

**Statement of Consultation**

**for the**

**Ashfield Local Plan 2023-2040**

**Regulation 19 Pre-Submission Draft**

**Regulation 22 (1)(c)(v)**

**April 2024**

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## Introduction

* 1. Ashfield District Council undertook a consultation on a draft Ashfield Local Plan under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, from 4th October to 16th November 2021. The responses to the consultation are set out in the Regulation 18 Statement of Consultation (Examination Library ref. SD/07).
  2. The Council’s Local Development Panel (which changed to the Local Plan Development Committee from May 2023) considered the responses received and made recommendations to Cabinet regarding the emerging Local Plan. The Council refined and amended the Regulation 18 draft Local Plan to produce the Ashfield Local Plan 2023 to 2040 Regulation 19 Pre-Submission Draft.
  3. The Pre-submission draft of the Ashfield Local Plan 2023-2040 was subject to an 8 week public consultation, commencing on Monday 4th December 2023 to Monday 29th January 2024, under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The supporting Sustainability Appraisal and Habitats Regulations Assessment were also consulted upon at the same time.
  4. This document follows on from the Regulation 18 Statement of Consultation and should be read in conjunction with that statement. It sets out how Regulation 19 was met, and meets Regulation 22 (1)(c)(v).
  5. Additional information regarding collaboration and liaison with prescribed bodies is included in the Duty to Co-operate Statement of Compliance for the Ashfield Local Plan 2023 to 2040 (Exam. ref. DTC/01).

## How did we consult?

* 1. Consultation was undertaken in line with the provisions of the ADC Statement of Community Involvement (SCI) (Exam. Ref. SD/06). We consulted all organisations and persons on the Council’s Local Plan database. This list included the specific and general consultation bodies as set out in the SCI.

### Making copies of documentation available for inspection during the consultation

* 1. Copies of the Regulation 19 draft Local Plan document, Policies Maps (North and South), representation forms and guidance were made available to view at the following venues. A poster was also placed at these venues to advertise this.
* Ashfield District Council – Main Offices, Kirkby in Ashfield
* Sutton in Ashfield Library
* Kirkby in Ashfield Library
* Hucknall Library
* Selston Parish Hall
  1. In addition to the above, the following supporting documents were made available at the main Ashfield District Council Offices:
* Statement of Consultation (Regulation 18)
* Sustainability Appraisal (including Non-technical summary and all appendices)
* Habitats Regulations Assessment
* Equalities Impact Assessment
* Health Impact Assessment
* Whole Plan Viability Assessment
* Background Paper 1: Spatial Strategy and Site Selection
* Background Paper 2: Housing
* Background Paper 3: Economy and Employment
* Background Paper 4: Green Belt Harm Assessment

### Emails and letters

* 1. Letters or emails were sent to 1188 individuals, companies, groups and organisations registered on the Local Plan Consultation Database to inform them of the public consultation.
  2. In addition to the above, details of the consultation, together with a publicity leaflet were circulated via other internal Council departments as follows:
* Business Support mailing list (in excess of 1000 contacts)
* Community groups and voluntary organisations database
* Town centre and markets mailing list.

### Website

* 1. An accessibility checked copy of the draft Regulation 19 Local Plan consultation document, representation forms (and guidance on making representations), frequently asked questions, all supporting documents and evidence base was available to view and download from the council’s website ([Ashfield Local Plan (2023-2040) Regulation 19 pre-submission draft](https://www.ashfield.gov.uk/planning-building-control/local-plan/emerging-local-plan/ashfield-local-plan-2023-2040-regulation-19-pre-submission-draft/)).
  2. The website also included an interactive Policies Map and online representation form.

### Posters and Banners

* 1. Posters to publicise the consultation event were also displayed at the main Council offices and all of the district’s libraries and in the leisure centres at Sutton, Kirkby and Hucknall.
  2. Banners were places in prominent locations in the three town centres at Sutton, Kirkby and Hucknall, and also outside the Parish Hall in Selston.

### Press release and formal notices

* 1. A press release was issued by Ashfield District Council and a news item was also posted on the Council’s website.
  2. Formal notices were posted in the following newspapers:
* Eastwood and Kimberly Advertiser
* Hucknall Dispatch
* Mansfield Chad

### Social media (Facebook and Twitter)

* 1. The consultation was publicised on the council’s Facebook page on 4th December 2023 (reaching 9.7k people), and again on 6th January 2024 (reaching 2.1k people.
  2. An article also featured on the Council’s and the ‘Succeed in Ashfield’ LinkedIn pages for the duration of the consultation.

### Meetings with Groups

* 1. Meetings were held with representatives of the District’s Parish Councils, Neighbourhood Forums, and adjoining Parish Councils as follows:
* Selston Parish Council/ Selston Neighbourhood Forum
* Annesley & Felly Parish Council
* Teversal, Stanton Hill & Skegby Neighbourhood Forum
* Brinsley Parish Council
* Papplewick Parish Council

## Who responded?

* 1. A total of 122 persons or organisations responded resulting in a total of 438 individual representations. Representations are comments made to a specific part of the Plan e.g. a policy or site allocation.
  2. In addition to the above responses, 2 petitions were received objecting to proposed housing allocations as follows:
* H1Hd Stubbing Wood Farm, Watnall Road, Hucknall – 103 signatures
* H1Sq Hardwick Lane Recreation Ground – 586 signatures

## What was said and what was our response?

* 1. Table 1 below provides a summary of the key issues raised pursuant to Regulations 19/20, set out under each chapter header in the draft Ashfield Local Plan. A brief response from Ashfield Council to these key issues is also included.
  2. Table 2 sets out a summary of key issues raised in objection to proposed Housing Allocations under Policy H1.
  3. Where a policy, site allocation or other part of the Plan is not listed under the summary of key issues, the following applies:
* no comment was received, or
* the comments submitted are of minor issue – which are of little risk to the soundness of the Plan or would not potentially require changes that materially affect the policies or proposals in the Plan or are considered by officers to be of least significance relating to the ‘soundness’ of the Plan.

