



## **DISCLAIMER**

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Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B
To which part of the Local Plan does this representation relate?	Paragraph number:	Policy number:	Part of policy map:	Paragraph number:	Paragraph number:	Document name:	Page / Paragraph:	Do you consider the Local Plan to be sound?	Do you consider the Local Plan to be sound?	The Local Plan is not sound because it is not:	Do you consider the Local Plan document to comply with the duty to co-operate?	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:	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?	If you wish to participate at the hearing sessions at Examination, please outline why you consider this to be necessary:	Consent for storing submitted data
						The Strategic Accessibility of Settlements Study (Strategic Assessment Study)		No	No	The LP is not founded on up to date data and information.		The use of the 'Greater Nottingham Accessibility of Settlements Study, Jan 2010' raises significant concerns. Chapter 7, para 7.1 of the Study (Accessibility Strategy 2006/7) states:  <i>The Strategic Accessibility Assessment largely draws upon existing data sources and information including the 2001 Census, the Indices of Deprivation data, the accessibility analysis set out in the City Council's Bus Accessibility report (2003), and data gathered for the community plans including "One Nottingham --- One Plan", as well as views and information gathered from partners at a series of themed workshops held between March and June 2005 and additional mapping using Accession including recalculations of the DfT's core accessibility indicator sets. This data is supplemented by local travel information collected through the biennial Personal Travel Survey.</i>  It is of great concern that data from 2003-2005 is being used to assess strategic accessibility in 2024, for a Local Plan which is designed to last until 2040. Enormous changes have taken place over the past 20 years across services and facilities - including health, education, community, transport, public transport and infrastructure which need to be understood in order to plan for the population of Ashfield. In addition the economy, health and wellbeing status, size and age of the population have all changed significantly.  In the TSS area we have considerable issues of increased deprivation and poorer health (Stanton Hill has one of the worst deprivation scores in the country), and an aging population. Public transport has been decimated, there may be bus stops walkable within 5 minutes, but there are no or very few buses! A primary health care facilities has closed, and the one medical centre remaining in the area which nearly collapsed in 2023, is under enormous stress with people unable to access health care when they need it. Schools are stretched with the primary/junior schools full.  Considerable house building has taken place since 2003 and in particular over the past 4 years, increasing the population but not the resources for services, facilities or infrastructure. Many other changes have taken place, which appear to be unaccounted for in baseline evidence to understand how things are now.	The Council must reconsider its use of the Greater Nottingham Accessibility of Settlements Study and old data as base line evidence for the LP running from 2023 to 2040. Without a clear rationale why such aged data remains relevant today the LP is unsound. The council needs to commission, with its partners, up to date data to prepare the Local Plan from. Without up to date data the Forum has little confidence in the LP's proposals for its area.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
Chapter 1: Where are we now? Appendix B: Scoping Report Consultation Summary.	Para 1.13. Monitoring the implementation of the Local Plan requires working and co-operation with a range of organizations, including neighbourhood plan forum ...					Appendix B: Scoping Report Consultation Summary.	Page(s) B12-15	No	No		The plan does not meet the requirements of the Councils Duty to Cooperate.	The Council has not approached TSS Forum to discuss the significant implications of the LP on the NP area.  The decision to designate the settlements of Stanton Hill and Skegby as Sutton Main Urban Area has not been discussed with the TSS Forum. This significant change will result in a massive change in all aspects of these two settlements.  The Forum provided a comprehensive response to the Regulation 18 (Teversal, Stanton Hill and Skegby Neighbourhood Forum: Comments on Ashfield District Local Plan 2020-2038), however, only 3 concerns were reproduced in the Regulation 18 consultation responses – Appendix B: Scoping Report Consultation Summary. Significant concerns were not included including: •Unfair and heavy burden on current residents, due to services struggling to meet increasing demand. •Disproportional increase in dwellings against the 2016 emerging plan, without increase in services and infrastructure. •TSS area overburdened by development •Loss of services and amenities potentially resulting in increasing inequalities particularly in health and education. •Impact on the area's essential character, and failing to recognize and develop its important attributes. •Desk based and often old studies lack detailed knowledge and often contain inaccuracies that could affect decisions. In addition to the points identified above the submission also included numerous additions/changes to the text. The Consultation Summary does not give reference to these suggestions.	There needs to be meaningful discussion between the Council and the Forum as to how the policies and objectives of the NP are being followed and any reasons to deviate, and in particular the significant change to designate 2 of the settlements as the Sutton MUA discussed and agreed.  The Forum seeks an explanation as to why the comments made to Regulation 18 were not referenced in the Scoping Report Consultation Summary, as these comments are pivotal to the current proposals in the current emerging Plan.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
						Health Impact Assessment		No	No	The LP is not founded on information in the HIA which reflects the current state of areas within TSS area.		The Health Impact Assessment (HIA) despite using data from 2016-9 describes devastating levels of poor health across Ashfield. The ONS reports that Ashfield as a whole is in the second worst quintile in England, and inequality at birth in the worst quintile - this is for all Ashfield. If these categories were just for our most deprived areas - some of which fall within TSS area then they would be far worse. As a high level assessment it fails to identify specific areas of poor health and deprivation, such as in Stanton Hill. The assessment must reflect the current situation which shows that primary health care across TSS (and Huthwaite) is struggling to provide access to patients at the right time. This submission provides further details of these issues. Failure to access healthcare results in increased illness and disability.  It is unclear as to whether the HIA was an independent assessment.  The HIA states: 6.3 'Access to healthcare services' as positive. This is clearly not the case in the TSS area, with increasing high levels of unmet need, contributing to worsening health and lower life expectancy. 6.6 'Access to active transport' as positive/uncertain. Public transport is not reliable across the area, due to the cancelling of bus routes and/or the reduction in services, limiting access to work, leisure, shopping etc. 6.7 'Crime reduction and community safety'. Positive. Residents living in certain areas across TSS do not feel safe, and do not see a reduction in crime. 6.12 'Climate Change'. Positive. See section on Climate change. It is important that these are credible and will be taken seriously. The evidence thus far does not give confidence that, for example, developers are including green energy systems or improved insulation in their new properties. 6.13. 'Health inequalities'. Positive. It is hard to understand the reason for this rating, as we cannot see actions or developments which would address issues of poorer access to healthcare, access to work etc. There is no redistribution of health and social infrastructure, and the new policies do not contribute towards improving health and well-being.	Without a clear rationale why such conclusions were made are relevant particularly when many of its conclusions are not recognisable for the TSS area, and are the foundation for many policies and proposals for the TSS area are weak and unsubstantiated.  The council needs to commission, with its partners, an independent HIA using up to date data, and a sustainability assessment which reflects the facts of the area, without which the Forum has little confidence in the LP's proposals for its area.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
Chapter 2: Shaping the future of Ashfield, what we need to achieve	Page 30 S011 To meet the global challenge of Climate Change. S011(g) Moving away from the extraction of fossil fuels, the burning of which is carbon intensive. Given the UK 2050 net zero target and the period of the Local Plan, surely this should be phasing out the extraction of fossil fuels?							No	No	As the policy stands the Forum considers that it is unsound.		S011(g) Moving away from the extraction of fossil fuels, the burning of which is carbon intensive. Given the UK 2050 net zero target and the period of the Local Plan, surely this should be phasing out the extraction of fossil fuels?  Is this a serious proposal or just a nice idea? If the former it will require investment in the construction of a district heating scheme utilising mine water energy. A scheme in Durham required investment of £3.8 million for 750 new homes. ADC has no previous experience of managing area heating schemes. Has the Council thoroughly researched this and if so where are the practical policies required to implement the proposal?	The Forum would like to see further details of how fossil fuels will be phased out.  It would also like to see practical policies required to implement this proposal, including anticipated costs.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
