP Planning Ltd

1. To which part of the Local Plan does this representation relate?

Part of Local Plan:	Tick if Relevant (✓):	Specify number/ part/ document:
Local Plan Paragraph Number		Paragraph Number:
Local Plan Policy Number	✓	Policy Number: H1
Local Plan Policy Map		Part of Policy Map:
Sustainability Appraisal		Paragraph Number:
Statement of Consultation		Paragraph Number:
Supporting Evidence Base		Document Name: Page / Paragraph:

2. Do you consider the Local Plan to be LEGALLY COMPLIANT?

Yes No

3. Do you consider the Local Plan to be SOUND?

Yes No

If you have answered NO, please answer Question 3a.

3a. The Local Plan is not sound because it is not:

- | | | |
|-------|---------------------------------|-------------------------------------|
| (i) | Positively Prepared | <input checked="" type="checkbox"/> |
| (ii) | Justified | <input checked="" type="checkbox"/> |
| (iii) | Effective | <input checked="" type="checkbox"/> |
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4. Do you consider the Local Plan Document to comply with the DUTY TO CO-OPERATE?

Yes No

5. Please provide precise details of why you believe the Local Plan is, or is not, legally compliant, sound or in compliance with the duty to cooperate, in the below box.

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6. What change(s) do you consider necessary to make the Local Plan legally compliant or sound or to meet the duty to co-operate, with regards to the issue(s) identified above?

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7. Do you wish to participate at the hearing sessions at Examination?

Yes

No

If you have answered YES, please answer Question 7a.

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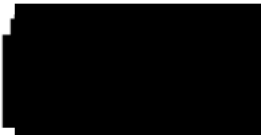
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Part of Local Plan:	Tick if Relevant (✓):	Specify number/ part/ document:
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Local Plan Policy Number	✓	Policy Number: S2
Local Plan Policy Map		Part of Policy Map:
Sustainability Appraisal		Paragraph Number:
Statement of Consultation		Paragraph Number:
Supporting Evidence Base		Document Name: Page / Paragraph:

2. Do you consider the Local Plan to be LEGALLY COMPLIANT?

Yes No

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Yes No

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3a. The Local Plan is not sound because it is not:

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Local Plan Policy Number	✓	Policy Number: S7
Local Plan Policy Map		Part of Policy Map:
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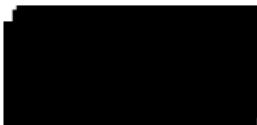
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dynamic development solutions™

For and on behalf of
Ackroyd & Abbott Ltd

REPRESENTATION TO THE ASHFIELD LOCAL PLAN REGULATION 19 CONSULTATION

Land at Pleasley Road, adjacent to Station Farm, Teversal

**Prepared by
DLP Planning Ltd
Sheffield**

January 2024





Prepared by:	Stella Heeley BSc (Hons) MSc MRTPI Senior Planner
Approved by:	Lydia Sadler BSc (Hons) MTP MRTPI Director
Date:	January 2024

DLP Planning Ltd
Ground Floor V1 Velocity
Tenter Street
Sheffield
S1 4BY

Tel: 01142 289190

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1.0 INTRODUCTION

- 1.1 This Representation to the Ashfield Local Plan Regulation 19 consultation has been prepared by DLP Planning Ltd on behalf of our client Ackroyd and Abbott Ltd.
- 1.2 As discussed in comprehensive detail in the following chapters – We **object** to several of the strategic policies (including **Policies S2, S5 and S7**) and **Policy H1**, on grounds that these do not meet the tests of soundness set out in paragraph 35 of the National Planning Policy Framework ('the Framework'). Through these representations we also promote the allocation of land at Pleasley Road, adjacent to Station Farm, Teversal - as outlined in red on the enclosed site location plan - as an additional housing allocation.

2.0 NATIONAL PLANNING POLICY CONTEXT

2.1 The National Planning Policy Framework (the “Framework”), last revised December 2023, sets out the Government’s planning policies for England and how they should be applied (paragraph 1). The policies that are relevant to the plan-making process and these representations are summarised below.

2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should apply to both plan-making and decision-taking (paragraph 11). For plan-making, the presumption means:

- a) *All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- b) *Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - i. *The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - ii. *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.*

2.3 Paragraph 15 states that:

“The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

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3.0 OBJECTIONS TO THE DRAFT LOCAL PLAN

- 3.1 Policy S2 (Achieving Sustainable Development) sets out criteria for achieving sustainable development, including in the determination of planning applications. The criteria set out within this policy are broadly supported. However, there are numerous parts of the policy that we fundamentally **object** to, as detailed below.
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- 3.5 **As currently worded, point 4 of policy S2 is, therefore, not effective as it would not apply to all developments.** The wording of point 4 should be clarified to state it is only

applicable to major developments, and to include an appropriate cross-reference to policy SD1.