## Table 1: Summary of Key Issues raised at the Regulation 19 consultation of the draft Ashfield Local Plan and Council Response

|  |  |  |
| --- | --- | --- |
| **Plan Reference** | **Summary of Key Issues** | **Council Summary Response** |
| Chapter 2 Shaping the future of Ashfield, what we want to achieve (Vision and Objectives) | | |
| Vision | Objection received to the Plan period being 2023 – 2040 - strategic policies should look ahead over a minimum 15-year period from adoption.  Objection received to the omission of cross-boundary co-operation including meeting part of the unmet needs of Nottingham City Council within the vision and objectives. | Strategic Policies look ahead over a period of 15 years with an end date of 2040 and an anticipated adoption date of 2025.  Ashfield Council have an excellent record of partnership working with Nottingham City Council and other Nottingham Core Housing Market Area (HMA) constituent authorities. This is set out in more detail in the Statement of Common Ground between Ashfield and the Nottingham Core HMA authorities (SCG/02), and in the Duty to Co-operate Statement (DTC/01).  Ashfield Council falls within the Nottingham Outer HMA and there has not been any request for Outer HMA authorities to meet any unmet housing need which may arise in the adjacent Core HMA. |
| Vision and Strategic Objectives | A number of comments supported the vision and strategic objectives 4, 13 and 14, including support from the Environment Agency and Historic England. | Support noted. |
| Chapter 3 Sustainable development in Ashfield - Strategic Policies | | |
| Strategic Policy 1: Spatial Strategy to deliver the Vision | Respondents that consider Policy 1 to be ‘unsound’ noted the following:   * Challenged the release of Green Belt sites, stating more suitable/sustainable sites are available – broadly this relates to the objection to the inclusion of site allocations or land promoters/owners seeking the allocation of new /previously assessed sites located outside of the Green Belt. * Comment that it is not justified, nor clear as to why the proposed strategy only focusses on sites of less than 500 dwellings where the respondent(s) feel there is a perceived under supply in the Local Plan (see also comments under Policy S7).   The respondent(s) commented that a dispersed strategy will not deliver sufficient homes, or the new and improved infrastructure needed and will not deliver against the plan’s vision and objectives – their view is that other spatial options are considered preferable and more sustainable, such as a new settlement / strategic site options included in the Regulation 18 draft of the Plan.   * Concern raised over the amount of growth in some settlements such as Stanton Hill, Skegby and Huthwaite due to existing pressures on infrastructure such as health care facilities, schools, and the impact on the local highway network. (see also comments in response to housing allocations – Policy H1).   A number of other respondents supported the spatial growth strategy as it does not rely on the need for a new settlement and is considered to deliver proportionate growth in the more sustainable settlements. | * Ashfield Council have taken the decision to release Green Belt sites to support existing constrained settlements, and to provide for strategic employment opportunities in key locations along the M1 corridor. This approach is consistent with the Council’s spatial strategy, the rationale for which is set out in Background Paper 1 (BP/01). * Background Paper 1 sets out greater detail in respect of the Council’s Spatial Strategy and rationale behind this approach. The Council intend to produce an update to this Paper on matters where further clarification/additional information would be beneficial to the reader.   The slight shortfall in specifically identified sites, when set against the strategic policy, is acknowledged in the Local Plan at para. 3.63 and also in Background Paper 1. However, this exceeds the provisions of NPPF para. 68 to plan for 10 years. In reality it is expected that actual delivery will be closer to meeting the level of need over the entire plan period, as additional large windfalls could be anticipated towards the letter stages of the Plan period. In addition, the Plan will be reviewed at least every 5 years to ensure a sufficient supply of land for new homes moving forwards (see LP para. 3.64).   * The Infrastructure Delivery Plan (IDP) (SEV/36) sets out the infrastructure required to support the growth proposed in the emerging Ashfield Local Plan 2023 -2040. This is a ‘living document’ which will be regularly updated. The IDP describes what infrastructure is required, how, when and by whom it will be delivered and, where known, the location. It is accompanied by a schedule that prioritises infrastructure by need (as identified by the infrastructure providers), and provides an indication of likely costs, and other funding sources. This will assist in ensuring a timely provision of infrastructure.   In this respect Policy SD5: Developer Contributions, requires development proposals to:   1. meet all reasonable costs associated with the infrastructure required as a consequence of the proposal; 2. where appropriate, contribute to the delivery of infrastructure to enable the cumulative infrastructure impacts of developments to be managed, including identified transport infrastructure requirements; and 3. provide for the future maintenance of facilities delivered as a result of the development.   General support for the revised spatial strategy is noted. |
| Strategic Policy S2: Achieving Sustainable Development | One respondent commented that 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 and they felt the Council’s use of the term social value is not consistent with national policy. | The supporting text to Strategic Policy S2 cross refers to Policy SD1 which gives more detail on how social value will be achieved on major developments. A minor change is proposed to clarify that policy S2 point 4 refers to major development only.  Securing social value through development reflects the principles of sustainable development, which is at heart of the National Planning Policy Framework (NPPF). Paragraph 8 of the NPPF describes sustainable development as responding to economic, social and environmental objectives, and explains that these should be pursued in a mutually reinforcing way. |
| Strategic Policy S3: Meeting the Challenge of Climate Change | Natural England noted that Integrated Water Management (IWM) is only referenced in the Plan once, and the broader thinking of this concept of water management is not positively considered throughout the Plan and so does not align with the Plan being positively prepared within the tests of soundness. Natural England requested that IWM is woven throughout the Plan in a considered way, including in policy CC3: Flood Risk & SuDS.  A number of recommended changes to the policy are proposed, notably from the Environment Agency, relating to improving the quality of water bodies and achieving better than existing water run-off rates for both greenfield and brownfield development. | The Council will review the wording of Policies CC3 and S3 based on the submitted representations prior to Examination and will include any proposed changes in a schedule of proposed changes where deemed appropriate for clarity. |
| Strategic Policy S4: Green Belt | Challenges from landowners/land promoters for the need for further release of Green Belt to accommodate additional site allocations to meet the Plan’s objectively assessed housing need (see also comments under Policy S7). | The Council have taken the approach to minimise Green Belt release, whilst simultaneously supporting existing constrained settlements, and to provide strategic employment opportunities which maximise the proximity to the strategic transport network, namely the M1 corridor. This is consistent with the Spatial Strategy to Deliver the Vision in Local Plan Policy S1.  Background Paper 1 discusses the justification in greater detail, in particular throughout Chapters 2, 4 and 9. The Council intend to produce an update to this Paper on matters where further clarification/additional information would be beneficial to the reader. |