Chapter 3 Sustainable Development in Ashfield - Strategic Policies	Para 3.16 Stanton Hill and Skegby forming part of Sutton Main Urban Area (MUA)							No	No	We do not believe that the LP will deliver sustainable development (healthy communities) and is therefore unsound		The Forum disputes the assertion that the settlements of Stanton Hill and Skegby are capable of expansion. This is because the medical facilities and schools are overwhelmed now, and it is not clear if and where any additional facilities are proposed.  Traffic surveys carried out by the TSS Forum reveal that the road network is at capacity at peak times.  Public transport is lacking.  Further evidence is submitted under the specific sections of this submission identifying how serious the current issues are in regard to the lack of services for the current residents. To ignore these issues would result in further harm to individuals living in our communities.	There needs to be meaningful discussion between the Council and the Forum as to how Skegby and Stanton Hill have now come to form part of the Sutton MUA and the implications of this.  The LP needs to set out how increased capacity of medical facilities and schools is going to be delivered to meet existing needs and the needs of the occupants of the additional houses proposed for our area.  The plan should demonstrate how public transport in Stanton Hill and Skegby will increase to a level befitting a MUA?	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes

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Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B
															This refers to the data protection terms set out on the front page of the Rep form
	<p><b>Para 3.4</b> Capitalize on the accessibility of the M1 transport corridor</p> <p>Locate growth in sustainable and accessible locations</p> <p>Support proportionate and sustainable growth in the villages</p> <p>Promote sites and sustainable growth in the short and medium term, distributed proportionately across the District.</p>								<p>Para 3.4 Capitalize on the accessibility of the M1 transport corridor</p> <p>Locate growth in sustainable and accessible locations</p> <p>Support proportionate and sustainable growth in the villages</p> <p>Promote sites and sustainable growth in the short and medium term, distributed proportionately across the District.</p>	<p>Para 3.4 Capitalize on the accessibility of the M1 transport corridor</p> <p>Locate growth in sustainable and accessible locations</p> <p>Support proportionate and sustainable growth in the villages</p> <p>Promote sites and sustainable growth in the short and medium term, distributed proportionately across the District.</p>		<p>The nearest suitable access to the M1 (J28 and J29) from within the TSS area is in excess of 6 miles. The nearest major highway to the area is the A38, adjacent to Skegby. Roads leading to the M1, especially at peak times, are busy and frequently congested.</p> <p>By bringing more development to the Stanton Hill end of the Sutton MUA will put greater pressure on the narrow country lanes to J29.</p> <p>The distance to the nearest train stations of Sutton Parkway, Kirby or Mansfield, is around 4 miles on foot or in a car. Buses directly to the stations are limited or do not exist.</p> <p>The Forum considers that a disproportionate number of houses in the TSS area are proposed in the LP in comparison with other areas across the District and will destabilise the health, wellbeing and community cohesion.</p>	<p>The Forum has always accepted that there will be development in the Neighbourhood Area, but that the size of the developments must be proportionate to the medical, educational and other essential services available.</p> <p>During a series of meetings with the Council when preparing the Neighbourhood Plan sites for new development were agreed based on a structured approach accounting for constraints. It is to be regretted that in preparing the LP ADC has chosen not to seek local input but to include sites that do not meet its own criteria or those of the existing development plan.</p> <p>There needs to be meaningful discussions between the Council and the Forum as to how sustainable development is taken forward in the TSS area.</p>	<p>The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.</p>	Yes
	<p><b>Para 3.9</b> Housing development will be mainly concentrated in and adjacent to the larger and more accessible towns of Hucknall, Sutton and Kirby. The village of ..... And Fackley have been allocated appropriate levels of development....</p>								<p>No</p> <p>We do not consider the Local Plan is delivering appropriate levels of development so therefore is unsound.</p>		<p>Although Stanton Hill and Skegby fall within the newly formed MUA, Fackley does not. The allocation and development of the two greenfield sites between Stanton Hill and Fackley will lead to Fackley's absorption into Sutton's MUA, leading to its loss of identity.</p> <p>The development would also lead to the loss of part of the green gap between Teversal, Stanton Hill and Fackley.</p> <p>There is one pub and one shop selling flowers in Fackley and no schools, health facilities or effective public transport. There are no other buildings capable of being adapted to commercial use. By its nature this scale of development will be unsustainable.</p> <p>The Teversal, Stanton Hill and Skegby Neighbourhood Plan Policy NP2 and paras 158-162 sets out criteria for development in Fackley which, by its nature has to be very limited and must preserve the character of the settlement which is a transition point from the urban to rural.</p> <p>One of these sites has already been refused planning permission by the council, an indication of the degree of concern to its allocation.</p>	<p>The majority of the new development is proposed to take place in the Sutton MUA, of which the majority will be in TSS area and Huthwaite. There needs to be meaningful discussion with the Forum as to how this decision has been reached without consultation with them as having responsibility for the TSS Neighbourhood Plan.</p> <p>Kirby despite being included within the same category has only 33% when the TSS allocation includes the development at KingsMill, and 17% when Huthwaite is added.</p> <p>Hucknall is</p>	<p>The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.</p>	Yes	
51. Spatial Strategy to Deliver the Vision	<p><b>Criteria 4</b> Scale and character of named settlements</p>								<p>No</p> <p>We do not consider the LP is sensitive to the scale and character of the named settlements so is unsound.</p>		<p>Named Settlements, by their nature, are sensitive to inappropriate development, whether in character or size. The focus cannot be on growth alone but also on preserving the essential character of the settlement and ensuring that the design of new dwellings is in keeping with the existing housing stock, whilst delivering benefits appropriate to the settlement's needs.</p>	<p>Add "and that respects the individual local scale and character of each settlement"</p> <p>Add the words "as well as economic, social and environmental benefits" and the words "and that respects the individual local scale and character of each settlement"</p>	<p>The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.</p>	Yes	
52. Achieving Sustainable Development	<p>Criteria 2 (a) (b) (c). Development will be permitted without delay where:</p> <p>a. it will not conflict with other policies in this Local Plan or policies in a neighbourhood plan, unless material consideration indicates otherwise</p> <p>b. it will not adversely affect, and should enhance, the character, quality, amenity and safety of the environment</p> <p>c. it will not adversely affect highway safety or the capacity of the transport system</p> <p>g. it protects the environment and quality of life by: Managing and reducing the risk of pollution in relation to the quality of land, air, light and water.</p>							<p>No</p> <p>The plan is not delivering sustainable development and is therefore unsound.</p>		<p>Criteria 2(a),(b),(c) all relate to ensuring developments do not adversely affect highway infrastructure and the character and amenity of the area and safety of local people. Such protection should also be achieved for local medical and education infrastructure where greater demands caused by increased population will reduce these services for existing population unless new facilities are delivered alongside new housing.</p> <p>This is particularly relevant to housing site allocations where the capacity of the road network, health services, education and public transport provision does not match the situation on the ground.</p> <p>Criteria 2(g) does not specify drainage and flood risk as an environmental issue needing to be addressed to protect the environment and quality of life.</p> <p>As a result, the plan is not delivering sustainable development and is unsound.</p>	<p>There needs to be meaningful discussion between the Council and the Forum about how the policies and objectives of the NP are being followed and any reasons to deviate discussed and agreed.</p> <p>Add: additional criteria similar to criteria 2c, which would read ... "it will not adversely affect the delivery of health and education services of capacity of existing medical centres or schools"</p> <p>Add: to (g) first bullet point after water... "including drainage and flood risk, and ..."</p>	<p>The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.</p>	Yes		