- 3.6 Further to the above, the Local Plan policies should clearly state how social value is calculated, how it is achieved, and how that will be possible on all the allocations and sites that will come forward within the Authority area.
- 3.7 In addition, paragraph 8 of the Framework recognises that the planning system has three key objectives in achieving sustainable development, one of which is a ‘social objective’. This is reflected in point 1 of policy S2. The Framework itself does not include any references to, nor does it explicitly define, ‘social value’ as a term. **Point 4 of Policy S2 is, therefore, also not consistent with national policy.**
- 3.8 Policy S5 (High Quality Buildings and Places Through Place Making and Design) states that *“Neighbourhood plans / orders can have a key role in placemaking and allows communities to have more influence and control over their local area to ensure they get the right type of development for their neighbourhood”*. Whilst we do not object to this statement in principle, **we object on the basis that this criterion is not currently consistent with national policy.**
- 3.9 Paragraph 13 of the Framework states that *“Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies”*. In order to ensure conformity with national policy, it is therefore necessary to provide clarification in point 3 of policy S5 as follows: *“Neighbourhood plans / orders can have a key role in placemaking and allows communities to have more influence and control over their local area to ensure they get the right type of development for their neighbourhood where this is in accordance with overarching strategic policies”*.
- 3.10 Policy S7 (Meeting future Housing Provision) states that a minimum of 7,582 new dwellings will be delivered in Ashfield over the period 2023 to 2040. The policy’s supporting text then specifies that the housing requirement figure is based on a Local Housing Need derived from the standard method calculation, which results in a housing need figure of 446 dwellings per annum (dpa) as of April 2023.

- 3.11 We agree, in principle, that the Council's calculation of the annual housing requirement using the standard method is correct and that over the 17 year plan period (2023 to 2040) the total housing requirement based on the standard method would therefore be 7,582 dwellings.
- 3.12 However, the plan currently only identifies a total housing supply of 6,700 dwellings over the plan period, which is a deficit of 882 dwellings and represents just 13 years' supply. Therefore, **we object to point 1 of policy S7 as it is currently not positively prepared or effective**, because it states that 7,582 dwellings will be delivered over the plan period despite the fact that there are 882 dwellings that have not been positively planned for, and it is unclear how these 882 dwellings would be delivered. No further clarity is provided in the associated 'Background Paper 2: Housing' that forms part of the supporting evidence base.
- 3.13 'Background Paper 2: Housing' establishes that the current supply of deliverable and developable sites combined with extant permissions (as at April 2023) allows the Authority to only confirm the delivery of 6,700 of its 7,582 target, leaving a clear deficit of 882 dwellings for the plan period. The Council seek to justify this (in paragraph 7.3 of Background Paper 2) on the basis that it is compliant with paragraph 68 (now paragraph 69) of the Framework because:
- "...the Plan currently provides for 6700 dwellings against a need of 7582 to the year 2040, amounting to approximately 13 years supply post adoption (to year 2038/39). It is considered to be consistent with NPPF paragraph 68 which requires policies to identify a sufficient supply and mix of sites, (taking into account their availability, suitability and likely economic viability), with specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan"*
- 3.14 These are the years which paragraph 69 of the Framework states must be effectively planned for and covered by any emerging local plan, with specific deliverable sites for the first five years identified, developable sites identified for the 6-10 year post-adoption period, and where possible for the 11-15 year post-adoption period. This is assuming the plan period is only 15 years. As the Ashfield Local Plan covers the 17 year period 2023 to 2040, and given the tendency for Local Plan adoption dates to slip, in order to ensure the Plan is sound at the point of adoption it would be prudent for the Council to identify further developable sites at this stage to avoid unnecessary delays during the Examination process should further allocated sites be required.
- 3.15 Further to the above, paragraph 22 of the Framework states that *"strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-*

term requirements and opportunities". Paragraph 23 of the Framework then states that *"strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period"*. As the Ashfield Local Plan covers a period of 17 years (2023 to 2040), in order to comply with national policy its strategic policies should plan to meet the housing needs identified over that defined plan period.

- 3.16 The test in the Framework is that a minimum of 15 years' supply should be identified if it is possible to do so. It is not accepted that it is impossible to identify 17 years' supply. As this and other objections highlight, there are clearly sufficient deliverable sites that could be allocated; it is simply the Council's choice not to do so. In this respect the level of housing provision is not in accordance with the Framework as it is possible to allocate deliverable sites for the whole of the plan period, and the Council's justification for not doing so is simply inaccurate and not borne out by the evidence.
- 3.17 In summary, **policy S7 is not positively prepared or consistent with national policy because the level of housing provision that has been planned for (as also set out in the housing allocations identified in policy H1) does not meet the identified needs for the plan period.** In order to ensure the plan is positively prepared and consistent with national policy, the Council should ensure that sufficient sites are identified which, as a minimum, meet the housing requirement for the whole plan period (7,582 dwellings), including through allocating further deliverable and developable sites, as required.
- 3.18 Further to the above, it is also concerning that the supply figures only just cover a 15-year requirement ($446 \times 15 = 6,690$ dwellings) with no buffer included. Therefore, if any identified developable sites fail to be delivered then the minimum housing requirement would not be met. This further supports our recommendation that the Council should allocate further sites to ensure Ashfield's identified housing needs for the plan period are met in full.
- 3.19 As demonstrated in the following chapter, there is additional suitable, available and deliverable land within Ashfield on non-Green Belt sites, that are in appropriate and sustainable locations, that could be allocated. Full and clear consideration should be given to this prior to the plan being submitted for formal Examination.

