



**Ashfield District Council**

**Local Plan**

**Statement of Consultation**

**Regulation 18 Statement**

**June 2016**

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**The Statement of Consultation document reflects the position at June 2016. Consequently, the Local Plan Publication may have additional changes to reflecting the emerging evidence base such as the Whole Plan Viability Study.**

## How to read the document:

- Please note that all reference to Policies or paragraph numbers within this document relate to the Local Plan Preferred Approach, January 2016.
- Section 6 sets out the responses received to the Local Plan Preferred Approach, 2016 consultation. The responses are specifically related to policies or sites and are set out in same order as the Local Plan Preferred Approach 2016 comprising comments on :
  - General comments.
  - Introduction & Portrait.
  - Vision and Strategic Objectives and Key Diagram.
  - Spatial Strategy.
  - Strategic Policies.
  - Area Policies including housing and employment sites and alternative sites put forward for each area.
  - Development Management Policies.
  - Appendices including Trajectory
  - Policies Maps
  - Sustainability Appraisal
  - Supporting Documents
- For each Policy, Allocation or other documents there is the following:
  - A Table which set out the following (see example below):
    - A summary of representations into the categories of 'Support', 'Objection' or 'Comment'. For comments on site allocations these categories may be subdivided into specific areas of responses such as flooding, landscape etc.
    - The Council's response to the representations including identifying whether any changes are proposed.
    - Proposed amendments.

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to Policy</b>	
<b>Support</b>	
<b>Object</b>	
<b>Comment</b>	
<b><u>Responses received relating to Policy supporting text</u></b>	
<b>Support</b>	

Object	
Comment	

- A Table which set out proposed amendments (see example below):
- Changes to the policy or paragraphs are identified in a red font.
  - Deletions from the policy or supporting text are crossed through.
  - If significant changes are proposed to the text of the Local Plan Preferred Approach the changes will be identified in terms of a general intentions rather than identifying the specific changes. For example 'Amend the Introduction to set out the relationship between strategic planning and the development management process.'

### Proposed Amendments

Issue/Policy	Amendment
Amend Policy S1 (4b)	<b>b) Does not materially conflict with adjoining or nearby land uses;</b>
Paragraph 4.4 amend for clarification to include "enhance and improve" habitats. The use of the wording "the use of native and other complementary species" is appropriate to Policy EV4.	Para 4.4 – amend to ... should include the retention of valuable existing features, and <b>enhance and improve</b> habitats wherever possible. <del>and the use of native and other complementary species.</del>
Additional paragraph	It should also identify that the Local Plan should be read as a whole with proposals being considered against all relevant policies.
<b>Proposed Amendments</b>	
Delete Policy S1 3. as it repeats Point 2. of the Policy.	Deleted S1 3. amend numbering accordingly. <del>Development will be permitted where it does not conflict detrimentally with other policies contained within the Local Plan.</del>

- A Table which identifies who has responded to the Policy or site allocation, see example below.

<u>List of Respondents</u>				
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Smith	0001	√		
Jones	8000		√	
Regeneration Group	9000			√

### Proposed Amendments

Issue/Policy	Amendment
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## **1.0 Introduction**

- 1.1 This Statement of Consultation sets out the details of publicity and consultation undertaken to prepare and inform the Ashfield District Council Local Plan. This Statement fulfils the requirements of Regulation 22 (1)c of the Town and Country Planning (Local Planning) (England) Regulations 2012 to prepare a statement setting out how the Local Planning Authority (LPA) has complied with Regulation 18 of the same Regulations in preparation of the Local Plan.
- 1.2 The purpose of this Statement is to describe the consultations undertaken at each of the previous stages of the preparation of the Local Plan. The Statement summarises which bodies and persons were invited to make representations up to and including the most recent, Preferred Approach stage, how they were invited to do this, a summary of the main issues raised and how they have been taken into account by the Council.
- 1.3 In response to the Government's agenda, the Council has agreed to produce a Local Plan for a 15 years period, which runs to 2032. The Local Plan will contain strategic policies, area policies (including site allocations) and development management policies. It will enable the Council to manage growth and development effectively within the District over the coming years.
- 1.4 This document identifies the Regulations which have required the consultations to be made throughout the plan making process, describes how they were undertaken, and then summarises the main issues raised and responses to the consultations. A substantial part of the document provides a comprehensive summary of the Local Plan Preferred Approach, 2016 Consultation enabling those who made representations to see how their comments have been taken into account.

## **2.0 Statutes and Regulations**

2.1 Preparation of the Ashfield District Council Local Plan has been undertaken according to the following statutes, regulations and guidance:

- a) The Planning and Compulsory Purchase Act 2004;
- b) The Localism Act 2011 (which amended certain sections of the Planning and Compulsory Purchase Act, 2004);
- c) The Environmental Assessment of Plans and Programmes Regulations 2004;
- d) The Town and Country Planning (Local Planning) (England) Regulations 2012;
- e) The National Planning Policy Framework 2012 (NPPF);
- f) National Planning Practice Guidance.

2.2 The initial stages of preparation were undertaken as part of the Ashfield Development Framework process where the Council was looking to take forward a Core Strategy followed by site allocations and development management development plan documents. With changes in legislation the Council determined to take forward a Local Plan which integrates the strategic policies, site allocations and policies for development management in a single document.

2.3 The Local Plan has developed over time, evolving through on previous consultations stages, including:

- Leaflet to all households “The Ashfield Development Framework; Does it affect me?” published in April 2009 and delivered by a private company to households in Ashfield with a freepost response to be included on the Council’s database.
- Preparation of Core Strategy Issues and Options (up to June 2009)
- Consultation on Core Strategy Issues and Options (June/July 2009)
- Preparation of Spatial Growth Options (up to October 2009).
- Consultation on Spatial Growth Options (October/November 2009)
- Preparation of Core Strategy Preferred Option (up to March 2010)
- Leaflet sent to all households in Ashfield with the Council Tax demand on the Ashfield Local Development Framework (April 2010).
- Consultation on Core Strategy Preferred Option (March/April 2010)
- Preparation of Local Plan Preferred Approach (up to September 2012).
- Consultation on Local Plan Preferred Approach (September/November 2012).
- Local Plan Publication (August/September 2013).
- Local Plan Submission 18<sup>th</sup> December 2013.



- Local Plan withdrawn from Examination on 24<sup>th</sup> July 2014 following an Exploratory Meeting with the Inspector and the Inspector's letters of 26<sup>th</sup> March and 15<sup>th</sup> April.
- 2.4 Following the withdrawal of the Local Plan on 24<sup>th</sup> July 2014, the Council has been updating the evidence base to support the Local Plan. The Cabinet approved consultation on the Local Plan Preferred Approach on 7<sup>th</sup> January 2016. The Cabinet Resolved to:
- a) Approves the Preferred Approach Local Plan;
  - b) Approves 480 dwellings per year as the District's housing target;
  - c) Approves the revised Statement of Community Involvement (SCI);
  - d) Approves the Public Consultation of the Preferred Approach Local Plan and its accompanying evidence base to begin as soon as possible following approval;
  - e) Grants delegated authority to the Chief Executive (in consultation with the Leader and Portfolio Holder) to approve minor amendments to the Preferred Approach Local Plan and any accompanying documents in preparing them for the period of public consultation
- The Reason - Approval will ensure that the Local Plan can progress in a timely manner. This will ensure that the Council meets the Government's deadline of early 2017 for producing a Local Plan.
- 2.5 The Cabinet Report was called-in by eight councillors. The reasons stated for the call-in were that the decision was considered to be 'contrary to policy' and that the report to Cabinet contained both 'incorrect information' and 'inadequate or inaccurate information'. The call-in was accepted in accordance with the provisions of Part 4 of the Council's Constitution, Overview and Scrutiny Procedure Rule No. 15.
- 2.6 The Call-in was considered at an Extraordinary Overview and Scrutiny Committee on 26<sup>th</sup> January. The Committee resolved "that to allow the public consultation process to commence as soon as possible and in accordance with the provisions of Overview and Scrutiny Procedure Rule 15 as contained in Part 4 of the Council's Constitution, no further action be taken in relation to the called-in decision."
- 2.7 From 2<sup>nd</sup> February to 20<sup>th</sup> March 2016 a consultation was undertaken on the Local Plan Preferred Approach.
- 2.8 Following the Publication of the Local Plan, anticipated to be Autumn 2016, the Regulations require the following stages to take place leading up to adoption of the Local Plan by the Council:
- (Regulation 19/20)
- Consultation on the Local Plan Publication; for legal compliance and soundness.

(Regulation 22)

- Submission of the Local Plan Publication.

(Regulation 24)

- Examination in Public of the Local Plan.
- Adoption of the Local Plan by the Council.

- 2.5 The Regulations state that the Council, in its role as local planning authority, must notify a range of agencies, organisations and individuals at each stage of the Local Plan preparation process, and invite them to submit representations on its content. These representations must then be considered in the development of the Local Plan.
- 2.6 Bodies to be notified include regulatory agencies, physical infrastructure delivery agencies, social infrastructure delivery agencies, major landowners, housebuilders and developers, minerals and waste management agencies, voluntary bodies, neighbouring local planning authorities, county councils and parish councils. The Council publicises each consultation stage and invites representations from the public, including residents of Ashfield and any other groups or organisations.
- 2.7 The Local Plan Regulations 2012, Regulation 35 states that the Council must make available the Local Plan Publication document, and supporting documentation, at their principal office and other places within there are, and published on the Council's website. These requirements are the minimum for consultation. The Council's Statement of Community Involvement (SCI) establishes more detailed guidelines for engagement which have been taken place. The SCI has been updated and was adopted by the Council in January 2016. The document sets out the Council's policy and approach to public consultation and involvement in the preparation of the Local Plan and the planning applications it determines.

### **3.0 Duty to Co-operate**

- 3.1 The Planning and Compulsory Purchase Act 2004,(as amended by the Localism Act 2011) place a legal duty on local planning authorities to cooperate with neighbouring authorities, county councils and other prescribed bodies when planning for sustainable development.
- 3.2 The additional prescribed bodies with which local planning authorities outside London are required to cooperate are set out in Regulation 4 of Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012. They include:
- Local Planning Authorities, either neighbouring or making up the Housing Market Area.
  - Environment Agency.
  - Historic England.
  - Natural England.
  - Civil Aviation Authority.
  - Homes and Communities Agency.
  - Clinical Commissioning Groups.
  - The National Health Services Commissioning Board.
  - Office of the Rail Regulator.
  - Highways England.
  - Highway Authorities.
  - Local Enterprise Partnerships.
  - Local Nature Partnerships.
- 3.3 The Duty to Co-operate forms part of the ‘Test of Legal Compliance’ against which an independent inspector will assess the documents during a Public Examination. It is considered essential that the Council can demonstrate effective collaborative working with neighbouring authorities, key stakeholders and other organisations during the preparation of both its Local Plan and the evidence base that supports it.
- 3.4 There is a history of joint working and cooperation between Ashfield District Council and neighbouring authorities in Nottinghamshire and Derbyshire, as well as other stakeholders some of which are included in the list of prescribed bodies. The preparation of Ashfield’s Local Plan encompasses an aligned approach to the Core Strategies in Greater Nottingham, with on-going and constructive engagement between constituent and neighbouring authorities and relevant organisations as the Plan progressed.
- 3.5 Ashfield has worked closely with Mansfield District Council and Newark and Sherwood District Council which, together with Ashfield, comprises the Nottingham Outer Housing Market Area. This includes identifying the housing requirement for the housing market area through the Strategic

Housing Market Assessment. The geographic location of Ashfield means that parts of the District are strongly influenced by the Greater Nottingham area. Ashfield has worked closely with the Greater Nottingham Local Authorities of Broxtowe, Erewash, Gedling, Nottingham City and Rushcliffe (comprising the Nottingham Core Housing Market Area). Ashfield has continued the development of the key policy areas of the Local Plan, including housing and employment provision, in alignment with the Greater Nottingham Councils throughout the development of the document up to the current stage.

- 3.6 The Council has also worked with Nottinghamshire County Council and other infrastructure providers to identify on-going needs for the District and the wider area. Ashfield is bound by two further Local Authorities; Bolsover and Amber Valley in Derbyshire. Discussions with these councils have also taken place to ensure any cross boundary issues are discussed and where appropriate, addressed.

## **4.0 Ashfield Local Plan Previous Consultations**

- 4.1 The Local Plan preparation process has involved a number of stages and at each stage the Council has actively sought input from consultees to help shape the policies and proposals of the plan. The Local Plan process builds on relevant information and comments received from previous Ashfield Local Development Framework (LDF) consultations and the Local Plan which was withdrawn from examination. These include the following
- The Ashfield Development Framework – The Core Strategy Issues and Options (June 2009)
  - The Ashfield Development Framework Core Strategy – Area Based Spatial Growth Options (October 2009)
  - The Ashfield Development Framework – The Core Strategy The Preferred Option (March 2010)
  - Ashfield Local Plan 2010 - 2023 Preferred Approach (September 2012)
  - Ashfield Local Plan Publication 2013.
- 4.2 Each of the above consultations was carried out in accordance with the guidance provided within the Council's adopted Statement of Community Involvement (2006 and 2010, and 2013).
- 4.3 A summary of the responses from the Local Plan Preferred Approach 2012 and Local Plan Publication 2013 are set out in Appendix 1.

## **5.0 Ashfield Local Plan Preferred Approach Consultation (2nd February 20th March 2016) – Form of Consultation**

### **Form of Consultation**

5.1 Consultation on the Local Plan Preferred Approach was held for a period of over six weeks between 2<sup>nd</sup> February and 20<sup>th</sup> March 2016. The consultation includes the following:

- **E mail and/or letters to**
  - All parties on the Council's Local Plan Database
  - Via Community Action Officers emails to parties on their database.
  - Ashfield District Councillors
  - Ashfield Nottinghamshire County Councillors
  - Mark Spencer MP
  - Gloria De Piero MP
  - Ashfield DC Management Team and various officers
  - Clerk to Council, Selston Parish Council
  - Clerk to the Council, Annesley & Felley Parish Council
  - Chairman of the Teveral, Stanton Hill and Skegby Neighbourhood Forum.
- **Email to Specific Consultee & Duty to Co-operate bodies<sup>1</sup> including:**
  - The Coal Authority
  - Environment Agency
  - Historic England
  - Natural England
  - Network Rail
  - Highways England
  - Amber Valley Borough Council
  - Broxtowe Borough Council
  - Erewash District Council
  - Gedling Borough Council
  - Newark and Sherwood District Council
  - Bolsover District Council
  - Mansfield District Council
  - Nottingham City Council
  - Rushcliffe Borough Council
  - Nottinghamshire County Council
  - Derbyshire County Council
  - Ault Hucknall Parish Council
  - Bestwood St Albans Parish Council
  - Blackwell Parish Council
  - Brinsley Parish Council
  - Greasley Parish Council
  - Ironville Parish Council

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<sup>1</sup> The Town & Country Planning (Local Planning)(England) Regulations 2012

- Linby Parish Council
- Newstead Parish Council
- Nuthall Parish Council
- Papplewick Parish Council
- Pleasley Parish Council
- Pinxton Parish Council
- Ravenshead Parish Council
- Somercotes Parish Council
- South Normanton Parish Council
- Tibshelf Parish Council
- Nottinghamshire Police and Crime Commissioner
- Derbyshire Police and Crime Commissioner
- Western Power Distribution
- Vodafone and O2
- EE
- Three
- Area Team - Derbyshire and Nottinghamshire, NHS England
- Mansfield and Ashfield Clinical Commissioning Group,
- Nottingham North & East Clinical Commissioning Group,
- NHS Property Services Ltd,
- Severn Trent Water Ltd.
- National Grid Plc
- Homes and Communities Agency
- Office of Rail Regulation (Guidance not interest unless specific aspect impact railways. Given HS2 is likely to run through Ashfield email sent) (02/02/2016)
- D2N2 Local Enterprise
- Lowland Derbyshire and Nottinghamshire LNP

Any emails that came back were analysed and where appropriate a letter or new email address was found.

- **Specific Consultation Events** - Attending by officers providing advice and explanations to questions on the Local Plan Preferred Approach and its evidence base.

Date	Location/Time
09/02/2016	John Godber Centre, Ogle Street, Hucknall. 3.00 to 6.30pm.
23/02/2016	Old Parish Hall, Selston. 4.15 to 7.15pm.
17/02/2016	All Saints Centre, Huthwaite. 3.00 to 7.00pm.
24/02/2016	Community Room, Brook Street Court, Brook Street, Sutton (Former Sutton Baths). 3.00 to 7.00pm.
01/03/2016	Healdswood Community Centre, Skegby. 3.00 to 7.00pm.
03/03/2016	Ashfield DC Council Chamber, Kirkby-in-Ashfield. 3.00 to 7.00pm.

- **Meetings with Groups**

<b>Date</b>	<b>Location/Time</b>
10/02/2016	Sutton Junction Residents Association.
17/02/2016	ACCESS, Annesley Woodhouse.
23/02/2016	Selston Parish Council & Neighbourhood Plan Steering Group.
02/03/2016	Teversal, Stanton Hill & Skegby Neighbourhood Forum.
02/03/2016	Youth Forum.
07/03/2016	Annesley & Felley Parish Council.
09/03/2016	Reach Out Residents, Hucknall.
15/03/2016	Kirkby Area Residents Association (KARA).
16/03/2016	Ashfield Citizen Panel.

- **Leaflets were delivered to the majority of primary schools in the District for leaflets to be taken home.**
- **Site Notices were put up adjacent to all proposed housing allocations in the Local Plan Preferred Approach unless the site already had planning permission.**
- **Full Displays and Local Plan Preferred Approach Documents and Sustainability Appraisal:**
  - Hucknall Housing/Cash Office
  - Sutton in Ashfield Library
  - Selston Library
  - Kirkby in Ashfield Library (1/2/16 JC & DB)
  - Kirkby in Ashfield Council Offices (1/2/16 NO)
- **Local Plan Preferred Approach Documents and Sustainability Appraisal & Poster**
  - Sutton Cash Office, Sutton in Ashfield
  - Selston Cash Office/Health Centre
  - Jacksdale Library
  - Annesley Woodhouse Library
  - Huthwaite Library
  - Skegby Library
  - Edgwood Road, Hucknall Library
  - Acacia Centre, Acacia Avenue, Annesley



- **Posters (Community Centres, Leisure Centres & Other)**
  - Ashfield District Council Community Centres
  - Lammas Leisure Centre
  - Hucknall Leisure Centre
  - Festival Hall Leisure Centre
  - Edgewood Leisure Centre
  - Huthwaite Leisure Centre
  - Selston Leisure Centre
  - Titchfield Park Visitors Centre, Hucknall
  - Kingsway Park Visitors Centre, Kirkby
  - Portland Park, Kirkby
  - Selston Golf Course
  - John Godber Centre, Hucknall
  - Under One Roof, Hucknall
  - St Johns Church Hall, Kirkby Woodhouse
  - Acacia Centre, Annesley Woodhouse (Gill Welsh passed to Manager, Peter Clarke on 28.1.16)
  - Age UK, Regent Street Mansfield
  - Ashfield Voluntary Action
  - Evergreens, Kirkby
  - Health and Wellbeing Centre, Kirkby x 3 (Gill Welsh passed to Sarah Taylor, Health and Social Care Officer on 27.1.16)
  - Mansfield CVS, Wood Street
  - Selston Parish Hall
  - Tin Hat, Selston
  - Underwood Community Centre
  - Kirkby Town Centre Notice Boards
  - Annesley & Felley Parish Council's noticeboards
  - Selston Parish Council's noticeboards
  - ACCESS, Annesley noticeboard.
- **Posters in Post Offices**
  - Kirkby Post Office
  - Selston Post Office
  - Poster left at Jacksdale Post Office
  - Underwood Post Office
  - Forest Road Post Office, Annesley
  - Nuncargate Road Post Office, Annesley
  - Hucknall Town Centre Post Office
- **Posters in Shops**
  - Asda, Sutton in Ashfield
  - Idlewells, Sutton in Ashfield
  - Morrison's, Kirkby-in-Ashfield
  - Tesco, Hucknall
  - Tesco, Huthwaite
  - Co-operative, Huthwaite
  - Co-operative Stanton Hill

- Co-operative, Skegby Co-operative, Annesley
- Co-operative, Selston
- **Newspapers articles/notices - Chad**
  - Front Page “Over 7,000 new homes for Ashfield” and pages 6 & 7 (30<sup>th</sup> December 2016)
  - Front Page “Residents Anger over new homes bid” and pages 4 and 5 Listed Sutton and Kirkby Housing allocations. (6<sup>th</sup> January 2016)
  - 500 new homes a year for Ashfield” pages 8 & 9 (13<sup>th</sup> January 2016)
  - Front page “Houses Clash Forces Rethink” and pages 4 & 5 (20<sup>th</sup> January 2016)
  - “Council announces dates and times for consultation over Local Plan” pages 6 & 7 (3<sup>rd</sup> February 2016)
  - Public Notice - “Consultation on the Preferred Approach Document” (published 3<sup>rd</sup> February 2016)
  - Page 18 & 19 “residents gear up to fight council’s rural housing plan” (17<sup>th</sup> February 2016)
- **Newspapers articles/notices - Hucknall Dispatch**
  - Article “Thousands of new homes on the way” front page and pages 2 and 3. (1<sup>st</sup> January 2016)
  - Article 15<sup>th</sup> January 2016 “480 homes year for Ashfield (two pages) “Fears of flooding raised over new housing schemes” (22<sup>nd</sup> January 2016)
  - “Council votes for public consultation on its preferred local plan” pages 4 & 5 (29<sup>th</sup> January 2016)
  - “Consultation details are announced” page 15 (6<sup>th</sup> February 2016)
  - Public Notice - “Consultation on the Preferred Approach Document” (published Friday 5<sup>th</sup> February 2016)
  - Page 4 & 5 “residents gear up to fight council’s rural housing plan” (19<sup>th</sup> February 2016)
- **Newspapers articles/notices - Ripley and Heanor News**
  - Public Notice published on Thursday 4<sup>th</sup> February 2016 “Consultation on the Preferred Approach Document”.
- **Newspapers articles/notices - Alfreton News**
  - Public Notice published on Tuesday 2<sup>nd</sup> February 2016 “Consultation on the Preferred Approach Document”.

## **6.0 Ashfield Local Plan Preferred Approach Consultation 2016 – Summary of responses received, Council’s response and proposed changes.**

6.1. The Council received 683 responses to the consultation, raising a number of different issues.

6.2. This Section provides:

- a. An overview of the key changes proposed. This is derived from the more detailed summary of responses.
- b. Summary responses to the Local Plan Preferred Approach consultation as follows:
  - Responses have been summaries in relation to the following main headings:
    - General Comments on the Plan.
    - Introduction.
    - Portrait of Ashfield, Strategic Objectives and Vision.
    - Strategic Policies.
    - Area Policies.
    - Development Management Policies – Adapting to Climate Change.
    - Development Management Policies – Protecting the Environment.
    - Development Management Policies – Providing Jobs.
    - Development Management Policies – Shopping.
    - Development Management Policies – Providing Homes.
    - Development Management Policies – Contributing towards Successful Development
    - Appendices.
    - Trajectory.
    - Policies Map.
    - Sustainability Appraisal
    - Strategic Housing Market Assessment.
    - Other Documents forming the Supporting Evidence.
  - Under each of the Main Heading there is a summary identifying whether the representation set out support for the policy/allocation, an objection to the policy/allocation or comments on the policy/allocation. These element may be subdivided in relation to specific aspects such as flooding issues, economic issues etc. Where this has not been specifically stated, officers have made a judgement on the nature of the response.

- Identifies proposed changes to the Local Plan arising from the consultation. This includes what are identified as 'Proposed Amendments'. These reflect matters raised within representations, as well as changes Officers have identified during or subsequent to the Consultation, through new evidence.
- Identifies the name and reference number of the parties responding to that aspect of the Plan.
- All reference to Policies or paragraphs within the document relate to the Local Plan Preferred Approach, January 2016.

## Overview of Responses & Changes

6.3. The Table below sets out, in relation to Policies, a short summary of responses and changes proposed arising from the the Local Plan Preferred Approach 2016 consultation. The responses to the proposed housing allocations are set out separately beneath the table.

Local Plan Preferred Approach		
Policy	Title	Summary Changes
<b>Introduction &amp; Portrait</b>		
Introduction & Portrait		<p>Emphasis on the introduction identifying the relationship between strategic planning and the development management process.</p> <p>The Portrait within the Preferred Approach Local Plan will not been taken forward into the Publication Local Plan (paragraphs 2.6 to 2.70). It duplicates the detailed information and data contained within the Sustainability Appraisal and the Annual Monitoring Report.</p>
<b>Vision, Strategic Objectives &amp; Key Diagram</b>		
Vision		Small number of changes proposed to the Vision to include historic assets and healthier environments.
Strategic Objective		Support for a significant number of the strategic objectives. Generally no changes. Small changes to SO17 to include blue infrastructure and watercourses and to SO18 Heritage Assets wording.
Key Diagram		No changes proposed to the key diagram.
<b>Spatial Strategy</b>		
Spatial Strategy		Change to reflect that the focus of the majority of development is within or adjacent to the 3 main settlements 'or on the fringe of Mansfield'.
<b>Strategic Policies</b>		
S1	Sustainable Development Principles	Some changes proposed to the wording of the Policy to reflect comments received.
S2	Overall Strategy for Growth	General support for the overall strategy for growth with the emphasis on urban areas. Objections largely related to housing with concerns raise by some parties over the five year housing supply and the SHMA. The impact of the housing requirements on infrastructure was also raised. Some objections on the grounds that the employment land need is deficient and should have

		<p>greater regard to market requirements and changing patterns of employment demand.</p> <p>Changes proposed include:</p> <ul style="list-style-type: none"> <li>Identifying the percentage housing distribution for the different areas.</li> <li>Clarifying the period the number of jobs relates to.</li> <li>Some changes to the wording of various aspects of the Policy.</li> <li>Additional wording to give a greater emphasis to health and wellbeing in the Policy.</li> <li>Changes to the supporting paragraphs to the Policy relating to: health/wellbeing, social mobility, Objectively Assessed Need, and five year land supply.</li> </ul>
S3	Settlement & Town Centre Hierarchies	<p>Title of the Policy amended to '<b>Settlement and Retail Hierarchy</b>'.</p> <p>No changes proposed to the wording of the Policy but changes are proposed to the format and title of the Policy to avoid misunderstanding of the Policy and its implications. Some amendments arising from comments are reflect in relation to Policy S2 on housing distribution.</p>
<b>Area Based Strategic Policies</b>		
HA1	Hucknall Town Centre.	Limited respondents. No changes proposed to the Policy.
HA2	Hucknall Economy and Jobs.	Limited respondents. No changes proposed to the Policy.
HA3	Housing Land Allocations for the Hucknall Area.	<p>Title of the Policy amended to '<b>Hucknall Housing Allocations</b>'.</p> <p>Some support for the housing requirements. The Environment Agency identify that the housing allocations fall within Flood Zone 1, in line with the NPPF flood risk sequential test to the location of new development. Objections in general to more houses in Hucknall, the impact on the environment, infrastructure and highways.</p> <p>A number of alternatives housing sites were put forward.</p> <p>A summary of the responses to proposed housing allocations are set out separately.</p> <p>Minor changes proposed to the wording of the Policy with some updating to the supporting paragraphs.</p>
HA4	Hucknall Green Infrastructure	Support for green infrastructure corridors. No changes proposed to the Policy.
SKA1	Sutton in Ashfield & Kirkby-in-Ashfield Town Centres.	No responses received to the Policy or supporting paragraphs. No changes proposed to the Policy.
SKA2	Economy and Jobs in Sutton and Kirkby.	<p>Some objections on the grounds that:</p> <ul style="list-style-type: none"> <li>The employment land need is deficient and should have greater regard to market requirements and changing patterns of employment demand;</li> <li>The Policy does not conform to the NPPF failing to pay sufficient regard or attach appropriate weight to Government policies and initiatives.</li> </ul> <p>These responses were linked to a number of alternative employment sites proposed at North Sherwood Way (the MARR) and in the Green Belt near Junction 27 of the M1 motorway.</p> <p>Proposal that Policy aspect, which promotes sustainable tourism should make reference to ecological assets in addition to those of landscape and heritage</p>

		value. Policy amended to reflect this aspect. No other changes to the Policy proposed.
SKA3	Sutton and Kirkby Housing Allocations.	<p>Some support for the housing requirements. The Environment Agency identify that the housing allocations fall within Flood Zone 1, in line with the NPPF flood risk sequential test to the location of new development. Objections in general to more houses in Sutton in Ashfield and Kirkby-in-Ashfield, the impact on the natural environment, infrastructure, highways, and historic environment. It was put forward that there should be more housing in Hucknall with its good transport access to Nottingham, rather than Sutton and Kirkby.</p> <p>A number of alternatives housing sites were put forward. A summary of the responses to housing allocations are set out separately.</p> <p>Some changes are proposed to paragraphs describing sites and updating the supporting paragraphs.</p>
SKA4	Gypsy and Travellers Site Allocation.	No responses received to the Policy or supporting paragraphs. No changes proposed to the Policy.
SKA5	Green Infrastructure in and around Sutton in Ashfield and Kirkby-in-Ashfield.	<p>Support for the green infrastructure corridor. Proposal of an additional corridor to the south of Annesley including Annesley plantation and connecting towards Bentinck Void and GI link 8. This aspect to be investigated by the Council's Localities Section.</p> <p>No changes proposed to the Policy.</p>
RA1	The Rurals Economy and Jobs	Limited respondents. No changes to Policy proposed.
RA2	Housing Land Allocations for the Rurals (Selston, Jacksdale, Bagthorpe and Underwood Area).	<p>Title of the Policy amended to '<b>The Rurals Housing Allocations</b>'.</p> <p>Some support for the housing requirements. The Environment Agency identify that the housing allocations fall within Flood Zone 1, in line with the NPPF flood risk sequential test to the location of new development. Objections in general to more houses, the impact on the natural environment, loss of greenfield sites rather than developing brownfield sites, infrastructure, highways, and historic environment. A number of alternatives housing sites were put forward.</p> <p>A summary of the responses to housing allocations are set out separately.</p> <p>Some changes are proposed to update the supporting paragraphs.</p>
RA3	Green Infrastructure in the Rurals.	Support for the green infrastructure corridors. No changes proposed to the Policy.
<b>Development Management Policies</b>		
<b>Adapting to Climate Change</b>		
CC1	Zero and Low Carbon Developments and Decentralised Renewable and Low Energy Generation.	<p>Changes made to reflect the Deregulation Act 2015 so that in relation to zero and low carbon requirements the Policy identifies the Council will seek to support these proposals rather than the proposals being a specific requirement. Supporting paragraphs have also been amended according. Some small changes are proposed to the wording in the rest of the Policy and the supporting paragraphs to reflect comments made.</p> <p>Supporting paragraphs amended to identify that the Carbon Energy Opportunities and Heat Mapping Study has mapped the wind potential within the District for small, medium and large scale wind turbines.</p>
CC2	Water Resource Management.	General support for the Policy but a specific objection has been made to Policy CC2 Bullet Point (8) which requires that residential development will implement

		<p>water efficiency measures to achieve a requirement of 110 litres per person per day and which the Council justifies in para 8.27. The water efficiency measures consideration will be considered in the Whole Plan Viability Study and whether they can be justified in relation to viability of development.</p> <p>Some changes to the Policy and the supporting paragraphs are proposed to reflect comments received, particularly by the Environment Agency. This includes addition elements to the Policy covering the management of construction sites should ensure that contaminated surface water is prevented from leaving a site untreated.</p>
CC3	Flood Risk and SUDS.	<p>General support for the Policy with comments raised in relation to surface water, specific developments and to impact of soft landscaping on flooding. Some changes to the Policy and the supporting paragraphs are proposed to reflect comments received.</p>
Protecting and Enhancing the Environment		
EV1	Green Belt.	<p>General support for the Policy. However objections were raised including boundary is drawn to tightly around urban areas, that farm and rural diversification should be a valid development within the Green Belt and raising that Green Belt should not include which it is unnecessary to keep permanently open and that Council's should be satisfied that Green Belt boundaries will not need to be altered at the end of the Plan period.</p> <p>There was support for some minor changes to the Green Belt boundaries around urban areas and settlements. Objections in relation to a number of sites not being removed from the Green Belt. No changes are proposed in relation to specific sites boundaries identified in the Preferred Approach.</p> <p>Changes to the wording of the Policy are proposed to ensure the Policy align with NPPF. A new supporting paragraph is proposed to clarify that applications have to be considered against other policies within the Local Plan including Policy EV11 on landscape.</p>
EV2	Countryside.	<p>Some support for the Policy. Objection to the Policy as it should not allow any development in the countryside around Teversal, Stanton Hill and Skegby. An objection was raised in relation to land to the East A60, Nottingham Road, Sutton in Ashfield which it is proposed should be integrated into Berry Hill Mansfield Sustainable Urban Extension. Comments made on wording in the Policy and paragraphs including an objections to the paragraph that suggests blanket support for physical infrastructure. Natural England raised that the Policy should protect soils. (Taken forward in Policy SD8).</p> <p>Some changes to the Policy wording proposed. New supporting paragraph to clarify that applications have to be considered against other policies within the Local Plan and particularly Policy EV11 on landscape.</p>
EV3	Reuse of Buildings in the Green Belt and Countryside.	<p>Limited respondents. No changes to Policy proposed.</p>
EV4	Green Infrastructure, Biodiversity and Geodiversity.	<p>Some support for the general emphasis of the Policy. Objections in relation to specific site and conflict between environmental designation and development proposals. A number of issue raised including specific wording of the Policy and paragraphs, between the designation of Local Wildlife Sites (LWS) and active beneficial management, future LWS protection, the value of the sites for nature and the benefit of people is diminished by development which abuts them, all LWS should be protected including a surrounding buffer green infrastructure network and access should be protected.</p> <p>Changes are proposed to the Policy and supporting paragraphs to reflect a number of the comments received and to reflect the Potential Special</p>