Chapter 1 Where are we now? Evidence base and Duty to Cooperate	<p><b>Para 1.13</b> Monitoring the implementation of the Local Plan requires working and co-operation with a range of organizations, including neighbourhood plan forum.</p> <p><b>Para 1.17</b> The Plan reflects engagement with local communities....</p>								<p>Appendix B: Scoping Report Consultation Summary</p> <p>Pages B12-15</p>		<p>The Forum does not consider the LP complies with the duty to cooperate</p> <p>The plan has not been prepared with due engagement with the TSS Forum, which is classified as a Statutory Consultee for planning purposes. The Forum prepared and is responsible for the TSS Neighbourhood Plan which forms part of the development plan. The Council has not approached TSS Forum to discuss the significant implications of the LP on the NP area.</p> <p>The decision to designate the settlements of Stanton Hill and Skegby as Sutton Main Urban Area has not been discussed with the TSS Forum. This significant change will result in a massive change in all aspects of these two settlements.</p> <p>The Forum provided a comprehensive response to the Regulation 18 (Teversal, Stanton Hill and Skegby Neighbourhood Forum: Comments on Ashfield District Local Plan 2020-2038), however only 3 concerns were reproduced in the Regulation 18 consultation responses – Appendix B: Scoping Report Consultation Summary. Significant concerns were not included including:</p> <ul style="list-style-type: none"> <li>- Unfair and heavy burden on current residents, due to services struggling to meet increasing demand.</li> <li>- Disproportional increase in dwellings against the 2016 emerging plan, without increase in services and infrastructure.</li> <li>- TSS area is overburdened by development</li> <li>- Loss of services and amenities potentially resulting in increasing inequalities particularly in health and education.</li> <li>- Impact on the area's essential character, and failing to recognize and develop its important attributes.</li> <li>- Desk based and often old studies lack detailed knowledge and often contain inaccuracies that could affect decisions.</li> </ul> <p>In addition to the points identified above the submission also included numerous additions/changes to the text. The Consultation Summary does not give reference to these suggestions.</p>	<p>There needs to be meaningful discussion between the Council and the Forum as to how the policies and objectives of the NP are being followed and any reasons to deviate, and in particular the significant change to designated 2 of the settlements as the Sutton MUA discussed and agreed.</p> <p>The Forum seeks an explanation as to why the comments made to Regulation 18 were not referenced in the Scoping Report Consultation Summary, as these comments are pivotal to the current proposals in the current emerging Plan.</p>	<p>The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.</p>	Yes	
Chapter 2 Environment	<p><b>Page 30 &amp; 31 SO11(g)</b> To meet the global challenges of climate change</p> <p><b>Section 4.6 SO13(b)</b> Ensuring development proposals fully consider the coal mining legacy issues to ensure the stability of the land and to optimise the potential for the use of mine water heating</p> <p>Also see: <b>Chapter 4, Section 4.6</b> Ashfield's mining heritage provides opportunities for the utilisation of mine water as a heat source.</p>							No			<p>The Forum appreciates the aspirations summarized in Chapter 2 SO11(g) and SO13(b)</p> <p>Moving away from the extraction of fossil fuels, the burning of which is carbon intensive. Given the UK 2050 net zero target and the period of the Local Plan, surely this should be phasing out the extraction of fossil fuels?</p> <p>Is this a serious proposal or just a nice idea? If the former it will require investment in the construction of a district heating scheme utilising mine water energy. A scheme in Durham required investment of £3.8 million for 750 new homes. ADC has no previous experience of managing area heating schemes. Has the Council thoroughly researched this and if so where are the practical policies required to implement the proposal?</p>		<p>The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.</p>	Yes	

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Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B
Chapter 3 Strategic Policy S1: Spatial Strategy to Deliver the Vision	Page 33-38	Policy S1 S1.1-9							No	We do not believe that the Plan will deliver sustainable development (healthy communities) and is unsound		The Forum disputes the assertion that the settlements of Stanton Hill and Skegby are capable of expansion, because the medical facilities and schools are overwhelmed now. It is not clear if and where any additional facilities are proposed.  Traffic surveys carried out by the TSS Forum reveal that the road network is at capacity at peak times.  Public transport is lacking.  Further evidence is submitted under the specific sections of this matrix identifying how serious the current issues are in regard to the lack of services for the current residents. To ignore these issues would result in further harm to individuals living in our communities.  <b>Named Settlements</b> , by their nature, are sensitive to inappropriate development, whether in character or size. The focus cannot be on growth alone but also on preserving the essential character of the settlement and ensuring that the design of new dwellings is in keeping with the existing housing stock, whilst delivering benefits appropriate to the settlement's needs.  Delivery homes via dispersed development is already taking place in Skegby but without having the benefit of 106 contributions that could support the funding for a new primary health care facility or school.	There needs to be meaningful discussion between the Council and the Forum as to how the Skegby and Stanton Hill have now come to form part of the Sutton MUA.  The LP needs to demonstrate how an increased capacity of medical facilities and schools is going to be delivered to meet existing needs and the needs of the occupants of the additional houses proposed for our area.  The LP should be allocating sites and proposing policies that are capable of delivering sustainable development. This includes sites and policies for service infrastructure. If this cannot be included sites should not be allocated as they would be by definition unsustainable.  <b>Add:</b> the words "and that respects the individual local scale and character of each settlement" <b>Add:</b> the words "as well as economic, social and environmental benefits" and the words "and that respects the individual local scale and character of each settlement"	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
Para 3.4 Capitalize on the accessibility of the M1 transport corridor  Locate growth in sustainable and accessible locations  Support proportionate and sustainable growth in the villages  Promote sites and sustainable growth in the short and medium term, distributed proportionately across the District.		Policy S1							No	We do not consider the Plan is delivering proportionate development and is unsound		The nearest suitable access to the M1 (J28 and J29) from within the TSS area is in excess of 6 miles. The nearest major highway to the area is the A38, adjacent to Skegby. Roads leading to the M1, especially at peak times, are busy and frequently congested.  By bringing more development to the Stanton Hill end of the Sutton MUA will put greater pressure on the narrow country lanes to J29.  The distance to the nearest train stations of Sutton Parkway, Kirkby or Mansfield, is around 4 miles on foot or in a car, however buses directly to the stations are limited or do not exist.  The Forum considers that a disproportionate number of houses in the TSS area are proposed in the LP in comparison with other areas across the District and will destabilise the health, wellbeing and community cohesion.  We are concerned that the Greater Nottingham Accessibility of Settlements Study, January 2010 is already 13 years old and by the end of the Plan will be nearly 30 years old. Considerable change has occurred Globally, in the UK, across Ashfield and in TSS area which this study does not reflect.	The Forum has always accepted that there will have to be development within the Neighbourhood Area, but that the size of the developments must be proportionate.  During a series of meetings with the Council when preparing the Neighbourhood Plan sites for new development were agreed based on a structured approach accounting for constraints. It is to be regretted that in preparing the LP ADC has chosen not to seek local input but to include sites that do not meet its own criteria or those of the existing development plan.  There needs to be meaningful discussions between the Council and the Forum as to how development is taken forward in the TSS area.  The use of the Settlement Study to inform this Plan should be reviewed, as the consequences of not doing so will result in harm to the TSS area.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