4.0 LAND AT PLEASLEY ROAD, ADJACENT TO STATION FARM, TEVERSAL

- 4.1 This representation promotes the allocation of land at Pleasley Road, adjacent to Station Farm, Teversal - as outlined in red on the enclosed site location plan - as an additional housing allocation.
- 4.2 The site comprises of greenfield land adjacent to the settlement boundary of Fackley and in proximity to Teversal. It has a site area of approximately 2.1 hectares. This aligns with the proposed spatial strategy, set out in draft Policy S1, which supports smaller scale growth within or adjoining Named Settlements (including Fackley) that meets the needs of the community and sustains services and facilities.
- 4.3 The site is bound by existing trees and landscaping to the north, east and south. Beyond the landscaping, Pleasley Road is located to the north, and some limited built form (the Old Railway Station) is located to the east. Station Farm is located to the west of the site.
- 4.4 The site is located entirely within Flood Zone 1.
- 4.5 The site is not located within or adjacent to the Green Belt or a Conservation Area. Also, there are no listed buildings or scheduled monuments on the site or in close proximity.
- 4.6 The boundary of the Teversal Conservation Area is located circa 400 metres to the north east of the site.
- 4.7 Adjacent to the site, to the east, is a Local Wildlife Site.
- 4.8 There are designated Green Spaces to the north, south and east of the site.
- 4.9 The site is located within a Countryside Policy Area in the 2002 Local Plan, and is within the 2017 Teversal, Stanton Hill and Skegby Neighbourhood Plan area. The emerging Local Plan currently intends to continue the site's policy designation as Countryside Policy Area.
- 4.10 An outline planning application with all matters reserved except for access (reference V/2021/0609) was submitted to Ashfield District Council in August 2021 for the development of up to 47 dwellings at the site. The application was refused by Ashfield District Council in December 2023, under delegated powers, for the following three reasons:

- 1. The application site is in an unsustainable location, isolated from services,*

facilities and sustainable travel options and heavily reliant on the private car to access services and facilities. Consequently, the proposal conflicts with the following national and local planning policy and guidance:

- *National Planning Policy Framework Parts 2, 8 and 14*
 - *Ashfield Local Plan Review 2002 policy EV2*
 - *Teversal, Skegby and Stanton Hill Neighbourhood Plan policy NP1*
2. *The proposed access details are unacceptable because of sub-standard visibility splays which will give rise to a dangerous access to the detriment of road users and pedestrians which will be in conflict with the following policies:*
- *Ashfield Local Plan Review 2002 policy HG5e*
 - *Teversal, Skegby and Stanton Hill Neighbourhood Plan policy AP1*
3. *The applicant is unable to demonstrate that the site access can be delivered because the land is not in the ownership of the applicant, therefore contrary to the following policies:*
- *Ashfield Local Plan Review 2002 policy HG5e*
 - *Teversal, Skegby and Stanton Hill Neighbourhood Plan policy AP1*

4.11 Whilst this Regulation 19 consultation is not an opportunity to formally appeal the above referenced decision, it is nevertheless important for the Inspector to be aware as part of the Local Plan Examination that we dispute the reasons for refusal discussed above.

4.12 In relation to reason 1: The site is in a reasonably sustainable location. There are public transport links, and local facilities and services, within Fackley and Teversal. For example, under 250 metres to the south west of the site, on Fackley Road, there are two bus stops (one per direction) which provide access to the 417 route which is the Sutton town service to the bus station. Whilst the 417 service is not currently regular, the service is due significant improvements as a result of Bellway Homes Ltd being required to pay £90,000 to provide an increased service and a larger vehicle on the 417 bus service as part of their outline planning permission for up to 300 dwellings with at Ashland Road West (appeal reference APP/W3005/W/21/3274818, decision dated 13th December 2021). It is understood that Reserved Matters are currently being progressing in relation to the permission.

4.13 Further to the above, the Carnarvon public house and restaurant is located under 250 metres to the west, Teversal football club and the Teversal Trails visitor centre are located under 300 metres to the south east, and the Teversal camping and caravanning club site is located under 600 metres to the west. Also, to the north east in the village of Teversal, St Katherine's Church is located under 800 metres from the site.

4.14 In addition, there is an array of facilities and services in the neighbouring settlements of Stanton Hill and Skegby including (but not limited to) Healdswood Nursery and Infant School, Skegby family medical centre, Skegby Junior Academy, the Co-Operative food shop, and a

BP petrol station.