		Protection Area for the Sherwood Forest Region.
EV5	Protection of Green Spaces and Recreational Facilities.	General support for the policy but with comments raised on specific issues. These included that all local wildlife sites and nature reserves should be protected with a buffer provided around these areas, the excellent network of country parks, wildlife areas, footpath, trails and cycle ways should be protected, clarification on "locality" and "catchment". Some changes are proposed to the Policy and supporting paragraphs.
EV6	Trees, Woodlands and Hedgerows.	General support for the Policy with comment raising specific aspects including Planted Ancient Woodland (PAWS), ancient hedgerow, tree preservation orders, trees in conservation areas and there should be an emphasis on native species. Some changes to the Policy and Supporting text.
EV7	Provision and Protection of Allotments.	Limited respondents. Objection to the protection of a specific site with comments on various paragraphs. Changes to the wording of the Policy and paragraphs proposed.
EV8	Equestrian and other rural land based activities.	Limited respondents. Comment regarding the supporting paragraphs to the Policy. Minor alterations proposed to the paragraphs to reflect comments received.
EV9	Agricultural Land Quality	Limited respondents. Comments highlighting that best and most versatile agricultural land should be protected. No changes proposed.
EV10	The Historic Environment	Limited respondents. General Support for the Policies. However, a number of proposed amendments to the Policy and paragraphs were highlight by Historic England. Other parties raised that the Council should designate the 'Kirkby Hardwick Local Character Area' and for a new Conservation Area relating to part of the Hardwick Hall Park as well as Hardwick Farm and Norwood Lodge. Neither of these aspects would be designated or taken forward as part of the emerging local plan. The Policy and supporting paragraphs have been amended to reflect the matters raised by Historic England. It is not proposed to designate the Conservation Area or the Character Area.
EV11	Protection and Enhancement of Landscape Character.	Limited respondents. General support for including landscape policy. No changes to the Policy proposed.
<b>Providing Jobs</b>		
PJ1	Business and Economic Development.	Single respondent relation to Nursing Homes and the Green Belt. Respondent considers the PJ policies leave Plan users without a clear view as to what is intended and how applications will be judged. No changes proposed to the Policy.
PJ2	Business and Employment Development Sites.	Single respondent relation to Nursing Homes and the Green Belt. Respondent considers that the Policy is in conflict with Policy S3 and the PJ policies leave Plan users without a clear view as to what is intended and how applications will be judged. No changes proposed to the Policy.
PJ3	Rural Business Development.	Single respondent supporting the Policy but setting out a number of comments including the need for tourism development to include ecologically sensitive assets. Changes to the Policy proposed to reflect the comment.
PJ4	Agricultural, Forestry or Horticultural Development, Farm Diversification.	Limited respondents. General support for the policy with comments. Changes proposed to the supporting text on diffuse pollution and agriculture.
PJ5	Education, Skills and Training.	Limited respondents. The Education Authority emphasised the rising school populations and the need for planning contributions from development towards primary and secondary schools in Ashfield. No changes proposed to the Policy.
<b>Shopping</b>		
SH1	Retail, Leisure Commercial and Town Centre Uses.	Limited respondents. General support for the Policy. Issues raised over the Impact Test, particularly the thresholds. Emphasis from a number of comments on the town centre first. Changes to the Policy will need to be considered in relation to the updated Retail Study once it is completed. Wording to the



		Sequential Test proposed to be updated for clarification purposes. Changes proposed to the supporting paragraphs to emphasis early discussions with the Council on the Impact Test.
SH2	Local Shopping Centres, Shopping Centres and Single Shops.	No responses received to the Policy or supporting paragraphs. No changes proposed to the Policy.
SH3	Food, Drink and the Evening Economy	<p>A single respondent raised issues regarding public health and more specifically in relation to obesity. The comments raise the planning approach to hot food takeaways in relation to concentration and clustering/vitality and viability, hours of operation and healthy eating options.</p> <p>Changes are proposed to the Policy to identify that Hot food Takeaways within 400m of a schools, college or youth facilities will not be supported and to update the information in the supporting paragraphs to the Policy.</p>
SH4	Shopfronts	Limited respondents. Comments were raised regarding specific aspects of the Policy wording and to specific paragraphs. Changes are proposed to the Policy wording and to supporting paragraphs to reflect aspects of the issues raised.
<b>Providing Homes</b>		
HG1	Provision for Gypsies, Travellers and Travelling Showpeople.	No responses received to the Policy or supporting paragraphs. No changes proposed to the Policy.
HG2	Affordable Housing (Including Starter Homes).	A number of objections and comments were received. These varied from the requirement for affordable housing being insufficient to questions raised in relation to viability of development in relation to affordable housing requirements. The Affordable Housing policy will need to be reviewed in the context of the introduction of Starter Homes and viability. Changes to the Policy will be informed by the Whole Plan Viability Study currently being undertaken.
HG3	Public Open Space in New Residential Development.	Limited respondents. Queries regarding the evidence base and the use of local standards. Some changes to the Policy and paragraphs including changes to the Policy to reference the Biodiversity Opportunity Mapping Technical Paper and to the paragraph with the emphasis on a more concentrated approach to outdoor sports facilities.
HG4	Housing Mix.	<p>Some supports for self-build / custom build. Objections on the basis the Policy is overly prescriptive linked to the Nationally Described Space Standard and that developments of 10 or more dwellings will be expected to provide 10% of dwellings. Concerns expressed over an approach for the inclusion of self build and custom build on housing sites. Objection also raised in relation to care homes and various Policy conflicts. Comments raised over the need for more bungalows with an increasingly elderly population.</p> <p>Minor changes proposed to update the supporting paragraphs.</p>
HG5	Housing Density.	Limited respondents. Some support for the Policy but with an objection that the Policy approach is overly prescriptive. No changes proposed to the Policy.
HG6	Conversions to Houses in Multiple Occupation, Flats and Bedsits.	No responses received to the Policy or supporting paragraphs. No changes proposed to the Policy.
<b>Contributing to Successful Development</b>		
SD1	Good Design Considerations for	Some general support for the Policy. Objections raise on the basis the Policy was unnecessary prescription or detail.

	Development.	Changes are proposed to the Public Realm & Open Space aspect of the Policy and the supporting paragraphs for clarification, which sets out what to apply and consider when creating public realm strategies.
SD2	Amenity.	Limited respondents. Proposals that policy should include reference to overshadowing and frost pockets within potential developments created by the location and orientation of established woods adjoining such developments. Also suggested a requirement for buffer zones between developments and areas of high biological and technological habitat. No changes proposed to the Policy.
SD3	Recycling and Refuse Provision in New Development.	Limited respondents. General support for the Policy. Updates proposed to the supporting paragraphs to reflect the latest information.
SD4	Infrastructure Provision and Developer Contributions.	<p>General support for the Policy. Comments raised in relation to lack of infrastructure provision for hospital, schools, doctors, dentists, care services and recreational facilities. To viability aspects (NPPF para 173) although comments also reflected that the Council should obtain greater sums from S106 for infrastructure. The Education Authority and CCG identified that there would be infrastructure requirements in relation to residential development. Concerns were raised regarding transport specifically the A611 through Annesley Woodhouse.</p> <p>Proposed changes include:</p> <ul style="list-style-type: none"> <li>• Delete reference in the Policy to Policies EV5 and EV6 as both are protection policies not applicable to SD4.</li> <li>• Emphasis the role of viability with reference to Policy SD5.</li> </ul>
SD5	Assessing Viability.	<p>No responses received to the Policy or supporting paragraphs. However, changes are proposed to the Policy and supporting paragraphs for clarification of the Policy.</p> <p>In addition, changes have been made to set out additional text to the Policy reflect the approach to a lack of demand for a site or premises for various uses. This reflects that the Council will require applications to demonstrate they have meet the Demand Test and/or the Viability Test. Paragraphs in the Local Plan Preferred Approach have also been moved (10.13 to 10.16) with minor amendments from Policy PJ3 to Policy SD5.</p>
SD6	Telecommunications.	No responses received to the Policy or supporting paragraphs. No changes proposed to the Policy.
SD7	Contaminated Land and Unstable Land	Single response received. The Environment Agency raised that large parts of Ashfield is on principal aquifer where groundwater is sensitive to pollution. Recommend that the plan demonstrate a commitment to ensuring that surface water which may be contaminated pre and post construction is prevented from leaving site untreated, either by overland flow or via highway drainage and public surface water. Changes to the supporting paragraphs proposed to emphasis this aspect.
SD8	Environmental Protection.	Some support for the Policy. Concerns raised regarding air quality A617 Annesley Woodhouse Badger Box junction. Suggested policy should include impact of smells from farms in relation to the location of residential dwellings. Changes to the Policy are proposed to reflect the comments on soils raised by Natural England in relation to Policy EV2. Changes to the Policy and supporting paragraphs provide protection for soils on development sites.
SD9	Traffic Management and Highway Safety.	Some support for the Policy. Specific objections in relation to the impact on traffic of Sutton Junction level crossing. Comments made regarding congestion, traffic network particularly in relation to Junction 28 of the M1 A617 and the A38. Proposals for new arterial routes put forward. No changes to the Policy proposed.
SD10	Parking.	Single respondent who supported the Policy. No changes proposed to the

		Policy.
SD11	Advertisements.	Single respondent who supported the Policy and suggested changes to the Policy wording. Policy wording and supporting paragraphs amended to reflect the response.
SD12	Provision and Protection of Health and Community Facilities.	General support for the Policy with specific comments raised including that the CCGs will be seeking S106 planning contributions for health services provision, proposal to include CAMRA's Model Policy and comments regarding health impact assessments. Changes proposed to the Policy and supporting paragraphs to reflect the comments received.
SD13	Designing out Crime and Fear of Crime.	Single respondent who supported the Policy and raised the need for a balance to be struck whereby the appearance, function and enjoyment of living in an area isn't unduly constrained by security concerns. No changes to the Policy proposed.
	Other Policies	Comments were received proposing that Ashfield Local Plan Review 2002, Policy RC2 Open Areas should be a policy in the emerging plan. There is also a proposal for a Policy on 'green' cemeteries. No changes are proposed to the Plan to take these proposals forward.
		N.B Limited – refers to five or fewer respondents.

### ***Proposed Housing Allocations***

6.4. The Preferred Approach Local Plan proposed the allocation of 76 sites to help meet the District's future housing need. Of these sites, the Council received 10 or more representations on seven of these sites (representations ranged from 16 to 199), highlighting their support or voicing concerns for the site proposed. Whilst respondents focused on specific sites, when assessed as a whole, a large proportion of the comments mirrored one another, illustrating shared concerns.

6.5. The key shared concerns raised across the seven sites related to:

#### ***Infrastructure - traffic and congestion; and school and healthcare provision***

6.6. A number of responses raised concerns about the current levels of congestion and traffic across the District and at specific locations, feeling that further development would increase problems and levels of congestion. Concerns were also raised with regard the location of vehicular access points and how these may impact on existing roads.

6.7. Queries and concerns were also raised about education and healthcare provision across the District. A number of responses highlighted that schools are currently at capacity, with their children having to travel to access schools. Equally, examples were given of having to wait excessive time to see a GP.

#### ***Loss of greenfield sites and use of brownfield sites***

6.8. A number of respondents questioned why the Council is proposing to develop greenfield sites, highlighting that brownfield sites should be developed first. Some respondents felt there were sufficient brownfield sites to meet future development needs.

*Flooding*

- 6.9. Concerns about flooding on some of the proposed housing allocations were raised, with respondents questioning how sites with existing surface water flooding could be development. Queries were also raised about how development on these sites would result in flooding of existing properties adjacent to the site.

*Impact on views and property values*

- 6.10. Respondents raised concerns about the impact new development would have on their existing views and the potential impact on property values.

***Specific Proposed Sites***

- 6.11. Of the 76 housing sites proposed, a large proportion of the site focused representations related to seven sites, all of which received 10 or more representations:

*2 sites at Sutton East (SKA3ah and SKA3e) (62 responses – 2 support / 54 object / 6 commented)*

- 6.12. The primary concerns of respondents relate to flooding. Concerns were also raised about the presence of an historic landfill site, air pollution and congestion. No changes to the site proposed.

*Site at Beck Lane (SKA3h) (199 responses – 3 support / 193 object / 3 commented)*

- 6.13. The primary concern of residents relate to impact on the surrounding highway network. Concerns were also raised about access being taken via residential streets, the impact on a listed building, proximity of a local wildlife site and air pollution. No changes to the site proposed.

*Ashlands Road (170 responses – 2 support / 167 object / 1 commented)*

- 6.14. A number of the responses received related to the detail of the planning application for the site, which are not directly related to the principle of development set out in the local plan. Beyond these responses, concerns related to highways, loss of greenspace and flooding. No changes to the site proposed.

*Brand Lane (20 responses – 18 object / 2 commented)*

- 6.15. Primary concerned related to impact on views. Queries were also raised about on street parking on Brand Lane and the presence of medieval remains. No changes to the site proposed.

*Mowlands (92 responses – 12 support / 78 object / 2 commented)*

- 6.16. In addition to the common concerns (highways, infrastructure and greenfield site), the primary concerns related to the impact on Kirkby Conservation Area, the Dumbles Ancient Woodland, Bore Hill and protected green space adjacent to A38. To reflect elements of these concerns, revisions to the site boundary have been applied.

Broomhill (16 responses – 2 support / 10 object / 4 commented)

- 6.17. In addition to the common concerns (highways, infrastructure and greenfield site), representations related to how the site was to be accessed and impact on wildlife. No changes to the site proposed.

**Evidence Base**

- 6.18. A number of responses were set out in relation to various documents forming the evidence base. This included the following:

- Trajectory
- Glossary
- Policies Maps
- Sustainability Appraisal
- Strategic Housing Market Assessment
- Other Documents forming the Supporting Evidence including:
  - Green Belt Boundary Review Technical Paper 2015;
  - Green Infrastructure & Biodiversity Technical Paper;
  - Habitats Regulations Assessment (HRA);
  - Health Impact Assessment;
  - Housing Site Selection Technical Paper;
  - Infrastructure Delivery Plan 2013;
  - Strategic Housing Land Availability Assessment;
  - Strategic Green Belt Review December 2015;
  - Transport Study.

A summary of the responses to these documents together with any changes proposed is set out towards the end of the consultation Statement.

## General comments

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Support for the plan which is robust, objective and reflects an up-to-date evidence base.	Support acknowledged
Support for the move from regional strategies towards the localism agenda.	Support acknowledged
Mansfield District Council welcomes Ashfield District Council's positive approach to planning for their area and meeting their own requirements for employment and residential development.	Support acknowledged
Chapter 11 – Shopping; Chapter 12 -- Providing Homes ACCESS are comfortable with the proposals provided. Most of our concerns or support has been contained within earlier paragraphs. However, we asked the Council to pay particular concerns on our comments regarding bungalows.	Comments acknowledged.
<b>Object</b>	
Concerns regarding the Plan in relation to the number of house (too high), the amount of greenfield sites proposed and the impact on the Green Belt. Considered that there is too much reliance on the Strategic Housing Market Assessment rather than the views of local people. Raised issue over the design quality of new housing and the lack of infrastructure provision for hospital, schools, doctors, dentists, care services and recreational facilities.	<p>National Planning Policy identifies that all councils are required to prepare a Strategic Housing Market Assessment to assess their full housing needs. (NPPF para 159). Consequently, the Council his required to identify the need for new housing and to meet that need by allocating sites for the housing identified. The SHMA is a key evidence source in this context.</p> <p>The Council is working with the infrastructure providers and</p>

	other sections within the Council to identify the infrastructure needs arising from the development in the local plan and how and where developments needs to contribute towards meeting these requirements.
<p>Criticism of the 6 weeks consultation as being insufficient when the consultation document is not already in the public domain.</p> <p>It is clear to me hundreds of Skegby residents do not feel currently represented as shown by the number of returned comments letters signed and returned</p> <p>The current perception of the local community is that ADC is manipulating the weighting, particularly on the Beck Lane proposed site, to suit the purpose &amp; does not appear to be able or wish to engage fully with the local communities. The "Preferred Forward Plan" seems cover this up with out of date or current none existent surveys.</p> <p>The public are expected to comment blind at present on a plan which is not complete. Such a caviller approach has resulted what it is widely believed to be a done deal with developers behind closed doors. All this appears to be at the expense of the community, whilst not showing provision in the "Plan" for the necessary associated infrastructure (roads, traffic, schools, medical etc.) to sustain the level of housing development, proposed adjacent to the current community on a countryside site totally unsuitable. This is in contravention of current national &amp; local policy.</p>	<p>The consultation period was in excess of the requirements of of the Town and Country Planning (Local Planning) (England) Regulation 2012 and reflect a consistent approach adopted by other councils to consultations of this nature.</p> <p>The nature of any local plan meanas that there will be different viewpoints on its proposals and allocations particularly where the Council has to allocate sites to meet the objectively assessed housing needs and the employment land requirements for the District. The consultation provides the opportunity for representation to be made by all parties and for those representation to be taken into account before a decision on a final approach to the Locla Plan is made.</p> <p>The Local Plans Expert Group "Report to the Communities Secretary and to the Minister of Housing and Planning" March 2016, identified that many authorities add additional stages of consultation. This includes "a preferred Local Plan stage which is introduced so that communities can comment on a draft local plan and have their comments taken into account before a local plan is published under Regulation 19 (following which the Regulations require further consultation – but no changes – and then submission to the Secretary of State for Examination)." The approach taken by the Council in undertake a Preferred Approach consultation facilitates local people commenting on the Plan and enables the Council to take into account their</p>



	<p>representations.</p> <p>The Local Plan is base on evidence but this is an on-going process to update existing information and studies up to the stage where the Council determines the Local Plan that should be submitted to the Secretary of State for an Examination in Public.</p> <p>There will be developers with interests in the sites put forward under the Strategic Housing Land Availability Assessment (SHLAA) as under national planning practice guidance councils are required to be “proactive in identifying as wide a range as possible of sites and broad locations for development (including those existing sites that could be improved, intensified or changed).” This will include sites put forward by developers. However, all sites submitted to the Council, as part of the ‘Call for Sites’ process, have been assessed using a consistent approach. The Site Selection Technical Paper and Housing Spatial Options paper clarify the approach taken to site selection and the overall strategic approach for the direction for growth.</p> <p>The Council has, and will continue to work with service providers to identify the infrastructure requirements associated with the proposed site allocations. The Infrastructure Delivery Plan has been updated and supports the Local Plan Publication document.</p>
<b>Comment</b>	
Historic England welcomes that many of its comments on the Local Plan Preferred Approach 2012 have been taken on	Support acknowledged and comments noted.



<p>board. They identified that there are difficulties in trying to make the policies within the heritage section of the plan all encompassing and inclusive to all types of heritage asset. As a result, there are some areas of slight confusion, and they consider that the topics are too broad in places.</p> <p>Supported that Local Heritage Assets are now included within the Local Plan and this makes the Plan evidence base much more robust. Greater recognition of the different values between designated heritage assets and local heritage assets in the policies would make this more transparent, taking into account the different relative importance and weighting within the NPPF.</p>	
<p>All references in the Local Plan to 'English Heritage' should be altered to Historic England.</p>	<p>All references to English Heritage will be amended to Historic England.</p>
<p>National Grid has no comments to make in response to this consultation.</p>	<p>Comment noted.</p>
<p>How will Ashfield District Council take into account the announcement made in the Budget speech on Wednesday 16th March? This will affect several current proposals for housing land, given the concerns by residents across the District.</p>	<p>In relation to the local planning the budget identified a number of proposals which could impact on the Plan including:</p> <ul style="list-style-type: none"> <li>• Garden villages and towns – The Council Local Plan does not bring forward garden villages.</li> <li>• Moving to a more zonal planning system, speeding up the process for assessing housing need and Local Plans – The Council is taking stock of these proposals, but they are merely proposals at this stage and carry no weight. As such, the Council is continuing to progress its local plan to ensure the District meets the March 2017 deadline set by the</li> </ul>

	<p>Government.</p> <ul style="list-style-type: none"> <li>• Transparency of the land market – There are benefits in increasing transparency in the property market, given the emphasis placed on viability by national planning policy.</li> <li>• Stations regeneration (the Communities Agency will work in partnership with Network Rail and Local Authorities to bring forward land around stations for housing, commercial development and regeneration) - The Local Plan identifies a housing allocation on land close to Sutton Parkway Station.</li> <li>• Starter Homes (This prospectus invites Local Authorities to access the £1.2 billion of funding to remediate brownfield land to deliver Starter Homes) - Given the complexities of regenerating brownfield sites, which the District has experience of with its former colliery sites, these funds are welcome. The Council has allocated a number of brownfield sites within the draft Local Plan and welcomes a funding system that may help them come forward.</li> </ul>
<p>The Local Plan provides land for development up to 2033, however it seems clear that demands for additional growth will continue beyond that date. It is difficult to predict the future and the further out we go the less certainty there would be, however it would be useful to understand where development might occur beyond 2033. Taking key decisions with a view to only 15-20 year forward vision risks making the wrong decision or committing to future direction of travel by stealth. For example, does the agreement to development of Mowlands at SKA3al mean that the next plan will be for Mowlands South or another chunk of housing development to the west of Mowlands and eventually out to the ADC boundary? And does the agreement of SKA3e, SKA3ah and</p>	<p>The National Planning Policy Framework identifies that a local plan should be drawn up over an appropriate timescale, preferably 15 years. (NPPF para 157). This timescale is reflected in the Local Plan. However, national policy guidance identifies that it is expected that a local plan will be review at least every five years. Consequently, it is anticipated that the Local Plan will need to be update to take account of the latest evidence at the time. This will include evidence relating to future housing need and if any future need is identified what sites are appropriate to meet that need.</p>

<p>SKA3ao mean that ultimately the plan might be to infill all the land out to Derby Road and Coxmoor Road?</p>	
<p>The Duty to Co-operate (S110 of the Localism Act 2011 which introduced S33A into the 2004 Act) requires the Council to co-operate with other prescribed bodies to maximise the effectiveness of plan making by constructive, active and on-going engagement.</p> <p>Ashfield is part of the Outer Nottingham HMA together with Mansfield and Newark &amp; Sherwood District Councils. It is also noted that Ashfield is bordered by five other neighbouring authorities namely Nottingham City, Gedling, Broxtowe, Bolsover and Amber Valley District Councils. Moreover the preferred option documentation refers to the Hucknall sub area of Ashfield having strong links with Nottingham. It is suggested that the Council provides further clarification about this relationship and its implications in the next stages of preparing the Local Plan.</p> <p>It is also recommended that when the Ashfield Local Plan is submitted for examination the Council provides a Statement of Compliance with the Duty to Co-operate including a detailed commentary on the outcomes of the process.</p>	<p>The Council has met the requirements of the Duty to Cooperate and this will be set out in detail with the supporting evidence for the Local Plan Publication Document.</p> <p>The emphasis on working together is set out in the Local Plan Preferred Approach in paragraph 1.24 to 1.35. It is intended that the Council will set out a Duty to Cooperate Statement as part of the Local Plan submission documents.</p>
<p>Nottinghamshire County Council's response included Rapid Health Impact Matrix which identified that the Plan had a positive impact in relation to the following aspects:</p> <ul style="list-style-type: none"> <li>• Housing quality and design;</li> <li>• Access to healthcare services and other social</li> </ul>	<p>Comments acknowledged.</p>

<p>infrastructure;</p> <ul style="list-style-type: none"> <li>• Access to open space and nature;</li> <li>• Air quality, noise and neighbourhood amenity;</li> <li>• Accessibility and active transport;</li> <li>• Crime reduction and community safety;</li> <li>• Access to healthy food</li> <li>• Access to work and training;</li> <li>• Social cohesion and lifetime neighbourhoods</li> <li>• Minimising the use of resources;</li> <li>• Climate change.</li> </ul> <p>A number of recommended amendments or enhancements have been incorporated under the relevant Policies. Or sections.</p>	
<b>Responses received relating to Policy supporting text</b>	
Bolsover District Council - Ashfield District Council is planning to meet its own Housing and Employment needs and has not approached this Council about not being able to meet its own needs within its own area.	Comment acknowledged.

### Proposed Amendments

Issue/Policy	Amendment
No changes proposed from the consultation responses.	-

**Ashfield District Council - Statement of Consultation**

<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Plan</b>	<b>Support the Plan</b>	<b>Comment on the Plan</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Plan</b>	<b>Support the Plan</b>	<b>Comment on the Plan</b>
Mansfield District Council	1872		√		Ward	5807		√	
Johnson	1886		√		Bolger	5817		√	
Lathall	1917		√		Lathall	5819		√	√
Collier	1918		√		Nicoll	6063	√		
Bolsover District Council	1982			√	Home Builders Federation	6151			√
Lathall	2631		√		National Grid	6184			
Shaw	2707			√	Manders	6640		√	
Whetton	2753			√	Lewis	6729		√	
Nottinghamshire County Council	2803			√	Madden	6805		√	
Cooper	2811		√						
Historic England	2836			√	Elkington	6877		√	
ACCESS - Annesley Community Committed to Ensuring Sustainable Settlements	5359			√	Eyre	6897		√	

## Introduction & Portrait of Ashfield

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the text	
The Plan should define the relationship between strategic planning and the development management process.	The Council proposes to amend the Plan accordingly.
<p>The Plan acknowledges the importance of the variety of green spaces across the district that contribute to its character, biodiversity value and the quality of life for the residents. In addition the Plan should recognise the role of the natural environment in providing essential services, ecosystem services that are critical to our economic and social wellbeing.</p> <p>We recommend reference is made to the National Character Areas (NCAs) relevant to the district; 30: Southern Magnesian Limestone and 49: Sherwood. Each NCA is defined by a unique combination of landscape, biodiversity, geodiversity and economic and cultural activity. The NCA profiles provide an integrated, locally specific evidence base that can be used for making decisions about the natural environment. The NCAs highlight the significant opportunities in each area and therefore provide a useful planning tool that can help guide the design of projects so that they are appropriate to the locality and deliver the maximum benefits for the natural environment. In particular the NCA Strategic Environmental Objectives could be useful to inform the GI and Biodiversity Strategy. The NCA profiles can be accessed at <a href="https://www.gov.uk/government/publications/national-">https://www.gov.uk/government/publications/national-</a></p>	<p>Comments acknowledged.</p> <p>While noting the comments, the Portrait within the Preferred Approach Local Plan has not been taken forward into the Publication Local Plan (paragraphs 2.6 to 2.70). It is considered that it duplicated detailed information and data related to the District is contained within the Sustainability Appraisal Scoping Report and the Annual Monitoring Report.</p>

<p>character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-east-midlands</p> <p>2.68 The Plan highlights the importance of its villages which form part of the Hidden Valley, which is described as the historical gateway to Robin Hood's Sherwood Forest. Sherwood Forest provides one our most distinctive landscapes comprising internationally and nationally important habitats that support an abundance of wildlife, deliver important natural processes and offer extensive opportunities for recreation, leisure and tourism. Natural England aim to work with others to protect and enhance the special character of the area by restoring an extensive area of semi natural heathland and woodland habitat that is increased in area and more resilient to climate change. Sustainable development and tourism will be encouraged that protects the valuable natural resources and creates vibrant communities with a high quality of life. We consider the Ashfield Local Plan has an important role to play in helping to achieve this goal.</p>	
<p>Para 1.5 In relation to the Selston, Jacksdale and Underwood area the term 'Rurals' is inappropriate. The Plan seeks to provide for the needs of the settlements but it infers attitudes appropriate to the deep countryside. Suggest that 'Rurals' should be changed to 'settlement areas' as is set out in the Vision.</p> <p>Para 1.21 The Plan is unclear about what policies and groups of policies would apply to an expansion of Wren Hall, Selston in relation to a) the Home's most intensive care facilities (for people who cannot look after themselves; b) the planned</p>	<p>The villages of Selston, Jacksdale, Bagthorpe and Underwood are small settlements surrounded by open countryside. It is considered appropriate to use the term 'Rurals' to describe this area within the Plan. No changes proposed.</p> <p>The Council is satisfied that the Local Plan contains adequate policies to enable the determination of applications for developments of the type suggested. No changes proposed.</p> <p>There are no exceptional circumstances for a revision to the Green Belt in this respect. The suggested amendment would</p>

construction of much needed accommodation for people who need assistance to maintain their independence; and c) areas in between.

A sound Plan needs to have consistency and links between these areas of health, aging and accommodation. The landowner of Wren Hall requests the inclusion of one allocation at Wren Hall and land adjacent.

Para 2.6 The Rural area has a particularly high proportion of its population over 65'. The proprietors and staff at Wren Hall would agree that demand is high. There is a long waiting list that can be submitted if necessary. Consequently an allocation is necessary. This section deals with employment. Wren Hall should be recognised as a major employer in this area.

Para 2.63 – 2.70 The incoherence in the plan in the term Rural comes out in this section.

Wren Hall should be mentioned in paragraph 2.64 which talks about the range of facilities and services in Selston. It is a major employer with a workforce of 117 staff.

Paragraph 2.66 suggests that there are a limited number of employment units in the villages. This fails to acknowledge Wren Hall Nursing Home as a major employer. The home would like to expand to create a further 25 to 30 jobs. The proprietor feels strongly that this should be reworded to reflect this.

not accord with national policy and guidance.

The Council disagrees with the representations in that:

- It is not necessary for a Local Plan to single out individual employers within specific areas.
- There are a limited number of employment units in the Rurals.
- The Council considers that the Green Belt has assisted in the Rural Villages retaining their character. This is a reflection of the Green Belt purposes and their application.
- The Councils has reviewed the boundaries and considers that they are logically drawn.
- The Green Belt boundary was drawn up under the Green Belt Local Plan 1989. The NPPF identifies that Green Belt boundaries should only be altered in exceptional circumstances and under these circumstances the approach of the Council is considered to be in conformity with the provisions of the NPPF.