| Strategic Policy S5: High Quality Buildings and Places through Place Making and Design | Challenge to point 3 (relating to the use of Neighbourhood Plans/orders) that the current wording is not consistent with national policy – wording is suggested to address this.  Comment that the policy is considered to be over-lengthy and risks repeating what is already in the Framework. Furthermore, there is no mention of the National Design Guide.  Uncertainty over what is intended for the use of the Design Review Panel. | The Council considers Strategic Policy S5 is consistent with national policy in its aims to ensure that all new development creates high quality buildings and places.  A minor change is proposed to add a new paragraph before paragraph 3.51 of the supporting text to S5, which will address the concerns raised in respect of the lack of reference to the National Design Guide.  The supporting text to S5 (para 3.52) clarifies that the use of a Design Review Panel may be used certain types of development including, proposals for important public spaces, strategic sites, and other large sites. |
| Strategic Policy S6: Meeting Future Needs - Strategic Employment Allocation at Junction 27 M1 Motorway | Overall, responses to Policy S6 supported the allocations at Junction 27 of the M1.  Historic England maintain objection to both sites north and south of Junction 27 due to the potential adverse impacts on Annesley Hall Registered Park and Garden and other heritage assets.  Policy and the supporting text could clarify other uses that would be acceptable on the site would be B2.  Concerns relating to the allocations that an increase in traffic flow along the A608 and A611 as a result of the proposed development would have a considerable negative effect for residents in the area, including a significant increase in air pollution and impact on existing wildlife corridors. | Support for strategic employment allocations at M1 junction 27 is noted.  A change to text is proposed to include mitigation measures within Policy S6 which will help to address concerns raised by Historic England. Site selection to address the wider need for logistics/distribution has taken account of the planning balance and reflect the NPPF aims in weighing competing needs. The benefits of providing strategic economic development opportunities in this particular location are discussed in Background Paper 1 (Chapter 9) and also in Background Paper 3 (BP3).  These strategic site allocations require the release of Green Belt land. The justification for allocating in this particular location is set out in the Background Papers (as above) and takes account of the substantial regional demand for distribution facilities along the western arc of the M1 (J28-J24). However, the policy as drafted does not preclude general industrial development on these sites and development proposals will be assessed on their merits at planning application stage.  Policy SD9: Environmental Protection, requires development to demonstrate that proposals minimise harmful emissions to air, will not lead to the declaration of a new Air Quality management Area, and will not impact negatively on an existing Air Quality management Area. In addition, Policy SD10: Transport Infrastructure, supports development where it reduces the need to travel by private motor vehicle and promotes smarter choices (to reduce congestion and air pollution). Policy EV4: Green Infrastructure, Biodiversity and Geodiversity, will deliver, conserve and enhance Green Infrastructure. It will also protect and enhance biodiversity and geodiversity, through the protection of sites of important sites (SSIs, LNRs, LWSs and site supporting Priority Habitats and priority Species. |
| Strategic Policy S7: Meeting Future Housing Provision | Objections to the policy primarily relate to:   * Comments that the dispersed development spatial strategy has not been positively prepared as it fails to meet the minimum objectively assessed housing over the plan period, and so additional sites should be allocated to address the shortfall. Objections on this basis are broadly from landowners / promoters and seeking to allocate additional sites, within and outside of the Green Belt. * Concern that the Council has not presented sufficient evidence to demonstrate that allocating sufficient land to meet housing needs in full would be inconsistent with the spatial strategy. * Consideration that there is additional suitable, available, and deliverable land available on non-Green Belt sites and in sustainable locations within Ashfield that could be allocated to address the shortfall. * In relation to the above comments, the site assessment conclusions set out within the SHELAA, Sustainability Appraisal and Background Paper 1 are also challenged. * Concern that if the housing need is not met, this will result in a shortfall in affordable housing. * Comments also raise concerns regarding the Duty to Cooperate and the Council should be allocating sites (which are considered to be suitable) to accommodate some of Nottingham City’s unmet housing need. | * The slight shortfall in specifically identified sites, when set against the strategic policy, is acknowledged in the Local Plan (at para. 3.63) and also in Background Paper 1. However, this exceeds the provisions of NPPF para. 68 to plan for 10 years. In reality it is expected that actual delivery will be closer to meeting the level of need over the entire plan period, as additional large windfalls could be anticipated towards the latter stages of the Plan period. In addition, the Plan will be reviewed at least every 5 years to ensure a sufficient supply of land for new homes moving forwards (see LP para. 3.64). * Background Paper 1 outlines the sequential approach to housing site selection, prioritising sites with planning approval or brownfield sites where available and deliverable. The remaining allocations have been selected in accordance with the spatial strategy to focus on smaller/medium sites and support green belt settlements. These were taken from a pool of sites which had been assessed as potentially deliverable in the SHELAA (SEV/20). Chapters 7-11 of the Paper sets out more detail. The Council intend to produce an update to this Paper on matters where further clarification/additional information would be beneficial to the reader prior to Examination. * See paragraphs above. * The Council are confident that site conclusions in the SHELAA reports have been applied consistently in accordance with the adopted joint methodology (shared with the Nottingham Outer HMA authorities). Where appropriate, these will be reviewed in light of any material changes or new evidence. The SA (SD/03) was undertaken by external consultants (WSP) with an excellent track record in Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) to support effective and efficient decision-making. Background Paper 1 draws from these assessments among other considerations to arrive at a preferred selection of site allocations. * As set out above, the supply of housing sites exceeds the provisions of NPPF para. 68 to plan for 10 years. In reality it is expected that actual delivery will be closer to meeting the level of need over the entire plan period, as additional large windfalls could be anticipated towards the latter stages of the Plan period. The Plan will be reviewed at least every 5 years to ensure a sufficient supply of land for new homes moving forwards. The affordable housing requirement (Policy H3) requires new residential developments to provide for a proportion of affordable housing, informed by evidence from the Housing Need Study and the Whole Plan Viability Assessment. In addition, Local Plan Policy H4: Rural Exceptions Sites enables smaller scale affordable housing schemes to come forward where land would not normally be used for housing due to other policies of restraint. Any development scheme coming forward under Policy H4 will therefore contribute towards the overall level of affordable housing whilst supporting the District’s more rural communities. * The Council has co-operated fully with prescribed bodies and neighbouring authorities. More detail can be found in the Duty to Co-operate Statement and Statements of Common Ground (SCG/01 – SCG10). With regard to housing need, Ashfield does not fall within the same Housing Market Area (HMA) as Nottingham City. The former is located within Nottingham Outer HMA, along with Mansfield and Newark & Sherwood authority areas, whilst the latter falls withing the Nottingham Core HMA. The Nottingham Core authorities are not relying on Ashfield District to provide for any outstanding need arising within their own HMA. |
| Strategic Policy S8: Delivering Economic Opportunities | As noted above, Historic England object to the employment land allocations at Junction 27.  A number of responses support the policy; however, one land promoter states the Plan significantly underestimates the requirement for employment land and so fails to allocate sufficient land to meet identified local and strategic employment needs. It is stated this will perpetuate the longstanding shortfall of available land for strategic B8 distribution and constrain the growth potential of the local and regional economy. | See response to Policy S6 above.  The Council consider the assessment of need for employment land within Ashfield District to be sound. Further details can be found in Background Paper 3: Economy and Employment (BP/03). |