- 4.15 In relation to reasons 2 and 3: Speed surveys were undertaken in June 2020 and again in September 2022, and both surveys found that the 85 percentile wet weather journey speeds in both directions were less than 37mph. As such, based on Manual for Streets standards, 2.4m x 50m visibility splays will enable vehicles to exit the site safely. Visibility splays in excess of this are achievable in both directions. Also, the untitled land which forms part of the visibility splays is covered by an insurance policy.
- 4.16 The site was initially assessed in the 2021 Strategic Housing and Employment Land Availability Assessment (“SHELAA”) and in the September 2021 Sustainability Appraisal (“SA”). In relation to suitability, the SHELAA concluded that: the site would not be suitable without mitigation due to substantial access constraints; the adjacent local wildlife site needs to be taken into account to avoid or mitigate impacts on biodiversity; any potential harm to Hardwick Hall’s significance would need to be assessed; and, the development is required to maintain the sense of openness between Teversal and Stanton Hill.
- 4.17 As discussed above, the access constraints can be addressed to ensure that access to the site would be suitable and safe. Also, as part of the application process assessments were undertaken – as far as was practicable given the outline nature of the application - to establish whether there could be any impact on / harm to biodiversity, Hardwick Hall’s significance, and / or the openness between Teversal and Stanton Hill.
- 4.18 In relation to biodiversity: Up-to-date ecology surveys, and a biodiversity baseline and net gain assessment, would be undertaken as part of a Reserved Matters or full planning application, and mitigation measures (such as incorporating buffer zones into the landscaping scheme, only planting native tree and shrub species, and incorporating bat boxes into the development) would be proposed accordingly if required to ensure that existing biodiversity is not harmed. Also, imminently forthcoming legislation requires 10% biodiversity net gain to be achieved. As such, potential impact on biodiversity should not be considered as a site constraint that prevents the site from being allocated for housing.
- 4.19 In relation to Hardwick Hall’s significance: The site is located more than 2 kilometres from Hardwick Hall. There is existing built form adjacent to the site along Pleasley Road, and there is a significant level of screening in the form of landscaping between Hardwick Hall and the site (including Silverhill Wood). Also, the Stanley and Silverhill Character Analysis of

Hardwick Hall Setting Study maps (numbers 10, 11, 14, 15 and 16) indicate areas that would theoretically be visible from the roof of Hardwick Hall, Hardwick Hall Towers, Broadoak Hill, the Western Terrace and the Stableyard Terrace respectively, and the site does not fall within any of the areas of theoretical visibility. Further to this, the Study also indicates significant views towards Hardwick (on map 12) and the site is not indicated on the associated map. Therefore, it is considered that residential development at the site will not have any impact on the significance of the Hardwick Hall, and no harm to the significance will be caused. It is also of note that Harwick Hall is not referred to in the 'Historic Environment' section of the Officer's report for application V/2021/0609, and impact on any heritage assets was not a reason for refusal. As such, potential impact on Hardwick Hall's significance should not be considered as a site constraint that prevents the site from being allocated for housing.

4.20 In relation to the openness between Teversal and Stanton Hill: A Landscape Visual Impact Assessment would be undertaken as part of a Reserved Matters or full planning application, and mitigation measures (such as utilisation of soft landscaping to provide screening) would be proposed accordingly if required to ensure that there would not be an unacceptably adverse impact on the openness between the two areas (the green gap). As such, potential impact on the openness between Teversal and Stanton Hill should not be considered as a site constraint that prevents the site from being allocated for housing.

4.21 In the SA the site is considered to be a "reasonable alternative" site for housing. However, the site was not selected for the following reason:

"The site is located adjacent to Fackley where it can be seen as have a more rural character. It would represent the development of a greenfield land intruding into a key 'green gap' identified in the Teversal, Stanton Hill and Skegby Neighbourhood Plan. It would also be detrimental to the settlement pattern to this part of Fackley."

4.22 The SA was updated in November 2023 as part of the evidence base for the Regulation 19 consultation. The assessment of the site against the seventeen different SA objectives and the conclusion remains the same in the 2023 SA.

4.23 The commentary provided above in response to the SHELAA's conclusion, in relation to the openness between Teversal and Stanton Hill, is also applicable to the SA's conclusion.

4.24 This site should therefore be considered a suitable, available and deliverable site that accords with the overall proposed spatial strategy (as set out in Policy S1) and should be

included as an allocation in Policy H1 in order to ensure that the Council meets its minimum housing requirement for the full plan period (as set out in our objections to Policy S7 above).



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For and on behalf of
Ackroyd & Abbott Ltd

REPRESENTATION TO THE ASHFIELD LOCAL PLAN REGULATION 19 CONSULTATION

Land at Pleasley Road, adjacent to Station Farm, Teversal

**Prepared by
DLP Planning Ltd
Sheffield**

January 2024





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1.0 INTRODUCTION

- 1.1 This Representation to the Ashfield Local Plan Regulation 19 consultation has been prepared by DLP Planning Ltd on behalf of our client Ackroyd and Abbott Ltd.
- 1.2 As discussed in comprehensive detail in the following chapters – We **object** to several of the strategic policies (including **Policies S2, S5 and S7**) and **Policy H1**, on grounds that these do not meet the tests of soundness set out in paragraph 35 of the National Planning Policy Framework ('the Framework'). Through these representations we also promote the allocation of land at Pleasley Road, adjacent to Station Farm, Teversal - as outlined in red on the enclosed site location plan - as an additional housing allocation.