<p>Paragraph 2.67 is objected to. There is no evidence that Selston, Bagthorpe, Jacksdale and Underwood have retained their village-like character due to the existence of the Green Belt boundary. It is not one of the purposes of the Green Belt unless it is read in its widest context.</p> <p>The boundaries are drawn illogically. Are you saying that there are a limited number of suitable brownfield sites because of the existence of an over tight Green Belt boundary which has eroded the village-type character?</p> <p>Suggest revised paragraph 2.67 to read as follows:          'The area is a long way from Nottingham and development in and at the edges of the settlements would have no material impact on the expansion of Nottingham or its joining up with any other settlements. None the less, the settlements have a tight Green Belt drawn not to identifiable features in many cases, often running through property boundaries and needing close interpretation which has led to a number of difficult to judge cases. There has been additional pressure to expand or intensify inside and up to the Green Belt boundary. Consequently, there are now a limited number of suitable brownfield sites for new residential development in the villages. A number of proposals are therefore made for revising the Green Belt boundary in the area to provide for the reasonable development needs of the villages and above all to ensure there is provision for the accommodation of the identified aging population in this land use zone.'</p>	
<p>Paragraph 1.14 - Page 4 – The following section should be</p>	<p>The paragraph identifies the broad areas of the evidence base</p>

<p>reworded as follows ‘ <i>Key evidence base studies undertaken include the following - ‘Landscape Character Assessments’</i>, this should be replaced by ‘<i>key evidence base studies undertaken include the following - ‘The Greater Nottingham Landscape Character Assessment’</i></p>	<p>rather than specific studies. No changes proposed.</p>
<p>We are disappointed that many of the documents upon which decisions and comments should be based on are still being completed as indicated in Para 1.14, &amp; Para 1.16. ACCESS ask that the next consultation period be not commenced until these documents are completed and available for the public.</p>	<p>Studies have been undertaken to form the basis of the Local Plan. However, the Preferred Approach Local Plan identified a number of policies and site allocations whereby it is considered that a number of Studies need to be updated to reflect the Local Plan and its proposals. To wait until all Studies have been completed means that there would have been significant time delays in getting the plan to adoption.</p>
<p>Para 1.19 -- habitats regulations assessment - It would be valuable if this paragraph included a piece concerning the potential Special Protection Area (pSPA) for Nightjar and Woodlark within the Sherwood Forest area. Breeding Nightjar are found in the Forestry Commission woodlands within this district, during surveying it was established that Nightjar breeding in Park Forest Annesley were commuting to Salmon Road and the adjoining woodlands to forage.</p> <p>NWT supports the view of the Mansfield &amp; Ashfield local group chair, that a green corridor should be created connecting existing and planned routes around Annesley Woodhouse.</p> <p>Para 1.21: - health impact assessment - "<i>improved access to open spaces and green infrastructure links will encourage people to use the outdoor areas of their home and work</i>" NWT comment: – NWT supports the plan for ‘sustainable transport links’ and the associated health benefits of</p>	<p>The Portrait within the Preferred Approach Local Plan has not been taken forward into the Publication Local Plan (paragraphs 2.6 to 2.70). It is considered that it duplicated detailed information and data related to the District is contained within the Sustainability Appraisal Scoping Report and the Annual Monitoring Report. However, the Plan will be amended to reflect to identify the potential Special Protection Area (pSPA) for Nightjar and Woodlark within the Sherwood Forest area</p> <p>Comments are noted and have been raised with the Council's Locality Officers to investigate.</p> <p>The Council is undertaking Biodiversity Opportunity Mapping project and the intention is for this to be taken into account in relation to GI corridors.</p>

<p>encouraging walking, cycling etc. the value of another strand to the 'multi-functional' use of the green infrastructure corridors which connect wildlife sites but NWT feels that to achieve multi-functional corridors the corridors must be well designed and of sufficient width to allow wildlife to move freely through the site without human activity causing an overall negative impact on the original purpose of the corridor.</p> <p>Para 2.39 and 2.40 clarification of these paragraph, Sites of Importance for Nature Conservation (SINC) are now renamed in Nottinghamshire as Local Wildlife Sites (LWS), Local Nature Reserves (LNR) are a separate designation for areas of importance for both local people and wildlife the designation for these sites is made by the council and agreed by Natural England, councils are obliged to designate one hectare of LNR per thousand residents, many of Ashfield District Council's LNR's are also designated as LWS but not all.</p> <p>Para 2.61:- This paragraph requires stronger wording to support the importance of Ashfield districts environment and wildlife, suggested wording, "the natural environment should be protected and enhanced, where possible the area of sites should be increased to create buffers, to increase the sites robustness.</p>	<p>Comments acknowledged. Changes are proposed to ensure the Local Plan identifies Local Wildlife Sites rather than SINC sites.</p> <p>While noting the comments, the Portrait within the Preferred Approach Local Plan has not been taken forward into the Publication Local Plan (paragraphs 2.6 to 2.70). It is considered that it duplicated detailed information and data related to the District is contained within the Sustainability Appraisal Scoping Report and the Annual Monitoring Report.</p>
<p>Page 6: 1.21 &amp; 1.22 this states that a Health Impact Assessment will be prepared for the Publication of the Local Plan. Evidence suggests that to have material impact a HIA should be undertaken as early as possible in the plan making or planning application process. It therefore could be argued</p>	<p>Comments noted.</p>

<p>that this should have been undertaken as part of the Equality Impact Assessment.</p> <p>Page 14: Health, Education and Crime. The Health Summary provided is out of date and needs to be replaced with the 2015 summary.</p>	<p>While noting the comments, the Portrait within the Preferred Approach Local Plan has not been taken forward into the Publication Local Plan (paragraphs 2.6 to 2.70). It is considered that it duplicated detailed information and data related to the District is contained within the Sustainability Appraisal Scoping Report and the Annual Monitoring Report.</p>
<p>Para 1.31 &amp; 1.33- can an explanation be given to what is meant by a “greener” Nottinghamshire &amp; a “greener” Ashfield.</p>	<p>What is meant by ‘greener’ is set out in the relevant sustainable community strategies.</p>
<p>Para 2.10 -- we share ADC's concern about the educational attainment within Ashfield and support all measures which may improve this. Low educational attainment will only lead to low paid employment which in turn restricts the ability of people to enter the housing market.</p>	<p>Comments acknowledged.</p>
<p>Para 2.24 -- we would dispute that junction 26 of the M1 provides a good link to Hucknall. We believe that junction 27 provides an equally good link for southbound traffic on the M1 as well as northbound.</p>	<p>While noting the comments, the Portrait within the Preferred Approach Local Plan has not been taken forward into the Publication Local Plan (paragraphs 2.6 to 2.70). It is considered that it duplicated detailed information and data related to the District is contained within the Sustainability Appraisal Scoping Report and the Annual Monitoring Report.</p>
<p>Para 2.25 - given that the A611 road from the junction of A60, through Annesley Woodhouse to the A608 junction, for traffic wishing to enter onto the M1 at J27 is recognised by Notts County Council Highways as one of the most busy and congested routes in Nottinghamshire, we fail to see why this has been omitted.</p>	<p>While noting the comments, the Portrait within the Preferred Approach Local Plan has not been taken forward into the Publication Local Plan (paragraphs 2.6 to 2.70). It is considered that it duplicated detailed information and data related to the District is contained within the Sustainability Appraisal Scoping Report and the Annual Monitoring Report.</p>

Para 2.35 -- ACCESS would suggest that Ashfield has within Sherwood Business Park some important manufacturing firms including TST Ltd and Autofil Ltd as examples and these should be listed either within this paragraph or whatever pertinent paragraph.	Comments acknowledged but the paragraph do not look to identify a list of manufacture companies. It highlights some of the major employers or sectors.
Paragraph 2.39 – Environmental Characteristics There is an opportunity within the Portrait of Ashfield District to highlight the existence of heritage assets within and adjacent to the district boundary, which are cultural and environmental assets and contribute to the tourism economy. One such location is Hardwick Hall and Parkland, located on the northern boundary of the district. For example, the following text could be added to paragraph 2.39: <i>“On the northern boundary of the district is the internationally significant heritage attraction of Hardwick Hall and its Registered Historic Parkland. Hardwick provides a publicly accessible green space with impressive panoramic views to and from Silverhill Wood and the surrounding rural area.”</i>	While noting the comments, the Portrait within the Preferred Approach Local Plan has not been taken forward into the Publication Local Plan (paragraphs 2.6 to 2.70). It is considered that it duplicated detailed information and data related to the District is contained within the Sustainability Appraisal Scoping Report and the Annual Monitoring Report.
Para 2.39 - consider adding to the end of this paragraph – “where such interaction does not degrade or seriously threaten important and vital wildlife habitats and species”.	The paragraph simply sets out the background to environmental characteristics. No changes proposed.
Para 2.40 - ACCESS would state that Local Wildlife Sites (LWS) are also of Local importance and should be included within policy EV5 and within this paragraph.	The paragraph sets out national designations. LWS are included with Policy EV4. No changes proposed.
Paragraph 2.41 – Page 22 – this paragraph refers to ‘policy EV12’, it should refer to ‘Policy EV 11’	While noting the comments, the Portrait within the Preferred Approach Local Plan has not been taken forward into the Publication Local Plan (paragraphs 2.6 to 2.70). It is considered that it duplicated detailed information and data related to the District is contained within the Sustainability Appraisal Scoping Report and the Annual Monitoring Report.

<p>In the Portrait of Ashfield – Environmental characteristics (p22), reference to habitats and designated sites is welcomed. Some of the species for which Ashfield is important could also be highlighted (e.g. whiteclawed crayfish, great crested newts, dingy skipper, pale St. John’s Wort. The Nottinghamshire Biological and Geological Records Centre would be able to assist with this).</p> <p>Paragraph 2.40: ‘calcerous’ should read ‘calcareous’, and ‘designated’ should read ‘designation’. In addition, SINC’s are now known as LWSs (Local Wildlife Sites).</p>	<p>Comments acknowledged.</p>
<p>Para 2.60 - ACCESS would point out that the conservation area of New Annesley, contains a large proportion of the newly developed properties, on what was previously a conservation site of the old pit top. The new development should not be included within a conservation area and the boundaries should be amended accordingly.</p>	<p>Acknowledged. The Council proposed to review the New Annesley Conservation Area at a future date.</p>
<p>Para 2.67 - this paragraph confirms the villages within that portion of Ashfield’s District entitled the “Rurals”. The Rurals are Selston, Jacksdale, Bagthorpe, and Underwood which are stated to have largely retained their village-like character due to the existence of the Green Belt boundaries.</p> <p>Examination of the Policy Map (South) which is attached below shows that Annesley Woodhouse apart from a narrow strip, at the Shoulder of Mutton Hill, is totally surrounded by Greenbelt and should be considered under this definition as part of the “Rurals”. It is similar in size and character to the 3 villages outlined, sharing many features such as Shopping Parades etc.</p>	<p>The Rural refers to a specific area within the Local Plan which is to the west of the M1 motorway. In this context Annesley Woodhouse does not fall into this area. No changes proposed.</p>
<p>Para 2.71 – The final section of 2.71 includes a statement</p>	<p>Support acknowledged</p>

about recognising and utilising the historic environment which is strongly supported by the National Trust.	
<p>Page No 28 - Infrastructure -- there are many approved but not yet commenced developments throughout Ashfield. These development impacts also need taking into account. We suggest changing this paragraph to <i>“Areas of the District suffer from limited infrastructure capacity and solutions are needed, in consultation with infrastructure providers to enable future development needs to be accommodated as well as currently committed development needs which have yet to be commenced”</i>.</p> <p>Page No. 28 -- Green Infrastructure - consider changing “<i>may need</i>” to “<i>will need</i>” to be more proactive in providing improvements to green infrastructure which will promote health and protect valuable habitats and species.</p>	Comments acknowledged but no changes proposed. ‘Future’ would include current committed developments.

### Proposed Amendments

Issue/Policy	Amendment
Introduction	Amend the Introduction to set out the relationship between strategic planning and the development management process. It should also identify that the Local Plan should be read as a whole with proposals being considered against all relevant policies.
Portrait	<p>The Portrait within the Preferred Approach Local Plan will not been taken forward into the Publication Local Plan (paragraphs 2.6 to 2.70). Detailed information and data related to the District is contained within the Sustainability Appraisal Scoping Report and the Annual Monitoring Report.</p> <p>Paragraphs 2.1 to 2.5 (brief overview of the District) and</p>



	<p>paragraph 2.72 will be moved (with the below amendments) to the start of the Local Plan's Introduction.</p> <p><b>Ashfield District</b></p> <p><b>2.1</b> Ashfield District covers an area of 10,956 hectares and is located on the western side of Nottinghamshire in the East Midlands Region. <b>The District forms part of the Nottingham Outer Housing Market Area (HMA), together with Mansfield and Newark &amp; Sherwood.</b> It adjoins seven districts <del>within the County</del> including Nottingham City to the south, <del>and Mansfield to the north and east,</del> and <b>Bolsover in Derbyshire to the west.</b></p> <p><b>2.2</b> The District benefits from a number of high quality transport links, with the M1 dissecting the District, providing communities and businesses with access to the motorway network via Junctions 28 (adjacent to District) &amp; 27. It also have heavy and light rail connects that link Ashfield with Nottingham, Mansfield and Worksop.</p> <p><b>2.3</b> There are three main urban areas in the District where housing, jobs and services are <del>generally</del> <b>largely</b> concentrated. <del>The southernmost is Hucknall which lies immediately north of Nottingham</del> <b>in the south of the District, whilst</b> Kirkby-in-Ashfield and Sutton-in-Ashfield are .....</p> <p><b>2.4</b> Sutton-in-Ashfield is the largest of the three town centres, <b>lying at the top of the District's town centre hierarchy as a</b></p>
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	<p>sub-regional centre, above Hucknall as a major district centre and Kirkby a district centre, as identified in the Ashfield Retail Study, 2016. <del>has been identified as a 'centre of sub-regional importance' by the Ashfield Retail Study Update 2011; with Hucknall identified as a 'major district centre', and Kirkby in Ashfield, the smallest of the three town centres, defined as a 'district centre'.</del></p> <p>2.5 Three villages of Jacksdale, Selston and Underwood, located east of the M1, also contain significant residential areas, but lack .....</p> <p>2.6 Across Ashfield lie a number of important historic and environmental assets that play an important role in characterising the rural and urban environments. These range from listed buildings and conservation areas to ancient woodlands and local wildlife sites.</p> <p><b>Key issues</b></p> <p>2.16 It is the communities and environments across the District the Local Plan seeks to support and enhance through the promotion of sustainable development. Demographic data and information related to the District and its communities is detailed within the accompanying Sustainability Assessment Scoping Report (at a point in time) and updated annually within the Annual Monitoring Report (AMR).</p>
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	<p>During the Local Plan's creation, the AMR The portrait of Ashfield coupled with the Plan's evidence base, has highlights a number of important issues in the area that the Local Plan will positively utilise or help to address.</p> <p>Key messages from the Sustainable Appraisal will be incorporated into the Key Issues within the Plan.</p>
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<b>List of Respondents</b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Environment Agency	1870		√		Natural England	3185			√
Nottinghamshire County Council	2803			√	ACCESS - Annesley Community Committed to Ensuring Sustainable Settlements	5359			√
National Trust	2828		√	√	England Lyle Good & Dr Bell	6630			√
Nottinghamshire Wildlife Trust	2832			√					

## Vision, Strategic Objectives & Key Diagram

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Vision</b>	
Support for the local plan vision in that "By 2032 Ashfield District will be a place which is economically strong and	Support acknowledged.

diverse, attractive to business investment and meets community needs in a sustainable manner with tackling climate change being at the forefront of the Council's priorities". In particular, there is support for the statement within the vision that 'the regeneration of the District will continue through a policy of concentrating development in and adjoining the urban and settlement areas'.	
Environment Agency Supports that climate change has been placed at the forefront of the Councils priorities and they consider this to be progressive, given its prominent position at the start of the Vision. However, climate change is a broad subject, going further than energy and energy conservation. The Vision would benefit by making reference to blue (aquatic) and green infrastructure as natural assets in need of safeguarding for the benefit of people and wildlife.	The Council proposes to amend the definition of green infrastructure to make it clear that it included blue infrastructure. The feedback from councillors was that most people would not understand the reference to blue infrastructure if included in the Vision.
The Council's vision is broadly appropriate and we agree that all residents should have the opportunity of living in a decent home, which they can afford, in a local community where they want to live. To meet this end, we consider reference should be made to the release of carefully selected greenfield sites.	It is not intended to amend the Vision. It is not considered necessary to amend the vision to include the wording proposed. It would require significant additional text which would also include the emphasis on brownfield site first. No changes proposed.
Highways England welcomes the overarching emphasis on improving sustainable transport infrastructure and encouraging its use. This is reflected as part of the Plan's Vision, for "public transport, walking and cycling links to be improved to connect residents more easily with local and regional destinations".	Support acknowledged.
Whilst the vision at page 30 refers to meeting the needs of the rural settlements specifically, there is no reference to the proposed spatial strategy of directing the majority of the development proposed towards Sutton and Kirkby and Hucknall. The proposed vision could be strengthened by a	It is considered that this is reflected in the Vision in the wording concentrating development in and adjoin the urban and settlement areas. No changes proposed.

clearer reference to the strategy to direct development to these existing urban areas.	
The Vision is generally supported. A minor change is requested to the 8th paragraph, as follows: <i>Growth within the District will be accommodated in a manner that achieves the protection, restoration and enhancement of <u>historic and environmental assets</u> and creates safer <u>and healthier</u> environments including green infrastructure networks and habitat creation.</i>	Support acknowledged. Agreed that the amendments facilitate the Vision and therefore changes proposed.
We are pleased the Plan aims to improve the quality of life for its residents, visitors and businesses through the promotion of health and well-being. Access to high quality open spaces and opportunities for sport, recreation and sustainable travel can make an important contribution to the health and well-being of communities.	Support acknowledged.
Page 30 - the statement <i>"housing will be well-planned and designed to meet the needs of local people and will include a mix of tenures, sizes and types as well as meeting sustainable development initiatives and Zero carbon targets"</i> Consider changing to <i>" housing will be well-planned and designed to blend in with the existing built environment to meet the needs....."</i> . this would better reflect that housing is not just about new build but harmonising with existing build.	It is not considered necessary to amend the Vision which has been agreed by the Council to reflect the change proposed. The proposed change is a design aspect, which is covered by policies in the Local Plan and specifically an issue for individual planning applications. No changes proposed.
Support for the local plan vision in that <i>"By 2032 Ashfield District will be a place which is economically strong and diverse, attractive to business investment and meets community needs in a sustainable manner with tackling climate change being at the forefront of the Council's priorities"</i> .	Support acknowledged.

<p>In particular, there is support for the statement within the vision that <i>'the regeneration of the District will continue through a policy of concentrating development in and adjoining the urban and settlement areas'</i>.</p>	
<p><b>Object</b></p>	
<p>Vision</p> <ul style="list-style-type: none"> <li>• Paragraph 4 should Change to, "the needs of the Settlement Areas (using the same wording as in the paragraph above rather than rural) will be catered for including in particular specific provision for its disproportionately aging population. Overall the settlement areas outside the urban areas will also have at least fair and equal access to jobs and services."</li> <li>• Identified as Paragraph 6 but assumed to be from the text paragraph 5. Include the words 'all residents including the elderly'.</li> <li>• Final Proposed Change; Remove the last paragraph which is incoherent with those above and does not seem to provide fair and equal for all but specifies that those three other places will receive special treatment.</li> </ul>	<p>The Council does not consider that the proposals amendments justify changing the Vision for the Local Plan and should be seen in the context of 'The core issue for our clients is to provide reasonably for the land use needs of the highly successful Wren Hall Nursing Home complex to expand in situ.'</p> <p>In relation to the Final Paragraph the Council see no issues. The Vision reflects that the majority of the population of the District and the Job opportunities are within the the three main towns specified and with the context of sustainable development and a policy of urban concentration there is the ambition for them to be successful places. No changes proposed.</p>
<p><b>Strategic Objectives</b></p>	
<p><b>Support, Objections and Comments</b></p>	
<p>Add in the following after S05 and before S06; "S0# Selston. To enhance Selston's role in providing jobs and being a centre for the provision of older people's</p>	<p>The Council does not consider that the proposals amendments justify changing SO5 and SO6 of the Local Plan and should be seen in the context of statement in the representations that 'The</p>

<p>accommodation with a particular allocation at the successful job creating location at Wren Hall.”</p> <p>SO 17 The proposed policies and map now have a plethora of land use designations. The Green Space (and nature conservation) designations with their subscripts are a complex feature. That emphasises even further that Green Belt should not be maintained over wide areas of undeveloped land because it is being used as a surrogate policy for that which should be done through wider development management policies. Designating something Green Belt is no guarantee whatever of any quality of land management or design.</p> <p>SO 20 To a considerable degree S020 is supported in its aims. However, for the policy to be coherent there have to be sufficient Green Belt releases, positive policies for expansion of elderly accommodation and indeed allocations to make it work.</p>	<p>core issue for our clients is to provide reasonably for the land use needs of the highly successful Wren Hall Nursing Home complex to expand in situ.’ No changes proposed.</p> <p>The Council does not consider any changes are required to SO17, which is supported by a number of other representations. No changes proposed.</p> <p>The Council disagrees with the comments over the Green Belt and consider that it reflects the context of the representations that ‘the core issue for our clients is to provide reasonably for the land use needs of the highly successful Wren Hall Nursing Home complex to expand in situ.’ No changes proposed.</p>
<p>Support for Strategic Objective S08 Provision of Sustainable Housing, Housing development within and adjoining Hucknall, Sutton/Kirkby and The Rurals settlements will help to reduce the need to travel, support the provision and use of public transport and facilitate accessibility to services and facilities.</p>	<p>Support acknowledged.</p>
<p>Strategic Objective SO8: Provision of Sustainable Housing We welcome aspirations to support growth in the economy and the provision of well-planned and well designed housing, which will be distributed to the most appropriate locations within and adjoining the towns of Hucknall, Sutton and in particular</p>	<p>Support acknowledged.</p>



Kirkby-in-Ashfield, ensuring that the aims of the NPPF are met.	
Strategic Objective SO8: Provision of Sustainable Housing We welcome aspirations to support growth in the economy and the provision of well-planned and well designed housing, which will be distributed to the most appropriate locations within and adjoining the towns of Hucknall, Sutton and in particular Kirkby-in-Ashfield, ensuring that the aims of the NPPF are met.	Support acknowledged.
Strategic Objective SO8: Provision of Sustainable Housing. Support is given to the stated intent to ensure that new housing “will be situated in the most appropriate locations within and adjoining the towns of ..... Kirkby ..... to ensure that the sustainable development aims of NPPF are met.” However, WE OBJECT to the failure to allocate KA03 Site 5 for new housing, which we believe would fully accord with the spirit and intent of SO8.	Support acknowledged.
Strategic Objective SO8 deals with the provision of sustainable housing and aims to provide sufficient good quality, environmentally sustainable, well planned and designed housing to enable all residents to have access to a suitable home. The objective indicates that new housing will be situated in the most appropriate locations within and adjoining the towns of Hucknall, Sutton and Kirkby and the villages of Selston, Jacksdale and Underwood.	Support acknowledged.
Support for Strategic Objective S08 Provision of Sustainable Housing. The towns of Hucknall, Sutton and Kirkby contain the majority of jobs and services within the District and the villages of Selston, Jacksdale and Underwood are served by a range of community services and facilities and are in close proximity to employment opportunities in the surrounding areas (for example, Sherwood Business Park). Therefore,	Support acknowledged.

<p>focusing housing development within and adjoining these settlements will help to reduce the need to travel, support the provision and use of public transport and facilitate accessibility to services and facilities.</p>	
<p>SO11 - we fully support this statement. All communities within Ashfield have suffered adverse effects from poor infrastructure for too long.</p> <p>SO12 - we ask that you should just not “<i>match the vulnerability of the land use to identify flood risk</i>” but also to “<i>match the vulnerability of land use to identified surface flood risk</i>”.</p>	<p>Support acknowledged.</p> <p>Guidance provided by national planning policy and by the Environment Agency identifies vulnerable uses against specific flood zones. No similar guidance exists in relation to surface water. The Strategic Objective and the policies in the plan reflect national guidance in manage surface water risks by undertaking appropriate measures such as SuDS. No changes proposed.</p>
<p>SO12: Addressing Climate Change: SO12 is broadly supported but there needs to be emphasis on energy efficiency by stating that new builds will have better insulated walls and loft, with more efficient heaters installed, earlier in this document Page 17, 2.19 it is stated that “The District has the highest percentage of terraced properties (20%) within the HMA” we assume that many of these will be older properties in need of refurbishment again requiring better insulation and more efficient heating, with the smaller energy consumption there will be a cut in the amount of climate change gasses produced during energy production, transmission or manufacture and construction of generating machinery.</p>	<p>The Deregulation Act 2015 sets out that no additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings should be set in Local Plans other than the nationally described space standard, an optional requirement for water usage and optional requirements for adaptable / accessible dwellings. These can only be considered subject to viability considerations. Consequently, the Council cannot set a local standard for energy efficiency above the current Building Regulations standard.</p>
<p>Highways England - Strategic Objective 13: Reducing the Need to Travel by Car is predicated on reducing congestion by making efficient use of existing infrastructure and promoting</p>	<p>Support acknowledged.</p>

quality public transport, cycling and walking opportunities to help reduce the need to travel by car	
SO14: Environmental Responsibility - Here the LPA pledges "to make maximum use of previously developed land for appropriate new uses taking into account the results from SHLAA. This is strongly supported. However, WE OBJECT to the failure to give full, open, objective consideration to KA03 Site 5 in this regard and to the failure to allocate the site for development accordingly and would ask the Council to rectify this when considering comments received in relation to the Preferred Approach Plan.	Support acknowledged.
Environmental issues are developed through the strategic objectives with landscape issues addressed primarily through strategic objectives S015, S017 and S019. Landscape character is not specifically mentioned in these strategic objectives. Considered that the SA should make specific reference to landscape character	Support acknowledged. It is considered that landscape character is an integral part of S017: Natural Assets.
<p>Environment Agency:</p> <ul style="list-style-type: none"> <li>• SO12 - Addressing Climate Change - Supports this objective as it links to blue and green infrastructure and natural processes to tackle flood risk management and to incorporation of SUDs into all new developments.</li> <li>• SO15 - Environmental Capacity - Supports this objective but identifies that it could be less broad in nature and they recommend more robust wording such as 'protection and enhancement of the environment'.</li> <li>• SO17 - Natural Assets - Supports this objective but expect that 'watercourses' be included given they are natural assets. Also requested to amend to include 'blue and green</li> </ul>	<p>Support acknowledged. Comments are noted, however, it is considered that the aspect of protection and enhancement of natural assets is reflected in SO17.</p> <p>The Council proposes to amend SO 17 to include green and blue (aquatic) infrastructure together with watercourses.</p>

infrastructure'	
We welcome the commitment to encourage sustainable growth that achieves the protection, restoration and enhancement of the districts environmental assets and development that helps to create a coherent green infrastructure network. In particular we support the suite of environmental objectives which contribute to these aims.	Support acknowledged.
<p>Strategic Objective SO17: Natural Assets</p> <p>Wording proposed to be amended to include the following <i>“to safeguard importance areas of countryside by protecting the green belt, particularly to prevent coalescence of settlements. They should also include to prevent coalescence of settlements/industry such as Sherwood business Park to Annesley Woodhouse”</i>.</p> <p>Also stressed that the argument for building a total of 480 dwelling per year is made clearly but how many new developments have been granted planning permission in the district but to date no houses have been built? The number of houses in these developments should be totalled up together with and ‘windfall’ development with the resulting figure taken from the total estimated housing need over the lifetime of this document. This will prevent over development of the district with a glut of new houses on the market.</p>	<p>It is considered that the Strategic Objective is seen in general terms and consequently any amendment is unnecessary. It is set out in the context of the Green Belt purposes identified in the NPPF, paragraph 80 including “to prevent neighbouring towns merging into one another.” No changes proposed.</p> <p>Paragraph 47 of the National Planning Policy Framework (NPPF) states that, ‘to boost significantly the supply of housing, with Local Authorities being required to use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing’. The Strategic Housing Market Assessment (SHMA) sets out for Ashfield with its housing target of 480 homes a year. This has been reviewed and is considered as appropriate in meeting the objectively assessed needs. The sites allocated to meet this need are identified in the Plan and include sites with planning permission. The approach set out in the representations would not meet the requirements of the NPPF and mean that it is unlikely that the Plan could be deemed to be “sound” at examination. No changes proposed.</p>

<p>Strategic objectives SO17: Natural Assets and SO18 Heritage Assets are supported.</p> <p>Minor changes are requested to SO18 to ensure consistency with NPPF terminology:  <i>To <del>conserve</del> safeguard, enhance and where necessary, regenerate the District's distinct historic environment, including its wider and the settings of heritage assets, particularly that associated with including Scheduled Monuments, Registered Parks and Gardens, Conservation Areas, Listed Buildings, archaeological sites and other recognised locally important historic assets.</i></p>	<p>It is considered that the proposed changes are consistent with Policy EV10 and therefore the proposed amendments will be taken forward.</p> <p><b>Proposed amendments are detailed below.</b></p>
<p>SO19 Character of the District - Strong support is given to the stated intent "to ensure development contributes to the Local Distinctiveness of the District and enhances both settlement identity and the environment through high quality sustainable design, ..... to develop a strong sense of place and neighbourhood pride." However, WE OBJECT to the failure to remove KA03 Site 5 from the Green Belt to enable it to be considered for development, which effectively perpetuates the current downward spiral, described in detail elsewhere in our submission, to the clear detriment of the local environment. Its enforced deteriorating condition is a source of shame rather than enabling its potential to be realised and thereby contribute to neighbourhood pride.</p>	<p>Support acknowledged.</p>
<p>Reference to the protection, restoration and enhancement of environmental assets and the creation of GI networks and habitat within the Local Plan Vision (p30) is welcomed and supported, as is Strategic Objective (SO) 17 relating to Natural Assets; and subsection 12 in Policy S2 – Overall Strategy for</p>	<p>Support acknowledged.</p>

Growth (and the supporting text in paragraph 4.44).	
<b>Key Diagram</b>	
Following the above addition on the Strategic Objectives, mark Selston as having a function as a core important settlement between J27 and J28- noted elsewhere in the plan Text and served by both.	What is a core settlement within the Policies in the Local Plan? Not consistent with other Policies and references in the Plan. <b>No changes proposed.</b>

### Proposed Amendments

Issue/Policy	Amendment
Vision - Amend the Vision, to reflect comments of the the National Trust and the Nottinghamshire County Council, paragraph 8	Amend the Vision, paragraph 8:  “Growth within the District will be accommodated in a manner that achieves the protection, restoration and enhancement of <b>historic and</b> environmental assets and creates safer <b>and healthier</b> environments including green infrastructure networks and habitat creation.”
SO17 Natural Assets	Amend to the following” To protect, enhance and expand Ashfield’s network of green <b>and blue</b> infrastructure, including its distinctive rural and urban landscapes, woodlands, <b>watercourses</b> , geology, archaeological....”
SO18 Heritage Assets	Amend to “To <b>conserve</b> <del>safeguard</del> , enhance and where necessary, regenerate the District’s distinct historic environment, <del>including its wider</del> and the settings of heritage assets, <del>particularly that associated with</del> including Scheduled Monuments, Registered Parks and Gardens, Conservation Areas, Listed Buildings, archaeological sites and other recognised locally important historic assets.”

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<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Environment Agency	1870		√		Nottinghamshire Wildlife Trust	2832			√
Collins	2016		√		Natural England	3185		√	
Barton Willmore	2495		√		ACCESS - Annesley Community Committed to Ensuring Sustainable Settlements	5359			√
National Trust	2828			√	Pegasus Planning	6036		√	
Derbyshire County Council	2637			√	England Lyle Good & Dr Bell	6630	√		
Nottinghamshire County Council	2803			√	Taylor Wimpey UK Ltd	6644		√	
Highways England	2816		√		Bidwells on behalf of David Wilson Homes (East Midlands)	6705		√	

## Spatial Strategy

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
Add at the end of the italicised section 'including particularly the need to accommodate an aging population in the south west of the district'.	Council does not consider there are grounds for these comments on the Spatial Strategy which relate to a specific issues of Wren Hall.

<p>Also suggest the following addition in the un-numbered red box beginning ‘the Strategy seeks to distribute housing ...’; <i>“the disproportionate need to accommodate an aging population in the south west is reflected in this specific housing figure for that zone for that particular need.”</i></p> <p>Page 36-38 Without prejudice to the representations above regarding the problems of saying “rurals”, our client believes these pages illustrate a negative and incoherent approach. Our client asks that the Green Belt releases in the Rurals area should be revisited to ensure that there is enough land identified especially for elderly person’s accommodation.</p>	<p>No changes proposed.</p>
<p>Supports the Spatial Strategy which seeks to focus new development towards existing urban areas and settlements, as the most sustainable locations within Ashfield.</p> <p>The Spatial Strategy seeks to adopt the District's Objectively Assessed Housing Need of 480 dwellings a year as the District's housing target, as guided by the Nottingham 2015 Outer Strategic Housing Market Assessment (SHMA), published in October 2015. However, the SHMA has not yet been tested under examination by an independent Inspector. Furthermore, in assessing affordable housing needs, the SHMA tested a number of scenarios (25%, 30%, 35% and 40%) of household income spent on housing. The affordable housing need was calculated as 164 dwellings per annum based on the affordability threshold of 30%. This figure is a dramatic reduction from the 25% scenario of 280 affordable homes per annum. The 30% scenario therefore needs to be</p>	<p>Support acknowledged.</p> <p>Comments acknowledged.</p>



fully justified in order to ensure that affordable housing needs for the District have not been under-estimated.

### Proposed Amendments

Issue/Policy	Amendment
No changes proposed from the consultation.	
<b>Proposed Officer Amendments</b>	-
Spatial Strategy does not identify Mansfield and is inconsistent with Policy S2 which does identify the Sub Regional centre of Mansfield. Deleted reference to Hucknall for consistency as the Strategy does not specifically identify the three main settlements.	This focuses the majority of development within or adjacent to the 3 main settlements or <b>on the fringe of Mansfield</b> . <del>with a minor reduction for Hucknall compared to that within the SHMA.</del> An appropriate level of growth is proposed in the Rurals to help sustain these community.