| Strategic Policy S9 Aligning Growth and Infrastructure | Some concerns existing infrastructure will not accommodate the level of growth proposed in the Plan.  Concern that the reference to development on the boundaries of adjoining authorities potentially contributing towards infrastructure requirements of the District, is not clear on how this would be achieved. | The Infrastructure Delivery Plan (IDP) sets out the infrastructure required to support the growth proposed in the emerging Ashfield Local Plan 2023 -2040. This is a ‘living document’ which will be regularly updated. The IDP describes what infrastructure is required, how, when and by whom it will be delivered and, where known, the location. It is accompanied by a schedule that prioritises infrastructure by need (as identified by the infrastructure providers), and provides an indication of likely costs, and other funding sources. This will assist in ensuring a timely provision of infrastructure.  Policy SD5: Developer Contributions, requires development proposals to:   1. meet all reasonable costs associated with the infrastructure required as a consequence of the proposal; 2. where appropriate, contribute to the delivery of infrastructure to enable the cumulative infrastructure impacts of developments to be managed, including identified transport infrastructure requirements; and 3. provide for the future maintenance of facilities delivered as a result of the development.   The Council have a good working relationship with neighbouring authorities and have ongoing dialogue for both strategic matters and specific site level issues. Details of joint working can be found in the council’s Duty to Co-operate Statement and various Statements of Common Ground. A major projects meeting is also held on a monthly basis to discuss more complex planning applications, involving planning officers and key infrastructure providers. |
| Strategic Policy S13: Protecting and Enhancing Our Green Infrastructure and the Natural Environment | The Environment Agency recommends encouraging, where possible, in excess of the mandatory 10% of Biodiversity Net Gain (up to 20%). | Comment noted.  Policy EV4: Green Infrastructure, Biodiversity and Geodiversity requires 10% BNG as a minimum. Supporting text (para. 5.97) sets out that wherever possible, the Council will endeavour to pursue a higher target, subject to local evidence and plan-based or site-based viability assessments. |
| Strategic Policy S14: Conserving and Enhancing Our Historic Environment | The policy is supported by Historic England. | Support noted. |
| Chapter 4 Meeting the challenge of climate change and adapting to its effects | |  |
| Policy CC1: Zero/Low Carbon Developments and Decentralised, Renewable, Low Carbon Energy Generation | Natural England raise concern that there is no mention of ensuring that any development protects and enhances the natural environment or biodiversity in delivering net zero targets. NE do however suggest additional wording to address their concern and make the policy ‘sound’.  One respondent raises concern that the Plan has not practically addressed the key fundamental and critically important issues of climate change – i.e. poor insulation, gas-fired domestic heating, and fossil fuel powered cars. | Enhancements to the natural environment and biodiversity are addressed under Strategic Policy S13 Protecting and Enhancing Our Green Infrastructure and the Natural Environment, and development management Policy EV4: Green Infrastructure, Biodiversity and Geodiversity. The council will consider amendments to the wording of Policy CC1 based on Natural England’s suggestions prior to Examination and include in a schedule of proposed changes if appropriate.  Whilst the Local Plan can seek to address the impact of climate change with regard to location of development (e.g. close to services and jobs to discourage private car usage, or avoidance of Floodzones), design elements (e.g. orientation to maximise/ avoid solar gain, or requiring car charging points), and encourage/require provision of sustainable transport routes, the planning system cannot stipulate the type of domestic heating, details for insulation, and use of fossil fuels. This role sits with building regulations and central government. |
| Policy CC3: Flood Risk and SuDS | A number of representations, whilst not objecting to the policy, propose additional or revised wording to strengthen the policy, – notably from the Environment Agency, Historic England, and Severn Trent.  Comments relate to broad concerns regarding issues of existing flooding and potential exacerbation of existing issues as a result of the proposed site allocations. | Comments noted.  The Council will review the wording of Policy CC3 based on the received comments prior to Examination and will include any proposed changes in a schedule of proposed changes where deemed appropriate for clarity.  All sites have been assessed via the SHELAA, which excluded sites which were at risk of high-level flooding (Zone 3). Policy CC3 and its supporting text sets out the development will not be permitted unless it incorporates Sustainable Urban Drainage Schemes. |
| Chapter 5 Protecting and enhancing Ashfield’s character through its natural environment and heritage | |  |
| All policies | A number of recommendations have been put forward to the Council to strengthen the aspirations of the policies in Chapter 5, including:  Seeking 20% Biodiversity Net Gain  Give weight to the emerging Local Nature Recovery Strategy  Increased woodland planting and improved accessibility to woodland. | Comments noted.  See comments for Policy S13 above.  The Council is currently working with Nottinghamshire County Council on the development of a Local Nature Recovery Strategy. Paragraph 5.93 makes references to the development of LNRS, this will be updated prior to Examination and any proposed changes will be included in a schedule of proposed changes where deemed appropriate for clarity.  Policy EV6 aims to minimise the loss of trees, woodland and hedgerows where development is proposed. Clause 2b includes the requirement for appropriate replacement trees at a minimum ratio of 2 new trees for every tree lost. This applies where they are subject to a tree preservation order, or in a Conservation area, or are of a visual, historic or nature conservation value. Accessibility to woodland is a matter which sits outside of the Local Plan process. |
| EV4: Green Infrastructure, Biodiversity and Geodiversity | Seeking opportunities to enhance/ better reveal the historic environment, through any provision of Green Infrastructure/ biodiversity provision. The policy should recognise the value of the historic environment in contributing to the multi-functionality of green-blue infrastructure via cultural heritage, recreation, and tourism through assets such as registered parks and gardens, local historic parks, canals, heritage/ historic landscapes etc.  Comments encouraging additions to the policy to include reference to identifying opportunities to create and enhance blue green corridors to protect watercourses and their associated habitats from harm. | The Council acknowledges that heritage assets have the potential to be included within green infrastructure networks. Para. 5.75 of the supporting text refers to 'historic sites' in the context of Green Infrastructure (GI) networks. Additionally, the definition of Green Infrastructure in Appendix 1: Glossary – identifies that GI includes historic parks and gardens, and archaeological features. Policy EV9 - Historic Environment, seeks to protect sites or areas of archaeological interest. As such it is not considered necessary to amend Policy EV4 in respect of this issue.  Policy EV4 aims to deliver, conserve and enhance GI. The policy specifically refers to the Council’s Green and Blue Infrastructure and Biodiversity Strategy as the local approach to do this. The Strategy examines the connectivity of green spaces at a local level and identifies GI network opportunities and ensure that the GI network is protected and enhanced. |