Para 3.7, 3.8 Policy S1 sets out the hierarchy of settlements which will assist in the creation of sustainable communities by identifying the areas which have the best access to a wide range of services and facilities...also by protecting rural and natural environments.		Policy S1							No	We do not consider the Local Plan is delivering appropriate levels of development so therefore is unsound. Or that the rural and natural environment will be protected.		We demonstrate in this response that the TSS area does not have services or facilities to meet the needs of current residents. Therefore this assertion that services and facilities are already in place is incorrect.	The council must have meaningful discussions between with the Forum as to how new development, particularly residential development can be proposed and delivered, without detriment to the current residents.  Following this the LP needs to include how increased capacity of medical facilities and schools will be delivered to meet existing needs and the needs of the occupants of the additional houses proposed for the TSS area.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
Para 3.9 and 3.10. Housing development will be mainly contained in and adj to the larger towns ... Sutton (MUA). The villages...Fackley have been allocated appropriate levels of development... Concentrating new development in these areas will help reduce the carbon footprint of the community.		Policy S1							No	We do not consider the Council understands the paucity of public transport across TSS. Therefore this policy is unsound.		Although Stanton Hill and Skegby fall within the newly formed MUA, Fackley does not. The development of the two greenfield sites between Stanton Hill and Fackley will lead to Fackley's absorption as part of Sutton's MUA.  The Forum disputes the assertion that the proposed new 150 dwellings in Fackley, an increase of current dwellings of approximately 43% is an appropriate level of development which would support rural infrastructure and sustain vitality.  The development would lead to the loss of part of the green gap between Teversal, Stanton Hill and Fackley.  There is one pub and one shop selling flowers in Fackley and no, schools, health facilities or effective public transport. There are no other buildings capable of being adapted to commercial use. By its nature any development will be unsustainable.  The Teversal, Stanton Hill and Skegby Neighbourhood Plan Policy NP2 and paras 158-162 sets out criteria for development in Fackley which, by its nature has to be very limited and must preserve the character of the settlement which is a transition point from the urban to rural. It is unclear how development on countryside in this area will reduce the carbon footprint of the community. See also comment under 3.16	There needs to be meaningful discussion between the Council and the Forum as to how the Skegby and Stanton Hill have now come to form part of the Sutton MUA.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
Para 3.12 Sutton (MUA to include Skegby and Stanton Hill) have excellent public transport links - either buses or trains.		Policy S1							No	We do not consider the Council understands the paucity of public transport across TSS. Therefore this policy is unsound.		Skegby and Stanton Hill within the proposed Sutton MUA do not have excellent public transport links - either buses or trains	The council must evidence such statements as this, especially when significant policies and allocations are being based on them.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
Para 3.16 Huthwaite, Stanton Hill and Skegby, which form part of Sutton MUA...their close proximity to a town centre accompanied by the services and facilities available in each area mean that these settlements are capable of expansion. A regular bus service operates in each area and there are fewer policy restrictions to growth in the absence of the Green Belt		Policy S1							No	We do not consider the Council has taken into consideration the most up to date evidence when developing their Spatial Strategy.  Green Belt is one policy restriction. The absence of social and transport infrastructure commensurate to the proposed increase in population are others. The Forum is not convinced that the right balance has been given for the LP to demonstrate that its spatial strategy can deliver sustainable development.		As stated throughout this response Stanton Hill, Skegby and Huthwaite do not have services or facilities which currently meet the needs of the existing communities. One medical centre, with a branch in Skegby serves not only the three settlements (MUA) , it also serves Fackley, Teversal and the hamlets. Skegby practice virtually collapsed in 2023 due to issues with recruiting and retaining staff. This has resulted in considerable unmet need, which if not addressed will increase the levels of ill health and have a negative impact on deprivation. It also has had a negative impact on the residents of Huthwaite who struggling to get appointments to see a clinician.  It is a matter of fact that other parts of Ashfield have Green Belt within them. This is a policy restraint for which clear exceptional circumstances are needed to change through the LP process. It is also a matter of fact that some of the settlements surrounded by this Green Belt are the most sustainable in Ashfield District, for instance, with train lines to Nottingham and Mansfield and then connections to trams and buses. The TSS area does not have Green Belt and does not benefit from active train lines and open stations. The absence of these practicalities to support sustainable development and the reality that there are no proposals to change this situation in the foreseeable future must bring into focus whether the realities that affect peoples' daily lives should be given greater weight in determining the spatial distribution of sustainable development, over a paper policy like Green Belt. By not recognising that the most accessible and sustainable parts of the district have the promise of delivering new sustainable development to meet the objectives of national policy on so many levels and are the exceptional circumstances necessary to adjust the Green Belt, the LP is directing people into areas where they can only live if they have a car and will need to use it for work, shopping, school, socialising, health access etc.	The Greater Nottingham Assessable Settlement Study, 2010 is more than 13 years old. And is reliant on old data. Much has changed over the past 13 years, including the addition of considerable numbers of new dwellings in especially Skegby, Stanton Hill and Huthwaite, meaning an increased population, reduced availability of public transport, poor road networks, increased number of children etc. There has been no significant additional primary health care services or facilities over the last 10 years. Out of three practices across TSS and Huthwaite, 2 practices were merged in 2015, followed in 2023 the merging of the remaining 2. Health indices from the ONS indicate an overall worsening in levels of deprivation and health.  Given the disproportionate and unsustainable scale of new development in the TSS (with Huthwaite) area when considered against public services and public transport provision the spatial strategy of the plan and the exceptional circumstances of significantly better services in other parts of the district should be reviewed.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes

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Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B
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Strategic Policy S2: Achieving Sustainable Development.	(a) It will not conflict with other policies in this LP or policies in a Neighbourhood Plan... (b) It will not adversely affect and should enhance, the character, quality, amenity and safety of the area. (c) It will not adversely affect highway safety or the capacity of the transport system. (d) ... (e) ... (f) ... (g) ... (h) ... (i) ... (j) ... (k) ... (l) ... (m) ... (n) ... (o) ... (p) ... (q) ... (r) ... (s) ... (t) ... (u) ... (v) ... (w) ... (x) ... (y) ... (z) ...	Policy S2							No	We do not consider the LP is sensitive to the scale and character of the named settlements so is unsound.		Ensuring that development that complies with the development plan will be permitted without delay is fully understood. However, when the LP is proposing policies and allocations that are contrary to the policies in the TSS Neighbourhood Plan, an equal part of the Development Plan, there is clearly a difficulty being proposed in the LP. This includes where the development will adversely affect, and not enhance, the character, quality, amenity and safety of the area, and where it does adversely affect highway safety or the capacity of the transport system and in particularly the management of surface water resulting in flooding.  (a),(b),(c) all relate to insuring developments do not adversely affect highway infrastructure and the character amenity and safety of local people. Such protection should also be achieved for local medical and education infrastructure where greater demands caused by increased population will reduce these services for existing population unless new facilities are delivered alongside new housing.  This is particularly relevant to site allocations where the capacity of the road network, health services, education and public transport provision does not match the situation on the ground.  Criteria 2(g) does not specify drainage and flood risk as an environmental issue needing to be addressed to protect the environment and quality of life.	The Forum would welcome the opportunity to work with the council to ensure that the policies of the Neighbourhood Plan are respected, adhered to and consistent with those in the LP.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