<b>List of Respondents</b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
England Lyle Good & Dr Bell	6630	√			Bidwells on behalf of David Wilson Homes (East Midlands)	6705		√	

## Strategic Policies

### Policy S1: Sustainable Development Principles

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
Support	
Support for Sustainable Development Principles in that when considering proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). Agreed that the Council should work with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves economic, social and environmental conditions in the area.	Support acknowledged.
<p>We support the principle of 'Sustainable Development' as defined – ie that “sustainable development is about achieving economic, environmental and social progress for this and future generations and that these principles are mutually dependent for true sustainability.”</p> <p>However, in doing so we would request the Council give specific consideration to the allocation of KA03 Site 5, which would be in full accord with Policy S1.</p>	<p>Comments noted.</p> <p>The site referenced lies within the Green Belt to the south of Kirkby. The Council does not consider it can justify under the provisions of the NPPF paragraph 83 the release of Green Belt land around Kirkby, whilst there is a supply of non-Green Belt land to help meet the housing needs in this area of the District.</p>
<b>Supports for Policy S1</b> in that when considering proposals the Council will take a positive approach that reflects the	Support acknowledged.

presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). It is agreed that the Council should work with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves economic, social and environmental conditions in the area.	
<b>Object</b>	
<p>Paragraphs 3 and 4 appears to contradict the positiveness of the first two paragraphs and are unnecessary given they shadow the NPPF.</p> <p>Paragraph 4 says development '<i>will be required to demonstrate</i>' - that is anything but positive planning and suggests that any development could be turned down for not contributing to one of these even though meeting all others.</p>	<p>The Council disagrees with this interpretation. However, it is considered that Point 3 of the Policy is in practice repeating Point 2 and therefore it is proposed to delete Point 3 of the Policy.</p> <p>In relation to Point 4 it is considered that this demonstrates matter that should be taken account of within the positive framework of the Policy.</p> <p>No changes proposed.</p>
<b>Comment</b>	
Amend S1 (4b) to "Does not materially conflict ....."	The Council acknowledges this comment and would support the proposed amendment.
<p>Para 4.4 - whilst accepting that development will have an impact with its surroundings we believe that wherever possible features and habitats should not just be retained but improved. We thus ask the last sentence to be changed to "... <i>should include the retention of valuable existing features and enhance and improve habitats wherever possible</i>"</p>	Amend wording to para 4.4 to reflect comments.
<b>Responses received relating to Policy supporting text</b>	

<p>Para 4.1 – Sustainable development</p> <p>This statement is not consistent with NPPF paragraph 14 (the presumption in favour of sustainable development) and should be deleted or amended. In general development should be approved if <i>it accords with the local plan</i>. Elsewhere where the plan is absent, silent or out of date, there must be benefits to be weighed against the impacts. Furthermore, if policies in the NPPF indicate that development should be restricted then these must be taken into account. In all cases, other material considerations should also be taken into account.</p>	<p>The Policy and supporting text are considered to be in accordance with the NPPF. However, to avoid and doubt it is proposed to delete the paragraph in question as it is not considered to be fundamental to the Policy.</p>
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### Proposed Amendments

Issue/Policy	Amendment
Amend Policy S1 (4b)	<b>b) Does not materially conflict with adjoining or nearby land uses;</b>
Paragraph 4.1	<b>Deleted paragraph 4.1</b>
Paragraph 4.4 amend for clarification to include “enhance and improve” habitats. The use of the wording “the use of native and other complementary species” is appropriate to Policy EV4.	Para 4.4 – amend to ... should include the retention of valuable existing features, and <b>enhance and improve</b> habitats wherever possible. <del>and the use of native and other complementary species.</del>
<b>Proposed Officer Amendments</b>	
Delete Policy S1 3 as it repeats Point 2 of the Policy.	<p>Deleted S1 3 and amend numbering accordingly.</p> <p><b>2. Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</b></p>

	<p>3. <del>Development will be permitted where it does not conflict detrimentally with other policies contained within the Local Plan.</del></p>
<p>Policy S1 4.</p> <ul style="list-style-type: none"> <li>Deleted e) and d) as already cover within the Policy S1 2.</li> <li>Amend c) to reflect a requirement for the comprehensive development of allocated sites</li> </ul>	<p><b>Policy S1 4.</b>  <b>Development will be required to demonstrate that it:</b></p> <ul style="list-style-type: none"> <li>a) <b>Contributes to the achievement of sustainable development;</b></li> <li>b) <b>Does not conflict with adjoining or nearby land uses;</b></li> <li>c) <b>Will not prejudice the comprehensive development of any allocated sites or the development of another site adjacent or nearby;</b></li> <li>d) <b>Does not form part of a larger site where there would be a requirement for infrastructure provision if developed as a whole;</b></li> <li>e) <del>Complies with other standards identified within the Local Plan;</del></li> <li>f) <del>Contributes to energy and water efficiency; and</del></li> <li>g) <b>Does not have a negative cumulative impact with other existing similar developments or developments for which there is planning permission in the area.</b></li> </ul>
<p>Delete paragraph 4.1 and paragraph 4.7 as they are not necessary in the context of the Policy or are covered by other policies in the Plan.</p>	<p><del>4.1 New development should achieve sustainable development principles and in general planning permission should be granted unless the development would cause demonstrable harm.</del></p> <p><del>4.7 Proposed development and uses of land within the District should not be harmful to the environment in terms of the character, quality, amenity or safety of the environment in relation to the impact associated with noise, light pollution,</del></p>

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	air quality, fumes, radiation or other similar consequences. Development should comply with prevailing standards for the control of emissions to air, water and land with opportunities taken to control and reduce the impacts of noise, visual intrusion, pollutants, nuisance and other unacceptable environmental impacts where practical.
Paragraph 4.4 amend for clarification. The use of the wording “the use of native and other complementary species” is appropriate to Policy EV4 rather than the Policy in question.	4.4 ..... The characteristics of the site and the surrounding area should also be considered, and development proposals should include the retention of valuable existing features <b>the enhancement and improvement of</b> habits, wherever possible. , and the use of native and other complementary species.

<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
National Trust	2828	√			Taylor Wimpey UK Ltd	6644		√	
J Collins Assoc.	3034		√	√	S Bacon	6695			√
ACCESS - Annesley Community Committed to Ensuring Sustainable Settlements	5359			√	Bidwells on behalf of David Wilson Homes (East Midlands)	6705		√	
England Lyle Good & Dr Bell	6630			√					

## Policy S2: Overall Strategy for Growth

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Support for the overall strategy for growth included in Policy S2 which seeks to direct development in Ashfield to within or adjoining the Main Urban Areas of Hucknall, Sutton-in-Ashfield (Sutton) and Kirkby-in-Ashfield (Kirkby). These areas are the most sustainable locations in the District to accommodate the required housing growth. They all provide a wide range of services and facilities and are well located in terms of access to the strategic road network. Sutton in particular is the largest town in the District. However, concerns were raised regarding the demonstration of the five year housing supply. (See comments on Appendix 10 Trajectory). Requested that the Council for consistency across the Plan and in terms of the Government's aspiration as set out in paragraph 47 of the NPPF to 'boost significantly the supply of housing', the targets at all times should be regarded as minimum requirements.	Support acknowledged. No change is proposed in relation to 'minimum requirements' as the Policy identifies that "A net increase of at least 8,268 dwellings will be delivered...."
<b>Housing</b>	
Endorsement for the strategy and research in the Strategic Housing Market Assessment including housing numbers and types. Stressed the need for bungalows for older residents.	Support acknowledged.

Support for the Council meeting is Objectively Assessed Housing Need as identified in the Strategic Housing Market Assessment and not AHN in full and will not rely on other neighbouring local authorities in the surrounding area (such as Amber Valley Borough and Bolsover District) to contribute towards meeting any of its housing needs.	Support acknowledged.
Support for Policy S2 as the 8,268 dwellings will be distributed across the District predominantly within the main settlements of Hucknall, Sutton-in-Ashfield and Kirkby-in-Ashfield. These settlements are the most sustainable locations to accommodate growth given their range of employment opportunities, shops and services. The Policy is therefore supported.	Support acknowledged.
Support for the overall strategy for growth included in Policy S2 which seeks to direct development in Ashfield to within or adjoining the Main Urban Areas of Hucknall, Sutton-in-Ashfield (Sutton) and Kirkby-in-Ashfield (Kirkby). These areas are the most sustainable locations in the District to accommodate the required housing growth. They all provide a wide range of services and facilities and are well located in terms of access to the strategic road network. Sutton in particular is the largest town in the District. However, concerns expressed regarding the demonstration of a five-year supply of deliverable housing land.	<p>Support acknowledged.</p> <p>Paragraph 4.12 sets out that the five year land supply is included in the two Strategic Housing Land Availability Assessments (SHLAAs) which support the Plan and the annual Housing Land Monitoring Report.</p> <p>For clarity additional tables and supporting text which demonstrate the provision of a five year land supply will be included at Appendix 10.</p>
It is considered that the spatial strategy for growth in the district is appropriate and strong support is given to the Plan period.	Support acknowledged.



KARA does not take issue with the amount of development proposed in the Preferred Approach Local Plan.	Comment acknowledged.
Home Builders Federation agree that the Council's starting point and adjustments to demographic projections following sensitivity testing are reasonable and consistent with the NPPF and NPPG. The conversion of household growth to dwellings is also reasonable.	Comment acknowledged.
<b>Economy</b>	
Support the basis for economic growth. Agreed that Ashfield have a small surplus of employment land, and that no further land needs to be considered for the consideration of industrial purposes.	Support acknowledged.
<b>Retail &amp; Town Centres</b>	
Broadly agree with the overarching strategy for growth within Ashfield and support directing new development towards locations within or adjoining the Main Urban Areas within the District. This approach should require a focus on reinvigorating town and local centres within the Authority, and in particular that of Sutton-in-Ashfield as a sub-regional centre at the top of the settlement hierarchy.	The Council welcomes this comment.
<b>Water and the Environment</b>	
Environment Agency set out support for the integration of water and flood management at point 8. To strengthen the policy they would recommend that the following additional text should be added:	Amend the Policy to include the proposed wording.  The Policy identifies that the natural environment will be protected, conserved and where appropriate enhanced. It is

<p>8c - 'create <i>habitat where possible</i>'.</p> <p>8d – This part of the policy would benefit from additional wording to encourage the use of more natural processes (soft engineering) and a multi benefit approach to new developments where this is feasible as an alternative or additional to hard engineering.</p> <p>12 - Include the requirement of 'no net loss in Biodiversity'.</p>	<p>considered that adding the additional wording would go beyond the provisions of the National Planning Policy Framework. No changes proposed.</p>
<p>Reference to the protection, restoration and enhancement of environmental assets and the creation of GI networks and habitat within the Local Plan Vision (p30) is welcomed and supported, as is Strategic Objective (SO) 17 relating to Natural Assets; and subsection 12 in Policy S2 – Overall Strategy for Growth (and the supporting text in paragraph 4.44).</p>	<p>Support acknowledged.</p>
<p><b>Access &amp; Highways</b></p>	
<p>Highways England identifies that Policy S2: Overall Strategy for Growth states that new sustainable transport infrastructure should encourage alternatives to using the private car and that 'Smarter Choices' should be used to alter travel behaviour. This emphasis on reducing the need to travel by car and changing travel behaviour will help to reduce vehicle trip impacts on the strategic road network, helping to safeguard its operation.</p> <p>They note the employment and housing requirements and that 65% of this growth will be delivered in Sutton and Kirkby. The comments raise that this area lies in relative proximity to M1 J28 (located just outside of the District) and therefore there could be some cumulative impacts on this junction, with development growth also coming forward in neighbouring</p>	<p>Support for this aspect of the Policy noted. The Council will continue to work with Highways England, the Highway Authority and neighbouring authorities to identify solutions and mitigate issues arising from the growth proposed.</p>

<p>districts. Highways England welcomes that the Council recognises that future proposed development, alongside that of neighbouring districts could have a cumulative impact on the strategic road network and that it is committed to working constructively with Highways England, the local highway authority and neighbouring authorities to find mutually compatible solutions and mitigation.</p> <p>Highways England identifies that there are no current plans for improvements to the M1 or A38 but they will be reviewing the need for improvements as part of the next phase of Route Strategies and through the related Road Investment Strategy process.</p>	
<p><b>Environment</b></p>	
<p>Policy S2 (12) – Overall Strategy for Growth</p> <p>While part 12 of this policy is generally supported, we consider that a minor wording change is necessary to ensure that the policy is aspirational in relation to the natural environment:  <i>12. The natural environments, will be protected, conserved and, where possible <del>appropriate</del>, enhanced.</i></p>	<p>It is considered that the Policy wording reflects the positive approach for the creation, protection, enhancement and management of biodiversity and green infrastructure in the context of the other policy requirements of the National Planning Policy Framework. However, the value of adding the term ‘possible’ to criteria 12 is acknowledged.</p> <p>Proposed amendments are detailed below.</p>
<p>Reference to the protection, restoration and enhancement of environmental assets and the creation of GI networks and habitat within the Local Plan Vision (p30) is welcomed and supported, as is Strategic Objective (SO) 17 relating to Natural Assets; and subsection 12 in Policy S2 – Overall Strategy for Growth (and the supporting text in paragraph 4.44).</p>	<p>Support acknowledged.</p>

<b>Minerals</b>	
<p>The County Council welcomes the various references throughout the Plan to minerals development; particularly part 12 of Policy S2 (and supporting text in paragraph 4.45) in relation to Mineral Safeguarded Areas, which reflects the requirements of the National Planning Policy Framework and Part 1a) of Policy EV2 that recognises that minerals development constitutes appropriate development in the countryside.</p>	<p>Support acknowledged.</p>
<b><u>Object</u></b>	
<b>Housing</b>	
<p>The HBF is critical of the Council's approach to no or only modest upward adjustments for economic growth, market signals and affordable housing needs for the following reasons :-</p> <ul style="list-style-type: none"> <li>• There is misalignment between economic growth forecasts and housing provision (the SHMA is based on a scenario of 9746 jobs but Policy S2 indicates 10,725 jobs will be created);</li> <li>• Only one economic forecast has been used (Experian). Inspectors at examinations in other areas have suggested that more than one forecast should be used.</li> <li>• The use of alternative employment rates in the calculations would have produced different results. In this context the employment rates used for both male and female groups aged over 50 as set out in Table 26 of the SHMA report look very optimistic. For these reasons the HBF considers that the Council may have under-estimated this aspect of its OAHN</li> </ul>	<p>The Council is satisfied that the Nottingham Outer SHMA provides a robust evidence document which identifies the objectively assessed housing need for the HMA and for each District.</p> <p>The 10,725 job figure covers a period from 2011 to 2033 and not the Plan period (2013 to 2032). This will be amended/clarified in the Local Plan.</p> <p>See below proposed amendments.</p>

<p>calculation resulting in a misalignment of housing and economic strategies.</p> <ul style="list-style-type: none"> <li>• With regards to market signals the Council's analysis identifies increases in overcrowding and houses in multiple occupation together with increasing affordability pressures despite relatively low house prices because of lower than average wages in the locality. In acknowledging these worsening trends in market signal indicators and to improve affordability for younger age groups the Council has applied an uplift equivalent to 11 dwellings per annum (2.5%). However this is a very modest uplift considering that worsening trends have been identified in more than one indicator. In comparison for example in the Eastleigh Local Plan Inspector's Preliminary Conclusions on Housing Need a 10% uplift was proposed as a cautious approach to modest pressures on market signals whilst the Uttlesford Local Plan Inspector's Conclusions found an overall increase of 10% was appropriate to achieve the objective of improving affordability. It is noted that the Council is arguing that the overall uplift from the starting to finishing point is 16% however it should be remembered that the adjustment earlier in the calculation was as a result of sensitivity test which demonstrated that the original demographic starting point may have been an under-estimation rather than to address worsening market signals. So again the HBF considers that the Council may have under-estimated this part of its OAHN calculation.</li> <li>• In assessing affordable housing needs the Council tested a number of scenarios for the percentage (25%, 30%, 35%</li> </ul>	
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<p>and 40%) of household income spent on housing. The affordable housing need of only 164 affordable homes per annum is based on the 30% scenario. This figure is a dramatic reduction from the 25% scenario of 280 affordable homes per annum. The Council's choice of the 30% scenario as its assessment of affordable housing needs should be fully justified so the Council is not seen to be under-estimating its affordable housing needs. If the affordable housing need is 280 affordable homes per annum equal to 58% of the overall OAHN then the Council should re-consideration whether or not to increase its housing supply to deliver more affordable houses (NPPG ID 2a-029-20140306).</p> <p>By comparison in Canterbury an uplift of 30% to meet affordable housing need is proposed (paras 20, 25 &amp; 26 Canterbury Local Plan Inspectors Note on main outcomes of Stage 1 Hearings dated 7 August 2015), in Bath &amp; North East Somerset the Council applied an uplift of 44% (paras 77 &amp; 78 BANES Core Strategy Final report 24 June 2014) and the pre submission Telford &amp; Wrekin Local Plan proposes a circa 50% increase to its housing requirement above a demographic based OAHN to help deliver affordable housing.</p>	
<p>Having reviewed the SHMA 2015, it is understood that the figure of 480 dwellings a year has been derived on the following basis. From a starting point of 412 dwellings per annum derived from the 2012 Sub National Population and Household Projections, sensitivity testing of migration trends and unattributable population change (UPC) increased this</p>	

figure to 469 dwellings. The SHMA undertook a jobs led modelling exercise but the conclusion was that this did not require any increase in the housing figure. An analysis of market signals resulted in a marginal increase up to the 480 dwellings proposed as the annual housing requirement over the plan period. The SHMA included an assessment of affordable housing needs which calculated an affordable housing need of 164 dwellings per annum. However no further adjustment was made to deal with issues of affordability.

It is our submission that the proposed housing requirement is not adequately justified and the SHMA should have considered a further uplift to deal with economic growth, market signals and affordable housing needs. We understand that this is the view of the HBF who will be making separate submissions on the consultation.

The evidence in market signals does point to increasing overcrowding and houses in multiple occupation together with affordability pressures. Again it is considered that these indicators merit a greater uplift in the OAN than the minimal 11 dwelling per annum proposed in the SHMA.

The SHMA also makes assumptions that the role of the private rented sector in providing housing to meet affordable needs will continue. This is a policy response that should be clearly understood by the Council. The private rented sector is a poor substitute for providing affordable housing that is secure and of a good standard. It is our view that the Council should be working to reduce the reliance on the private rented sector and

<p>planning for an appropriate level of housing that ensures affordable needs are properly met.</p> <p>The Council should review its approach to the establishment of the housing requirement for the plan period and uplift the housing requirement to properly reflect economic needs, market signals and the requirement for affordable housing.</p>	
<p>Concern raised that the Nottingham Outer SHMA is not robust because it is a crude assessment based on one econometric forecast prepared by Experian. This approach doesn't accord with PAS guidance on Objectively Assessed Housing Need assessments. The study should have taken into consideration other econometric forecasts, this would have provided an accurate calculation of housing need.</p> <p>Secondly the SHMA shows that household sizes have decreased in the HMA and there has been some suppression of household formation rates in relation to the 25 – 34 age groups. It proposes an additional requirement of 39 dwellings per annum in order to address this. A more positive approach would be to apply a 10% uplift, as was the case put forward at Tamworth District Council's examination by Nathaniel Lichfield &amp; Partners. This would result in a total HMA annual figure of 1441 dwellings per annum (the SHMA indicates a requirement of 1271 dpa). This economic led and household formation approach would be more positive and it would comply with paragraph 182 of the NPPF, and it contributes to a significant boost to housing supply which can be partly met on the respondents site (Thoresby Avenue, Kirkby in Ashfield (SHLAA ref. 34).</p>	



<p>The SHMA sets out a requirement for Ashfield of 480 dwellings per annum which is an increase of 17.8% in the 20 years from 2013 to 2033. However population levels in the report are stated to increase by only 11.2%, adjustments therefore account for over 3,000 additional houses during the period. This exceptional increase occurs during a period where exceptionally low birth rates of the early 2000's feed through into the 'home building' age group of 20 to 30 year olds. Further ONS projection for population growth, both for natural change and migration; show a dramatic fall off in the 2020s.</p>	
<p>Addition policy points to be included:</p> <ul style="list-style-type: none"> <li>• Housing Quality to include energy efficiency, water harvesting, green space, safe childrens areas, building materials, Council to show more support on building regulations and infrastructure planning.</li> <li>• Section 106 and Community Infrastructure Levy will be used more aggressively to prioritise long term infrastructure planning e.g. anticipated drainage problems on new developments</li> <li>• Social Housing – Discount offers will be judged by the local authority against the housing needs of the area and will adjust the criteria of eligibility.</li> </ul>	<p>The Deregulation Act 2015 sets out that no additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings should be set in Local Plans other than the nationally described space standard, an optional requirement for water usage and optional requirements for adaptable / accessible dwellings. These can only be considered subject to viability considerations. The Council is working with infrastructure providers to identify the requirements for infrastructure relating to the dwellings proposed. No changes proposed.</p> <p>Section 106 and (if adopted by the Council) CIL provides funding for some infrastructure requirements. However this has to be considered in relation to the NPPF provisions on viability. NPPF, paragraph 173, stresses that development should not be subject to a scale of obligations and policy burdens that the ability to develop viably is threatened. It also sets out that the</p>

	<p>costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. Consequently, S106 contributions and CIL must reflect viability issues and difficulty decision will have to be made in relation to infrastructure priorities in taking development forward.</p> <p>In relation to social housing the requirement have to reflect legislation such as the Housing and Planning Act 2016 which introduced starter homes and national policy. On planning applications where affordable housing is required advice is sought from the Council's Strategic Housing officers on the affordability requirements.</p>
<p>We are concerned that the Council has not considered an uplift of OAN taking account of the evidence of affordable housing need. Firstly, the application of a 30% ratio for household income spent on housing, rather than 25% set out in the original version of the SHMA, reduces affordable needs. The use of a 30% ratio needs clear justification.</p>	<p>The 30% ratio is considered to be appropriate and the Nottingham Outer SHMA provides full justification for this approach.</p> <p>The Council is satisfied that the Nottingham Outer SHMA provides a robust evidence document which identifies the objectively assessed housing need for the HMA and for each District.</p>
<p>Concern express regarding the requirement for 480 homes per annum due to the lack of infrastructure and particularly school places</p>	<p>The Council is working with infrastructure providers to identify the requirements for infrastructure relating to the dwellings proposed.</p>

<p>Concern raised regarding Statement 2, which states the housing need will be delivered over the Plan Period within or adjacent to the existing urban area to make effective use of brownfield land in sustainable locations.</p> <p>Whilst we acknowledge that the NPPF encourages the effective use of previously developed land, there is insufficient evidence to place such a reliance on this source of land, to support the delivery of new homes across the whole Plan Period. Moreover, if it is deemed that the Council's housing requirements should increase, owing to the inaccurate calculation of OAHN then it will be necessary to increase site allocations to ensure sufficient land is available to meet the need. We consider that there should be additional reference made to housing delivery on suitable greenfield land and/or land considered to make the least contribution to the purposes of the Green Belt over and beyond the Plan Period.</p>	<p>This response inaccurately reflects the wording of the policy which actually states "Dwellings will be provided within or adjacent to the existing urban area <u>taking the opportunity to maximise</u> the effective use of brownfield land in sustainable locations"</p> <p>The Council is satisfied that statement in bullet point 2 of Policy S2 is consistent with National Policy in respect of guiding development to the most sustainable locations and in encouraging the re-use of brownfield land. NPPF paragraph 111 specifically states, "Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land)..."</p> <p>Whilst the Council has sought to allocate brownfield land for development, (which can accommodate approximately 1,268 dwellings), it has been identified that there are insufficient brownfield sites (including derelict sites) available to meet the District's housing needs to 2032. In order to help meet the future housing needs of the District, the Council has had to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites deemed deliverable and sustainable, as required by national planning policy. In this respect the District is not over-reliant on supply from brownfield since the overall supply amounts to approximately 8,500 new homes.</p> <p>The Council is satisfied that the Nottingham Outer SHMA provides a robust evidence document which identifies the</p>
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	<p>objectively assessed housing need for Ashfield.</p> <p>The Plan allocates sufficient sites to meet the OAN and an additional reference to housing delivery on suitable greenfield land and/or land considered to make the least contribution to the purposes of the Green Belt is considered unnecessary. Furthermore, Policy S2 does not preclude unallocated sites from coming forward where they are sustainably located and consistent with other policies in the Local Plan.</p> <p>Delivery of housing and the 5 year land supply position is monitored on an annual basis through the Housing Land Monitoring Report (HLMR). This will indicate performance with regard to meeting the OAN and ultimately whether a revision of the Local Plan is required.</p>
<p>It is noted that the timelines within Table 1 – Dwelling Requirement &amp; Provision 2013 – 2032 are inconsistent and confusing, therefore we seek clarification of the start and end dates for the Plan Period – this should be clearly outlined in the Plan.</p>	<p>Table 1 calculates the supply of housing when set against the Objectively Assessed Need (OAN). The baseline for the OAN is derived from the Nottingham Outer SHMA (2015) which identifies the level of need from 2013 to 2033. Consequently 2013 is necessarily the starting point at which to assess housing supply against. Any under delivery or over provision since that time will therefore be taken account of in the calculations.</p> <p>The Council are aiming to adopt a 15 year Local Plan in early 2017 which would run until 2032. It is considered unnecessary to plan to 2033 simply because the SHMA covers that period.</p> <p>Housing monitoring is undertaken at the 1<sup>st</sup> April on an annual basis. Since the Preferred Approach plan was published in</p>

	<p>January 2016, the most up to date housing information has a base date of April 2015. This has therefore been used to populate Table 1, thereby giving a balance of requirement to meet housing needs between 2015 to 2032. In future iterations of the Plan, this will be revised to reflect the most up to date information at that time.</p> <p>It is anticipated that the final plan period will be 2017 to 2032. However, until such a time as the Plan is adopted this cannot be confirmed. For this reason, paragraph 1.2 simply refers to the planning for the period “up to 2032”.</p> <p>Proposed amendments are detailed below.</p>
<p>The Plan sets out to provide homes for people outside the district and develop Ashfield beyond what is fair and reasonable. Historic inward migration cannot be sustained in the medium to long term and should not be the basis for the Plan. ADC should develop Ashfield to provide homes and jobs for its residents.</p>	<p>The Council is satisfied that the Nottingham Outer SHMA provides a robust evidence document which identifies the objectively assessed housing need for Ashfield. This is consistent with the requirements of the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).</p> <p>The Council is also satisfied that there is enough suitable land available to meet the needs of the district over that period.</p> <p>For information, net <u>internal</u> migration between 2001 to 2013 accounted for 4.8% of the population of Ashfield, with net <u>international</u> migration at 0.04% (source ONS).</p> <p>No changes proposed.</p>
<p>ADC should use official ONS forecast of population change to</p>	<p>The SHMA has used the most up to date ONS household and</p>

<p>inform housing need. Over provision of housing land will destroy the natural environment of Ashfield and a more conservative approach should be applied with further allocation being made at later iterations of the Local Plan in 5/10/15 year time periods.</p>	<p>population data.</p> <p>National Planning Policy indicates that Local Plans should cover a 15 year plan period. There is a high risk that the Local Plan would be found to be unsound if a shorter timeframe was adopted. There is no justification for this approach as there are enough sites to deliver development over a 15 year period.</p>
<p>Additional housing need is being allocated based upon a catch-up of 20 year olds who have been unable to set up home in recent years. That might be a laudable goal but it is not going to happen when housing costs are so high. There are no policies that will enable this to happen; indeed factors will increasingly make it more difficult for young people to buy homes, not least lack of capital available from parent/grand-parents as the population ages.</p> <p>Figure 3 at 4.77 of the Sustainability assessment states that 409 houses pa are required for the projected jobs growth, therefore if population increases in Ashfield due to migration and other factors beyond the forecast demographic changes of 412 houses per annum then that will lead to increased unemployment since population would exceed employment by the equivalent of 71 houses per annum.</p> <p>The 480 demand led provision is overstated and the option 2 projections of 412 houses pa (8,240) should be used. This can be front end loaded and adjusted at a later date if it proves insufficient in say 6/7 years time.</p>	<p>The Local Plan includes policies which seek a mix of housing types which will meet the needs of a range of households e.g. singles, couples, families, older people, disabled people etc.</p> <p>Paragraph 47 of the National Planning Policy Framework (NPPF) states that, 'to boost significantly the supply of housing, Local Authorities should use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing'. Therefore the Council has no option but to plan for the future housing needs of the District. National planning policy specifies that, Local Plans should be drawn up over an appropriate timescale, preferably a 15 year time horizon.</p> <p>No changes proposed.</p>
<p>ADC should maximise new housing development on</p>	<p>Wherever possible, the Council has allocated brownfield sites</p>

<p>previously developed land and on surplus land within the current urban boundaries; this plan does not achieve that. This could include the use of allotments such as those EV7Sh and EV7Sb and marginal land on significant recreation grounds such as 50% of EV5/219 along Forest Road Skegby, parts of EV5/213-EV5/214 and the EV5/185 and EV5/186 areas.</p>	<p>within Preferred Approach Local Plan. The allocated brownfield sites can accommodate approximately 1,268 dwellings. A very small number of brownfield sites have been rejected due to severe constraints e.g. the majority are located in high flood risk areas (flood zones 2 or 3). The supply of brownfield sites has reduced, due to the successful redevelopment sites in the recent past for housing and to meet the need to provide land for business / jobs growth. In order to help meet the future housing needs of the District, the Council has no option but to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites deemed deliverable and sustainable, as required by national planning policy.</p> <p>The allotment sites and recreation grounds provide important recreation areas for local residents and they help to enhance the environment in built up areas. Furthermore, the sites suggested are not available for development.</p>
<p>The Local Plan provides land for development up to 2033, however it seems clear that demands for additional growth will continue beyond that date. It is difficult to predict the future and the further out we go the less certainty there would be, however it would be useful to understand where development might occur beyond 2033. Taking key decisions with a view to only 15-20 year forward vision risks making the wrong decision or committing to future direction of travel by stealth.</p> <p>For example, does the agreement to development of Mowlands at SKA3al mean that the next plan will be for</p>	<p>The NPPF requires Local Authorities to plan for 15 years. The Council will continue to monitor and review the Local Plan/delivery of development over the Plan period. It is not considered appropriate to plan/predict what will happen beyond 2032 as it will depend on the outcome of the next full review of the Local Plan.</p>

Mowlands South or another chunk of housing development to the west of Mowlands and eventually out to the ADC boundary? And does the agreement of SKA3e, SKA3ah and SKA3ao mean that ultimately the plan might be to infill all the land out to Derby Road and Coxmoor Road?	
Net provision of additional dwellings to be increased to provide for housing needs to be met in full and to include flexibility to react to changing needs and/or site delivery issues. Reliance is placed on housing delivery through a very significant number of small sites. Additional provision of larger sites should be made to, at least in part, recognise the fact that delivery of small sites is likely to be less certain. An increase in overall numbers may be justified on that basis as well as to take account of proposed changes of Government Policy on Starter and Affordable Homes.	<p>The Council's approach reflects a mixed of site of varying sites. There is not a reliance in the short term on substantial sites which can have substantial implications in relation to the five year housing supply as typically they can take a significant time for the site to be started.</p> <p>The Local Plan reflects the Council view on the Objectively Assessed Housing Need and sites have been allocated to meet this need.</p> <p>No changes proposed.</p>
<b>Economy</b>	
Objects to the Local Plan on the grounds that the employment land needs is deficient. It must have greater regard to market requirements and changing patterns of employment demand. The amount and location of land allocated for employment purposes should more closely reflect market requirement and flow from a detailed appraisal of the quality of existing employment sites. In particular additional land should be allocated, which is well related to the M1 and capable of providing plot or plots to accommodate large logistics buildings.	<p>It is considered that the Council has taken a positive approach to employment requirements within the District with the Local Plan allocating sites to provide the opportunity to deliver jobs. Consequently, no changes to the Policy are recommended in relation to these aspects.</p> <p>The objection links to an alternative site for employment, Land to the east of Junction 27 of the M1, adjacent to Sherwood Park. (Identified in the Strategic Employment Land Assessment as K11). The response to this aspect is set out in Policy SKA2 alternative employment sites.</p>
<b>Other</b>	



In reference to part 7, the ability for the existing community facilities, including Wren Hall, to expand should be included and encouraged where there is a demonstrable need.	The Council does not propose to amend the strategic policies in relation to a single site issue.
<b>Comment</b>	
<p>Bolsover District Council sets out:</p> <ul style="list-style-type: none"> <li>• Ashfield District Council is planning to meet its own Housing and Employment needs and has not approached this Council about not being able to meet its own needs within its own area.</li> <li>• None of Ashfield housing sites are located close to Bolsover District's boundary.</li> <li>• Notes that elements of the allocated employment sites are unlikely to come forward for a variety of reasons such as the High Speed 2 rail route.</li> <li>• Identifies that Bolsover DC may need to work with neighbouring councils to meet Bolsover's identified Travelling Showpersons plots under Derby and Derbyshire and East Staffordshire GTAA (2015).</li> </ul>	<ul style="list-style-type: none"> <li>• Yes, the Council is seeking to meet the needs of the District within Ashfield.</li> <li>• Comment noted.</li> <li>• Paragraph 4.124 of the Sustainability Appraisal acknowledges the implications of HS2. A small area of Castlewood Business Park would be affected if the HS2 route was confirmed. This has been taken into account which the sites allocated to meet the employment requirement.</li> <li>• The Council will continue to work with Bolsover as necessary throughout the development and implementation of each areas Local Plan.</li> </ul>
Stressed the need to review the housing figures and economic land use every five years through the life of the plan to correct any oversupply or undersupply of capacity.	The Local Plan will be kept under regular review and updated as necessary.
As there is enough industry I assume there will be no more industrial parks.	The Local Plan includes enough land allocations to accommodate new industrial development. Policies HA2 and SKA2 include details of proposed employment allocations.
The Plan could be strengthened by undertaking modelling	The Council has been liaising with the Clinical Commissioning

<p>work to assess population growth assessment and healthcare service impact working in conjunction with CCG colleagues.</p> <p>Proposed that the Council consults with Mansfield and Ashfield CCG and Adult Social Care and Health to discuss requirements relating to residential care homes for the future. New models of provision may mean that the information provided in 4.16 – 4.19 may need to be amended</p> <p>Choice of any additional sites for Gypsy and Traveller accommodation should take account of the need for access to healthcare, especially primary care (GP) services.</p> <p>Affordable housing should also be healthy housing, so new housing developments should meet standards required to maintain warm and healthy housing.</p> <p>The Council may find the Research &amp; Evaluation Framework for Ageing Cities and Measuring the Age-Friendliness of Cities useful to contribute to the implementation of the plan.</p>	<p>Groups regarding the implications of the housing proposals in the Local Plan.</p> <p>The Travellers sites proposed are identified in the Plan.</p> <p>Affordable housing requirements are set by the Building Regulations. National planning policy requires that if higher standards are to be taken forward the evidence base should identify a need and that the Policy is viable in the context of the viability impact of the Plan.</p>
<p>Make reference to the Social Mobility &amp; Child Poverty Commission (2016) report 'The Social Mobility Index' which identifies that older industrial towns such as Ashfield are becoming entrenched social mobility cold spots.</p> <p>There could be more emphasis to improve the take up of 'supported employment' and job retention schemes e.g. Mental Health supported employment and/or employing more people</p>	<p>Add reference to supporting paragraphs of S2 regarding social; mobility.</p>

with learning disabilities.	
<b>Retail &amp; Town Centres</b>	
<p>The overall strategy for growth should be extended to cover retail need across the Plan area, taking into account cross-boundary requirements. This will require an update of the District's Retail Study (2011) which is recognised at paragraph 1.14 of the consultation document.</p> <p>We request that the objectively assessed need for retail growth, taking account of sensitivity tests, should be considered as a strategic issue alongside traditional B Class employment and residential growth within the Plan. This is so that the plan led retail need is supported by a clear spatial strategy for phased growth over the lifetime of the Plan. This fosters investor confidence and also allows for triggers to be built into the strategy, such as partial review, should any parts of the strategy fail or not deliver as anticipated.</p> <p>This approach will secure the flexibility that the NPPF calls for over the lifetime of the plan, but ensures that the spatial strategy for growth is only altered through the plan making process where cross-boundary implications are appropriately considered, rather than through updates to evidence outside of the plan process.</p>	<p>An update to the Ashfield Retail Study is being undertaken and will feed into the Publication Local Plan where relevant.</p> <p>The Council acknowledges the important role retail plays in the local economy, providing jobs and helping to sustain the District's town centres. Taking into account recommendations within the emerging Ashfield Retail Study (2016), the Council will seek to enhance the importance of town centres and retail within Policy S2.</p>
<b>Health</b>	
Nottinghamshire County Council's response in relation to Public Health set out a "Rapid Health Impact Assessment Matrix. This has been assessed as impacting on a number of	Amend the Policy and supporting paragraphs to give emphasis to health and wellbeing in relation to the Local Plan.