| EV5: Protection of Green Spaces and Recreation Facilities | Sport England have raised concern that the wording of the policy is not clear regarding the protection of sports facilities, including playing fields and the policy does not address the replacement of the equivalent quantity of provision in accordance with national policy.  Sport England also recommends the policy should include wording that clarifies proposals for a flood resilience scheme affecting sports facilities, including playing fields, should be assessed against Paragraph 103 of the NPPF.  Two landowners / agents have requested that two sites designated as Green Space should not be subject to this designation. | A minor change is proposed to include a definition (as set out in paragraph 5.103) in Appendix 1: Glossary of Terms and Abbreviations.  The Council will review the wording of Policy EV5, criteria 5 based on the received comments prior to Examination and will propose changes where deemed appropriate for clarity.  Ashfield Public Open Space Strategy and Playing Pitch Strategy provides evidence on the existing green space network and its recreational values. |
| Policy EV9: The Historic Environment | Historic England have made a number of recommended changes to the policy for clarity and to ensure consistency with National Policy. | Comments noted.  The Council has reviewed the wording of Policy EV9 based on the received comments and changes (where appropriate) have been agreed with Historic England through a Statement of Common Ground. These changes will be included in a schedule of proposed changes. |
| Policy EV10: Protection and Enhancement of Landscape Character | CPRE Nottinghamshire consider that the exclusion of Named Settlements from this policy leaves them open to the future proliferation of inappropriate housing and renewable energy development, and proposals within these settlements should be subject to as assessment of impact on landscape character referred to in the policy. | Policy EV10, criteria 1 states that ‘Proposals for development outside Main Urban Areas and Named Settlements……..’ |
| Chapter 6 Meeting local housing needs and aspirations | |  |
| Policy H1: Housing Allocations | A majority of the representations to Policy H1 are objecting to the inclusion of a number of the site allocations. A list of the site allocations that have received objections and a summary of the issues raised against each is provided in Appendix A to this report.  A number of other representations were received from landowners / land promoters who, in challenging that the Council has not met its objectively assessed housing need (see comments under Policy S7), are promoting the inclusion of their sites to address the shortfall. These includes sites that were previously included in the Regulation 18 draft of the Plan but have subsequently been omitted for reasons set out by the Council, have been assessed in the SHELAA but have not been considered developable / deliverable, or are new sites that have not yet been submitted to the Council for consideration. | * Background Paper 1 outlines the Council’s Spatial Strategy and sequential approach to housing site selection, prioritising sites with planning approval or brownfield sites where available and deliverable. The remaining allocations have been selected in accordance with the spatial strategy to focus on smaller/medium sites and support green belt settlements. These were taken from a pool of sites which had been assessed as potentially deliverable in the SHELAA. Chapters 7-11 of the Paper sets out more detail. The Council intend to produce an update to this Paper on matters where further clarification/additional information would be beneficial to the reader prior to Examination. * As set out in the response to Policy S7 representations, the supply of housing sites exceeds the provisions of NPPF para. 68 to plan for 10 years. In reality it is expected that actual delivery will be closer to meeting the level of need over the entire plan period, as additional large windfalls could be anticipated towards the latter stages of the Plan period. The Plan will be reviewed at least every 5 years to ensure a sufficient supply of land for new homes moving forwards. * Any new sites submitted as part of the Regulation 19 consultation, or to the SHELAA process since that time will be subject to assessment through the SHELAA and SA prior to Examination. This will help to ascertain if there is any potential for additional ‘reserve sites’ in the event that they are deemed realistically deliverable and comply with the Council’s Spatial Strategy for growth. |
| Policy H5: Public Open Space in New Residential Developments | Sport England consider the policy and supporting text is not clear on how the requirements for outdoor sports facilities on new residential developments will be calculated and secured and have requested additional wording to clarify this. | Policy H5 sets out the circumstances where new provision should be made on site, or contribute to new/improved provision elsewhere, and requires provision for subsequent maintenance. The policy refers to provision of all types of good quality public open space including informal recreational open space, outdoor sports facilities, play space, cemeteries, allotments, natural spaces, and areas of public realm.  Supporting text in Local Plan paragraph 6.134 encourages early discussions with the Council in regard to new development proposals, in order to secure the right amount and type of open space in locations which provide most benefit to communities and the Green Infrastructure Network. It goes on to state that further detail and information on the criteria noted in the Policy may be found in Ashfield District Council’s Public Open Space Strategy (SEV/16), Allotment Strategy (SEV/18), Green and Blue Infrastructure and Biodiversity Strategy (SEV/11), Playing Pitch Strategy (SEV/15) and Town Centre Masterplans (SEV/33 – SEV/35). All of these documents will provide the necessary tools for negotiation on a site-by-site basis through the planning application process. They provide robust and up-to-date assessments of the need for open space, sport, and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision and are all subject to regular review and updates consistent with NPPF para. 102.  In respect of outdoor sports facilities, Ashfield’s Playing Pitch Strategy (2023) been developed in line with Sport England’s ‘Playing Pitch Strategy Guidance: An approach to developing and delivering a Playing Pitch Strategy’, ‘Assessing Needs and Opportunities Guide’ (ANOG), and has used the Sport England Playing Pitch Calculator (PPC) to look at what pitch provision will be required based on known housing growth. |
| Policy H6: Housing Mix | One respondent states the policy should provide clarity regarding the optional standards in building regulations for accessible housing and the policy should explicitly make reference to technical standards M4(2) and M4(3) to ensure clarity.  The same respondent also recommends that all new homes (not only large developments) meet Building Regulations M4 Category 2 accessible and adaptable standard homes to meet the needs of disabled and older people in the District. | Comment noted.  An updated Housing Needs Assessment was commissioned in partnership with Broxtowe, Gedling, Nottingham City and Rushcliffe local authorities to take account of more recent census data in late 2023. The final report is anticipated in Spring 2024 and may be used to update the Housing mix policy if appropriate at this stage. It is acknowledged that any additional demands on developers could impact on viability for site delivery and as such would require a review of the Whole Plan Viability assessment (SEV/38). |
| Policy H8: Houses in Multiple Occupation, Flats and Bedsits | The policy is challenged by one respondent who states the plan is not clear as to what form ‘mixed and balanced communities’ take (referred to in criteria 1 and 2 of the policy) and how proposals will be assessed against these criteria. It is also stated that the Local Plan evidence base does not set out relevant information and evidence relating to existing HMOs in the District and the justification for controlling HMOs (and the policy). | Policy H8 is intended to highlight issues which typically arise from this type of development and sets out matters for consideration.  The policy is not intended to be prescriptive and development proposals will be considered on a site-by-site basis, taking account of the impact on/off the immediate surroundings through the development management process.  Over recent years there has been a growth in the number of homes in multiple occupation (HMO) in Ashfield. Evidence will be included in the forthcoming Housing Land Monitoring Report for 2024. |
| Chapter 7 Building a strong economy which provides opportunities for local people | |  |
| Policies EM1-EM3 | 10 representations received to policies EM1, EM2 and EM3, nine of which supported policies EM1-EM3.  One respondent objecting to the policy seeks the allocation of a site for employment land stating this will be to accommodate a shortfall in employment land provision to account for the area of existing allocations taken up by Biodiversity Net Gain. | Support for policies is noted.  The Council do not consider that there is any shortfall for employment land provision throughout the Local Plan period based on current evidence. |