2.0 NATIONAL PLANNING POLICY CONTEXT

2.1 The National Planning Policy Framework (the “Framework”), last revised December 2023, sets out the Government’s planning policies for England and how they should be applied (paragraph 1). The policies that are relevant to the plan-making process and these representations are summarised below.

2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should apply to both plan-making and decision-taking (paragraph 11). For plan-making, the presumption means:

- a) *All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- b) *Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - i. *The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - ii. *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.*

2.3 Paragraph 15 states that:

“The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

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- 3.5 **As currently worded, point 4 of policy S2 is, therefore, not effective as it would not apply to all developments.** The wording of point 4 should be clarified to state it is only

applicable to major developments, and to include an appropriate cross-reference to policy SD1.

- 3.6 Further to the above, the Local Plan policies should clearly state how social value is calculated, how it is achieved, and how that will be possible on all the allocations and sites that will come forward within the Authority area.
- 3.7 In addition, paragraph 8 of the Framework recognises that the planning system has three key objectives in achieving sustainable development, one of which is a ‘social objective’. This is reflected in point 1 of policy S2. The Framework itself does not include any references to, nor does it explicitly define, ‘social value’ as a term. **Point 4 of Policy S2 is, therefore, also not consistent with national policy.**
- 3.8 Policy S5 (High Quality Buildings and Places Through Place Making and Design) states that *“Neighbourhood plans / orders can have a key role in placemaking and allows communities to have more influence and control over their local area to ensure they get the right type of development for their neighbourhood”*. Whilst we do not object to this statement in principle, **we object on the basis that this criterion is not currently consistent with national policy.**
- 3.9 Paragraph 13 of the Framework states that *“Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies”*. In order to ensure conformity with national policy, it is therefore necessary to provide clarification in point 3 of policy S5 as follows: *“Neighbourhood plans / orders can have a key role in placemaking and allows communities to have more influence and control over their local area to ensure they get the right type of development for their neighbourhood where this is in accordance with overarching strategic policies”*.
- 3.10 Policy S7 (Meeting future Housing Provision) states that a minimum of 7,582 new dwellings will be delivered in Ashfield over the period 2023 to 2040. The policy’s supporting text then specifies that the housing requirement figure is based on a Local Housing Need derived from the standard method calculation, which results in a housing need figure of 446 dwellings per annum (dpa) as of April 2023.

- 3.11 We agree, in principle, that the Council's calculation of the annual housing requirement using the standard method is correct and that over the 17 year plan period (2023 to 2040) the total housing requirement based on the standard method would therefore be 7,582 dwellings.
- 3.12 However, the plan currently only identifies a total housing supply of 6,700 dwellings over the plan period, which is a deficit of 882 dwellings and represents just 13 years' supply. Therefore, **we object to point 1 of policy S7 as it is currently not positively prepared or effective**, because it states that 7,582 dwellings will be delivered over the plan period despite the fact that there are 882 dwellings that have not been positively planned for, and it is unclear how these 882 dwellings would be delivered. No further clarity is provided in the associated 'Background Paper 2: Housing' that forms part of the supporting evidence base.
- 3.13 'Background Paper 2: Housing' establishes that the current supply of deliverable and developable sites combined with extant permissions (as at April 2023) allows the Authority to only confirm the delivery of 6,700 of its 7,582 target, leaving a clear deficit of 882 dwellings for the plan period. The Council seek to justify this (in paragraph 7.3 of Background Paper 2) on the basis that it is compliant with paragraph 68 (now paragraph 69) of the Framework because:
- "...the Plan currently provides for 6700 dwellings against a need of 7582 to the year 2040, amounting to approximately 13 years supply post adoption (to year 2038/39). It is considered to be consistent with NPPF paragraph 68 which requires policies to identify a sufficient supply and mix of sites, (taking into account their availability, suitability and likely economic viability), with specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan"*
- 3.14 These are the years which paragraph 69 of the Framework states must be effectively planned for and covered by any emerging local plan, with specific deliverable sites for the first five years identified, developable sites identified for the 6-10 year post-adoption period, and where possible for the 11-15 year post-adoption period. This is assuming the plan period is only 15 years. As the Ashfield Local Plan covers the 17 year period 2023 to 2040, and given the tendency for Local Plan adoption dates to slip, in order to ensure the Plan is sound at the point of adoption it would be prudent for the Council to identify further developable sites at this stage to avoid unnecessary delays during the Examination process should further allocated sites be required.
- 3.15 Further to the above, paragraph 22 of the Framework states that *"strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-*

term requirements and opportunities". Paragraph 23 of the Framework then states that "strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period". As the Ashfield Local Plan covers a period of 17 years (2023 to 2040), in order to comply with national policy its strategic policies should plan to meet the housing needs identified over that defined plan period.