<p>policies as well as emphasising the importance of health and wellbeing as part of the Local Plan.</p>	
<p><b>Housing</b></p>	
<p>The Council is asked to specifically re-consider Beacon Farm, Kirkby in Ashfield in the context of Policy S2 and to allocate the site for development.</p> <p>The Council is committed to developing a sustainable, diverse and resilient economy .....” which will include: “Developing a distinct image and civic pride for the area to promote economic progress and increase awareness of what Ashfield has to offer.”</p> <p>Whilst strongly supporting this, we would point out that taking no action to address the evident problems associated with Beacon Farm is in conflict with and contradicts these stated aims.</p>	<p>Support for the Policy acknowledged.</p>
<p>It is noted that approximately 65% is to be delivered in the Sutton and Kirkby area. This area lies in relative proximity to M1 J28 (located just outside of the District) and therefore there could be some cumulative impacts on this junction, with development growth also coming forward in neighbouring districts.</p> <p>In this regard, Highways England welcomes that the Council recognises that future proposed development, alongside that of neighbouring districts could have a cumulative impact on the strategic road network and that it is committed to working constructively with Highways England, the local highway authority and neighbouring authorities to find mutually compatible solutions and mitigation. (Please note that the</p>	<p>The Council welcomes these comments and will continue to work proactively with Highways England.</p>

<p>Highways Agency became a government-owned company in April 2015, under the new name of “Highways England” and this should be reflected in the document.)</p> <p>There are no current plans for improvements to the M1 or A38 but Highways England will be reviewing the need for improvements as part of the next phase of Route Strategies and through the related Road Investment Strategy process. Highways England has no further comments but welcomes future engagement with Ashfield District Council in order to discuss how to manage the potential infrastructure issue of the M1 J28 in its emerging Local Plan.</p>	
<p>The Council's general approach to calculating the housing requirement is considered to be reasonably robust. However there are a number of factors which suggest that actual requirements might be higher than forecast indicating a need for added flexibility. These include the need to take full account of the effects of the recent recession on household formation rates and in this regard, it is considered that the rebalancing applied is likely to be insufficient.</p> <p>Concern is also raised at the lack of application of a non-delivery allowance. Whilst it is acknowledged that this is partly compensated for by a lack of windfall allowance, it is considered that because of the number, scale and distribution of allocated housing sites, there is an increased probability of the non-delivery of sites. As such a higher non-delivery allowance should be applied and additional land allocated for development.</p>	<p>The Council is satisfied that the SHMA provides a sound evidence base which identifies the objectively assessed housing need for the District.</p> <p>The justification of not including a non-delivery allowance is set out in paragraph 4.11. However, it is proposed that the calculations will be amended to include a discounted rate for planning permissions, alongside a windfall allowance to reflect small sites which may come forward beyond the first 5 years based on historic performance.</p> <p>The delivery of sites has been based on a comprehensive site-by-site analysis on what could be reasonably expected. Projected delivery rates are influenced by a number of factors such as the status of the site, for example, whether it has full or outline planning permission etc, the size of the site and whether it is likely to attract/have on board multiple developers, site constraints and house types (where known). There is no sound</p>

	<p>reason to assume any of these sites will not come forward.</p> <p>Delivery of housing and the 5 year land supply position is monitored on an annual basis through the Housing Land Monitoring Report (HLMR). This will indicate performance with regard to meeting the OAN and ultimately whether a revision of the Local Plan is required.</p>
<p>Policy S2 2. consider changing the wording “<i>to maximise the effective use of Brownfield land...to prioritise Brownfield land over Green Field or Greenbelt and maximise the effective use of such Brownfield land in sustainable locations</i>”.</p> <p>8d) - consider changing this sentence to “<i>All development sites will achieve Greenfield run-off rates preferably via the use of SUDS, particularly within the catchment of the River Leen.....etc.</i>” The existing sentence implies that Greenfield run-off rates will not be applied to other areas.</p> <p>11d) – delete the word “Major”, so that minor roads may also have capacity enhancements rather than just major roads</p> <p>12 - suggest change this paragraph to the following – “<i>Development will not be allowed that places considerable harm and degradation on nearby natural environments. Natural environments will be protected conserved and where appropriate, enhanced</i>”.</p>	<p>Comments noted. It is proposed to amend the word ‘maximise’ with ‘prioritise.’</p> <p>The Policy reflects that brownfield sites will typically be expected to reduce run-off on brownfield rates but achieve greenfield rates on greenfield sites. Hucknall is identified as an exception as the evidence supports there is a high risk of flooding to Hucknall and Nottingham from the River Leen catchment.</p> <p>No amendment is proposed as the emphasis is on the major road network.</p> <p>It is not proposed to make change to the Policy. The points raised in the comment are reflected in the policies on the environment aspects of the Plan.</p>
<b>Responses received relating to Policy supporting text</b>	
Para 4.11 - ACCESS consider this a reasonable assumption.	Comments acknowledged.

Para 4.13 - ACCESS agrees with this statement and the Councils stance on removing any sites where planning permission has been given and development has not been commenced within five years. Such sites do not obviously fit within the words "deliverable, suitable, available and achievable".	Comments acknowledged.
Para 4.34 - it is disappointing to note that "evidence indicates that as people climb the career ladder they move out of Ashfield and Mansfield to areas that are perceived to offer a higher quality of life which is Broxtowe, Gedling, and Newark & Sherwood". ACCESS believes that this strengthens the need for improved transport links particularly concerning road congestion, improvements to other infrastructure provision but more importantly improvements to the environment. This is echoed within your own comments Para 4.36.	Comments acknowledged.
Para 4.41 -- ACCESS is also concerned that Green Infrastructure should be seen as multifunctional. There may be instances such as preservation of county rare species – that these and their habitats must be protected. Suggest adding the closing paragraph –“ except where such multifunctional access may be detrimental to protected species”	Comments acknowledged. No changes proposed.
Para 4.42 -- this statement does not seem to say anything about the importance of conserving and enhancing the natural habitat/environment. It is not sure stack knowledge it is of great importance for education, culture, leisure, tourism and the wider economy, but should seek to acknowledge	Amendment proposed: Add 'biodiversity and geo-diversity' to paragraph 4.42

biodiversity and geo-diversity.

### Proposed Amendments

Issue/Policy	Amendment
Policy S2 2.	<p>Policy S2 2. Amend</p> <p>2. A net increase of at least 8,268 dwellings will be delivered within the period 2015 to 2032. Dwellings will be provided within or adjacent to the existing urban area taking the opportunity to <del>maximise</del> <b>prioritise</b> the effective use of brownfield land in sustainable locations. In addition, land sufficient to accommodate an approximately 400 bedspaces in residential care homes (class C2) will be made available.</p>
Policy S2 5. a)	<p><b>Accommodating new employment opportunities for at least 10,725 more jobs over the <del>plan</del>-period 2011-2033<sup>5</sup>.</b></p> <p><b>Footnote:</b> <sup>5</sup> Reflects the evidence from the Employment Land Forecasting Study Nottingham Core HMA &amp; Nottingham Outer HMA 2015, Nathaniel Litchfield &amp; Partners.</p>
Policy S2 8.	<p>Amend to add the additional wording:</p> <p>c) Taking opportunities to protect and enhance the water environment <b>and create habitat where possible</b> through the design of the scheme.</p> <p>d) Achieving greenfield runoff rates within the catchment of the River Leen <b>using, where feasible, using soft</b></p>



	<p>engineering (natural processes) to minimise the risk of flooding to Hucknall and the City of Nottingham and to facilitate the multiple benefits from such an approach to the development.</p>
Policy S2 12.	<p>12. The natural environments, will be protected, conserved and, where possible and appropriate, enhanced.</p>
Amend the Policy and supporting paragraphs to give emphasis to health and wellbeing in relation to the Local Plan.	<p>Amend Policy S2. 14</p> <p><b>14. Development should contribute to and improve be designed to health and wellbeing in Ashfield. This can be achieved in a number of ways dependent on the nature of development including: <del>promote healthier lifestyles and to encourage people to be active outside their homes and places of work.</del></b></p> <ol style="list-style-type: none"> <li>1. Ensuring sufficient and suitable housing;</li> <li>2. Promoting job opportunities;</li> <li>3. Promoting healthy neighbourhoods and facilitating active and healthy lifestyles;</li> <li>4. Preventing negative impacts on residential amenity and wider public safety from noise, ground instability, ground and water contamination, vibration and air quality;</li> <li>5. Providing good access for all to health and social care</li> </ol>

	<p>facilities;</p> <p>6. Promoting access to green spaces, sports facilities, play and recreation opportunities;</p> <p>7. Promoting allotments and gardens for exercise, recreation and for healthy locally produced food.</p> <p>8. Measures to close the gap in educational attainment in Ashfield;</p> <p>9. Improved community safety;</p> <p>10. Supporting the provision of infrastructure to meet health and wellbeing needs.</p>
Amend the Policy and supporting paragraphs to give emphasis to health and wellbeing in relation to the Local Plan.	<p>Add the following paragraph in supporting text:</p> <p><b>Health and Well Being</b>  National Planning Practice Guidance highlights the importance of planning in relation to health and wellbeing and working with Health and Wellbeing Boards, Clinical Commissioning Bodies and other bodies within the NHS. Nottinghamshire Health and Wellbeing Strategy and its delivery plans sets out actions to tackle a number of priorities in relation to health and wellbeing in Nottinghamshire. The policies within the Local Plan will make an important contribution to improving health and wellbeing for the communities of Ashfield. Policy S2 sets out the strategic approach and is supplemented by a number of development</p>

	management policies which facilitate health and wellbeing.
Supporting paragraphs - Identify that there are issues for Ashfield in relation to social mobility.	<p>Add supporting paragraph in supporting text:</p> <p><b>Social Mobility</b>  There are issues for Ashfield in relation to social mobility. The Social Mobility Index by the Social mobility and Child Poverty Commission identifies the most and the least socially mobile areas of the country.</p> <p>It does so by examining in detail the chances available to young people from poorer backgrounds in each of the 324 local authority areas in England to get the educational qualifications they need to succeed in life, and the opportunities in the local area to convert those qualifications into a good job and a decent standard of living. Social mobility coldspots, the worst performing 20 per cent of authorities, includes Ashfield ranked at 36<sup>th</sup> in terms of the local authority areas.</p> <p><a href="https://www.gov.uk/government/publications/social-mobility-index">https://www.gov.uk/government/publications/social-mobility-index</a></p>
Paragraph 4.11	<p>For clarification delete text at paragraph 4.11 first sentence as follows:-</p> <p>“4.11 <del>The</del> Table 1 below illustrates how the need will be met over the <del>plan</del> period 2015<del>3</del> to 2032. This calculates the supply of housing when set against the Objectively Assessed Need (OAN). The baseline for the OAN is derived from the Nottingham Outer SHMA (2015) which identifies the level of need from 2013 to 2033. Consequently 2013 is necessarily the starting point at which to assess housing supply against. Any</p>

	<p>under delivery or over provision since that time will therefore be taken account of in the calculations. An end date of 2032 has been used in order to ensure a 15 year Local Plan post adoption.</p> <p>4.12 It should be noted that.....at this stage.”</p>
Paragraph 4.42 does not acknowledge the importance of protecting, conserving and enhancing the natural environment for the purposes of biodiversity and geo-diversity.	<p>Paragraph 4.42 ‘The Council is committed to protecting, conserving and enhancing the natural and historic environment as it is acknowledged that it is of great importance for <b>biodiversity, geo-diversity</b>, education, culture, leisure, tourism and the wider economy’.</p> <p>Add to glossary <b>Geodiversity:</b> Is the variety of rocks, minerals, fossils, landforms, sediments and soils, together with the natural processes which form and alter them.</p>
Appendix 10	<p>For clarity add 5 year housing land supply tables and supporting text into Appendix 10, once the update have been calculated. Text as follows:</p> <p><b>Five Year Land Supply</b> The National Planning Policy Framework (NPPF) places a duty on Local Planning Authorities to demonstrate a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their requirements 5 year Housing Land Supply.</p> <p>The Council’s situation as at 1<sup>st</sup> April 2016 is summarised</p>

below. This is based on the Local plan allocations and small sites (below 10 dwellings) with planning permission which have been discounted to account for potential non-delivery, set against the Council's objectively assessed need for 2013 to 2032. A 5% buffer has been applied to the 5 year supply calculations to ensure choice and competition in the market, consistent with the requirements of NPPF paragraph 47. Further details are set out in the Housing Land Monitoring Report 2016.

Methodology	Supply
Sedgefield	X.X Years
Liverpool	X.X Years

Tables X and X set out Ashfield's detailed position with regard to Ashfield's 5 year housing land supply, calculated using the 'Sedgefield' and Liverpool' methods of calculation respectively. The 'Liverpool approach' seeks to meet any backlog of provision over the whole plan period (also known as the residual approach). The 'Sedgefield approach' front loads the provision of any backlog within the first five years.

The tables take account of any undersupply for the years 2013 to 2016, based on Ashfield's objectively assessed need (OAN). It should be noted that although the new OAN has a base date of 2013, the calculations in the Strategic Housing Market

	<p>Assessment have also taken account of any under delivery against household projections since 2011 to 2013, and has 'mopped' this up within the future need figures.</p> <p>The five year land supply, delivery and longer term housing provision is monitored and updated on an annual basis in the Council's Housing Land Monitoring Report.</p> <p>The following schedule gives details of anticipated delivery on individual sites where the yield exceeds 10 dwellings, together with a summary of delivery on smaller sites.</p>
<b>Proposed Officer Amendments</b>	
Policy S2, point 2 - Amend text or clarity.	<p>Delete text as follows:</p> <p><b>".... land in sustainable locations. <del>In addition</del>, land sufficient to...."</b></p>
Policy S2, point 5 – Amend to identify that the jobs relate to the period 2011 to 2033 rather than the plan period to reflect the evidence form the Employment Land Forecasting Study Nottingham Core HMA & Nottingham Outer HMA 2015, Nathaniel Litchfield & Partners.	<p><b>5.The Council is committed to developing a sustainable, diverse and resilient economy reducing low wages and improving skills levels in order to narrow the difference between District and national figures. This will be achieved by:</b></p> <p><b>a) Accommodating new employment opportunities for at least 10,725 more jobs over the plan-period <del>2011-2033</del><sup>2</sup>. Of these jobs 2,099.....</b></p>

<sup>2</sup> Reflects the evidence from the Employment Land Forecasting Study Nottingham Core HMA & Nottingham Outer HMA 2015, Nathaniel Litchfield & Partners.

<p>Policy S2, Housing growth supporting text - New paragraph.</p>	<p>Add new paragraph at end of supporting text for Housing Growth to provide clarity in respect of approach to empty homes.</p> <p>“National Planning Policy guidance identifies that a potential source of housing supply may come forward from derelict land and buildings, including empty homes. Whilst the Council have and continue to work with the Homes and Communities Agency to deliver the Empty Homes Programme, it should be recognised that the scheme deals with existing properties. Those brought back into use as a result therefore represent a change in tenure (from private to affordable rented) and not additional supply since they are already included within the existing housing stock.”</p>
<p>Policy S2, Housing growth supporting text – Paragraph 4.11</p>	<p>Delete text as follows:</p> <p><del>It should be noted that the anticipated supply does not include any element for windfall sites in future (either small or large), nor does it apply a discounted rate to current planning approvals to take account of those which may lapse. Crude analysis indicates that a potential windfall rate based upon past delivery (focussing primarily on small sites) would slightly outweigh lapsed permissions when based on historic rates. In the absence of more detailed information, it is considered appropriate to not include either element at this stage</del></p> <p>Add new text:</p> <p>The anticipated supply applies a discount rate to small site</p>

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	planning permissions to account for potential non-delivery, alongside a windfall allowance to reflect small sites which may come forward beyond the first 5 years. All calculations are based on historic performance over a period of 10 years in order to take account of peaks and troughs in the housing market.
Policy S2, Table 1	Update table to relect more recent evidence as at April 2016. Include discount rate to account for non-delivery of planning permissions and small site windfall allowance for small sites beond the first 5 years.

<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Environment Agency	1870		√		Kirkby in Ashfield Residents Association (KARA)	3792		√	
Johnson	1886		√		ACCESS	5359			√
Lathall	1917		√		Ward	5807		√	
Collier	1918		√		Lathall	5819		√	
Bolsover District Council	1982			√	Pegasus Group on behalf of Hallam Land Management	6036	√	√	√
Oxalis Planning on behalf of Westerman Homes	2235		√		Home Builders Federation (HBF)	6151	√	√	√
Barton Willmore on behalf of Taylor Wimpey UK Ltd	2495	√		√	England Lyle Good & Dr Bell	6630	√		



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Lathall	2631		√		Manders	6640		√	
Derbyshire County Council	2637		√		Featherstones PDD Ltd	6641	√		
D. Shaw	2707	√			Taylor Wimpey UK Ltd	6644		√	
Nottinghamshire County Council	2803		√		Savills on behalf of Ellandi LLP	6692		√	√
Cooper	2811		√		S. Bacon	6695			
Highways England	2816			√	Bidwells on behalf of David Wilson Homes (East Midlands)	6705		√	
National Trust	2828			√	Lewis	6729		√	
Nottinghamshire Wildlife Trust	2832			√	Mrs.S.Mellors	6731	√		
J. Collins on behalf of Mrs Parker	3034	√	√	√	Wyatt	6740			√
Lewis	3058			√	Eyre	6897		√	
Natural England	3185		√		Elkington	6977		√	

### **Policy S3: Settlement and Town Centre Hierarchy**

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Support for the settlement hierarchy proposed within Policy S3 which confirms that Hucknall, Sutton and Kirkby and areas in the District adjacent to the Sub Regional Centre of Mansfield, will accommodate the largest scale of growth.	Support acknowledged.
It is considered that the settlement hierarchy is appropriate.	Comment acknowledged.

Natural England is pleased Policy S3, which sets out the settlement hierarchy, emphasises the need for development in rural villages to contribute to landscape character.	Support acknowledged.
Support for the town centre hierarchy. Sutton in Ashfield should be the focus for the development of retail and town centre uses in accordance with its position at the top of the hierarchy.	Support acknowledged.
<b>Object</b>	
More emphasis should be given to the Hucknall area which should make a greater contribution to housing numbers, particularly given its proximity to excellent public transport links to Nottingham.	Disagree. Hucknall is making a significant contribution to meeting the objectively assessed housing needs of the District (accommodating 30% of the Districts growth).  No changes proposed.
The inclusion of the smaller settlements within Kirkby and Sutton is questioned. Settlements such as Nuncargate, Huthwaite, Stanton Hill, Skegby, Kirkby Woodhouse and Annesley Woodhouse should not be classified as lying within the Main Urban Area. The ability of these settlements to absorb major growth is doubted having regard to the limitations of local facilities, employment opportunities and transport, and the resultant issues of sustainability.	Disagree. The Greater Nottingham and Ashfield Accessible Settlements Study provides evidence that these are highly sustainable settlements.  No changes proposed.
When our client reads the more detailed policies and how they would apply to the land use needs of the Nursing Home and area, they are of the view that para 4.16 et seq conflict with Policy S3 which appears to says such a site has to be allocated.  Para 4.58 needs to be more precise and include the ability for existing facilities to expand. For example, a decision might	Paragraph 4.16 to 4.19 set out the Council's position on residential care homes. It identifies that the evidence indicates an over-provision in Ashfield and it sets out that it is anticipated that care homes could come forward on housing allocations The Council does not see not see any conflict with para 4.58 under Policy S1.  National planning policy gives a clear emphasis to the

<p>also need to take account of PJ1 and PJ2. These appear to say that proposals such as those intended at Wren Hall will be allowed in Green Belt if it is expansion in situ and even if not allocated. If that is the case then it is suggested that the last sentence to be explicit.</p> <p>Our client notes the important and rational para 13.25 on Care Homes and the value of outlook. Expansion of Care Homes must be encouraged in the policies in ways which allow them to be built with more generous use of land. A specific allocation seems the best way to ensure that and our client asks for this allocation of Wren Hall.</p> <p>Our client considers the PJ policies leave Plan users without a clear view as to what is intended and how applications will be judged. A rewrite and allocation are sought.</p>	<p>protection of the Green Belt. NPPF para 87 to 90 identifies that inappropriate development is, by definition, harmful to the Green Belt. The paragraphs identify exceptions to this. Consequently, this would be the Policy starting point for development in the Green Belt. Under these circumstances it is not consider that there is any conflict with the employment related policies in PHJ1 and PJ2.</p> <p>Paragraph 13.25 sets out what is anticipated from developments for care homes in relation to the amenity policy.</p> <p>The Council has no issue with Policy PJ1 and PJ2 and the supporting paragraphs. No changes proposed.</p>
<p><b>Comment</b></p>	
<p>It would be helpful if the policy could set out more clearly the scale of development for each location either in terms of the number of dwellings and employment land proposed or as a percentage of the total provision proposed for the district.</p>	<p>Agree. Policy S2 will be updated to include a percentage breakdown for each area in relation to housing provision and identify a breakdown of the employment land for different areas.</p>
<p>Land east of Lowmoor Road is well located in relation to both Sutton and Kirkby and the range of retail and other services available. Paragraph 4.51 of the Preferred Approach paper notes the excellent transport links available to other major conurbations via the Robin Hood Rail line. There is an opportunity to improve infrastructure in this location through a more comprehensive development between Lowmoor Road and Newark Road.</p>	<p>As identified in the Site Selection Technical Paper, the Council does not consider that the site is suitable for allocation. No changes proposed.</p>

<p>A three tiered settlement hierarchy is proposed under Policy S3. 30% of housing requirement is proposed for Hucknall, 65% for Sutton and Kirkby and 5% for the Rural Areas.</p>	<p>Comments noted. Policy S2 has been amended to identify the percentage breakdown for housing requirements for different areas.</p>
<p>Redevelopment opportunities in Sutton should be prioritised and incorporated into an investment strategy.</p>	<p>Town centre regeneration is a priority for the Council. The Town Centre Masterplans are currently under review and will be updated accordingly. Whilst the Local Plan provides policies which support the regeneration of each town centre, the town centre masterplans and associated strategies provide the framework for future growth.</p>
<p>Lower order town centres should seek smaller scale growth. Any new policy should be clear that scale will be integral to decisions on proposals for new town centre uses and that this will be assessed in relation to town centre hierarchy.</p>	<p>Comments noted. The Council does not consider it necessary to make any amendments as the policy clearly sets out the hierarchy of the centres. No changes proposed</p>
<p>Page 52, item 12 - development of smaller retail outlets such as the Co-op at Annesley, place considerable strain on the smaller specialised outlets. Whilst ACCESS understands the need to protect existing centres within towns, it is more vitally important, that viable shopping parades within the villages and within Annesley Woodhouse are not compromised by developments of an inappropriate scale.</p> <p>ACCESS are greatly concerned that the emphasis seems to be placed on protecting the vitality and variability of town centres -- Para 4.64, Para 4.65 &amp; Para 4.66. An equal emphasis should be placed at proposals on shopping parades in that they should not put the viability of the shopping parade in its viability and vitality at risk. Small developments which the Council may not see as a threat to local shopping centres and town centres are often a large threat to smaller shopping parades.</p>	<p>The Local Plan has to be seen in the context of national planning guidance and permitted development. Permitted development includes using a public house (Use Class A4) as a retail outlet (Use Class A1).</p> <p>The role of the planning system is not to prevent competition between different parties. Nevertheless, the emphasis is upon town centres which under the NPPF includes district centres and local centres. The Policy emphasises under S3 10. that smaller scale development will be supported in the Local Shopping Centres identified in the Policy.</p>

### Proposed Amendments

Issue/Policy	Amendment
No changes are proposed to the Policy.	

<b>List of Respondents</b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Oxalis Planning	2235		√		Taylor Wimpey UK Ltd	6644		√	
Natural England	3185		√		HBF	6151			√
ACCESS - Annesley Community Committed to Ensuring Sustainable Settlements	5359			√	S. Bacon	6695	√		√
England Lyle Good & Dr Bell	6630	√			Bidwells on behalf of David Wilson Homes (East Midlands)	6705		√	

## Area Policy: Hucknall

### Policy HA1: Hucknall Town Centre

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
Support	
-	
Object	
-	
Comment	
Town Centre development does not cater for local community expressed concern regarding the lack of public toilets.	Comments acknowledged. However, this is an issue that does not fall within the context of the Local Plan.
Responses received relating to Policy supporting text	
Page 61 sets out a "potentially a new health centre". The CCG are current conducting a feasibility study and option appraisal for health facilities for Hucknall and the outcome is not yet known.	The Hucknall Town Centre Masterplan 2009 sets out an aspirational approach to the Town centre setting out a vision or strategy. It is not anticipated that health facilities will be brought forward if the CCG's appraisal does not identify a need for a new health centre.

### Proposed Amendments

Issue/Policy	Amendment
No changes proposed to the Policy.	None

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<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Nottingham North & East Clinical Commissioning Group	6509			√	Burbage	6735			√

## **Policy HA2: Hucknall Economy and Jobs**

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
The Environment Agency support the policy. Identified that on Site HA2b Baker Brook Industrial Estate the Baker Lane Brook runs through the site and is shown to have areas partially within Flood Zones 2 & 3. Careful consideration will need to be given for future development to ensure that flood risk is not displaced and surface water to the Brook is not increased.	Comments notes. The Baker Land Brook development incorporated a SuDS scheme to retain water on site and gradually release it back into the Brook.
<b>Object</b>	
Objection to land off Watnall Road being designated as an employment area. The site should be reallocated for all or part as housing to enable the repair and relocation of one pair of the listed hangers.	It is not proposed that there will be any amendments to the Policy to exclude the hangers. The issues has been raised with the Conservation Officer. No changes proposed.

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<b>Comment</b>	
Economic growth and the natural environment are mutually compatible. Growth in the tourism sector should be sustainable and ensure the protection of the district's natural assets and resources to enable healthy ecosystem services to be maintained.	Comments noted.
<b>Responses received relating to Policy supporting text</b>	
-	

**Proposed Amendments**

<b>Issue/Policy</b>	<b>Amendment</b>
No changes proposed to the Policy	None

<b><u>List of Respondents</u></b>									
<b>Respondent</b>	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	<b>Respondent</b>	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Environment Agency	1870		√		K and M Hauliers Ltd	6620	√		
Natural England	3185			√	Burbage	6735			√
Nottingham North & East Clinical Commissioning Group	6509			√					



## Policy HA3: Hucknall Housing Allocations - Non site specific responses

Please note that comments received in response to specific housing sites in Hucknall are set out separately under individual headers following this section.