| Chapter 8 Placing vibrant town and local centres at the heart of the community | |  |
| Policy SH1: Retail, Leisure, Commercial and Town Centre Uses | One respondent recommends the threshold for applying the sequential test should be increased to 1000 sq.m (or at least 500 sq.m) to more closely align with the guidance set out in the PPG and to prevent potential future town centre investment being undermined by perceived unnecessary planning policy requirements.  Historic England suggest Conservation Areas/ historic cores of high streets/ retail centres and how to enhance heritage assets in a retail setting to benefit the wider economy of the area. It is also suggested the policy could set out what type of design considerations are appropriate in the context of Conservation Areas and heritage assets such as shopfronts. | The Council does not consider that the threshold for applying the sequential test should be increased. Paragraph 8.15 of the Plan sets out that ‘The Ashfield Town Centre / Local Centre Study, 2023, concluded that each of the three primary town centres are potentially vulnerable to competing edge-of-centre and out-of-centre retail developments of 300sq.m. Consequently, the recommended local threshold of 300 sq.m. has been set out in the Policy across the District’s three town centres.  Policy EV9: The Historic Environment, and Policy SH3: Shopfront, are additional policies against which any development within a town centre would also be assessed. |
| Policy SH3: Shopfronts | Historic England states the policy should include a specific clause on how to deal with Shopfronts on heritage assets and in Conservation Areas. | The Council considers that this aspect is adequately covered by Policy EV9: The Historic Environment. Both Policy SH3 and EV9 would be considered to assess a shopfront on a heritage asset. |
| Chapter 9 Achieving successful development through well designed places | |  |
| Policy SD1: Social Value | One respondent suggests the policy is not a land use matter and is not consistent with national policy, justified and effective and the policy should be deleted. | Securing social value through development reflects the principles of sustainable development, which is at the heart of the National Planning Policy Framework (NPPF). Paragraph 8 of the NPPF describes sustainable development as responding to economic, social and environmental objectives, and explains that these should be pursued in a mutually reinforcing way. |
| Policy SD5: Developer Contribution | Nottinghamshire County Council have requested that Household Waste Recycling Centres (HWRC) should be included in the list of infrastructure which is eligible for developer contributions. | Comments are noted. The list of infrastructure and facilities in Policy SD5 is not exhaustive and would not preclude contributions to such facilities, however there are limits to what can be afforded via developer contributions and for development to remain viable. Therefore, no changes are proposed to the policy. |
| Policy SD6: Assessing Development Viability and Development Demand | Respondent considers that point 4 introduces a review mechanism for all section 106 contributions and policy requirements including affordable housing without any justification, which is not in accordance with national policy. | National policy requires infrastructure to be provided by the developer and if that is not achieved to meet the policy requirements the Council will take a flexible approach in these circumstances to deliver the necessary infrastructure and to seek to ensure a sustainable development that can be granted planning permission. |
| Policy SD7: Communications Infrastructure | One respondent suggests that infrastructure supporting mobile broadband and Wi-Fi should be included in all new development, not just major developments as referred to in the policy. | Comments are noted. The policy aims to strike a balance between what is reasonable and proportionate for developers to provide. No changes are proposed to the Policy. |
| Policy SD8: Contaminated Land and Unstable Land | The Environment Agency recommend that the policy should explicitly state that, impacts caused by contamination on water sources and resources caused by the site or previous use should be remedied. | Whilst the Local Plan can seek to address the impacts caused by contamination on water sources and resources caused by development, the planning system cannot stipulate how this should be remedied. This role sits with the Environment Agency and would be dealt with at the planning application stage. |
| Policy SD10: Transport Infrastructure | One respondent states the transport assessment, and cumulative impacts of the assessment is based on the strategy and proposals in the Regulation 18 draft of the plan (notably inclusive of the new settlement site at Whyburn), and the proposed mitigation does not reflect the proposed growth strategy set out in Regulation 19. The comment is made in the context of point 3 of policy SD10 which states that new development, singularly or combined with other proposed development should demonstrate that a sufficient package of measures are proposed (to mitigate the impact on the highway network.) | The Council is confident that the submitted transport evidence provides a sufficient package of measures to mitigate development on the highway network. The council will provide a subsequent Highways paper intend to address this issue prior to Examination. In the unlikely event of additional requirements, amendments will be included in a schedule of proposed changes. |
| Policy SD13: Provision and Protection of Health and Community Facilities | Sport England welcome the commitment within the policy to enhancing sports provision but recommend that a separate criterion is added to the policy to address proposals for the loss of sports facilities which is consistent with national policy.  Sport England recommend that criterion 3(c) of the policy (relating to exceptions of the loss of health and community facilities where they are no longer economically viable) is deleted as this is not consistent with national policy.  NHS Property Services suggest an exception to criterion 3(c) that the loss of existing facilities can be accepted where this forms part of a wider public service estate reorganisation. | Local Plan Policy EV5 aims to protect green spaces and recreational facilities and sets out the criteria against which the loss or partial loss would be considered, rather than policy SD13.  The aim of criterion 3(c) is to avoid derelict and underused sites and buildings, and assist in regeneration of brownfield land where appropriate. This is consistent with NPPF part 11 Making Effective use of land, and refers to commercial community facilities only.  The Council considers that this aspect is adequately covered by existing criteria 3(a) and 3 (b) which permit development for the alternative use of buildings or sites required for the provision of health and community facilities where adequate replacement provision is made, or where there is no longer a requirement for the facility in that location or an alternative facility in the locality has the capacity to meet those need. |
| General comments and Evidence Base | |  |
| Evidence Base | A number of comments have been received in response to the evidence base documents, predominantly the Sustainability Appraisal, Strategic Housing Land & Employment Availability Assessment, Green Belt Harm Assessment and Background Paper 1: Spatial Strategy and Site Selection.  A majority of the comments relate to supporting the allocation of sites not allocated in the plan, challenging the conclusions of the site assessment and selection process and justification for the preferred spatial strategy. | Background Paper 1 outlines the Council’s Spatial Strategy, sequential approach to housing site selection and exceptional circumstances for green belt release (including for strategic employment sites).  The Council are confident that site conclusions in the SHELAA reports have been applied consistently in accordance with the adopted joint methodology (shared with the Nottingham Outer HMA authorities). Where appropriate, these will be reviewed in light of any material changes or new evidence. The SA was undertaken by external consultants (WSP) with an excellent track record in Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) services to support effective and efficient decision-making. Background Paper 1 draws from these assessments among other considerations to arrive at a preferred selection of site allocations. |