- 3.16 The test in the Framework is that a minimum of 15 years' supply should be identified if it is possible to do so. It is not accepted that it is impossible to identify 17 years' supply. As this and other objections highlight, there are clearly sufficient deliverable sites that could be allocated; it is simply the Council's choice not to do so. In this respect the level of housing provision is not in accordance with the Framework as it is possible to allocate deliverable sites for the whole of the plan period, and the Council's justification for not doing so is simply inaccurate and not borne out by the evidence.
- 3.17 In summary, **policy S7 is not positively prepared or consistent with national policy because the level of housing provision that has been planned for (as also set out in the housing allocations identified in policy H1) does not meet the identified needs for the plan period.** In order to ensure the plan is positively prepared and consistent with national policy, the Council should ensure that sufficient sites are identified which, as a minimum, meet the housing requirement for the whole plan period (7,582 dwellings), including through allocating further deliverable and developable sites, as required.
- 3.18 Further to the above, it is also concerning that the supply figures only just cover a 15-year requirement ($446 \times 15 = 6,690$ dwellings) with no buffer included. Therefore, if any identified developable sites fail to be delivered then the minimum housing requirement would not be met. This further supports our recommendation that the Council should allocate further sites to ensure Ashfield's identified housing needs for the plan period are met in full.
- 3.19 As demonstrated in the following chapter, there is additional suitable, available and deliverable land within Ashfield on non-Green Belt sites, that are in appropriate and sustainable locations, that could be allocated. Full and clear consideration should be given to this prior to the plan being submitted for formal Examination.

4.0 LAND AT PLEASLEY ROAD, ADJACENT TO STATION FARM, TEVERSAL

- 4.1 This representation promotes the allocation of land at Pleasley Road, adjacent to Station Farm, Teversal - as outlined in red on the enclosed site location plan - as an additional housing allocation.
- 4.2 The site comprises of greenfield land adjacent to the settlement boundary of Fackley and in proximity to Teversal. It has a site area of approximately 2.1 hectares. This aligns with the proposed spatial strategy, set out in draft Policy S1, which supports smaller scale growth within or adjoining Named Settlements (including Fackley) that meets the needs of the community and sustains services and facilities.
- 4.3 The site is bound by existing trees and landscaping to the north, east and south. Beyond the landscaping, Pleasley Road is located to the north, and some limited built form (the Old Railway Station) is located to the east. Station Farm is located to the west of the site.
- 4.4 The site is located entirely within Flood Zone 1.
- 4.5 The site is not located within or adjacent to the Green Belt or a Conservation Area. Also, there are no listed buildings or scheduled monuments on the site or in close proximity.
- 4.6 The boundary of the Teversal Conservation Area is located circa 400 metres to the north east of the site.
- 4.7 Adjacent to the site, to the east, is a Local Wildlife Site.
- 4.8 There are designated Green Spaces to the north, south and east of the site.
- 4.9 The site is located within a Countryside Policy Area in the 2002 Local Plan, and is within the 2017 Teversal, Stanton Hill and Skegby Neighbourhood Plan area. The emerging Local Plan currently intends to continue the site's policy designation as Countryside Policy Area.
- 4.10 An outline planning application with all matters reserved except for access (reference V/2021/0609) was submitted to Ashfield District Council in August 2021 for the development of up to 47 dwellings at the site. The application was refused by Ashfield District Council in December 2023, under delegated powers, for the following three reasons:

- 1. The application site is in an unsustainable location, isolated from services,*

facilities and sustainable travel options and heavily reliant on the private car to access services and facilities. Consequently, the proposal conflicts with the following national and local planning policy and guidance:

- *National Planning Policy Framework Parts 2, 8 and 14*
 - *Ashfield Local Plan Review 2002 policy EV2*
 - *Teversal, Skegby and Stanton Hill Neighbourhood Plan policy NP1*
2. *The proposed access details are unacceptable because of sub-standard visibility splays which will give rise to a dangerous access to the detriment of road users and pedestrians which will be in conflict with the following policies:*
- *Ashfield Local Plan Review 2002 policy HG5e*
 - *Teversal, Skegby and Stanton Hill Neighbourhood Plan policy AP1*
3. *The applicant is unable to demonstrate that the site access can be delivered because the land is not in the ownership of the applicant, therefore contrary to the following policies:*
- *Ashfield Local Plan Review 2002 policy HG5e*
 - *Teversal, Skegby and Stanton Hill Neighbourhood Plan policy AP1*

4.11 Whilst this Regulation 19 consultation is not an opportunity to formally appeal the above referenced decision, it is nevertheless important for the Inspector to be aware as part of the Local Plan Examination that we dispute the reasons for refusal discussed above.