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Support for all the sites allocated in the Policy	Support acknowledged.
General support for more housing in Hucknall	Support acknowledged.
Environment Agency support the proposed housing allocations as they all fall within Flood Zone 1, in line with the NPPF flood risk sequential test to the location of new development. Specific comments are made in relation to sites.	Support acknowledged.
<b>Object</b>	
<u>Green Belt</u>	
Objection to more housing development in Hucknall, particularly in Green Belt.	Paragraph 47 of the National Planning Policy Framework (NPPF) states that, 'to boost significantly the supply of housing, Local Authorities should use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing'. Therefore, the Council has no option but to plan for the future housing needs of the District. National

	<p>planning policy specifies that, Local Plans should be drawn up over an appropriate timescale, preferably a 15 year time horizon.</p> <p>The 2015 Strategic Housing Market Area Assessment (SHMA) identifies that the Council needs to deliver 480 dwellings per annum between 2013 and 2033. Taking into consideration development that has been delivered since 2013, the Council has been required to identify sites for over 8000 dwellings over the Local Plan period (2017 to 2032).</p> <p>The Council considers that there are exceptional circumstances for Green Belt release in Hucknall due to the lack of deliverable sites to meet localised needs.</p> <p><b>No changes proposed.</b></p>
<u>Natural Environment</u>	
Greenfield sites should only be used as means of last resort not as the primary (cost effective) easy option for developers.	<p>The Council has allocated a number of brownfield sites within Preferred Approach Local Plan, which can accommodate approximately 1270 dwellings. A very small number of brownfield sites have been rejected due to severe constraints e.g. the majority are located in high flood risk areas (flood zones 2 or 3). Unfortunately the supply of brownfield sites has reduced, due to the successful redevelopment sites in the recent past and the need to provide land for business / jobs growth.</p> <p>In order to help meet the future housing needs of the District, the Council has had to make the difficult decision to propose the</p>

	<p>allocation of greenfield land for development. In doing so the Council has selected sites deemed deliverable and sustainable, as required by national planning policy.</p> <p>No changes proposed.</p>
<p>The use of green space and good agricultural land will result in a loss of recreational space and local wildlife.</p>	<p>The majority of land proposed to be allocated for housing is not designated recreational land. As far as possible, the Local Plan evidence has utilised the available information to examine the agricultural land classifications for each site. This has been taken into account in the site selection process. In determining the most suitable sites, the Council needs to ensure that sites are capable of delivering development within the Local Plan period (the next 15 years). This has resulted in some sites with higher grade soils being taken forward.</p> <p>An ecology assessment will be required as part of the planning application process. Any future development proposals should accord with Policy EV4 of the Local Plan which seeks to protect nationally and locally designated wildlife sites and protected or priority species.</p> <p>No changes proposed.</p>
<p>A number of the proposed allocations appear to directly affect Local Wildlife Sites. It is requested that all proposed allocations affecting LWSs are omitted from the Local Plan, or the boundaries of these proposed allocations are amended to specifically exclude the LWSs. Alternatively, it should be explicitly stated that the LWSs should be retained and</p>	<p>The Council has generally looked to ensure that any allocation avoids sites which have an ecological value including local wildlife sites. However, the Council as the local planning authority is required to balance the economic, social and environmental dimensions of sustainability. This has meant in a limited number of cases local wildlife sites are included in an</p>

<p>incorporated within the allocations as part of the open space provision.</p>	<p>allocation. For example Broomhill Farm HA3a and Rolls Royce HA3t (which has planning permission). In these cases the sites are retained within the boundaries of the propose allocation to ensure than mitigation measures are undertaken to minimise the impact on local ecology.</p> <p>The next stage of the Local Plan will include concise development briefs for the larger site allocations which do not currently have the benefit of planning permission. These will help to clarify the approach to LWSs among many other requirements in respect of detailed proposals.</p> <p>Add supplementary text in supporting paragraphs to clarify that Local Wildlife sites will be taken into account in detailed development proposals (where relevant to individual site allocations).</p>
<p><u>Infrastructure</u></p>	
<p>There would need to be substantial increases to the surrounding infrastructure which is currently struggling to meet existing demands.</p>	<p>In developing the Local Plan the Council has worked closely with Education Department at the County Council, the Clinical Commissioning Groups and other infrastructure providers to understand and plan for the infrastructure needed to support the development proposed in the Plan. This will lead to an update of the Infrastructure Delivery Plan to support the Local Plan. This information will be used to help negotiate s106 agreements with future developers to help secure funds to deliver the infrastructure needed. In some cases this may lead to the delivery of new infrastructure as part of the development.</p> <p>No changes proposed.</p>

<u>Highways</u>	
<p>Opposition to any more housing in Hucknall; the town is full/bursting. Existing development sites allocated in the 2002 Local Plan are already gridlocking the town.</p>	<p>Paragraph 47 of the National Planning Policy Framework (NPPF) states that, 'to boost significantly the supply of housing, Local Authorities should use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing'. Therefore, the Council has no option but to plan for the future housing needs of the District. National planning policy specifies that, Local Plans should be drawn up over an appropriate timescale, preferably a 15 year time horizon.</p> <p>The Council has sought to appropriately distribute the required growth across the District, whilst ensuring sites are deliverable, in line with national planning policy.</p> <p>In developing the Local Plan the Council has worked closely with Highways Department at the County Council to understand and plan for the highways infrastructure needed to support the development proposed in the Plan alongside new development proposals in neighbouring authorities (Mansfield, Gedling). This information will be used to help negotiate s106 agreements with future developers, to help secure funds to deliver the infrastructure needed.</p> <p>In addition to consultation with the Highways Department, the Council has commissioned an update to the Transport Study that will include an assessment of traffic impact resulting from the proposed sites and potential mitigation needed to help</p>

	<p>reduce that impact. This study, together with consultation with the County Council's Highways Department, will inform the design of any future development and s106 negotiation related to wider highways infrastructure mitigation.</p> <p>No changes proposed.</p>
<b>Comment</b>	
<p>The development is unlikely to reflect the current needs of an aging populations for smaller, single story dwellings.</p>	<p>The Local Plan contains a separate policy (HG4 Housing Mix) which requires developers to engage with the Local Authority to discuss an appropriate mix of housing early in the planning application process. In addition, it requires that 10% of new dwellings should be accessible or easily adaptable homes for occupation by the elderly or people with disabilities.</p> <p>No changes proposed. (However, Policy HG4 will need to reflect any necessary changes required as a result of the Whole Plan Viability Study)</p>
<p>All new developments should be small scale to prevent areas being overwhelmed.</p>	<p>The Council needs to allocate land for over 8000 dwellings in order to deliver the objectively assessed housing needs of the District over the next 15 years. The Council consider that the range of sites included in the Local Plan Preferred Approach is both appropriate and deliverable.</p> <p>The Plan includes 74 housing allocations which range in size from a yield of 10 to 495 dwellings. In addition, it includes 2 more strategically sized sites (SKA3a1 – Mowlands and HA3t, Rolls Royce) which offer the opportunity to provide a greater</p>

	<p>range of on-site benefits whilst being able to fulfil the needs of the District later in the Plan period.</p> <p>The Local Plan does not allocate sites below 10 dwellings, however, an additional supply of approximately 400 dwellings can be sourced from these smaller sites and are counted towards the overall supply for the District (ALPPA Table 1).</p> <p>No changes proposed.</p>
<p>Broxtowe, Gedling and City Councils are eager to push their quotas to the outskirts of their boundaries pushing the problem elsewhere whilst taking the incentives and revenue generated from tax.</p>	<p>The Council maintained its opposition to the housing allocations of land adjoining Hucknall in Gedling (Top Wighay, Papplewick Lane and Bestwood) throughout the development and examination of the Aligned Core Strategy. Now that the ACS has been adopted, the Council is continuing to have open dialogue with Gedling with regard to the future development of the sites to try to ensure the best outcome for Hucknall.</p> <p>No changes proposed.</p>
<p>This sounds like a done deal. I did not receive notification of the Local Plan proposals until 4 days before the consultation ended.</p>	<p>The Local Plan Preferred Approach isn't the final Local Plan document, it is a draft consultation document. This has been developed following a lengthy process of evidence gathering and site assessments, together with information gathered from consultations on previous iterations of the Plan. This latest consultation has enabled the Council to gain the views of residents, statutory consultees and other interested parties in order that the necessary amendments can be made prior to the completion of the final document (the Local Plan Publication) which will be subject to a final round of consultation in late 2016 prior to submission to the Secretary of State.</p>

	<p>The Council have undertaken more than six weeks of public consultation in order to ensure that local residents and other interested parties have an opportunity to make their views known. This approach complies with the requirements of regulation 18 of the Town and Country Planning (Local Plans) (England) Regulations (2012).</p> <p>No changes proposed.</p>
<p>The proposed proportions of new housing focus too heavily on Sutton/Kirkby at 65%. The proposed large allocations at Selston are highly questionable as is identifying settlements such as Kirkby Woodhouse as being within the “main urban areas”. Hucknall is underprovided with new homes at 30% of the overall proposed development. Many of the sites are small – the type where viability may be disproportionately affected by economic factors leading to failed delivery. Hucknall has excellent accessibility by public transport with the tram/Rail and bus services and is capable of absorbing more of the Plan’s housing allocations. This would help sustain Hucknall town centre and local jobs whilst offering the district’s population ready access by public transport to higher level facilities and employment opportunities offered in the City.</p> <p>It may also help improve retention of skills in Ashfield of residents who might otherwise migrate to adjacent areas such as Broxtowe or Gedling in order to access higher paid jobs in Nottingham. Retention is less likely to occur as a result of allocations in Selston and Skegby. Additionally it will help meet the City’s housing need.</p>	<p><u>Distribution</u></p> <p>The distribution of housing sites across Ashfield is considered to be appropriate. Strategic Objective S08 sets out that new housing will be situated in the most appropriate locations within and adjoining the towns of Hucknall, Sutton and Kirkby and the villages of Selston , Jacksdale and Underwood. Policy S2 further sets out that development will be primarily directed towards the 3 towns (and areas in the District adjacent to Mansfield).</p> <p>For the above reason it is considered that 65% of housing sites allocated towards a combined area of Sutton and Kirkby is broadly equivalent to the 30% allocated to Hucknall, thereby attributing a comparable level of growth across the 3 main towns. The remaining 5% has been allocated to the ‘Rurals’ area (Selston, Underwood, Jacksdale area) to support rural infrastructure and sustainable growth.</p> <p>Ashfield District Council have not been requested to take on board any under-provision from the City of Nottingham. The City is located within a separate Housing Market Area (Nottingham</p>



	<p>Core HMA) which plan to meet housing need between the constituent authorities.</p> <p><u>Deliverability/ Viability</u></p> <p>With regard to the Selston allocations, these sites have been assessed as developable and deliverable and have the support of the Neighbourhood Forum.</p> <p>The Council consider that the range of sites included in the Local Plan Preferred Approach is appropriate and deliverable. The Plan includes 74 housing allocations which range in size from a yield of 10 to 495 dwellings. In addition, it includes 2 more strategically sized sites (SKA3al – Mowlands and HA3t, Rolls Royce) which offer the opportunity to provide a greater range of on-site benefits whilst being able to fulfil the needs of the District later in the Plan period.</p> <p>The Local Plan does not allocate sites below 10 dwellings, however, an additional supply of approximately 400 dwellings can be sourced from these smaller sites and are counted towards the overall supply for the District (ALPPA Table 1).</p> <p>With regard to viability, all sites put forward as allocations have been assessed as deliverable. In addition, The Council has commissioned an update of the Whole Plan Viability Assessment, which includes the impact of all policies in the Local Plan. Any issues raised as a result will be addressed at the Publication Stage of the Local Plan.</p> <p><u>Retention of skills</u></p>
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	<p>There is no evidence to support the notion that a skilled workforce is only required in the City of Nottingham.</p> <p>No changes proposed.</p>
<b>Responses received relating to Policy supporting text</b>	
None.	

### Proposed Amendments

<b>Issue/Policy</b>	<b>Amendment</b>
HA3 paragraph 5.17	<p>Add text to reflect Local Wildlife sites as follows:</p> <p>Paragraph 5.17:  <b>“Site HA3a: South of Broomhill Farm/North of A611....between the road and the new development. Included within the boundary of the site is a Local Wildlife Site. Development would need to include mitigation of any negative impact on this. Delivery is ...”</b></p> <p>Paragraph 5.21:  <b>“Site HA3e: Broomhill Farm, Nottingham Road. .... Achievable in the SHLAA. A Local Wildlife Site lies adjacent to the site boundary. Development would need to include mitigation of any negative impact on this. The site is located...”</b></p>
<b>Officer Amendments</b>	
HA3 supporting paragraphs 5.17 – 5.27 as appropriate.	Add text to cross refer to site briefs where relevant to individual

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	site allocations.
Policy HA3 - site list and supporting paragraphs.	Update as necessary with regard to site specific/alternative site responses and any new sites which have secured planning approval since April 2015.

<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Environment Agency	1870		√		Parker	6602	√		
Lathall	1917		√		M. Redfern	6580	√		
Collier	1918		√		L. Sparkes	6627	√		
Lathall	2631		√		I. Platts	6635	√		
Nottinghamshire County Council	2803	√		√	Bacon S	6695	√		
Cooper	2811		√		Mr & Mrs Overton	6728	√		
Turner	3099		√		Manders	6640		√	
Ward	5807		√		Lewis	6729		√	
Lathall	5819		√		Elkington	6977		√	

**Policy HA3: Hucknall Housing Allocations - Individual Housing Sites**

**HA3a: Site: South of Broomhill Farm/North of A611, Hucknall**

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
<b>Object</b>	
<u>Policy</u>	
Opposition to allocating land for housing in the Green Belt.	The Council acknowledges the objections to the release of Green Belt land for housing development. Following a comprehensive review of all land submitted to the Council, it has been necessary to allocate Green Belt land for housing in order to meet the District's objectively assessed housing needs.
<u>Natural Environment</u>	
Objects to a housing allocation on a Local Wildlife Site (EV4ndm).	Any future proposal would need to comply with Policy EV4 Green Infrastructure, Biodiversity, and Geodiversity of the Local Plan in this respect.  It is the intention of the Council to retain the Local Wildlife Site. This will be detailed within site's development brief.
Broomhill Farm includes two mature landscape areas and a designated Local Wildlife Site. Development would destroy two of the most important natural history sites in the area. The Council state that, a small part of the site is a Local Wildlife Site. The whole of the site is of environmental importance.	The Council's Landscape Architects have undertaken a landscape assessment of the site. The assessment indicates that the site's capacity to accommodate development is moderate. This is highly comparable with the majority of sites taken forward as housing allocations. The emerging Local Plan does not include a Mature Landscape Policy. With regard to the Local Wildlife Site, see response above.
The Council has given a positive score for 'access to open spaces'. However, the development will destroy a local wildlife site and another environmentally important site.	See above. The positive score relates to publicly accessible open space, which lies in close proximity to the site.
Objections to the loss of high grade agricultural land.	The Local Plan evidence clearly identifies the agricultural land

	<p>classifications for each site. This has been taken into account in the site selection process. In determining the most suitable sites, the Council needs to ensure that sites are capable of delivering development within the Local Plan period (the next 15 years). This has resulted in sites with higher grade soils being taken forward.</p> <p>Natural England has been consulted on the Local Plan and have raised no objections to any of the sites taken forward for allocation.</p>
<p>Greenfield sites should only be used as a last resort. They should not be used as a cost effective, easy option for developers.</p>	<p>The Council has allocated a number of brownfield sites within Preferred Approach Local Plan, which can accommodate approximately 1268 dwellings. A very small number of brownfield sites have been rejected due to severe constraints e.g. the majority are located in high flood risk areas (flood zones 2 or 3). Unfortunately the supply of brownfield sites has reduced, due to the successful redevelopment sites in the recent past and the need to provide land for business / jobs growth. In order to help meet the future housing needs of the District, the Council has had to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites deemed deliverable and sustainable, as required by national planning policy.</p>
<p>Objection to the loss the area because it is used by dog walkers and ramblers. There is no open spaces left for residents to walk.</p>	<p>The site is not currently designated as a public open space in Ashfield Local Plan Review (2002). Part of the site will contain public open space as part of the development. The public Rights of Way will also still be maintained through the development of the site; this includes links to the surrounding green infrastructure routes.</p>

<p>Regarding Rolls Royce - in recent weeks the Council has started ruining cycle paths and footpaths that have been used for years by local residents. Green areas in Hucknall are slowly disappearing to be replaced by hundreds of new homes.</p>	<p>This statement is incorrect. The existing footpath has been retained and a new footpath will be incorporated into the scheme. The Council would only ever seek to maintain or improve public footpaths and cycle paths. It may be that maintenance work is in progress and this has created the impression that footpaths have been damaged.</p> <p>A draft Green Infrastructure network for Ashfield has been developed which links into the wider GI network across Nottinghamshire, Derbyshire and other areas of the East Midlands; details are contained within the Council's Green Infrastructure and Biodiversity Technical Paper. The network identifies strategically planned links between existing and proposed green spaces with the communities around them. Green Infrastructure will need to be an integral part of this planned development to help to achieve sustainable growth in the area.</p>
<p>The benefits of the countryside should not be ignored. It should be retained for future generations. There are health benefits for local residents using the site for recreation.</p>	<p>The Council recognises the benefits of the Countryside. Local Plan Policies EV1 and EV2 seek to protect the majority of land currently designated as Countryside and Green Belt.</p> <p>However, as detailed above, the Council has had to take the difficult decision to allocate sites within the countryside and greenbelt into order to meet the District's future housing need, as required by national policy.</p>
<p>Concern raised regarding the quantum of housing and the impact this will have on the ecology and natural environment. The land has value as an unmanaged green oasis for wildlife. The scale of the development should be reduced and a nature</p>	<p>Local Plan Policy EV4 seeks to protect Green Infrastructure and minimise the fragmentation of habitats. The text in Policy HA3a acknowledges the designated Local Wildlife Sites on the site and seeks to protect the nature conservation interests on the</p>

<p>conservation site should be incorporated within the site. Kestrels, Sparrow Hawks are often seen in the area and Sky Larks live in the grassland in the summer.</p> <p>The proposed allocation affects the Farley's Grassland LWS (5/2275), and may affect the Farley's Disused Railway LWS (2/235). It is requested that all proposed allocations affecting LWSs are omitted from the Local Plan, or the boundaries of these proposed allocations are amended to specifically exclude the LWSs. Alternatively, it should be explicitly stated that the LWSs should be retained and incorporated within the allocations as part of the open space provision.</p>	<p>site. Any future planning application will be required to demonstrate that it is compliant with Policy EV4 in this respect.</p>
<p>Concern raised regarding the impact the development would have on SSSIs and Local Wildlife Sites (LWS).</p>	<p>Any future planning application will be required to demonstrate that it is compliant with Policy EV4. Natural England have been consulted on the Local Plan and no objections have been raised in this respect. The Council will continue to consult Natural England as necessary throughout the planning process.</p> <p>Future details related to the protection of the LWS on site will be contained within the site's development brief.</p>
<p><u>Highways/Access</u></p>	
<p>a) The Council claims on one page that Broomhill Farm extension scores a 'positive impact' with regard to 'Highway capacity available'. On the same page under 'Known physical constraints – Highway/access' it states 'currently no access from the public highway' 'there are access constraints which can be mitigated'. Confusing to say the least.</p>	<p>a) The capacity of the highway relates to the amount of vehicles on the roads rather than physical access to and from a site. The highway network has the capacity to accommodate the number of additional cars arising as a result of the development.</p> <p>The evidence acknowledges that there is currently no direct access to the public highway. This constraint can be overcome due to the new roundabout installed as part of the Rolls Royce</p>

	development.
b) The report states, under 'Highways and Access' that the area tops the list of known constraints and would require major infrastructure works.	b) Major infrastructure works will be required (the new roundabout and an access road into the site).
c) The local plan states that the council want to provide "good access to open green spaces" it wants to "expand the green infrastructure" and "reduce the need to travel by car". The council publication also states that Hucknall has "excellent access to the strategic road network".	c) Comments noted. No amendments required.
d) The site proposed borders a busy bypass with, currently no direct road access to the site. The report itself states under "Highways and Access" that the area tops the list of known site constraints" and would require "major infrastructure works".	d) As identified in point a, highway improvements will be undertaken as part of the development.
e) Objection raised in relation to the access and egress to and from Hucknall on that side of town. The roads in the area are already heavily congested. The additional houses from this proposal and Rolls Royce will only serve to have a greater impact on the road network, causing even longer tailbacks. What are the chances of the emergency services reaching homes during the morning and evening rush hour?	e) Objection noted. The Council have continued to work closely with the Highway Authority throughout the site selection process. It is acknowledged that traffic congestion will increase as a result of the proposed developments in the District. Recommendations from the 2016 Transport Study will be taken into consideration. The Infrastructure Delivery Plan and Site Development Briefs include further details of highway improvements.
f) All residents will need to travel by car to access services and facilities in Hucknall, thereby creating more congestion.	f) This is not correct. There are excellent footpath and cycle path routes from the site to the surrounding area and into Hucknall town centre.
g) The Council's Equality Impact Assessment appears to promote a rosy future of 'less travel' and 'less need for travel' with 'key facilities being provided on site' and 'public transport networks should also be created with new ones enhanced'. It	g) The 2016 Infrastructure Delivery Plan sets out the infrastructure requirements relating to the site allocations.



states that Rolls Royce is mixed use and this reduces travel cost and there will be no need for access by private transport to reach local facilities and employment. It also mentions 'new schools' and the creation of 'new green infrastructure and open spaces'. There is no evidence of any of this in any of the plans.	
h) There is far too much new housing being built in Hucknall with inadequate upgrading of road infrastructure.	h) The Council is required by national planning policy to deliver the objectively assessed housing needs of the District over the next 15 years. The Council will continue to work with the Highway Authority to ensure that any necessary road improvements associated with sites allocated for housing are delivered (as identified in the 2016 Infrastructure Delivery Plan).
i) Concern raised about the new access road and related visibility.	i) The new access road will need to meet highway standards, as identified in the 6Cs Design Guide.
j) Concern raised about the impact that an increase in traffic will have on safety.	j) As set out above, development will need to meet highway standards.
<u>Flooding</u>	
a) The site acts as a natural drainage area which accommodates the run off from surrounding homes.	a) The site is not in a high risk flood zone. A flood risk assessment will be required as part of any future planning application. A Sustainable Drainage System will be required where necessary.
b) Any risk of flooding should not be tolerated.	b) See above.
c) Building on an area with natural springs doesn't make sense.	c) See above.
<u>Comments</u>	
Hucknall has taken more than its fair share of new housing. Enough is enough.	Paragraph 47 of the National Planning Policy Framework (NPPF) states that, 'to boost significantly the supply of housing, Local Authorities should use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market

	<p>and affordable housing'. The Council is required by national planning policy to plan for the future of the District. The NPPF specifies that, crucially Local Plans should be drawn up over an appropriate timescale, preferably a 15 year time horizon. The 2015 Strategic Housing Market Area Assessment (SHMA) identifies that the Council needs to deliver 480 dwellings per annum between 2013 and 2033. Taking into consideration development that has been delivered since 2013, the Council has been required to identify sites for over 8000 dwellings over the Local Plan period (2017 to 2032). The site is required to meet the objectively assessed housing needs of the District. South of Broomhill Farm is the most suitable site available when considering the reasonable alternatives.</p>
<p>At the 2002 Ashfield Local Plan Review the Council stated 'Development of site possible without adversely affecting the Green Belt and in particular the open break between Hucknall and Nottingham. Development area defined to the south by a prominent ridgeline beyond which lies the important open break.' The owner of Broomhill Farm, Nottinghamshire County Council, disagreed with A.D.C claiming - "Site should be extended to the by-pass. The ridgeline is not a valid boundary for development as it would be visible over the ridge." A.D.C. countered N.C.C.'s argument stating- "Disagree. Ridgeline is well defined defensible feature that clearly establishes a topographical limit to development." Broomhill Farm Extension is the land that Ashfield District</p>	<p>See above.</p>

Council, in 2002, rejected for housing. The Council now proposes to allocate it. For what reason?	
The site would not benefit Hucknall Town Centre regeneration, it would help Bulwell Town Centre.	Strongly disagree. The site has good links to Hucknall Town Centre via the road and footpath/cycle path network.
The Council states that the site has minor topographical constraints. The truth is, it's sloping and used by locals for sledging and skiing.	One small part of the site, which forms a Local Wildlife Site, is steeply sloping. This will be maintained as a designated Local Wildlife Site.
Demand for housing land has increased tremendously since 2002 but that does not justify a volte-face which would lead to the coalescence of Hucknall and Nottingham, especially when alternative sites are available.	Development would not result in the coalescence of Hucknall and Nottingham, as is evident from the results of the Green Belt assessment. A gap will still be maintained.
The Council claims in one document that 'There is a GP facility within 800 metres of the site.' Whilst in another it states 'No access to GP'. It is anyone's guess which is accurate. I know of is no GP surgery within 800 metres of the site. Does this relate to a veterinary surgery?	The edge of the site is approximately 500 metres from a GP surgery on Farley's Lane. Consequently, part of the site is within 800 metres of the GP Surgery. The Sustainability Appraisal will be amended accordingly.
Ashfield District Council's assessment of Broomhill Farm extension is biased in favour of Nottinghamshire County Council land. Had the site been in private ownership it would not have been so highly assessed. Potential development land should be assessed on its own merits, not by who owns it.	This statement is incorrect. All land submitted for consideration has been assessed on its own merits using the same assessment process, as identified in the Site Selection Technical Paper. The SHLAA utilises a joint methodology which has been agreed with the Greater Nottingham Authorities, Mansfield District Council and Newark and Sherwood District Council and has been subject to public consultation. The Green Belt Review Framework has been agreed with the Greater Nottingham Authorities and has been subject to public consultation. The Sustainability Appraisal has been subject to consultation with statutory consultees.
The Council's Preferred Option, in its present form, may well not stand up to scrutiny and consequently be open to	The Council believes that the Local Plan will stand up to scrutiny because it is based on sound evidence.

challenge.	
Objections received from residents living adjacent to the site who do not want development next to their property.	Objections noted.
What form of compensation does the Council intend to pay out for the noise and light pollution the homes will produce?	Any future planning application will need to demonstrate that it is compliant with planning policies relating to residential amenity, which includes issues relating to noise and light.
Concern raised that development would have a negative effect on the value of homes adjoining the site. Does the Council intend to compensate adjoining landowners?	Whilst this is not a planning consideration, the Council is not aware of any evidence to support this claim.
What measures will be put in place to keep the homes adjoining the site clean from dust created?	Conditions may be imposed in relation to site construction vehicular activity in order to keep dust and noise levels to a reasonable level.
What measures are being put in place to ensure that the Council manages the potential disruption caused by the builders?	See above.
Criticism of the level of community consultation and time given to respond.	<p>The Council strongly disagrees that the level of consultation and time given to respond was inadequate.</p> <p>The Council have undertaken more than six weeks of public consultation in order to ensure that local residents and other interested parties have an opportunity to make their views known. This approach complies with the requirements of regulation 18 of the Town and Country Planning (Local Plans) (England) Regulations (2012).</p> <p>The record of consultation highlights the numerous methods of consultation undertaken by the Council, including several manned exhibitions, meetings with local residents groups, site notices, newspaper articles, public notices, library displays and information leaflets were put in the book bags of primary school</p>

	children in the District.
The Council has stated that the main focus of communication is through the Mansfield and Ashfield Local Strategic Partnership. Who is in this team? Do any of the team live in the area affected?	The Council is unclear where this reference has been taken from or what it is referring to. Various methods of communication have been utilised, as set out above.
Won't Rolls Royce meet the housing needs without the need to allocate land for an additional 465 homes?	No.
Concern raised regarding air pollution caused by the increase in traffic.	Comment noted. The Council's Environmental Health team has raised no objections to the allocation of the site.
The Council does not take into consideration the views of residents. This is evident with the Rolls Royce development.	<p>This statement is incorrect. All responses received in relation to planning applications or consultation on the Local Plan are taken into consideration.</p> <p>The National Planning Policy Framework paragraph 14 indicates, proposals which accord with the Development Plan (Local Plan) must be approved without delay.</p>
The Council only wants to make money and is not taking into consideration the huge impact this development will have on the community.	This statement is incorrect. The Local Plan evidence base has informed the site selection process to ensure that sites taken forward will deliver sustainable development.
The Council should allocate brownfield sites rather than countryside. Small scale brownfield schemes are preferable to largescale monstrous sites. Why is there a need to build on fields and open spaces?	The Council has allocated a number of brownfield sites within Preferred Approach Local Plan, which can accommodate approximately 1268 dwellings. But unfortunately the supply of brownfield sites has reduced, due to the successful redevelopment of such sites in the past and the need to provide land for business / jobs growth. As a result, the Council has had to make the difficult decision to propose the allocation of sites within the countryside to meet the District's future housing needs, as required by national planning policy.

There is plenty of land available in Nottingham on brownfield sites.	Brownfield sites in Nottingham are required to meet the housing needs of the City. Nottingham does not have enough sites to meet their own housing needs. The Borough Councils of Gedling, Broxtowe and Rushcliffe are assisting Nottingham City in meeting their housing needs.
Disappointment in the Council for allowing this to happen. The feelings of local people are ignored every time policy makers get together. Section 106 money is very tempting to Local Authority coffers and the money is required to offer improve local services.	All comments received are taken into consideration in the development of the Local Plan and any necessary amendments are made as a consequence. The Council is required by national planning policy to deliver the objectively assessed housing needs of the District over the next 15 years. If the Council doesn't produce a Local Plan, the Government will intervene to ensure that a Local Plan is produced. Developer contributions can only be sought for projects directly relating to the development of the site e.g. education contributions for improvements to schools, open space improvements, and highway improvements.
House prices are unaffordable for many local people. Many households are in unsustainable levels of debt. The houses currently being built are 4/5 bedroom luxury houses which do not help people the Council is seeking to help. Starter homes are needed but unless developers are forced to build this type of property they will continue to waste our green spaces with their blatant profiteering.	The Council is seeking to deliver a mix of house types and affordable housing. This approach is supported by policies in the Local Plan.  The Government is proposing to require future development to include a minimum amount of on site Starter Homes.
<u>Infrastructure</u>	
Hucknall's services are already stretched.  It is difficult to get a Doctor's appointment in Hucknall.	The Council has worked closely with the Clinical Commissioning Groups and the County Council Education Department to understand the future health and education requirements resulting from the sites proposed, which will eventually feed into an Infrastructure Delivery Plan. This work will then be used to

	help negotiate developer contributions for the health and education infrastructure needed.
<u>Sustainability Appraisal</u>	
The sustainability appraisal notes a number of positive impacts – none of which seem particularly quantifiable other than an increase in the number of new dwellings (to have this as a positive impact is something that many of the locals, if not all, will find highly questionable!)	The Council disagrees with this statement. In order to ensure that the method of SA assessment proposed is robust, statutory bodies have been consulted as part of the development of the Sustainability Appraisal (e.g. Natural England, Historic England, Environment Agency, utility providers, Highway Authority, Highway Agency etc).
Good access to open green spaces – this is wrong, by allowing development across this site you are limiting the access and considerable reducing green space for the existing residents of Hucknall.	The Council disagrees with this statement. The site is not designated public open space. As part of the development of the site public open space will be provided and green infrastructure routes will be enhanced.
Improvement in health and social inclusion – how can you quantify this? Improvement in this very complex issue needs more than a new housing site.	The SA uses a consistent approach in the assessment of all sites. New housing provides for the needs of people in need of a home. The delivery of new housing will improve the health and social inclusion of those in need of a home.
Supports regeneration of Hucknall Town Centre – there will be more people in Hucknall yes but other than monies provided to the council by the house builder in S106 funds there is no proof that there will be any impact onto regeneration.	An increase in the number of people living in Hucknall will support retail, leisure and other businesses in the Town Centre.
Highways capacity is available – This is wrong, highways information is easily obtained through surveys but as someone that tries to get into Hucknall each evening I can assure you that the infrastructure is in considerable need of improvement.	In developing the Local Plan the Council has worked closely with Highways Department at the County Council to understand and plan for the highways infrastructure needed to support the development proposed in the Plan alongside new development proposals in neighbouring authorities. This information will be used to help negotiate s106 agreements with future developers, to help secure funds to deliver the infrastructure needed.