## Table 2: Summary of key issues raised in objection to proposed Housing Allocations (Policy H1).

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| --- | --- | --- |
| **Area based general responses** | **Number of respondents objecting to the site allocation** | **Summary of key issues** |
| Sites relating to Hucknall | See numbers of objections to the respective site allocations in Hucknall below. | * Traffic congestion - the quantity of traffic now using Watnall Road causes serious traffic congestion. * Inadequate basic facilities - doctors, dentist and schools are already inadequate, without the increased population from the proposed level of development. * Local Services and Facilities – concern there is no commitment in the Plan to local services (leisure facilities). |
| Sites relating to Huthwaite | See numbers of objections to the respective site allocations in Huthwaite below. | * Huthwaite does not have the infrastructure to support the proposed level of development (capacity of schools, GP surgery, increased congestion on the highway network). * Adverse impacts on biodiversity/wildlife * Steep topography – impact on views / landscape * Increased flooding – concern development will exacerbate existing issues |
| Sites relating to Jacksdale | See numbers of objections to the respective site allocations in Jacksdale below. | * Flooding, notably on local road and existing drainage is not suitable. * Potential adverse impacts on wildlife * Green Belt should not be changed. * Jacksdale does not have the infrastructure to support the proposed level of development (capacity of schools, GP surgery, increased congestion on the highway network). |
| **Specific sites** | **Number of respondents objecting to the site allocation** | **Summary of key issues** |
| H1Hb Linby Boarding Kennels, East of Church Lane, Hucknall | 1 | * The background paper Spatial strategy and site selection document, October 2023 gives site H1Hb an overall green belt harm rating of ‘relatively high’ (score 15). This is the highest score for sites in Hucknall. * This shows the site as having high impact in terms of preventing settlements merging. Allocation of the site would have particular implications for the village of Linby, in terms of coalescence with Hucknall. It would result in an irregular and irrational green belt boundary. |
| H1Hc Land north of A611 / South of Broomhill Farm, Hucknall | 1 | * Potential significant impact on biodiversity - there are two Local Wildlife Sites 2/235 and 2/2275 which will be affected. * Challenge that the scheme is viable due to the cost of delivering BNG. * The land would be more viable for biodiversity offsetting. * Concern over the impact on local services/infrastructure. |
| H1Hd Stubbing Wood Farm, Watnall Road, Hucknall | 6  (plus a petition of 103 signatures) | * Potential for an adverse impact on ancient woodland. * The developer failed to declare multiple privately owned dwellings that are on the site. All of the privately owned dwellings have full access rights to their properties via the private lane. The submission should not be allowed to be put forward on this basis. * Concerns on impacts on the adjacent ancient wood land, including the wildlife (deer’s, badgers, wild ducks, hedgehogs, moles, hares, bats, toads, and woodpeckers). * Historic War Tower (protected) is located on the site. Concerns that development would take the tower out of its natural surroundings and could suffer with anti-social behaviour. * The front and back fields are particularly prone to flooding since the soil is clay sitting on bedrock, and surface water from Westville Estate runs across this land, adding to the flooding because it finally passes under Watnall Road, which floods on the bends of the road after heavy rain. * Lack of infrastructure to support the new development (lack of capacity at the Flying High Academy, GP surgery, dentist) * Long standing of many years, 60 to 70 years of flooding from Long Lane onto Watnall Road. * Existing traffic congestion - the site will exacerbate existing issues and concerns over cumulative impacts of vehicles exiting from Stubbing Wood on to Watnall Road or Lancaster Road. |
| H1Se Priestic Road, Sutton | 1 | * Concern regarding land stability. The site is a former railway embankment which has been filled in. |
| H1Sf Rear 23 Beck Lane, Skegby | 2 | * Flooding - exacerbating existing issues (extensive comments provided on this issue in the Regulation 19 representation). * Access will be obtained via Omberley Avenue and associated issues such as congestion, safety and issues associated with cars parked on Mansfield Road. * There appear to be no plans to build / include bungalows or dwellings for the elderly or disabled within the site. * Lack of infrastructure to support the growth, notably schools and healthcare facilities. * Historic England (HE) remain concerned about the development in the setting of Dalestorth House Grade II, and the cumulative impact of the developments H1Ss and H1Si. HE recommended additional detail within the Heritage Assessment and consider that further consideration is required of the cumulative impacts and what mitigation measures are possible and appropriate to bring forward to reduce the harm to this heritage asset. A masterplan for development in this vicinity could be useful to understand the cumulative effects and solutions. |
| H1Sh Pasture Farm, Alfreton Road | 1 | * The site should not be included in the Local Plan for development of new housing as it cannot create a "better place to live" it will be wholly unhealthy due to its proximity to a major road (A38) above its level. * The site has a public house sitting above/alongside another side and finally a Haulage contractors’ yard on the adjoining Calladine Lane industrial estate. * All of the above will be detrimental to the health of any residents. * There is no safe access. The only access is along a private driveway not designed for vehicles. * There is an ancient laid hedgerow through the middle of the site. * Two footpaths located on the site – concern these will be lost. * A stream forms at this location. * There is no opportunity for a green space in this Hollow should it be developed. |
| H1Si Rear Kingsmill Hospital | 1 objection and  1 respondent (Historic England) providing comments | * Historic England (HE) remain concerned about the development in the setting of Dalestorth House Grade II, and the cumulative impact of the developments H1Ss and H1Sf. * HE recommended additional detail within the Heritage Assessment and further consideration is required of the cumulative impacts and what mitigation measures are possible and appropriate to bring forward to reduce the harm to this heritage asset. A masterplan for development in this vicinity could be useful to understand the cumulative effects and solutions. * The site will have a major impact on the surrounding area, especially highways. |
| H1Sj Clegg Hill Drive, Huthwaite | 2 | * Concern regarding the existing capacity at the dentist, GP and whether there will be the investment in new local infrastructure. * Concern whether utilities infrastructure can support another 500+ properties. * The 300 homes planned for Ashland Road area will put an unacceptable strain on Huthwaite. * Flooding – development will exacerbate existing issues. * There is insufficient road access and capacity. |