4.12 In relation to reason 1: The site is in a reasonably sustainable location. There are public transport links, and local facilities and services, within Fackley and Teversal. For example, under 250 metres to the south west of the site, on Fackley Road, there are two bus stops (one per direction) which provide access to the 417 route which is the Sutton town service to the bus station. Whilst the 417 service is not currently regular, the service is due significant improvements as a result of Bellway Homes Ltd being required to pay £90,000 to provide an increased service and a larger vehicle on the 417 bus service as part of their outline planning permission for up to 300 dwellings with at Ashland Road West (appeal reference APP/W3005/W/21/3274818, decision dated 13th December 2021). It is understood that Reserved Matters are currently being progressing in relation to the permission.

4.13 Further to the above, the Carnarvon public house and restaurant is located under 250 metres to the west, Teversal football club and the Teversal Trails visitor centre are located under 300 metres to the south east, and the Teversal camping and caravanning club site is located under 600 metres to the west. Also, to the north east in the village of Teversal, St Katherine's Church is located under 800 metres from the site.

4.14 In addition, there is an array of facilities and services in the neighbouring settlements of Stanton Hill and Skegby including (but not limited to) Healdswood Nursery and Infant School, Skegby family medical centre, Skegby Junior Academy, the Co-Operative food shop, and a

BP petrol station.

- 4.15 In relation to reasons 2 and 3: Speed surveys were undertaken in June 2020 and again in September 2022, and both surveys found that the 85 percentile wet weather journey speeds in both directions were less than 37mph. As such, based on Manual for Streets standards, 2.4m x 50m visibility splays will enable vehicles to exit the site safely. Visibility splays in excess of this are achievable in both directions. Also, the untitled land which forms part of the visibility splays is covered by an insurance policy.
- 4.16 The site was initially assessed in the 2021 Strategic Housing and Employment Land Availability Assessment (“SHELAA”) and in the September 2021 Sustainability Appraisal (“SA”). In relation to suitability, the SHELAA concluded that: the site would not be suitable without mitigation due to substantial access constraints; the adjacent local wildlife site needs to be taken into account to avoid or mitigate impacts on biodiversity; any potential harm to Hardwick Hall’s significance would need to be assessed; and, the development is required to maintain the sense of openness between Teversal and Stanton Hill.
- 4.17 As discussed above, the access constraints can be addressed to ensure that access to the site would be suitable and safe. Also, as part of the application process assessments were undertaken – as far as was practicable given the outline nature of the application - to establish whether there could be any impact on / harm to biodiversity, Hardwick Hall’s significance, and / or the openness between Teversal and Stanton Hill.
- 4.18 In relation to biodiversity: Up-to-date ecology surveys, and a biodiversity baseline and net gain assessment, would be undertaken as part of a Reserved Matters or full planning application, and mitigation measures (such as incorporating buffer zones into the landscaping scheme, only planting native tree and shrub species, and incorporating bat boxes into the development) would be proposed accordingly if required to ensure that existing biodiversity is not harmed. Also, imminently forthcoming legislation requires 10% biodiversity net gain to be achieved. As such, potential impact on biodiversity should not be considered as a site constraint that prevents the site from being allocated for housing.
- 4.19 In relation to Hardwick Hall’s significance: The site is located more than 2 kilometres from Hardwick Hall. There is existing built form adjacent to the site along Pleasley Road, and there is a significant level of screening in the form of landscaping between Hardwick Hall and the site (including Silverhill Wood). Also, the Stanley and Silverhill Character Analysis of

Hardwick Hall Setting Study maps (numbers 10, 11, 14, 15 and 16) indicate areas that would theoretically be visible from the roof of Hardwick Hall, Hardwick Hall Towers, Broadoak Hill, the Western Terrace and the Stableyard Terrace respectively, and the site does not fall within any of the areas of theoretical visibility. Further to this, the Study also indicates significant views towards Hardwick (on map 12) and the site is not indicated on the associated map. Therefore, it is considered that residential development at the site will not have any impact on the significance of the Hardwick Hall, and no harm to the significance will be caused. It is also of note that Harwick Hall is not referred to in the 'Historic Environment' section of the Officer's report for application V/2021/0609, and impact on any heritage assets was not a reason for refusal. As such, potential impact on Hardwick Hall's significance should not be considered as a site constraint that prevents the site from being allocated for housing.

4.20 In relation to the openness between Teversal and Stanton Hill: A Landscape Visual Impact Assessment would be undertaken as part of a Reserved Matters or full planning application, and mitigation measures (such as utilisation of soft landscaping to provide screening) would be proposed accordingly if required to ensure that there would not be an unacceptably adverse impact on the openness between the two areas (the green gap). As such, potential impact on the openness between Teversal and Stanton Hill should not be considered as a site constraint that prevents the site from being allocated for housing.

4.21 In the SA the site is considered to be a "reasonable alternative" site for housing. However, the site was not selected for the following reason:

"The site is located adjacent to Fackley where it can be seen as have a more rural character. It would represent the development of a greenfield land intruding into a key 'green gap' identified in the Teversal, Stanton Hill and Skegby Neighbourhood Plan. It would also be detrimental to the settlement pattern to this part of Fackley."