	<p>In addition to consultation with the Highways Department, the Council has commissioned an update to the Transport Study that will include an assessment of traffic impact resulting from the proposed sites and potential mitigation needed to help reduce that impact.</p> <p>Negotiations with developers in respect of section 106 contributions are undertaken at the planning application stage. This will be informed by planning policy and the Infrastructure Delivery Plan in order to achieve a sustainable development.</p>
Access to a bus stop – Only on Nottingham Road side of the development.	This is incorrect. There are several bus stops on Broomhill Road and Nottingham Road within walking distance of the site.
<u>Alternative Sites</u>	
<p>There are better sites than Broomhill Farm Extension available to ADC, one of which is site H4 Stubbing Wood Farm. Allocation of Stubbing Wood Farm would not result in the coalescence of Nottingham and Hucknall. Broomhill Farm is sloping and undulating, this may restrict the capacity of the site to accommodate development. Stubbing Wood Farm is flat. Broomhill Farm has many mature hedgerows within it. Stubbing Wood Farm has no mature hedgerows. Stubbing Wood Farm would benefit Hucknall Town Centre Regeneration.</p> <p>Regardless of how Ashfield Council try to beef up the site, Broomhill Farm extension cannot provide a fraction of the planning benefits which development of Stubbing Wood Farm could deliver.</p> <p>ADC's assessment of Stubbing Wood Farm (SHLAA Ref. H4)</p>	<p>The Council disagrees with this statement. Broomhill Farm extension is well contained by residential development. It will be capable of being accessed via the new roundabout on the A611 once completed. It is also capable of accommodating much more development than Stubbing Wood Farm. If the Council was to allocate Stubbing Wood Farm rather than Broomhill Farm, it would not meet the housing needs of the District. This would be a high risk approach which is likely to result in the Local Plan being found to be unsound. The conclusion of the Site Selection document will be amended to further clarify the reasons why it is not suitable.</p>



has been so negative, inaccurate and misleading as to bring into question the integrity of the Council.	
<b>Support</b>	
<u>General</u>	
Support the allocation of this site	Support acknowledged
There is a need for more housing in Hucknall due to the population growth.	Support acknowledged
The site is ideal, it has a defensible boundary.	Support acknowledged
Acknowledgement that the proposed allocation offers a sensible continuum of housing.	Support acknowledged
Recognition that homes are needed and that the site may represent a sustainable urban extension.	Support acknowledged
<u>Highways/Access</u>	
Support the development of the allocation as it has excellent transport links to Nottingham and Mansfield. It is close to Trams and Hucknall Railway Station. Trams are within walking distance from Nottingham Road frontage. Good links to bus and cycle routes. The Hucknall Bypass provides a defensible boundary in terms of the alternations to the Green Belt.	Support acknowledged
Train links to Nottingham Railway Station provide good access to London and the north.	Comment noted.
Good cycle routes are already laid out in the surrounding area.	Comment noted.
Support for improved cycle and footpath links. Good examples include Stainborough Road and Bolingey Way estates in Hucknall.	Comment noted. The Local Plan contains policies which support improvements to cycle routes and footpaths.
<b>Comment</b>	
<u>Natural Environment</u>	
This proposed allocation is on the perimeter of the urban area of Hucknall, therefore any proposals should take into account	Comment noted.

the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone ML18 River Leen Corridor.	
Given that the area is currently Green Belt and there is a nature conservation area on site, attempts should be made to maintain the feeling of being close to the countryside in the design of any future scheme.	Comment noted. The Local Plan includes a policy which seeks to enhance green infrastructure. It also contains a policy on Design which is further supported by the Residential Design Supplementary Planning Document.
Green Belt release should be a last resort if the sustainability appraisal for all sites demonstrates that there are no other appropriate non-Green Belt sites. This is well established in national guidance.	The Council is of the opinion that there are exceptional circumstances for Green Belt release in order to ensure that the Council meets the objectively assessed housing needs of the District.
<u>Highways/Access</u>	
There should be no through route for vehicular traffic between the A611 and Nottingham Road as this would create a 'rat run' which would significantly impact on a number of properties within Phase 1 of the Broomhill Farm development on Jackson Road and Victoria Way, plus the properties which will be built as part of Phase 2. There are already good links to the A611 and Hucknall Town Centre via Watnall Road and Wood Lane. The creation of an additional link through this estate would undermine the purpose of the bypass (A611).	If the Broomhill Site is taken forward for development, the Council will work with the County Council and the developer to create a design and layout that effectively integrates with the surrounding communities, whilst aligning with highway standards. In seeking to achieve this, proposal may create a road link to the previous phases of Broomhill, however such a link would be designed to discourage rat-running.
<u>Flooding</u>	
Sites HA3a and HA3e - These sites are in flood zone 1 in their entirety; however their proximity to an area of flood zone following an ordinary watercourse needs to be considered, as flood zones may change over the lifetime of the development, particularly considering climate change. As such we recommend forward planning for flood resilience at the design stage of these relatively large housing developments, and run off should be minimised. This is particularly relevant	<p>The Council will continue to work with the Environment Agency and the Lead Local Flood Authority in this respect.</p> <p>Proposed amendment to the summary of the housing allocations paragraph 5.17 to reflect the comments.</p>

considering the current land use of these development areas is rural, and so maintaining a Greenfield run off rate is vital to prevent worsening flood risk in this area.	
<u>Infrastructure</u>	
There are capacity constraints at primary schools in the surrounding area. This will need to be addressed as part of the planning process.	Comment noted. The Council will continue to work with Nottinghamshire County Council to address the educational requirements associated with the development. Developer contributions will be sought for any necessary improvements. The Local Plan contains a policy to support this approach.
Working on the existing population forecasts secondary schools in Ashfield are at capacity from the 2020/21 academic year. The County Council will therefore be seeking a secondary education contribution on housing sites that apply for planning permission during the current 10 year pupil projection period. We are currently embarking upon a round of meetings with all secondary Head Teachers and Heads of Academy Trusts in the county to find out what their plans are for the future. The outcome of these discussions will inform our future planning of school places. The County Council will therefore be able to respond more formally on the impact of any proposed housing developments on the provision of secondary school places throughout the county.	Comment noted. The Council will continue to work with Nottinghamshire County Council to address the educational requirements associated with the development. Developer contributions will be sought for any necessary improvements. The Local Plan contains a policy to support this approach.
The comments made above are made in good faith and on the information available at the time. You should be aware that many factors can change at any time which could have an adverse impact on the supply of school places. When the County Council are approached by Ashfield District Council about the individual developments we will be able to respond more fully to their enquiry. If at that time there is insufficient capacity to accommodate the increase in pupils	The Council recognise the importance of ensuring development is supported by appropriate infrastructure and the Council will continue to work very closely with the County Council to highlight the future education capacity needs of the District. This will enable these requirements to be highlighted at an early stage in the development process, so developers are aware of the infrastructure requirements linked to a site. It is therefore important that effective dialogue between the

likely to be generated by a development and the development itself cannot enable the necessary provision the County Council will raise objections to the development.	Council and the County Education Department continues.
This proposed allocation is on the perimeter of the urban area of Hucknall, therefore any proposals should take into account the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone ML18 River Leen Corridor.	Comments acknowledged.

### Proposed Amendments

Issue/Policy	Amendment
Protection of the two Local Wildlife Sites which form part of the site.	Add to policy text: Any future planning application for housing development would need to comply with Policy EV4 in terms of the Local Wildlife Sites on the site.
Policy HA3 paragraph 5.17. Amend the paragraph to identify Local Wildlife Sites are located within the proposed allocation and to reflect that any site specific flood risk will need to take into account Farley Brook and greenfield run-off rates.	<b>Amend paragraph</b> <b>Site HA3a: South of Broomhill Farm/North of A611.</b> This is an amalgamation of 5 parcels of land submitted individually for assessment through the SHLAA (ref. H09, H51, H52, H81, H99). The site is located adjacent to the existing built area of Hucknall on land previously designated as Green Belt. The site is well contained by the A611 Hucknall by-pass and the estimated yield has been reduced to allow for a buffer between the road and new development. <b>Included within the boundary of the site are Local Wildlife Sites and any development would need to include mitigation of any impact on the Local Wildlife Sites. The site is within Flood Zone 1. Nevertheless, Farley Brook runs to the south and south west of the Hucknall Bypass. Consequently, any site specific flood risk assessment will need</b>

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	to take account of flood risk from the watercourse over the life of the development and will need to maintain greenfield run-off rates. Delivery is anticipated beyond 5 years to enable implementation of the necessary major highways infrastructure works.
Sustainability Appraisal – HA3a.	Access to GP Surgery – the site is partially within 800 metres of a GP Surgery (on Farley's Lane). Reduce from two positives to one positive.
SHLAA site H4 Stubbing Wood Farm Site selection conclusion needs to further clarify the reasons why the site has not been taken forward.	Add to the site selection document conclusion for SHLAA site H4 Stubbing Wood Farm: 'The site is not capable of accommodating the number of new homes required to meet the objectively assessed housing needs of the District (site capacity 200 dwellings). Broomhill Farm Extension can accommodate more than twice the amount of development (site capacity 480 dwellings).

<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Environment Agency	1870			√	W. Thornton	6614	√		
Mr. I. Glenn	2583	√			C. Roussel	6624	√		
Nottinghamshire County Council Planning Policy	2803			√	N. Bell	6628	√		
M. Turner	3099		√		J. Fortescue	6633	√		
Vincent & Gorbong on behalf of Nottinghamshire County Council	5480		√		E. Ferris	6637	√		
W. Soubry	6120	√			K. Willows	6715	√		

E. De Coverly	6566			√	Robinson	6733		√	
D. Mills	6575	√			S. M. Spolton	6059	√		

### HA3b: Site: South of Papplewick, Hucknall

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Object	
Highways & Access	
The combined impact of both Ashfield and Gedling Council's proposals in this area of the town will have an increasingly detrimental impact on existing residents e.g. increased traffic, and will put even further strain on Hucknall's infrastructure. If this site is to be included it is imperative that any access is secured from the current development and that there is no access from the neighbouring allotment site.	There are no plans for access to be taken from the allotment site. The allotments have statutory protection and such development would be inappropriate.
Will Oakenhall Avenue be opened up to through traffic to access the site? The road is very narrow and parking restricts this further. The junction with Wigwam Lane is also difficult to navigate.	There are currently no detailed plans of access arrangements. The Council is of the opinion that access can be achieved within the Plan period (within 15 years).
Economic	
The assessment at H20 also refers to the development of the site as "expected to include employment land". I assume this must be an error?	This is an error in the Sustainability Appraisal. There are no proposals for this to be a mixed uses site for housing and employment. The site is allocated for housing only. An amendment will be made to the SA to remove the sentence.

<u>Natural Environment</u>	
Concerns raised as the field is located at the bottom of an old pit spoil heap. Responses sets out that as an old spoil heap it should be inspected on a regular basis to ensure it is not a danger to members of the public. Also raised that a watercourse runs at the foot of the heap which also needs to be regularly inspected.	It is understood that Nottinghamshire County Council should undertake inspections.
We have lost too many green field sites in the Papplewick Lane area to housing. Green field sites should only be used as a last resort.	The Council has allocated a number of brownfield sites within Preferred Approach Local Plan, which can accommodate approximately 1268 dwellings. A very small number of brownfield sites have been rejected due to severe constraints e.g. the majority are located in high flood risk areas (flood zones 2 or 3). Unfortunately the supply of brownfield sites has reduced, due to the successful redevelopment sites in the recent past and the need to provide land for business / jobs growth. In order to help meet the future housing needs of the District, the Council has had to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites deemed deliverable and sustainable, as required by national planning policy.
This is high value landscape and a green wedge between built up areas. There is no evidence of an ecology report or landscape assessment. This development will not protect or enhance the natural environment.	The Council has undertaken a landscape assessment the results of which indicate that development would have a low impact on the landscape. An ecology assessment would be required at the development management stage. There are currently no national or local designated wildlife areas on the site.
<u>Flooding</u>	
The field is poorly drained and raised concerns over adjacent ditches that have been filled in over the years so that water no	Comment noted. This will be dealt with at the development management stage through the planning application process. A

longer runs away. Query raised regarding future maintenance of the ditch if the site is developed.	flood risk assessment will be required
Environment Agency - This site borders an area of Flood Zone 2 arising from an ordinary watercourse. An assessment of flood risk may be necessary at development management stage to consider flood risk from all sources, and clearly demonstrate how any risk posed by this flood zone will be mitigated over the lifetime of the development.	Comment noted. This will be dealt with at the development management stage through the planning application process.
Concern that any development could exacerbate existing surface water problems which are very evident in the area. Any potential development should also consider the impact, and seek to mitigate this, on the adjacent allotment land where there have been incidents of flooding. A brook which runs along the edge of the adjacent golf course land adjacent to this site, and the allotment land, is often blocked and prevents drainage.	See comments above.
Request to see evidence relating to site inspections of the watercourse. Respondent has indicated that inspections should be undertaken once every six months to check for blockages.	It is understood that Nottinghamshire County Council should undertake inspections.
<b>Other</b>	
Overlooking and loss of value to existing dwellings	Any future development would be required to accord with Local Plan policies relating to good design and residential amenity. Whilst loss of value is not a planning consideration, the Council is not aware of any evidence that new housing development has a de-valuing effect on existing homes.
Concern raised regarding the impact on health of a specific occupier of a neighbouring property due to overlooking/privacy issues and access to UVB rays that are found in sunshine.	Any future development would be required to accord with Local Plan policies relating to good design and residential amenity. The Residential Design Guide includes details of minimum distance requirements between dwellings. This will be taken into



	consideration at the development management/planning application stage.
My family has rented this field since 1949 and we have looked after and cared for the land. The horse grazing the land is old and would not be able to adapt.	The Council acknowledges that the site has been rented for grazing land for a number of years. However it has been allocated for housing development since 2002, within the current Ashfield Local Plan.
The site is not deliverable. It has been allocated since 2002 and has not come forward. Access constraints will need to be overcome.	Disagree. The site has not come forward as it relies on access from the adjoining site off Papplewick Lane. The area adjoining the site is now under construction and an access road can be achieved.
Development would result in overdevelopment of this part of Hucknall due to development of the adjoining site off Papplewick Lane.	Disagree. This is a small area which forms a logical extension to new development off Papplewick Lane. It is well contained and development would not have a significant impact on the landscape as the site is not prominent.

### Proposed Amendments

Issue/Policy	Amendment
The Sustainability Appraisal indicates that the site will include employment development. This is incorrect.	Remove the sentence "Development on site is expected to include employment land; therefore this site will have a significant positive effect." From the SA for this site.

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Environment Agency	1870			√	J Clarke	6543	√		
Norris	1878	√			Mr & Mrs Rippon	6801	√		

Harvey	6616	√							
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### HA3c: Site: Former Bamkins Factory, Hucknall

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
<b>Support</b>	
No comments received.	-
<b>Object</b>	
No comments received.	-
<b>Comment</b>	
<u>General comments</u>	
Part of the site is unavailable (T. C. Threads Ltd) for development as it is still in operation as a manufacturing company.	Comment noted. The boundary will be amended to remove the factory from the allocation.
<u>Flooding</u>	
Environment Agency - This site is located immediately north of another area of flood zone from an ordinary watercourse flowing into the River Leen. Run off needs to be minimised from this site to prevent exacerbating flooding downstream.	Comments noted. This will be added to the supporting text for Policy HA3c.

### Proposed Amendments

Issue/Policy	Amendment
Part of the site is unavailable (T. C. Threads Ltd).	Amend the boundary of the site to remove T. C. Threads Ltd from the allocation. Amend the site yield accordingly.
Flood risk: Run off needs to be minimised from this site to prevent exacerbating flooding downstream.	<b>Site HA3c: Former Bamkin factory site.</b> This site has previously had the benefit of outline planning permission for residential development and is considered suitable and developable in the SHLAA (ref. H31). <b>It is located immediately north of another area of flood zone from an ordinary watercourse flowing into the River Leen. Run off needs to be minimised from this site to prevent exacerbating flooding downstream.</b> The site is located within the Main Urban Area of Hucknall and a timescale of delivery within 5 years has been informed by contact with the applicant.

<u>List of Respondents</u>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Environment Agency	1870			√	S. West	6564			√

### HA3e: Site: Broomhill Farm, Nottingham Road, Hucknall

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	

<b>Support</b>	
<u>General</u>	
We recognise that this area was allocated in the 2002 Local Plan and it represents a deliverable area.	Comment noted. The Council welcomes support for the allocation.
<u>Highways</u>	
We support the potential for future pedestrian and cycle links to HA3e in support of sustainable transport.	Comment noted. The Council welcomes support for the allocation and associated policies relating to green infrastructure and transport.
<b>Object</b>	
<u>General</u>	
<p>a) Objection to the allocation of the site for housing.</p> <p>b) I saw recently in the local paper that Mark Spencer MP too shares our concerns about insufficient infrastructure in the area, and a new development such as the one proposed in HA3e will just make things even worse. This is on top of the new 'Rolls Royce' and Top Wighay developments that are now underway.</p>	Comments noted. The Council is required to meet its statutory duty to deliver development to meet its housing needs for the next 15 years. Where Councils have not met their statutory duty to deliver a Local Plan by 2017, the Government has indicated that they will step in and produce a Local Plan.
<u>Environment/Heritage</u>	
<p>My family and I recently moved into a new home adjoining the area proposed for new housing development and we, like many others, enjoy the benefits of being able to walk over the fields enjoying the fresh air and beautiful scenery that the old Broomhill Farm site provides.</p> <p>These fields are a wonderful escape from the built-up areas and are enjoyed by dog-walkers, hikers, joggers and anyone wanting to appreciate the beautiful countryside we still have</p>	<p>The fact that this site has been allocated for housing since 2002 should have been identified prior to the purchase of new properties adjoining the site via a search undertaken by an appointed solicitor.</p> <p>Site HA3a is currently designated Green Belt land but it is not designated as a public open space. An element of public open space will be required as part of the development of the site.</p>

left in Hucknall.	
Greenfield sites should only be used as a last resort not as a cost effective easy option for developers.	The Council has allocated a number of brownfield sites within Preferred Approach Local Plan, which can accommodate approximately 1268 dwellings. A very small number of brownfield sites have been rejected due to severe constraints e.g. the majority are located in high flood risk areas (flood zones 2 or 3). Unfortunately the supply of brownfield sites has reduced, due to the successful redevelopment sites in the recent past and the need to provide land for business / jobs growth. In order to help meet the future housing needs of the District, the Council has had to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites deemed deliverable and sustainable, as required by national planning policy.
<u>Highways</u>	
Apart from devastating the landscape, a new large housing development will bring even more people and cars into an already over-crowded, poorly resourced area.	<p>The Council has received no objections from the Highway Authority in this respect.</p> <p>In developing the Local Plan the Council has worked closely with Highways Department at the County Council to understand and plan for the highways infrastructure needed to support the development proposed in the Plan alongside new development proposals in neighbouring authorities. This information will be used to help negotiate s106 agreements with future developers, to help secure funds to deliver the infrastructure needed. In addition to consultation with the Highways Department, the Council has commissioned an update to the Transport Study that will include an assessment of traffic impact resulting from</p>

	<p>the proposed sites and potential mitigation needed to help reduce that impact.</p> <p>Negotiations with developers in respect of section 106 contributions are undertaken at the planning application stage. This will be informed by planning policy and the Infrastructure Delivery Plan in order to achieve a sustainable development.</p>
<b>Infrastructure</b>	
<p>Already, it is difficult to enrol our children in local schools, or find a doctor, dentist or healthcare facility that isn't fully-booked, and adding a possible extra 500 families will just stretch our local resources to breaking point.</p> <p>The level of housing is not being matched by infrastructure funding to provide Doctors/Schools at this point in time and that is the biggest issue Hucknall faces, in our view.</p>	<p>In developing the Local Plan the Council has worked closely with Education Department at the County Council, the Clinical Commissioning Groups and other infrastructure providers to understand and plan for the infrastructure needed to support the development proposed in the Plan. This will lead to an update of the Infrastructure Delivery Plan to support the Local Plan. This information will be used to help negotiate s106 agreements with future developers to help secure funds to deliver the infrastructure needed. In some cases this may lead to the delivery of new infrastructure as part of the development.</p>
<b>Comment</b>	
<b>Highways</b>	
<p>We are concerned that a 'rat run' might be created between the A611 and Nottingham Road and therefore request that there is no possibility of a through road for vehicular traffic created as part of this phase of the development. This would have a negative effect on properties on Jackson Road and Victoria Way. There are already good links between the A611 and the town centre through Watnall Road and Wood Lane and an additional link would simply push traffic through a</p>	<p>If the Broomhill Site is taken forward for development, the Council will work with the County Council and the developer to create a design and layout that effectively integrates with the surrounding communities, whilst aligning with highway standards. In seeking to achieve this, proposal may create a road link to the previous phases of Broomhill, however such a link would be designed to discourage rat-running.</p>

residential route which is not its purpose.	
<u>Flooding</u>	
There is a risk of surface water flooding on the site and the ground conditions can be boggy. Given the topography of the site, which rises significantly above Phase 1 of the Broomhill Farm development (HA3q) it will be important to ensure any risks are properly dealt with at the design and planning stage and through an appropriate SUDS.	Comment noted. This will be dealt with via the planning application process.
Environment Agency Sites HA3a and HA3e - These sites are in flood zone 1 in their entirety; however their proximity to an area of flood zone following an ordinary watercourse needs to be considered, as flood zones may change over the lifetime of the development, particularly considering climate change. As such we recommend forward planning for flood resilience at the design stage of these relatively large housing developments, and run off should be minimised. This is particularly relevant considering the current land use of these development areas is rural, and so maintaining a Greenfield run off rate is vital to prevent worsening flood risk in this area.	<p>The site is currently allocated for housing in the 2002 Ashfield Local Plan Review. The Council will continue to work with the Environment Agency and the Lead Local Flood Authority in this respect.</p> <p>Proposed amendment to the summary of the housing allocations paragraph 5.21 to reflect the comments.</p>
<u>Design</u>	
<p>a) We would expect the site to be allocated for lower density family housing so it is in keeping with Phase 1 of the Broomhill development (HA3q).</p> <p>b) Given the topography of the site, which rises above the phase 1 land levels, we would expect significant consideration be given to ensure the risk of overlooking on existing</p>	<p>The issues raised will be taken into consideration at the planning application stage. The Council will determine any future planning application on its own merits.</p> <p>The Local Plan contains planning policies which seek to ensure that new development promotes residential amenity and good design.</p>

properties is minimised and mitigated at the design stage.  c) We would expect any future development is particularly sensitive to existing properties on Victoria Way and Jackson Road, given the amount of flexibility possible in a development of this size, and where possible appropriate landscaping, is used to separate and demarcate the two developments.	
<u>Landscape</u>	
This proposed allocation is on the perimeter of the urban area of Hucknall, therefore any proposals should take into account the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone ML18 River Leen Corridor.	Comments acknowledged.

### Proposed Amendments

Issue/Policy	Amendment
Housing allocations paragraph 5.21. <b>Amend the paragraph to reflect that any site specific flood risk will need to take into account Farley Brook and greenfield run-off rates.</b>	<p>Proposed amendment to paragraph 5.21:</p> <p><b>Site HA3e: Broomhill Farm, Nottingham Road.</b> This site forms the southern part of land previously allocated for housing in the Ashfield Local Plan Review (2002) and has been assessed as suitable and achievable in the SHLAA. The site is located in the main urban area of Hucknall. The adjoining site (HA3q) has planning permission and development has commenced. <b>The site is within Flood Zone 1. Nevertheless, Farley Brook runs to the south and south west of the Hucknall Bypass. Consequently, any site specific flood risk assessment will need to take account of flood risk from the watercourse over</b></p>



	the life of the development and will need to maintain greenfield run-off rates. Development of this remaining area is considered to be deliverable within 5 years.
Officer recommendation: Since the Sustainability Appraisal for the site was completed for the Preferred Approach there is an area of new housing built between the site and Knitter's Cottage which is on the Local Heritage List. Consequently, new development on this site would not affect the setting of Knitter's Cottage. Proposed to remove the reference to Knitter's Cottage from the Sustainability Appraisal.	Sustainability Appraisal amendment:  Remove 'There is a locally listed building (Knitter's Cottage) on the boundary of the site.

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Environment Agency	1870			√	E De Coverly	6566			√
Nottinghamshire County Council	2803			√	S. Ralling	6615	√		

### HA3h: Site: Seven Stars PH & Land adjoining West Street, Hucknall

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	

<b>Support</b>	
I am pleased to learn that the council intends to include the site as a housing allocation in the local Plan Preferred Approach. As the landowner, I can confirm that I intend to bring the site forward for residential development as soon as practicably possible.	Comment noted. The Council welcomes this support and confirmation that development is deliverable.
A planning consultant has been appointed to provide advice on a residential scheme. I hope to share my ideas at an early stage in the planning process.	Comment noted. The Council welcomes this proactive approach.
The building has been unoccupied for several years and is in a dreadful state of repair. It is therefore considered that in order to maximise the developments potential and viability of the site, the Seven Stars will need to be demolished.	Given that the building is a local heritage asset which is included on the Local Heritage List, this would not be supported by the Council.
In summary, the site is very easily and quickly deliverable and will provide housing to Ashfield District Council, in close proximity to the local centre.	Comment noted. The Council agrees that the site can deliver sustainable development in close proximity to the town centre.
<b>Object</b>	
N/A – no objections received.	
<b>Comment</b>	
<u>General</u>	
I enclose an amended site plan including an additional area of land on Spring Street.	The site boundary will be amended to include the land submitted.
<u>Flooding</u>	
Environment Agency - This site borders Ogle Street to the north which according to current mapping, is a flood zone 2 area originating from the Baker Lane Brook, which may require further consideration at development management stage.	Comment noted. No amendment required. This will be taken into consideration as part of the planning application process.

### Proposed Amendments

Issue/Policy	Amendment
Amend site boundary to include additional land submitted (0.01 hectare).	Amend site boundary as requested.

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Environment Agency	1870			√	G. Sztejer	3369		√	

### HA3i: Site: Land Adjacent to the Arrows Centre, Annesley Road, Hucknall

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Comment	
<u>Flooding</u>	
Environment Agency - This site is positioned immediately upstream of the start of the en-mained section of the Baker Lane Brook and flows into the River Leen, which has significant flood risk issues. It is vital therefore that developers maximise the potential reduction of run-off from this site, post development, ideally to match Greenfield run off rates as not to exacerbate flood risk further downstream, preferably reducing the current flood risk to the land. The adequacy of SUDS will be	<p>The Council will continue to work with the Environment Agency and the Lead Local Flood Authority in this respect.</p> <p>Proposed amendment to the summary of the housing allocations paragraph 5.25 to reflect the comments.</p>

assessed by the Lead Local Authority as part of the development management process.	
<u>General</u>	
This proposed allocation is on the perimeter of the urban area of Hucknall, therefore any proposals should take into account the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone ML17 Linby Wooded Farmland.	Comment noted.

### Proposed Amendments

Issue/Policy	Amendment
Policy HA3 paragraph 5.25. Amend the paragraph to reflect that any site specific flood risk will need to take into account Farley Brook and greenfield run-off rates.	Policy HA3 paragraph 5.25. Baker Lane Brook runs to the south of the site. Consequently, any site specific flood risk assessment will need to take account of flood risk from the watercourse over the life of the development and will need to maintain greenfield run-off rates.

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Environment Agency	1870			√	Nottinghamshire County Council	2803			√

## Policy HA3: Alternative Housing Sites Proposed Hucknall

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Object	
<p><b>Lime Tree Road Allotments, Hucknall</b> – The shareholders of the Hucknall &amp; District Smallholders &amp; Allotment Society consider that the allotments should be allocated for housing.</p>	<p>Allotments form an important recreational resource and offer a diverse range of benefits to promote the health and wellbeing of local residents. The Council does not consider that the allotment site provides a better alternative to the sites taken forward for allocation due to the loss of a community asset. As such, no amendments are required.</p> <p>No changes proposed.</p>
<p><b>Land off Watnall Road including the listed hangers at Rolls Royce</b> - Representation sets out that the site should be allocated all or part as housing to enable the repair and relocation of one pair of the listed hangers.</p>	<p>Listed buildings are protected by the Planning (Listed Buildings and Conservation Areas) Act 1990 and by national planning policy contained in the National Planning Policy Framework (section 12). Relocating buildings to enable new development at a site or to allocate land for a different use would not be supported by the Council unless it was demonstrated that every possible alternative approach for restoration, conservation and re-use has been thoroughly explored. The site does not provide a better alternative to the sites taken forward for allocation. As such, no amendments are required.</p> <p>No changes proposed.</p>
<p><b>Stubbing Wood Farm, Watnall Road</b> – Broomhill Farm Extension cannot provide a fraction of the</p>	<p>Broomhill Farm is a much larger site than Stubbing Wood Farm and is the only suitable site in Hucknall which is capable of</p>

<p>planning benefits which development of Stubbing Wood Farm could deliver.</p> <p>A.D.C.'s assessment of site H4 Stubbing Wood Farm has been so negative, inaccurate and misleading as to bring into question the integrity of the Council.</p> <p>The Council's preferred option, in its present form, may well not stand up to scrutiny and consequently be open to challenge again.</p> <p>The SA assessment of the site is inaccurate:</p> <p>Objectives:</p> <p><u>Historic Environment</u> – disagree with the assessment of Neutral. Consider that the assessment should be ++ as it could help to restore the Listed Hangars opposite the site.</p> <p><u>Community safety</u> – disagree with Neutral. This should be + as access to Starth Wood could reduce anti-social behaviour in the vicinity.</p> <p><u>Biodiversity &amp; Green Infrastructure</u> – disagree with Neutral. The adjacent ancient woodland could be improved through management. Ash Die Back is a threat to the woodland. Considerable investment is required to manage the woodland.</p> <p><u>Landscape</u> – disagree with the assessment of - . There are no mature hedgerows on the site. Broomhill Farm has been given a Neutral. This is nonsensical, it should have been given - - .</p> <p><u>Air and Noise</u> – disagree with the Council's assessment of - . The noise from antisocial behaviour caused by motorbikes in the woodland is a nuisance. This could be prevented by opening up the woodland to the public. The protection and</p>	<p>delivering the number of homes required to meet the objectively assessed housing needs of the District.</p> <p>The Council strongly refutes the comments received in relation to the integrity of the Council and the suggestion that the evidence may not stand up to scrutiny. All sites have been assessed using a consistent methodology which has been subject to consultation with statutory consultees.</p> <p><i>SA Objectives:</i></p> <p><u>Historic Environment</u>: Disagree. If the site was taken forward the Council would not seek developer contributions for heritage assets as there are other priorities e.g. affordable housing, education, health provision, highway improvements etc.</p> <p><u>Community safety</u>: Disagree. All sites have been assessed as having a neutral effect.</p> <p><u>Biodiversity &amp; Green Infrastructure</u>: Disagree. The site has been assessed using a consistent methodology.</p> <p><u>Landscape</u>: The assessment is consistent with the SA methodology. There is an error in the text which states 'no landscape assessment has been undertaken for the site as it lies within the urban area.' This will be amended to reflect the fact that a landscape assessment has been completed (which indicates that development would have a moderate effect – this</p>
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<p>management of Starth Wood could contribute to air quality. <u>Climate change</u> – disagree with the Council's - . Watnall Road has been prone to flooding at Eel Hole Farm for the past 50 years. In recent years it has increased. The development of Stubbing Wood Farm could alleviate flooding through water attenuation measures. Nottinghamshire County Council and the Environment Agency have been consulted. A local Councillor is currently looking into potential mitigation of this flooding. Given the potential for improving flood risk, it should be ++.</p> <p><u>Travel and accessibility</u> – disagree with the Council's assessment of + . The planning approval for the new primary school and shops at Rolls Royce have not been taken into account in the assessment. Rolls Royce could also facilitate a GP surgery to serve the area. The primary school north of the site has not been taken into consideration. It should be a ++ for these reasons.</p>	<p>equates to one negative) and the site is Green Belt land. The SA of Broomhill Farm extension is also incorrect in stating that there is no landscape assessment for the site. This will be amended to reflect the fact that development would have a moderate impact on the landscape which again equates to one negative - . Development would have a moderate effect on both sites and this would not affect the suitability of the site.</p> <p><u>Air and Noise</u>: Disagree. The sites have all been assessed consistently without taking into consideration potential mitigation.</p> <p><u>Climate change</u>: Disagree. The sites have all been assessed consistently without taking into consideration potential mitigation.</p> <p><u>Travel and accessibility</u>: The text will be amended to reflect the fact that in the future there will be a school within walking distance. The conclusion will remain unchanged i.e. one positive +.</p>
<p><b>Linby Boarding Kennels</b> - The site has a long history of noise nuisance complaints, dating back to the closure of Linby Colliery in the late 1980's. Only the kennels' land is put forward as a potential residential site on this occasion. And only a part of the site would need to be allocated for development to finance and facilitate relocation of the kennels' business - something the Council has expressed a desire to achieve previously.</p>	<p>Results from the Green Belt Review indicate that this area performs well in meeting the five purposes of the Green Belt. As such, it is not considered suitable for allocation.</p> <p>No changes proposed.</p>

<p>Closure of the kennels has considerable support. At the last Local Plan there were in the region of 400 representations submitted supporting housing development on the site. There were no objections to the proposal from residents whatsoever. The only opposition was from Linby Parish Council, Gedling Borough Council, N.C.C., - none of which represented the wishes of local residents- and the CPRE who were opposed to all local rural developments.</p> <p>Allocating the 3.5 acres on which the main kennels' business is conducted - on which all the existing built development is located - for retirement bungalows would enable all of the remaining land to be allocated for open space/recreational use etc. This remaining land could be transferred to Council ownership or to a sports club or clubs.</p>	
<p><b>Land off Nottingham Road, Hucknall</b> – Object to the omission of the site from the Local Plan. The site has been consistently promoted at every stage of the Local Plan review. Objections were raised to the withdrawn Local Plan (in 2013) due to the omission of a Green Belt review in Hucknall. Since that time an adjoining site has been submitted (in response to the 'Call for Sites' process). This now forms a comprehensive site and an illustrative masterplan has been submitted which shows how the site could be developed whilst still maintaining a green infrastructure buffer between Hucknall and Bulwell. The site still remains suitable for housing and other development and is located in a sustainable location. Query raised regarding whether the Council has fulfilled its duty to cooperate with Nottingham City Council regarding the merits of omitting the site in terms of the role it could play in</p>	<p>Results from the Green Belt Review indicate that this area performs well in meeting the five purposes of the Green Belt. Furthermore the site is located within a high risk floodzone (floodzones 2 and 3). The NPPF indicates that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. The Council's Strategic Flood Risk Assessment supports this approach and indicates that the Council should not allocate sites in Flood Zones 2 or 3.</p> <p>No changes proposed.</p>