Strategic Policy S3: Meeting the Challenge of Climate Change	Page 44 Tables: 2 & 3	Policy S3							No	We do not consider the LP will meet the challenge of climate change, therefore is unsound.		The Forum appreciates the aspirations summarized in Chapter 1 – Key Issues 1.9 and in Chapter 2 SO 11.  SO 11 Point (g) Moving away from the extraction of fossil fuels, the burning of which is carbon intensive. Given the UK 2050 net zero target and the period of the Local Plan, surely this should be phasing out the extraction of fossil fuels?  SO 13 Point (b) Ensuring development proposals fully consider the coal mining legacy issues to ensure the stability of the land and to optimise the potential for the use of mine water heating. The Forum also supports the aspirations of Chapter 3 Strategic Policy S3: Meeting the Challenge of Climate Change.  It is good that the Council is committed to ensuring all new developments are as low carbon as possible. However, no specific target or standard, other than the Building Regulations, is specified. There is a positive aspiration that 'carbon and energy reduction measures (should go) beyond the Building Regulations but no indication on how this is to be achieved.	Add the words in the following terms: "Development will be directed to areas with good public transport links to reduce car journeys and maximise sustainability"	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
Strategic Policy S5: High Quality Buildings and Places through Place Making and Design	Page 48 Table 2(d)								No	We do not consider the LP will result in high quality buildings and place making design, therefore is unsound.		This Country has a rich and diverse character shaped by topography and the availability of local materials and building styles. It is essential to preserve this and avoid bland developments whose architecture is of stock design and has nothing in common with the surrounding area. New buildings should reference their surroundings and the existing housing stock so as to preserve the individuality of the area.	Add: the words "The design of new buildings references the existing built environment and avoids generic design."	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
Strategic Policy: S10. Improving Transport Infrastructure	Page 72&73 Table: 1-3								No	We do not consider the Plan is sensitive to the current capacity, capability or condition of the road network in the area. It also fails to appreciate the issues in regard to public transport named settlements, so is unsound.		The TSS Area is particularly poorly served by public transport with large parts having no bus service. The lack of public transport and its unreliability is one of the major complaints by residents during surveys carried out by the Forum. The proposition that new housing will lead to better public transport provision cannot be factored into assessments of sustainability for a number of reasons. There is no way of predicting how many of the residents will use public transport.  The roads within the area already carry high volumes of traffic so travelling in and out of the area is problematic. The Council is aware of the pressures which include the junction between Stoney-ford Road (B6028) and Priestic Road (B6023). Traffic surveys by the Forum during the preparation of the Neighbourhood Plan revealed that Mansfield Road, particularly in Skegby (B6014), was then at capacity at certain times of the day.  How many other parts of Ashfield District have experienced a similar proportionate increase? Therefore, whilst the Forum accepts that new housing will happen it expects this to be spread proportionately across the district with the greatest proportion where there is already good public transport provision.  All roads running through the settlements and villages from all directions are busy, especially at peak times. All include multiple areas which result in vehicle and/or pedestrian conflict. Narrow roads, and vehicle parking on each side pose issues and risks for vehicle users and pedestrians. Such examples are found in Stanton Hill – on Mansfield Road, High Street and Median Bank. HGVs passing through the village result in considerable vehicle conflict. Many of these HGVs are from the HGV Training Company and the Waste Disposal/Skip Company on the Brierley Park Industrial Estate in Stanton Hill.  The narrow single tracked lanes leading to the villages and hamlets again have significant issues with degradation of the surface, but also issues in regard to blocking by traffic mainly as a result of satellite navigation when main roads/motorway are blocked, resulting in residents and farmers being unable to access or exit their properties.  The condition of all the roads across the TSS area is poor with multiple potholes and surface degradation. The lack of road maintenance over the years has led to permanent damage which the filling of potholes fails to address. Increasing the numbers of vehicles on these roads as a result of copious new dwellings, without attending to the current issues will only serve to worsen the current situation.  In discussions with the Forum bus operators have made it clear that services need to be profitable across the route. A regular service through the Neighbourhood Area was withdrawn in 2019 as it was loss making overall. Bus operators have made it clear that new housing within the Neighbourhood Area would not bring about a reversal of that decision or alternative provision unless any consequent increase in demand is matched elsewhere on the route - something outside the control of the Council.	The Forum would like to see a commitment within the Plan for the Council and County Council to address the issue of the condition of the roads and where there are issues with accessibility that these be addressed. Attention to both these factors is a matter of urgency  Reference has already been made to the lack of public transport provision in the Neighbourhood Area and the constraints imposed by its road network.  The Forum would like to see a commitment within the Local Plan for the Council to work with the Forum and providers to bring regular (1 hourly) bus services to within a quarter of a mile of residents in urban and semi-rural locations. This will impact on mobility and access to services, work and study and reduce the need for car journeys and thus the area's carbon imprint.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
Strategic Policy: S10. Improving Transport Infrastructure - Continued									As above	As above		A large swathe of the Neighbourhood Area is rural and thinly populated as is the case with surrounding areas. New housing of a scale that would significantly affect passenger numbers would be unconscionable and grants to support loss making services can only be short term. Decisions on where to site new development must take such constraints into account.  There are a number of references in the Plan to the TSS Neighbourhood Area having good public transport links. This assertion misrepresents the actual public transport provision. The area relies entirely on bus services and is poorly served by the bus network as the services involved each have issues affecting their benefit to residents.  Stanton Hill and Skegby are served by the 141 bus which is an hourly service. The route from Nottingham city centre is long and tortuous which means that the service is plagued by delays and cancellations. Consequently, residents find it impossible to rely on the service for travel to work or education and such things as medical appointments. The service is dependent on a subsidy from Nottinghamshire County Council which runs out annually in September with no guarantee that it will be renewed. In discussions with the TSS Forum bus operators have agreed that there needs to be radical changes to the route to reduce delays and cancellations. Without this service the Neighbourhood Area will be effectively devoid of public transport. There needs to be a commitment from the bus operator and Nottinghamshire County Council to continue this service indefinitely but as this is outside the gift of Ashfield District Council so cannot be factored into the LP's policies on future development. The TSS Forum has been in negotiations to address this issue so far without success.  The only service into Teversal is the 417 which runs to and from Fackley 3 times per day, starting at 10.13 in Fackley and finishing at 14.00 from Sutton-in-Ashfield. Clearly this token service cannot be used for commuting to work or education. This service has little or no relevance to the area's transport needs.  Route 1 from Alfreton to Mansfield Woodhouse appears to be a half hourly service. It does not cross the Neighbourhood Area but leaves Tibshelf on the B6014 before turning right onto Chesterfield Road for Huthwaite thereby serving a handful of residents living on the very extremity of the Neighbourhood Area close to Tibshelf Wharf. Bus operators have made it clear that new housing within the Neighbourhood Area would not lead to better public transport provision. A large swathe of the Neighbourhood Area is rural and thinly populated as is the case with bordering areas. New housing of a scale that would significantly affect passenger numbers would be unconscionable and grants to support loss making services can only be short term. Decisions on where to site new development must take such constraints into account.  The Plan is therefore erroneous in its analysis of transport provision within the Neighbourhood Area and its policies are predicated on incorrect and misleading data.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.		