4.22 The SA was updated in November 2023 as part of the evidence base for the Regulation 19 consultation. The assessment of the site against the seventeen different SA objectives and the conclusion remains the same in the 2023 SA.

4.23 The commentary provided above in response to the SHELAA's conclusion, in relation to the openness between Teversal and Stanton Hill, is also applicable to the SA's conclusion.

4.24 This site should therefore be considered a suitable, available and deliverable site that accords with the overall proposed spatial strategy (as set out in Policy S1) and should be

included as an allocation in Policy H1 in order to ensure that the Council meets its minimum housing requirement for the full plan period (as set out in our objections to Policy S7 above).



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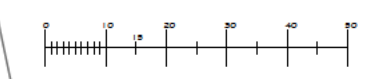
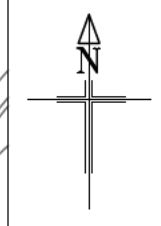
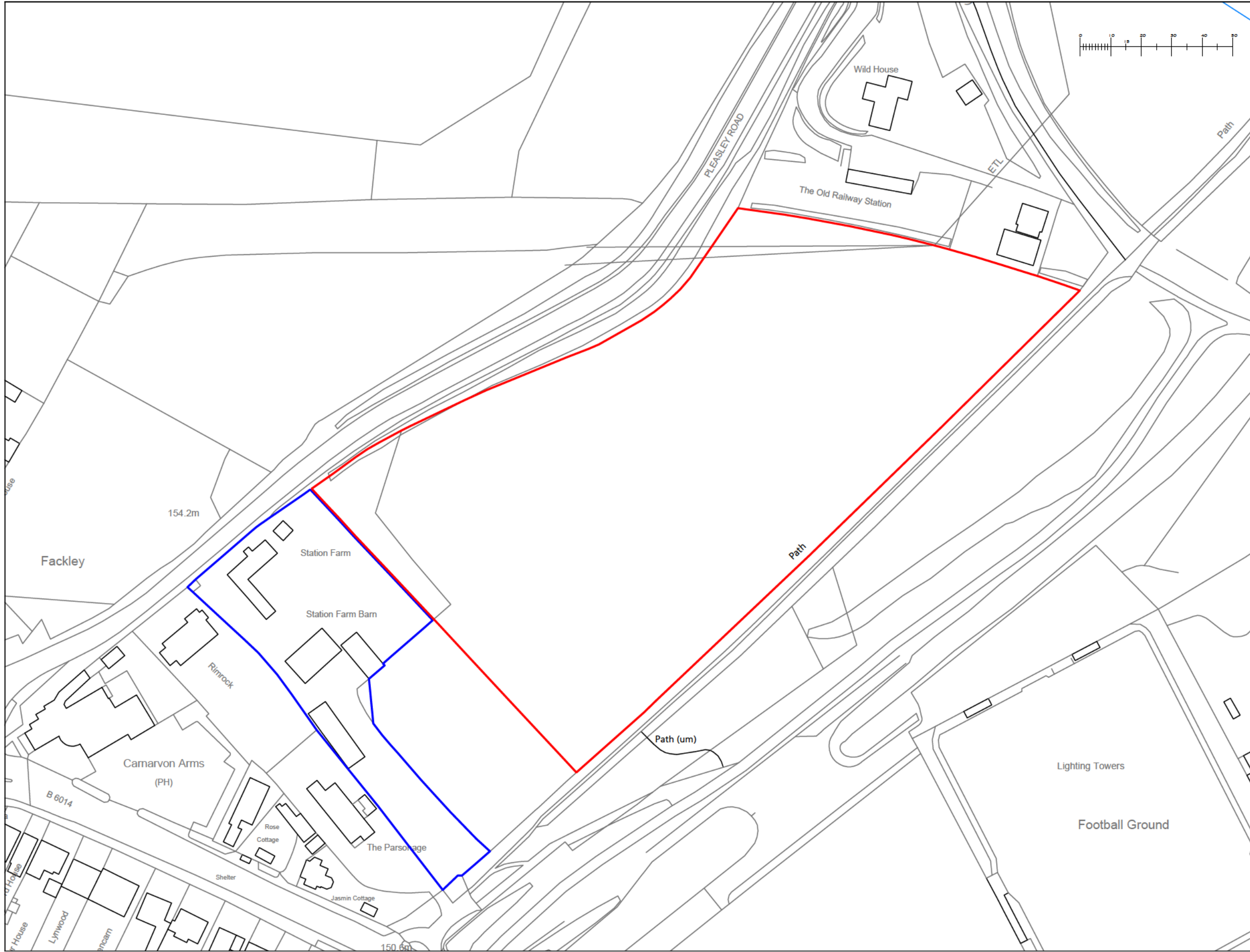
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Client	Ackroyd & Abbott Homes
Scale	1:1250
Date	June 2021
Drawn By	GRM
Project	Land off Pleasley Road Station Farm Teveral
Title	Location Plan
Drawing No. AAHPRTL/P/01	
All dimensions must be checked on site and not scaled from this drawing, if in doubt ask.	