| H1Sk Sunnyside Farm, Blackwell Road, Huthwaite | 23 | * Adverse impact on amenity with potential loss of light and noise pollution for nearby properties. * Flooding - Having more houses on Blackwell Road will affect the drainage and can result in flooding. The road already floods in heavy rain – existing issues will be exacerbated. * No Bus Route available - there is no bus route on Blackwell Road which affects the residents, the paths are not wide enough with parking for residents with prams or in a wheelchair. * Concerns regarding the available capacity of local schools and GP surgeries which will be put under more pressure by development of the site. * Development would result in the loss three local wildlife sites (LWS) as well as having a detrimental impact on 5 further sites in close proximity. * No consideration given to the infrastructure requirements (references to limited capacity at existing schools, GP surgery, hospitals). * Development of the site will result in the loss of green spaces, impacting on physical and mental well-being and tackling poor health. * Ground stability is a concern - a former colliery spoil tip is located on the southern part of the site. * There are several natural springs running across the site, which results in flooding. * Ancient rural footpaths will be lost. * There is a potential for buried archaeological remains on the site. |
| H1Sl North of Fackley Road, Teversal | 1 | * The allocation of site contradicts Policy EV10 and does not meet the test outlined in Policy EV4 and its supporting paragraphs. * Allocation conflicts with the Teversal, Stanton Hill and Skegby Neighbourhood Plan Policy NP1 Para 2 (landscape character and will not deliver a range of social facilities to meet local need) as well as Policy NP4 and the accompanying Design Guide. * The existing green corridors in proximity of the site are particularly sensitive and there is concern these spaces will be eroded. * The number and size of allocated sites in the settlement of Fackley are not in line with the definition of Policy S1 - 'small scale growth'. the increased number of dwellings. |
| H1Sn Adj Molyneux Farm, Fackley Road, Teversal | 1 | * The allocation of site contradicts Policy EV10 and does not meet the test outlined in Policy EV4 and its supporting paragraphs. * Allocation conflicts with the Teversal, Stanton Hill and Skegby Neighbourhood Plan Policy NP1 Para 2 (landscape character and will not deliver a range of social facilities to meet local need) as well as Policy NP4 and the accompanying Design Guide. * The existing green corridors in proximity of the site are particularly sensitive and there is concern these spaces will be eroded. * The number and size of allocated sites in the settlement of Fackley are not in line with the definition of Policy S1 - 'small scale growth'. the increased number of dwellings. |
| H1So Off Fackley Road, Teversal | 1 | * The allocation of site contradicts Policy EV10 and does not meet the test outlined in Policy EV4 and its supporting paragraphs. * Allocation conflicts with the Teversal, Stanton Hill and Skegby Neighbourhood Plan Policy NP1 Para 2 (landscape character and will not deliver a range of social facilities to meet local need) as well as Policy NP4 and the accompanying Design Guide. * The existing green corridors in proximity of the site are particularly sensitive and there is concern these spaces will be eroded. * The number and size of allocated sites in the settlement of Fackley are not in line with the definition of Policy S1 - 'small scale growth'. the increased number of dwellings. |
| H1Sq Hardwick Lane Recreation Ground | 3  (including 1 organisation representing 654 individuals – 586 of which had previously signed a petition) | * Sport England objects to the allocation of site H1Sq – Hardwick Lane as it is not consistent with the requirements of paragraph 103 of the NPPF. * Site H1Sq is a playing field, Sport England’s Active Places Power lists this site as including 1 adult football pitch. The Ashfield Playing Pitch Strategy (2023) (PPS) identifies the Hardwick Lane Recreation Ground as a lapsed site. However, a lack of use of a playing field should not be taken as necessarily indicating an absence of need in an area. The PPS identifies shortfalls in provision of youth 11v11 and youth 9v9 football pitches. * Sport England recommended that:   + a footnote is added to Policy H1 for site H1Sq which states that the allocation is subject to proposals demonstrating that the requirements of paragraph 103 of the NPPF have been met; and   + Paragraph 6.71 is updated to require mitigation for the loss of the playing field unless it can be demonstrated that the provision is surplus to requirements in line with NPPF paragraph 103. * The responses, on behalf of the SIA community group, objects to the loss of Hardwick Recreation Ground (H1Sq) as it does not align with the Council’s Health and Wellbeing Strategy 2021-2025 and is inconsistent with the NPPF (para 99, 98, 101, 16c, 92, 185b, 189). The Ashfield Public Open Space Strategy 2016-2026, does not take into account recent guidance by Natural England regarding a framework for green space, nor does the Local Plan refer to Green Infrastructure Standards for England: Summary Green Infrastructure Framework - Principles and Standards for England, January 2023. It is also stated the Playing Pitch Strategy 2023-2027 does not demonstrate that Hardwick Lane Recreation Ground is surplus to requirement in the catchment area. |
| H1St Land off Blackwell Road/Main Street, Huthwaite | 17 | * This area is prone to flooding and ground stability also, lack of drainage. * Development will result in the loss of wildlife. * Development will put strain on Blackwell Road which is already busy with traffic from the nearby the industrial estate. * The area is already struggling with spaces for school, doctors, and dentists. * Adverse impact on amenity – the noise and disruption for all local residents will be too much along with all the other traffic. * Ancient rural footpaths will be lost. * The community of Huthwaite does not have capacity in its education, health, sewerage, fire, and policing policies and cannot accommodate a further 400 families. * Concerns over highways safety as a result of increased traffic movements * There is a potential of archaeological remains on the site. * No bus service available on Blackwell Road |
| H1Va Land at Plainspot Farm, New Brinsley, Underwood | 1 | * Francis Street and Plainspot Road provide vehicular access to the site, both of which are narrow roads with existing traffic issues, which will only worsen with further development in the area. * Concerns regarding the accumulation of new housing surrounding the village leading to urban sprawl, and this will lead to the loss of village character and sense of community and have a detrimental impact on quality of life. * Further development on the edge of the village could lead to coalescence with surrounding villages, contrary to Green Belt policy, and will add further pressure to the existing local services and infrastructure. |
| H1Vj Land off Main Road, Jacksdale | 10 | * Concerns development will exacerbate existing flooding issues related to Bagthorpe Brook which is poorly maintained. * Issues of flooding on Main Road, Westwood and Brinsley Hill also noted as an issue. * Infrastructure will not be able to accommodate the growth (roads, schools, GP surgery and dentist). * Respondents note the issues raised in the SHELAA report as matters of concern, including: * Likely existence of contamination. * Likely ground stability issues. Part of the site is Coal High Risk Area * The site has significant access constraints and watercourse / surface flooding issues. * It is located in the Green Belt and therefore it is necessary to demonstrate that there are exceptional circumstances, for the site to be taken out of the Green Belt * A risk to wildlife and biodiversity * Landscape objectives are to enhance (e.g.: house building will detract severely). |