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Strategic Policy 12: Tackling Health Inequalities and Facilitating Healthier Lifestyles	Page 80-81 Table: 1, 2(c) (d)(e) (k)								No	The Plan fails to recognise the current position in that health care provision is not meeting the needs of its residents. Failure to address this issue and proceed with development with no planned additional facilities makes this policy unsound.		The Plan fails to consider the current access and provision of health care in the TSS area, and whether what is accessed and provided meets the needs of the current residents.  The only practice in the TSS area - 'Skegby Family Medical Centre' virtually collapsed, due to the challenges of recruiting appropriate clinical staff. Patients had extreme difficulties in getting appointments, so either went without seeing a clinician or attending A&E. Skegby practice is now an attachment of Brierley Park Medical Centre. However, patients continue to express frustration with long queues to speak to reception and booking appointments to see clinical staff. Lack of health care has a clear relationship to increasing health issues and deprivation, in an area which include high levels of deprivation.  Brierley and Skegby Medical Centre serves not only the TSS area but also Huthwaite, Stanton Hill and Skegby, once known as settlements and now part of the Main Urban Area (MUA) of Sutton and targeted for the development of over 3200* homes, with TSS talking 1602* (approx. 49%) of the houses, Huthwaite 801* (approx. 24%) – TSS and Huthwaite total 2403* (>70%).  Due to this situation current residents are missing out on essential health care, increasing the number of homes will worsen this situation for both the new and existing residents. It is unclear in the draft LP where actions are planned to improve access to primary health care.  <b>This is situation is contrary to the TSS NP which states: NP 32, para 114. Community Objective 3: To ensure that new development sustains and where necessary enhances local facilities to ensure that the capacity of local facilities (doctors and schools) is sufficient to meet local needs.</b>  It is of concern that some policies have been developed using old data. For example the Greater Nottingham Accessibility of Settlement Study, dated January 2010 Appendix 1 - The 2016-2018 Health Impact Assessment (HIA) uses old data as does the Ashfield District Health Profile 2019) identifies a district with significant health inequalities. 21.1% of children live in low-income homes, and life expectancy is 13.2 years lower for men and 10.6 years younger for women in the most deprived areas of Ashfield compared to the least deprived areas. It is widely recognised that these factors have worsened since this report. TSS includes area of severe deprivation – especially in Stanton Hill. It is clear that without significant actions being taken then health will only worsen given less access to health care.	The Council should have meaningful discussions with the TSS Forum about how the enormous and worsening issues of health inequalities can be addressed. This requires urgent actions so has to initially prevent worsening inequalities in the current population.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
S13 Protecting and Enhancing our Green Infrastructure and the Natural Environment	Page 83 The natural environment, including green and blue infrastructure corridors and assets will be protected, conserved and enhanced.  The biodiversity of Ashfield will be maintained and enhanced...								No	As the policy stands the Forum considers that it is unsound.		The Policies seem to offer comprehensive protection in relation to Green and Blue Infrastructure assessment, protecting and enhancing the landscape, and biodiversity etc.  Existing green spaces are an important resource and enhance the well being of the community. Often they are neglected or even destroyed thoughtlessly. Instead such spaces need to be retained and enhanced.  It is now accepted that this Country's flora and fauna has suffered a massive degradation in its variety and numbers. Positive policies to encourage its recovery are necessary and LP is an important opportunity through its policies to reverse this trend across Ashfield.  Other Policies in the Plan conflict with this Policy as they allocate sites which a fall within the Green Corridors/Gaps as detailed in the TSS Neighbourhood Plan.	The Council should have meaningful discussions on how the Plan can align with the TSS neighbourhood plan on Green Corridors and Gaps.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
S14: Conserving and enhancing our historic environment.	Page: 85 The Council will ensure that all heritage assets within the District are conserved and enhanced....											It is to our knowledge that there is a backlog with the registering of the heritage assets, we agree with the Policy which is required by legislation and national policy.	The Council should provide resources to ensure that the back-log is cleared and so the register is up to date and ongoing in order to ensure their continued protection.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
Chapter 4. Meeting the Challenge of Climate Change and Adapt to its Effects	Pages 88-89 Table Zero and low carbon development Proposals for non-wind decentralisation, renewable and low carbon energy generation Energy Storage								No	The council has not met with its duty to cooperate. By not proposing sufficient carbon neutral measures the plan is not sound.	The council has not met with its duty to cooperate. By not proposing sufficient carbon neutral measures the plan is not sound.	The Forum congratulates the Council for good intentions and some innovative ideas, but 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.  In this context it is as well to repeat that the Forum has set itself a target of the Neighbourhood Area becoming carbon neutral by 2030. This is an ambitious target but necessary to ensure that the issues preventing it being reached are seriously addressed. The main reason why the Forum would not reach this target is new unsustainable housing development.  As already mentioned the Neighbourhood Area is one of the least well served within the district by public transport. As a result any new housing will increase car journeys within the Area and inevitably lead to an increase in carbon emissions. New development therefore has to be concentrated where there are good transport links. This means that new development in the Neighbourhood Area must inevitably be restricted. Clearly there is a dichotomy between the need for the Council to provide sites for new homes and the need to restrict carbon emissions. The Local Plan contains many fine words but fails to address the steps needed to put them into practice.  Homes should be future-proofed and we should move the industry towards the Future Homes Standard.  There is no reference to improvement of the current poorly insulated and fossil fuel heated housing stock. As well as a responsibility to mitigate emissions by its own housing and commercial stock, the Council has the power to regulate landlords and demand adequate insulation in rented stock. These issues are omitted.	The council should have meaningful discussions with the TSS Forum about how the NP objective in meeting carbon neutral should be reflected in the LP  Such measures should be criteria in a policy that allows new development only when included.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
CC1. Zero and Low Carbon Developments and Decentralised, Renewable, Low Carbon Energy Generation.  Zero/Low Carbon Developments. Decentralised, Renewable and Low Carbon Energy Generation.	Para 4.4 ... 'the Council acknowledges that Building Regulations should be the primary means of introducing and enforcing carbon reductions, but considers development should, wherever possible, apply carbon and energy reduction measures beyond the Building Regulations.'  Para 4.5 Council will expect designers to appropriately utilise the assets of a particular site .... to help reduce energy consumption, utilise solar gain and resilience to temperature increases.  Para 4.6 Ashfield's mining heritage provides opportunities for the utilisation of mine water as a heat source.  Para 4.7 Lifestyle and Behavioural Change  Para 4.8 Highly efficient, zero carbon developments  Para 4.10								No			It is good that the Council is committed to ensuring all new developments are as low carbon as possible. However, no specific target or standard, other than the Building Regulations, is specified. There is a positive aspiration that 'carbon and energy reduction measures should go beyond the Building Regulations but no indication on how this is to be achieved. Again, a positive intention but no clear indication of how the following issues will be addressed – currently new build houses are still being constructed with poor insulation and heating provided by fossil fuel (gas and oil) boilers.  See also Chapter 2 SO13(b) Is this a serious proposal or just a nice idea? If the former it will require investment in the construction of a district heating scheme utilising mine water energy. A scheme in Durham required investment of £3.8 million for 750 new homes. ADC has no previous experience of managing area heating schemes. Has the Council thoroughly researched this and if so where are the practical policies required to implement the proposal.  Adaptation for climate change will require lifestyle and behavioural change. Policies should require development to encourage sustainable lifestyles. For example Section 4.7 states "layout should minimise the use of the private car and prioritise safe and attractive routes that benefits pedestrians and cyclists." Very desirable but we have just seen (a) our bus service removed and (b) recent applications for highly unsustainable development in the Neighbourhood Area as well as new sites being proposed in the Local Plan that conflict with this aspiration. Therefore, it is hard to see from the Plan how this is going to be achieved.  Government (policy) has announced the phasing out of new petrol and diesel cars by 2035 with the likelihood that electric vehicles would become the norm over the plan period. This places an emphasis on electric vehicle charging points in new homes. This policy will require charging points in almost all homes and at other locations which, together with the replacement of gas boilers by heat pumps, will require major improvement in electricity transmission systems. Whilst the latter is outside the Council's control it is an issue that needs to be addressed in formulating policy.  The Council fully supports the creation of highly efficient, zero carbon developments via recognised standards such PassivHaus and BREEAM Excellent or Outstanding. This is commendable but the time for a small number of highly energy efficient flagship schemes is over. We need effective strategies on housing and transport which will make a real difference to GHG emissions.  The Council actively encourages the development of viable technologies and infrastructure across the District.' This is positive but is not critical in reducing GHG emissions since we are seeing strong growth in off-shore wind generation. The issues of GHG emissions from domestic heating and from private/commercial transport are much more crucial (see points above).	The Forum recommends the setting of clear targets to measure progress of implementation of the Policy..  Further consideration is required as to ensure all new homes are built with effective insulation, and renewable heating systems.  Further consideration of allocated sites is required that in unsustainable locations, and where the public are reliant on private cars.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes

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Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B
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CC1. Zero and Low Carbon Developments and Decentralised, Renewable, Low Carbon Energy Generation.  Zero/Low Carbon Developments. Decentralised, Renewable and Low Carbon Energy Generation.  Continued									Continued As above			Continued The exporting of electricity to the grid is limited for properties across TSS by the Distribution Network Operators (DNOs) - licensed companies that own and operate the network of cables, transformers and towers that bring electricity from the national transmission network to businesses and homes. Put simply, they are companies that are authorised to distribute electricity in the UK. The DNO limits the amount of electricity exported to the grid from solar panels due to outdated and limited infrastructure. This results in considerable wastage of electricity.	Continued The Council should work with the DNO and partners to improve the capability and capacity of the storage system .		This refers to the data protection terms set out on the front page of the Rep form
CC2. Water Resource Management	Para 4.31 Flooding has a devastating impact on residents, business and provision of services. Consequently, the Policy aims to minimise vulnerability and provide resilience in relation to flooding and the impacts arising from climate change. Inappropriate development in areas at risk of flooding will not be permitted....								No	As the policy stands the Forum considers that it is unsound.		Flooding of both branches of the Meden at Newboundmill, on Buttery Lane and on Fackley Road has recently isolated Teversal village, but the Meden is not identified in the Plan in relation to flooding. In addition the hamlet of Stanley was further isolated as the Land Drain over topped resulting in the flooding of Silverhill Lane and Shepherds Lane. Stanley Lane was also blocked due to extensive flooding at the bridge close to Hardwick Inn, under the M1 bridge and on Deep Lane. The later are sited in Derbyshire but closure affects access to Stanley.  Recent approved sites of housing development in the Neighbourhood Area, for example on Beck Lane and Abbott Road, Skegby have been subject to flooding before or during housing development. This raises doubts about planning decisions in relation to flooding. Although the policy reads well, it does not take into consideration where flooding currently occurs and yet new allocations are planned for the same location - for example Beck Lane, Fackley Road.	The Forum requests further work is undertaken to protect current locations that flood, and that new developments are not added to those locations where they will make the flooding worse.  All new applications must demonstrate to the highest level the mitigations that will be put in place to negate the flooding risks.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
Chapter 5. Protecting and Enhancing Ashfield's Character Through its Natural Environment	Page 108 Table 2(g) Infill development	Policy: EV2. Countryside Infill							Yes			The Forum welcomes that infill development limited to a gap filled by 1 or 2 dwellings only.		The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	
	Page 114 Table 1(d) Re-use of buildings should not result in the proliferation of new farm buildings elsewhere on site.  Para 5.59 This will be supported where it meets sustainable development objectives. Preference will be given for the re-use of buildings for local business and commercial use, as opposed to residential use	Policy: EV3. Re-use of buildings in the Green Belt and Countryside.							No	Support with additional criteria			Additional criteria ... "The proposed use and design is compatible with the location and character of the building and settlement where it is located".	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
	Page 117-119 Table 1. Green Infrastructure  2. Biodiversity and Geodiversity (a) Development proposals on, or affecting, Local Wildlife Sites (LWSs), Local Geological Sites (LGSs), sites supporting priority habitats, or sites supporting protected or priority species, will not normally be permitted. Development may be permitted where it is clearly demonstrated that the need for the development outweighs the adverse impact on the nature conservation value of the site.  (c) Linkages between Green Infrastructure assets will be preserved, enhanced, or created to improve public access and biodiversity value.  4(b) Local Wildlife Sites (LWS) and Local Geological Sites (LGS) The number of Local Wildlife Sites (LWS) has increased since the 2002 Local Plan with approx. 20 more sites identified in the TSSNP area.	Policy: EV4. Green Infrastructure, Biodiversity and Geodiversity							No	As the policy stands the Forum considers that it is unsound.		The Forum welcomes that the linkages between Green Infrastructure assets will be preserved, enhanced, or created to improve public access and biodiversity value.  From experience Notts Wildlife Trust haven't been engaged by ADC in planning applications - but when members of the Forum have directly requested the NWT to comment (Skegby Bottoms Application) - they did this and were vehement in their opposition. The NWT are experts on the LWSs so they should be one of the stakeholders when LWS are affected. The Forum welcomes the increased recognition of more LWS in the TSS area. However, some of the allocations in the Plan conflict with this Policy.  Skegby, Stanton Hill, Fackley and Teversal are all linked by important green spaces and for the indigenous flora and fauna of this patch to survive these must be conserved and remain connected. Birds and bats travel along green corridors - they cannot thrive in isolated pockets so die out completely. Red listed hedgehogs - vulnerable to extinction in the UK - and several species of bats are resident in Skegby, often sighted in Healdswood. Owls, voles, stoats, weasels, foxes, shrews are still present - none of which exist in an 'urban area'.  The Skegby trail used to attract birdwatchers from all over the country. The once abundant wild birds such as Yellowhammers and Skylarks are now vanishingly rare but some are still clinging on. If Skegby is subsumed entirely by Sutton then these endangered British Birds will have no protection at all and Sutton itself will have lost its nearest 'green lung'.  Teversal Pastures are our only protected SSSI's in this neighbourhood but the mammals/birds that use them still need to forage/roost/nest/hunt over a wider area to survive. Those pastures join onto fields earmarked for housing development (fields which also have an abundant supply of endangered British Native Wildflowers), adjacent to ancient woodland.  The green corridors and gaps outlined in the TSS neighbourhood plan are not all protected in the Plan. For example the site allocated North of Fackley Road - which has recently been refused planning permission, yet appears in the allocations in this Plan. Opposite Molyneux Farm proposed allocations also sit within the green gap.	Add "Protect and enhance green spaces and access to countryside"  Add "Promoting the creation of diverse habitats, including re-wilding and the use of native plant species and wildlife corridors where possible"  The green corridors and gaps outlined in the TSS neighbourhood plan should harmonise with those in the Local Plan  Should developments be proposed that are on, or affect LWS, that Notts Wildlife Trust should always be a stakeholder and be asked to comment on the application.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
	Para 5.125 Re tree removal and site clearance prior to the planning process. Pre-emptive felling is strongly discouraged. If the Council considers that pre-emptive tree, woodland, or hedgerow removal has occurred, the Council will seek suitable replacement as part of any planning process.	Policy: EV6 Trees, woodland and hedgerows planting as part of any planning process.							Yes			The Forum welcomes the strong discouragement of pre-emptive felling of trees.		The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes
	Page 136-145 Table Para 5.148-5.152 Historic Environment  Para 5.165-166 Heritage assets  Para 5.177-5.181 Historic Landscape Features	Policy: EV9. The Historic Environment							No	The Forum supports the EV policy, however it has concerns regarding the impact of urban sprawl compromising the character in Skegby and Stanton Hill. It is also incomplete in that it does not include designated assets or locally listed (non-designated) sites		The Forum is satisfied that the policies in the emerging local plan should give adequate protection to the historic environment. However, the heritage of Skegby, a village noted in the Domesday Book, is not highlighted, and the appendices do not include designated heritage assets, or locally listed (non-designated) sites. They do not appear on the accompanying interactive map either.  As well as some surviving ancient grassland, Skegby has an 18th Century Pinfold illustrating its rural past; the water troughs on Old Road; the 17th Century Quaker House (of great historical importance in the Quaker Movement); 16th Century Cruck Cottage; the ruins of The Manor House and Skegby Hall are all of historical importance. This emphatically underlines that it is not part of the culturally derelict Sutton Main Urban Area and is a village existing in its own right.  It is important that this is the heritage of Skegby, it would be a travesty for this to be subsumed into urban sprawl. The residents of Stanton Hill are proud of the history of the settlement, developed in the mid 1800 in response to the pits of Silverhill, Teversal and Sutton, this heritage should not be overlooked as new developments take on their own character.  A 'Heritage Statement' which should accompany any proposals that affect designated and non-designated heritage assets are often desk-based. We have noted in the past that these are often inaccurate, incomplete, or minimise the impact of the proposal. 'It should always follow a site visit where the asset in question is familiar to those preparing the statement'.	The Forum requests discussion on the designation of Skegby and Stanton Hill as Sutton MUA, rather than settlements, so as to protect their character and heritage.  Add to the appendices and interactive map, designated heritage assets, or locally listed (non-designated) sites.  Can the issues of inaccurate, incomplete, and Heritage Statements which minimise the impact of the proposal be addressed in the local plan?	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes

H3																		
Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B	Part B
	Page 146 Table 1,2,3,4	Policy: EV10. The Protection and Enhanced of Landscape Character.							Yes				The Policies seem to offer comprehensive protection in relation to Green and Blue Infrastructure assessment, protecting and enhancing the landscape, and biodiversity etc.  None of the policies in EV10 conflict with the relevant TSSNP policies which are: NP1: Sustainable development 3c) - respect for the existing landscape character NP4: Protecting the landscape character - which is summarised in Appendix D.  Although the Forum is supportive of wind farms in principle, it is concerned that the areas identified as suitable for wind farms on the north facing side of Silverhill and to west of Stanley Lane are situated within the historic landscape setting of Hardwick Hall.	The council must obtain the written views of English Heritage and the National Trust regarding the setting of Hardwick Hall in this matter.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes	This refers to the data protection terms set out on the front page of the Rep form	
Chapter 6. Local Housing Needs and Aspirations	Pages 159 - 165 Housing Allocations in the Sutton Area  Para's 6.47 6.48 6.50 6.54 6.63-6.65 6.67 6.69 6.72-6.76 6.78-6.79	Policy: H1: Housing Site Allocations (greater than 10)						No	As the policy stands the Forum considers that it is unsound.			The choice of sites H1S1 North of Fackley Road, Teversal, H1Sn and H1So contradicts Policy EV10 and does not meet the test outlined in Policy EV4 and its supporting paragraphs. Para 2 and the objectives set out in Para 3.100 (Safeguarding key landscape). They conflict with the Teversal, Stanton Hill and Skegby Neighbourhood Plan Policy NP1 Para 2 (they do not respect landscape character nor do they deliver a range of social facilities to meet local need) as well as Policy NP4 and the accompanying Design Guide.  The green corridors between settlements must remain intact. The preservation of green spaces scores most highly in Forum surveys so they should be preserved and enhanced. The green corridors are particularly sensitive and the Forum will defend these spaces against any erosion. They should therefore be withdrawn.  These sites are not sustainable and have been included in the LP without consultation with Teversal, Stanton Hill and Skegby Neighbourhood Forum and despite widespread local opposition based on the same principles as those outlined above.  The new estates proposed for the Fackley area could also have deleterious effects on the River Meden which is an important water source for local wildlife including deer, badgers and birds and serves the wet meadowland of Teversal Pastures (SSSI).  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.  See also Chapter 3 - 3.16 The disparities between allocations across the main towns of Hucknall, Sutton and Kirkby are stark and disproportionate. The difference between allocation for TSS and Kirkby is that TSS (including land adjacent to KingsMill as due to its proximity to TSS and other large developments it will create pressure on the same services and facilities that are currently struggling to cope) would have 66% more new dwellings than Kirkby. TSS comprise of three settlements, although in this Plan Skegby and Stanton Hill redesignated as Sutton MUA.  Kirkby scored high on the Sustainability Assessment. However, unlike Kirkby, TSS does not have the benefit of good access to public transport - trains, buses, nor does it benefit from accessible health, education and community services and facilities etc.  If Huthwaite were considered alongside TSS then they together would have approximately 78% more proposed dwellings than Kirkby. As stated elsewhere in this response TSS shares primary health care services with Huthwaite, and similarly Huthwaite residents are experiencing significant issues in accessing their health centre.	H1S1 conflicts with the NP as already set out, and is unsustainable for the reasons already given.  H1Sn & o are unsustainable for the reasons already given but also break into the green space between Stanton Hill and Fackley.  Both these sites are in such close proximity to the existing housing in both Fackley and Stanton Hill (Meden Bank), that they will coalesce the two settlements contrary to the TSS Neighbourhood Plan para J82 and TSS Design Guide Appendix C. They will lead to the extension of Fackley into the Sutton MUA and there must be a physical and visual separation given this significantly new category of settlement being proposed to S&SH.  The green spaces that separate and surround the settlements within the Neighbourhood Area are effectively its Green Belt and should be treated as such. Neither is it clear where access to these sites will be. The B6014 carries far more traffic than its designation suggests and the two sites are close to a blind bend. It is clear that all these sites have been inserted into the LP without a thorough analysis of the factors mitigating against their inclusion or of the situation on the ground that makes them unsuitable.  The Forum wants to make it clear that the three sites in Fackley (identified above) must be removed from the site allocations.  The Local Plan, once made, and the Neighbourhood Plan cannot conflict. Since the NP is already in place amendments must be made to the LP to prevent this.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes			
					Background paper 1: Spatial Strategy and Site Selection	Page 86 - SHELAA excluded due to isolated unsustainable location							The Forum is pleased to note that the following sites have been excluded from SHELAA due to isolated unsustainable locations.  SA028 Land at Carnarvon Cottage, Silverhill, Teversal - 67 dwellings. SA062 South of Tibshelf Road, Fackley - 16 dwellings SA079 Land of Wild Hill, Teversal - 50 dwellings SA080 Wild Hill, Chesterfield Road, Teversal - 89 Dwellings  In the event of any of these sites being the subject of planning applications in advance of the adoption of the plan or being promoted to the inspector as additional or alternative allocations, the Forum hereby registers its objections.	In the event of any of these sites being the subject of planning applications in advance of the adoption of the plan or being promoted to the inspector as additional or alternative allocations, the Forum hereby registers its objections.	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes		
	Page 172 Table: Affordable Housing 1-5	Policy: H3 Affordable Housing						Yes					The current plan [2002] (p78 para 5.78) states 'No parts of the district have been identified as being sufficiently isolated from the main urban areas and named settlements to be likely to justify the need for affordable housing in such locations. In general terms the need for specific housing provision outside these areas will be dealt with under the provisions of EV1 and EV2.'		The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes		
Chapter 7. Building a Strong Economy Which Provides Opportunities for Local People	Page 192-3 Table; 1-3	Policy: EM1. Business and Economic Development						Yes					The lack of suitable land for new employment opportunities in the area is accepted by all parties. This means that the majority of residents have to travel to work. The major employment opportunities are in Mansfield and Nottingham.		The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes		
	Page 195-7 Tables; EM2. Employment land allocations EM3. Retention of employment sites and allocations	Policy: EM2&3. Employment Land Allocations						Yes					There is limited scope for further industrial development in the neighbourhood area. The Forum therefore refers to policies relating to employment and industrial development mentioned elsewhere in this response and re-emphasises its concerns where expressed.		The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes		
	Page 199-200 Table; 1-3	Policy: EM4. Rural Development						Yes					There is limited scope for further industrial development in the neighbourhood area. The Forum therefore refers to policies relating to employment and industrial development mentioned elsewhere in this response and re-emphasises its concerns where expressed.		The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes		
	Page 222-224 Tables: 2.(1) Landscape character and features  Para 9.19. Infill development Page 22-225	Policy: SD2. Good Design Considerations for Development						No	As the policy stands the Forum considers that it is unsound.				The protection and enhancement of wildlife is urgently needed. New developments must play their part though sensitive design that encourages wildlife and the proliferation of plant species. Developers are tempted to focus on the bottom line and profitability. Not only wildlife but residents also benefit from surroundings that are rich in diverse flora and fauna. Developers must be encouraged to build with wildlife in mind.  The developments proposed in POLICY H1: HOUSING SITE ALLOCATIONS - 63: H1S1, 67 H1Sn,69: H1SO off Fackley Road are essential green field areas needed to maintain the existing wild bird and mammal population. This is a rural landscape, emphatically NOT Sutton Main Urban Area!  The Forum welcomes the definition of 'infill' as normally capable of one or two dwellings only.	Add: Paragraph 2(i) "Conform to the Wildlife Trust's Homes for People and Wildlife guidance"	The Forum would like to participate at the examination to be able to present its main concerns and points to the Inspector.	Yes		