<p>delivering housing and other development in a sustainable manner albeit contingent on the land being released from Green Belt, as the Council has evidently justified elsewhere in Hucknall and The Rurals.</p> <p>The site has defining physical boundaries (in accordance with paragraph 85 of the NPPF) and has been used for other activities over the years.</p> <p>It is requested that the Council revisits the merits and contribution of this site to delivering sustainable housing and other growth to meet the needs of both Hucknall and Bulwell (fully exercising the duty to cooperate with Nottingham City Council).</p> <p>We are mindful of the Green Belt designation and purpose of this designation. Any allocation would need to be the subject of a development brief to establish the key parameters on which any future development proposal should be based.</p>	
<p><b>Whyburn Farm, Hucknall</b> – Whyburn is situated on the north western edge of Hucknall, accessed by the A611. It is equidistant from the Rolls Royce site and Sherwood Business Park, east of Junction 27 of the M1. Strategic highway connections to both are excellent. Hucknall Town Centre is readily accessible.</p> <p>Hucknall is already set to change with development at Top Wighay. This proposal requires the physical extension of the NET tram route.</p> <p>The Whyburn site provides an opportunity for a major mixed use urban extension which can help to meet the housing needs of Greater Nottingham Housing Market Area in a sustainable way. This is recognised in the 2008 Sustainable Urban Extension Study by Tribal consultants. The Tribal Study</p>	<p>Results from the Green Belt Review indicate that this area performs well in meeting the five purposes of the Green Belt. As such, the site is considered unsuitable for allocation.</p> <p>The Council is planning for the long term needs of the District by seeking to adopt a 15 year Plan. The Council is also continuing to work with neighbouring authorities as the Plan progresses and is satisfied that the duty to cooperate is being fulfilled.</p> <p>No changes proposed.</p>

<p>concluded that the site scored well in relation to key sustainability tests and it had a strong performance in terms of Green Belt and landscape impact. In addition the previous Local Plan Inspector confirmed the inherent merits of Whyburn as an appropriate location.</p> <p>Benefits include:</p> <ul style="list-style-type: none"> <li>• Good vehicle access</li> <li>• Potential for tram extension;</li> <li>• Opportunity for dedicated bus service;</li> <li>• Pedestrian/cycle connections to Hucknall;</li> <li>• Potential for easily defined defensible Green Belt boundary;</li> <li>• No topographical constraints;</li> <li>• Much of the development can be screened from external view by the landscape;</li> <li>• Good access to Sherwood Business Park;</li> <li>• More than 3000 new jobs;</li> <li>• More than 3000 new dwellings;</li> <li>• Park and ride to Nottingham;</li> <li>• Local Centre;</li> <li>• Extension to Dob Country Park.</li> </ul> <p>It is our view that Ashfield will need to cooperate appropriately with neighbouring authorities to meet the housing needs arising in the Nottingham City area. In accordance with paragraph 157 of the NPPF, the Council should plan for the long term needs of the area and remove this site from the Green Belt. The Plan currently fails to do this.</p>	
<p><b>Site at the Local Centre, land off Papplewick Lane, Hucknall</b> – Objection to the Local Plan due to the omission of</p>	<p>Objection noted.</p>

<p>this site from the document as a housing allocation. There is currently no planning condition imposed upon any planning permission or obligation to deliver a local centre or any particular mix or size of uses. There is currently an outstanding appeal for retail development on part of the site and an outstanding planning application for retail and residential across the whole of the site (response received 16/3/2016). Failure to allocate this site for housing fails to accord with Policy S1 which seeks sustainable development, and S2 which indicates that development will be primarily directed towards locations within the main urban area (Hucknall is within the MUA as identified by Policy S3).</p> <p>The NPPF indicates that local planning authorities should positively seek opportunities to meet the development needs of their area. They should meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies in the NPPF.</p> <p>Suggested amendment to the Policy and Plan: The site constitutes a highly sustainable location for further residential development within an already established residential area close to the town centre and other facilities. Whilst it is the landowners desire to deliver retail development on part of the site, if planning permission is not forthcoming through the planning or appeal process, then the site should form part of HA3L or alternatively be allocated individually for housing. Policy Map 2 should be amended to show the site as future housing land. It is suggested that the site could accommodate circa 25-30 dwellings. The entirety of the site should be allocated for residential development in accordance with</p>	<p>Sustainable development goes well beyond the delivery of housing. It encompasses the need to promote health and wellbeing by providing infrastructure to meet the needs of communities.</p> <p>The site is required as a Local Centre to support the sustainable development of the entire Papplewick Lane site and neighbouring areas. This approach accords with the NPPF, in particular Part 8 which seeks to ensure that development promotes social interaction. The NPPF advocates the incorporation of strong neighbourhood centres and high quality public space which meet the needs of the community.</p> <p>No changes proposed.</p>
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Policies S1 and S2.	
<p><b>Land at Common Lane/Leivers Hill</b></p> <p>This site should be allocated for housing development. The site is well located with good transport links to Hucknall town centre and beyond. It is a sustainable location close to community facilities and services including schools. At approximately 17 hectares it could deliver between 250 and 300 new homes. It would address the imbalance in housing locations by providing a deliverable site to the west of Hucknall. It has extensive frontage onto an existing highway and benefits from the provision of existing infrastructure. Housing would be attractive to occupiers and housebuilders. It would round off the existing urban area, and its topography would ensure that development would not intrude into open countryside. Development could be delivered quickly to help boost housing supply. It is likely to appeal to a range of housebuilders because of its size. Additional land should be safeguarded for future needs.</p>	<p>The site is in Green Belt and there are no exceptional circumstances for further Green Belt release due to the availability of more suitable sites in other parts of the District.</p> <p>Results from the Green Belt Review indicate that this area performs well in meeting the five purposes of the Green Belt. As such, the site is considered unsuitable for allocation.</p> <p>No changes proposed.</p>
<b>Support</b>	
Support for not including SHLAA Site H2 Common Lane, Hucknall as a housing allocation in the Local Plan. This is a valuable site for wildlife and it provides access to the countryside via public rights of way for residents.	Comments noted. The Council welcomes support for the approach taken.

### Proposed Amendments

Issue/Policy	Amendment
Sustainability Appraisal of SHLAA site H4 - Landscape section incorrectly states that no assessment has been undertaken.	Amend SA in relation to Landscape section of SHLAA site H4 - Moderate impact with one negative (-). Amend text to include landscape assessment details.

**Ashfield District Council - Statement of Consultation**

Sustainability Appraisal for Broomhill Farm (H9, H51, H52, H81, H99) – Landscape section incorrectly states that no assessment has been undertaken.	Amend the SA in relation to Landscape at Broomhill Farm (H9, H51, H52, H81, H99) – Add text in from Landscape Assessment i.e. moderate impact with one negative (-).
Sustainability Appraisal for SHLAA site H4 – there is a new school planned for the development at Rolls Royce. Add additional text to the SA.	SHLAA site H4 SA - Travel and accessibility: The text in the 'mitigation' section will be amended to reflect the fact that in the future there will be a school within walking distance. The conclusion will remain unchanged i.e. one positive +.

<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
K and M Hauliers Ltd	6620			√	I. Glenn	2583	√		
Hucknall & District Smallholders & Allotment Society	6737			√	IBA Planning on behalf of The Mellors Group	6432	√		
Oxalis Planning	1955	√			Allen Planning Ltd	6619	√		
John Holmes on behalf of Westerman Homes	2235	√			S. Brown	6708		√	
S. Bacon	6695	√							

## Policy HA4: Green Infrastructure in and around Hucknall

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Support for all the Green Infrastructure corridors set out in the Policy	Support acknowledged.
<p>The Plan recognises the benefits of Green Infrastructure (GI) which we consider is fundamental to the creation of sustainable communities.. Green infrastructure maintains critical ecological links between town and country. Local partnerships are seeking to use green infrastructure to drive economic growth and regeneration and improve public health, wellbeing and quality of life. It can also support biodiversity and the functioning of natural systems such as rivers and flood plains and help reduce the negative impacts of climate change.</p> <p>The Plan should take a strategic approach to planning for biodiversity and networks of green space that is considered at a landscape-scale across local authority boundaries. We are therefore pleased a Green Infrastructure and Biodiversity Strategy has been produced which identifies the network opportunities across the district. This is reflected in Policy HA4 which encourages provision of new and improved GI through</p>	Support acknowledged.

development that contributes to the strategic GI corridors and networks within Hucknall.	
Policies HA4, SKA5 and RA3, relating to GI, are welcomed and supported, along with the identification of strategic GI corridors; however, it should be noted that there are no maps within the Ashfield Green Infrastructure and Biodiversity Strategy showing the location of these corridors (or at least, not in the version available on the ADC website). It is also queried whether work will be undertaken to update these corridors in light of the Ashfield Biodiversity Opportunity Mapping project which is currently taking place.	<p>Support acknowledged.</p> <p>The Council's website sets out the Ashfield Green Infrastructure and Biodiversity Strategy including the associated maps.</p> <p>The intention is for the GI corridors to take into account the Ashfield Biodiversity Opportunity Mapping project.</p>
<b>Object</b>	
-	
<b>Comment</b>	
-	
<b>Responses received relating to Policy supporting text</b>	
-	

### Proposed Amendments

Issue/Policy	Amendment
No changes proposed to the Policy.	

<b>List of Respondents</b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy

**Ashfield District Council - Statement of Consultation**

Johnson	1886		√		Ward	5807		√	
Lathall	1917		√		Bolger	5817		√	
Collier	1918		√		Lathall	5819		√	
Cooper	2811		√		Manders	6640		√	
Lathall	2631		√		Lewis	6729		√	
Nottinghamshire County Council	2803		√		Eyre	6897		√	
Natural England	3185		√		Elkington	6977		√	



## Area Policies: Sutton in Ashfield and Kirkby-in-Ashfield

### Policy SKA1: Sutton-in-Ashfield and Kirkby-in-Ashfield Town Centres

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
-	
<b>Object</b>	
-	
<b>Comment</b>	
-	
<b>Responses received relating to Policy supporting text</b>	
-	

### Proposed Amendments

<b>Issue/Policy</b>	<b>Amendment</b>
No changes proposed to the Policy	-

<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>

None									
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## Policy SKA2: Economy and Jobs in Sutton in Ashfield and Kirkby-in-Ashfield

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
Support	
Environment Agency support the Policy. All proposed allocations for Sutton and Kirkby are located within flood zone 1 with no other constraints and supported by the Environment Agency.	Support acknowledged.
<p>Policy SKA2 sets out the strategy for economy and jobs in Sutton and Kirkby, indicating that the Council will support the sustainable economic growth of Sutton and Kirkby by allocating additional employment sites.</p> <p>Reference is made to a number of Locally Significant Business Areas including Lowmoor Business Park, Kirkby. Whilst the Proposals Map shows the area of Lowmoor Business Park cross hatched, the site references appear to be missing.</p> <p>The Lowmoor Business Park lies to the south of the land east of Lowmoor Road, proposed for residential allocation under Policy SKA3, providing easy access to existing employment opportunities. The designation of Lowmoor Business Park as a locally significant business area is therefore supported.</p>	Support acknowledged.
LPAs should support sustainable rural tourism and leisure developments that benefit businesses in rural areas,	Proposed to amend the Policy to include "ecologically sensitive areas."

communities and visitors, and which respect the character of the countryside. (NPPF, Para 28). Therefore, we welcome Policy SKA2 which promotes sustainable tourism that protects key environmental assets, this should make reference to ecological assets in addition to those of landscape and heritage value.	
The reference in part 7b of this policy to protecting the historic park and garden of Hardwick Hall and its setting is supported. National Trust has recently commissioned an assessment of the setting of Hardwick Hall which may assist the Council when assessing impacts on the setting of Hardwick.	Support acknowledged.
SKA2 – PJ2ke Castlewood. Support for the Castlewood employment site. Raised that HS2 route will impact on this site. Also suggested that there opportunities for solar panels on the substantial employment buildings.	<p>Acknowledged in the Sustainable Appriasl paragraph 4.124 that the route of HS2 will effect Castlewood and, if taken forward will result in a loss of ememployment land on this allocation.</p> <p>Policy CC1 sets out the Council's approach to low carbon energy generation which would support solar energy panels on buildings (subejct to any localised issues).</p>
<b>Object</b>	
<p>SKA2 – PJ2-Kg Mowlands Objected to the site being allocated on the basis of:</p> <ul style="list-style-type: none"> <li>• Concern that industry use is being proposed on a site in the countryside.</li> <li>• Effect of noise and air pollution for residents.</li> <li>• Access points to the development. In this context impact on Bloomer Wood and Sutton Meadows.</li> <li>• Risk of pollution to the local watercourses particularly Maghole Brook</li> </ul>	<p>The employment comprises part of what is anticipated to be a mixed use development comprising employment units to the north of the proposed site with housing to the majority of the site. The indication from the developer is that they anticipate that the development will comprises office units similar to 'The Village' site off the A38 in the District of Bolsover. As such this would be suitable for a residential location. If other form of employment units brought forward an important planning consideration would be the impact on nearby residential dwellings. In relation to access point please see the response to the Mowlands housing allocation.</p>

Little Oak Plantation is an Ancient Semi Natural Woodland located adjacent to the north of the site boundary SKA2h – Sherwood Business Park Annesley. This seems to run contrary to the protection to ancient woodland given in Policy EV6. Even development near to ancient woodland can cause damage to it over time.	Sherwood Business Park has been developed and the Policy identified the site as a key employment area in Ashfield. The ancient woodland was not identified until after Sherwood Park had been developed and therefore could not have been taken into account at the time planning permission was granted.
Objection to the Ashfield Local Plan Preferred Approach consultation document on the grounds that it is not sound because it does not meet the requirements or spirit of National Planning Policy, national guidance and Government initiatives. In particular, it fails to pay sufficient regard or attach appropriate weight to Government policies and initiatives. The submission raises specific issues with regard to land off Hamilton Road, Sutton in Ashfield which it is considered should have been identified for employment purposes.	<p>The objection relates to an alternative site for employment purposes off Hamilton Road, Sutton in Ashfield. Identified in the Council's 'Strategic Employment Land Availability Assessment', December 2015, as site reference S6. The response to this aspect is set out in Policy SKA2 alternative employment sites.</p> <p>It is considered that the Council has taken a positive approach to employment requirements within the District with the Local Plan allocating site to provide the opportunity to deliver jobs. Consequently, no changes to the Policy are recommended in relation to these aspects.</p>
Objects to the Local Plan on the grounds that the employment land needs is deficient. It must have greater regard to market requirements and changing patterns of employment demand. The amount and location of land allocated for employment purposes should more closely reflect market requirement and flow from a detailed appraisal of the quality of existing employment sites. In particular additional land should be allocated, which is well related to the M1 and capable of providing plot or plots to accommodate large logistics buildings.	<p>It is considered that the Council has taken a positive approach to employment requirements within the District with the Local Plan allocating site to provide the opportunity to deliver jobs. Consequently, no changes to the Policy are recommended in relation to these aspects.</p> <p>The objection links to an alternative site for employment Land to the east of Junction 27 of the M1, adjacent to Sherwood Park. (Identified in the Strategic Employment Land Assessment as K11). The response to this aspect is set out in Policy SKA2 alternative employment sites.</p>
Objects to the plan on the grounds that additional employment sites should be allocated including the site to the north of the	It is considered that the Council has taken a positive approach to employment requirements within the District with the Local

MARR, adjacent to Summit Park.	<p>Plan allocating site to provide the opportunity to deliver jobs. Consequently, no changes to the Policy are recommended in relation to these aspects.</p> <p>The objection links to an alternative site for employment to the north of the MARR, adjacent to Summit Park. ((Identified in the Strategic Employment Land Assessment as S7). The response to this aspect is set out in Policy SKA2 alternative employment sites.</p>
The Plan for Mowlands shows an area of employment land allocated at PJ2Kg, which would be better allocated as housing development.	There are no proposals to amend the mixed allocation to exclude employment. It is anticipated that the employment site could meet a requirement for an office park off similar to The Village at South Normanton off the A38.
<b>Comment</b>	
Page 100, item 6 - ACCESS would like a similar statement, as set out in Policy RA1 6. regarding Annesley Woodhouse shopping parade that would restrict development to an appropriately scaled size.	While the Policy does not specifically state retail it is considered that it would be reflected under Policy SKA2 4.
<b>Responses received relating to Policy supporting text</b>	
<p>Para 6.43 -- last mentioned before in the context of the cumulative road transport study, it is worth emphasising that if the road network is not improved significant office space will still be available at Sherwood Business Park and will become greater as developments feeding into the A611/A608.</p> <p>Para 6.46 – we can see no statements within the Parish Plan notes on Annesley &amp; Felley Parish website which makes the claims within this paragraph. Suggest that this is checked.</p>	<p>Comments acknowledged.</p> <p>Paragraph 6.46 reflected the Annesley and Felley Parish Plan 2006 to 2012. After liaising with the Parish Council it is understood that during the period of the consultation the Parish Council approved a new Parish Plan comprising of a number of objectives and actions (February 2016 Parish Council meeting). Under these circumstances the paragraph in question will be deleted.</p>

### Proposed Amendments

Issue/Policy	Amendment
Policy SKA2 7.	Amend policy “a) Safeguarding key landscape, <b>ecological sensitive areas</b> and heritages assests....”
Paragraph 6.46	Deleted the paragraph.

<u>List of Respondents</u>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Environment Agency	1870	√	√		Natural England	3185		√	
Woodland Trust	1878				ACCESS - Annesley Community Committed to Ensuring Sustainable Settlements	5359			√
D.Shaw	2707	√			Nathaniel Litchfield & Partners	5473	√		
S.Swift	2226	√ (PJ2-Kg)	√ (PJ2-Ke)		Pegasus Planning Group	6036		√	
The Tyler-Parkes Partnership Ltd	2808	√			Featherstone PDD Ltd	6641	√		
National Trust	2828		√						

**Policy SKA2: Economy and Jobs in Sutton in Ashfield and Kirkby-in-Ashfield. Alternative Sites proposed for employment purposes.**

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
<p><b>Land located off Hamilton Road, Sutton in Ashfield.</b> (The site is identified in the Council's 'Strategic Employment Land Availability Assessment', December 2015, as site reference S6).</p> <p>The submission comprises a letter raising objections to the Preferred Approach together with the completed 'Consultation Response Form' and DTZ Employment Report, November 2012. It sets out an object to the Local Plan Preferred Approach, to the retention of their land within the countryside designation and its omission as an employment allocation. The objection sets out a substantial response to support their argument, which summarised sets out the following main justification for removal of the land from the countryside designation and allocation for development:</p> <ul style="list-style-type: none"> <li>• The site is in a prime location lying adjacent to the MARR and Summit Park, a prestigious employment land allocation.</li> <li>• The Council's recent assessment of the site (Strategic Employment Land Availability Assessment) concludes that</li> </ul>	<p><u>Response to the alternatives sites proposed.</u></p> <p>A requirement of the NPPF is that the Local Plan should be based upon evidence. Paragraph 161 identifies that local planning authorities should use an evidence base to assess:</p> <ul style="list-style-type: none"> <li>• The needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development</li> <li>• The existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs. Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land.</li> </ul> <p>The Local Plan reflects the requirements of the National</p>

<p>it is anticipated to provide a good quality employment site if policy changes.</p> <ul style="list-style-type: none"> <li>• There is a strong case for allocating a 'pool' of employment land to allow for choice and to ensure there is sufficient high quality land to meet business needs over the plan period.</li> </ul> <p>It is considered that the Plan fails to satisfy the tests of soundness and set out clear justification for a strategic employment, or indeed, residential allocation on the land:</p> <ul style="list-style-type: none"> <li>• An assessment of national planning policy and Government directives. This is supported by reference is made to a number of paragraphs in the NPPF and national planning guidance, the Government's Productivity Plan Fixing the Foundations: Creating a more prosperous nation, change of use permitted development right and DCLG's Single Departmental Plan. It is set out that the implication is a substantial emphasis on using employment sites for residential development. The clear implications for this on Local Plan making is that there is a need to ensure that there is a greater surplus of employment land to provide an adequate 'cushion' against loss of employment land as well as against under-delivery on specific sites.</li> <li>• An appraisal of the Local Plan evidence documents.</li> <li>• A challenge to the contention that the site should be discounted for development and retained in the 'countryside' – the case for amending policy SKA2 to</li> </ul>	<p>Planning Policy Framework by meeting anticipated needs over the Plan period. It also incorporates flexibility by allowing for additional sites anticipated over three of the demand scenarios set out in the Employment Land Forecasting Study (ELF Study). Taken together the employment sites allocated provides for a high degree of choice for potential economic development. Consequently, is considered that the Council has taken a positive approach to the demand for economic development within the District, which will deliver jobs and opportunities in Ashfield.</p> <p>The Council has undertaken a Strategic Employment Land Availability Assessment, December 2015 analysing potential employment sites in Ashfield. This included the site in question. It is acknowledged that the site was assessed as "could be suitable if policy changes and is anticipated to provide a good quality employment site". However, the SELAA identifies potential sites that could be available for employment purposes, it does not allocated sites.</p> <p>There is a substantial evidence base in relation to employment land including the Employment Land Forecasting Study (ELF Study). The Council's Sustainable Appraisal sets out in paragraph 4.121 onwards, options identified in relation to Employment. The Council has taken forward an option which provides, in terms of demand, a higher requirement than is reflected in three of the the ELF Study scenarios. The Elf Study identifies that the Past Completions scenarios has data limitations. However, it is also considered to be unrealistic in</p>
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<p>include the site as an employment allocation.</p> <p>The submission sets out the case why the site should be allocated for employment purposes. While acknowledging that the other employment sites with services already in place may be built out first, it is maintained that the site should be removed from the countryside designation to ensure that development on this land is not unreasonably constrained by countryside policies. It identifies that it is important to note that during the period 2001-2014 Ashfield District lost 31.48 hectares of employment land to other uses. Most of this loss of employment sites is attributed to residential development.</p> <p>The response includes a report by DTZ dated November 2012. The Report is stated to demonstrate that there is a strong business case for the promotion of sustainable economic growth adjacent to the MARR in line with the NPPF and the East Midlands Regional Spatial Strategy Objectives.</p> <p>The response summarises the reasons why the site should be allocated as follows:</p> <ul style="list-style-type: none"> <li>• It is evident that the approach taken to employment land allocations in Sutton-in-Ashfield is a numbers driven exercise which seeks to follow a prescriptive formula and which is content to continue to allocate land historically allocated for employment use. Clearly national policy and Government initiatives require a proactive, dynamic approach capable of adapting to a constantly evolving marketplace and a land supply which has increasing</li> </ul>	<p>terms of the jobs required to generate that level of employment land requirement when compared to the other three scenarios in the Study. However, the Council has allowed for a higher level of employment land supply than is identified by these other scenarios. As such the proposals in the Local Plan Preferred Approach are considered to meet the requirements of the NPPF in taking forward a requirement to support economic growth in the District.</p> <p>The Sustainability Appraisal also set out an assessment of the employment sites in paragraph 5.22 onwards. The Ashfield Local Plan Summary Paper Supplementary Analysis, July 2013 responds to aspects raised in the DTZ Report of 2012.</p> <p>The sites allocated in the Preferred Approach are considered to meet the requirements of the NPPF with a substantial number of the sites already having planning permission for development for employment purposes. In this context:</p> <ul style="list-style-type: none"> <li>• As is required by the NPPF, the Council approach is based on the evidence. It has allowed for a pool of sites which is above the provisions set out in the ELF Study, which identifies a requirement of between 53 ha and 61 ha based on Experian Baseline, Policy-On and Labour Supply scenarios. The Council considers that the Past Completions scenario is unrealistic in the context of evidence of jobs anticipated to 2032. Nevertheless, the Council has allowed for a larger pool of sites to be taken forward as is identified in Table 18 of the Sustainability Appraisal and the allocations proposed in the Local Plan</li> </ul>
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<p>pressures placed upon it, particularly for alternative uses.</p> <ul style="list-style-type: none"> <li>• A large portfolio of sites is required which will offer choice and the opportunity for economic development to cluster in the most accessible locations where success can breed success. It is no longer acceptable for long-standing undeveloped or unoccupied employment allocations to continue to be promoted within a new plan. Instead there is a requirement for the new plan to identify the most economically viable and appealing sites.</li> <li>• Given the pressures placed on employment land allocations in Ashfield District, both from national initiatives, (such as permitted change of use and possible HS2 route), and more local demands (such as the need for waste sites), it is vital that a large pool of potential employment sites are identified in the Local Plan to provide a buffer.</li> <li>• Our Clients believe that our proposal to allocate additional employment land on land south of Oakham Business Park is sound. It has been robustly justified in economic, land-use and locational terms by credible up to date evidence to demonstrate that it would provide sustainable economic development which would make a positive contribution towards a strong and competitive economy. An employment land allocation would effectively appear as an extension to the Summit Park site east of Hamilton Road and would represent a proactive amendment to the Local Plan, meeting national planning and Government policy growth objectives.</li> </ul>	<p>Preferred Approach. The Council considers that the sites allocated allow for a choice of sites.</p> <ul style="list-style-type: none"> <li>• Anticipate losses of employment land going into the future is taken into account within the ELF Study in looking at future land requirements.</li> <li>• Employment sites suitable for housing have been considered and changes to allocations made where it is considered realistic that a site can come forward for housing purposes without a detrimental impact on the supply of employment land.</li> <li>• There is no evidence to suggest for Ashfield that there will be significant losses of employment sites arising from GPDO amendments which permitted development rights introduced to allow automatic conversion/redevelopment of offices and light industrial units.</li> <li>• The Preferred Approach provides a range of sites for different types of occupiers.</li> <li>• Sites are located on existing employment allocations or industrial parks, avoiding the loss of greenfield sites. The majority of the sites have seen some form of development and the majority of the sites are located where infrastructure is readily available so that the site will be available immediately or within a five year period.</li> </ul>
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<ul style="list-style-type: none"> <li>• Land adjacent to the MARR has been highlighted by the Local Plan and evidence base as a desirable location for employment development. The appeal of land adjacent to the MARR has clearly been demonstrated most recently by proposals within Mansfield District. Allocation of our Clients' site for employment development and the removal of the countryside designation would ensure that land with the greatest market appeal in the most accessible location is readily available at the earliest opportunity to meet a proven demand.</li> <li>• It is vital that the right land is allocated for employment development to act as a catalyst for further growth and provide local employment opportunities in line with sustainability objectives. The proposed site allocation therefore fully conforms with the requirements and ambitions of the NPPF.</li> <li>• Our Client formally requests that Preferred Policy SKA2: Economy and Jobs in Sutton and Kirkby be amended to also include SELAA site reference S6, land adjacent to Oakham Business Park/Hermitage Way Industrial Estate, west of Hamilton Road, as an allocated employment site.</li> <li>• Notwithstanding the clear justification for allocation of our Clients' land for employment use, they are also willing for it to be considered as a residential development site and therefore request that it be included in the next SHLAA Review and objectively judged against other potential site</li> </ul>	<ul style="list-style-type: none"> <li>• Pressures on employment sites such as HS2 have been taken into account as is identified in the Sustainable Appraisal.</li> <li>• It is recognised that Mansfield and Ashfield is a Functional Economic Market Area, evidenced by the ELF Study with Hucknall having strong links to the Greater Nottingham Area. The permissions for employment land at Summit Park in Ashfield and Lindhurst and Pleasley with the District of Mansfield already facilitates the choice of sites available along the MARR to developers and future occupiers.</li> <li>• The site at Junction 27 is located in the Green belt. Under the NPPF paragraph 83 Green Belt boundaries should only be altered in exceptional circumstances. The evidence base for the Local Plan in relation to employment is set out in various studies including the Employment Land Forecasting Study. (ELF Study). The ELF Study sets out various scenarios relating to future demand for employment land. The SA of the Local Plan Preferred Approach identifies the approach taken to both the demand and supply of employment sites. If evidence was provided of additional logistics requirements along the M1 the initial area of search should be around Junction 28 relating to land in Ashfield and Bolsover which is not in the Green Belt. However, the Council does not consider that there is evidence that provides the exceptional circumstances for the Green belt boundary to be amended in relation to the site adjacent to Sherwood Park.</li> </ul>
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allocations.	
<p><b>Land to the east of Junction 27 of the M1, adjacent to Sherwood Park. (Identified in the Strategic Employment Land Availability Assessment as K11)</b></p> <p>The approach objects to the Local Plan on the grounds that the employment land needs is deficient. It must have greater regard to market requirements and changing patterns of employment demand. The amount and location of land allocated for employment purposes should more closely reflect market requirement and flow from a detailed appraisal of the quality of existing employment sites. In particular additional land should be allocated, which is well related to the M1 and capable of providing plot or plots to accommodate large logistics buildings.</p> <p>The representations identify that the site is a suitable location for large format manufacturing or storage and distribution uses and has the capability of accommodating a single large unit of circa 300,000 sq ft.</p> <p>There are objections to the Draft Local Plan as:</p> <ul style="list-style-type: none"> <li>• It fails to appropriately respond to employment land requirements either quantitatively, or (most importantly), qualitatively. There is a stark deficiency of land in prime locations, particularly for logistic providers serving a sub-regional or regional market, requiring large format units and direct access to the national motorway network.</li> <li>• The Council set out in the Local Plan (paragraphs 4.23 - 4.30) ambitions for economic growth. However its approach</li> </ul>	<p>No changes proposed.</p>

<p>to assessing employment needs, focusses too greatly on academic modelling at the expense of an understanding of, and response to, market requirements.</p> <ul style="list-style-type: none"> <li>• The figures planned for are insufficient and wholly inflexible. More importantly perhaps, the approach to allocations lacks consideration of the quality of employment land supply and the specific requirements of different sectors of the employment market.</li> <li>• It largely rolls forward land previously allocated and undelivered. Whilst some of this land remains suitable for certain types of local employment, it is largely in secondary locations which is not appropriate for all occupiers, particularly those requiring prime locations close to the M1.</li> </ul> <p>It expressed that the land at Junction 27 is well related to the highway network; it would form a sensible and natural extension to Sherwood Park and its removal from the Green Belt would not affect any of the purposes of including land in the Green Belt.</p> <p>It is identified that the land would be particularly suited to meeting the needs of the logistics sector which is not being appropriately catered for by the proposed allocations. It quotes from a report produced by the British Property Federation (BPF) December 2015 on the logistics market, emphasising the employment generated by the sector, the Gross Value Added and wage levels.</p>	
<p><b>Land North of the MARR (Identified in the Strategic Employment Land Availability Assessment as S7)</b></p>	

<p>Identifies that their client controls land to the north (in Mansfield) and south of the MARR and this facilitates a strategic approach being taken to the development of the landholdings identified in the submission.</p> <p>The representations identify that the site's location adjacent to Summit Park to the west and the MARR to the south it is considered that it has good potential for employment use, building upon these existing and proposed employment areas delivering the employment growth and investment that MARR envisaged.</p> <p>The response identifies that:</p> <ul style="list-style-type: none"><li>• SELAA identifies the site as having the potential to provide a good quality employment site</li><li>• While the Sa of the site identifies potential adverse environmental effects these can be addressed through appropriate mitigation.</li><li>• MARR is a key economic corridor.</li></ul> <p>Consequently it could provide a valuable employment opportunity as an extension to Summit Park.</p> <p>The response highlights the Employment Land Forecasting Study past completions scenario which gives a higher employment land requirement. It proposes that that this should be reflected in the Council's approach and could be met by the site in question. The allocation of the site will provide flexibility to meet additional demands for employment</p>	
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space in the event that actual take-up exceeds the capacity of allocations	
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### Proposed Amendments

Issue/Policy	Amendment
No changes proposed from the consultation.	

<u>List of Respondents</u>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
The Tyler-Parkes Partnership Ltd	2808	√			Featherstone PDD Ltd	6641	√		
Nathaniel Litchfield & Partners	5473	√							

## Sutton-in-Ashfield and Kirkby-in-Ashfield Housing Allocations

### Policy SKA3: Sutton-in-Ashfield and Kirkby-in-Ashfield Housing Allocations – Non site specific responses

Please note that comments received in response to specific housing sites in Hucknall are set out separately under individual headers following this section.

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
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<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Support for all the sites allocated under the Policy	Support acknowledged.
Environment Agency support the Policy. All proposed allocations for Sutton and Kirkby are located within flood zone 1 with no other constraints and are supported by the Environment Agency.	Support acknowledged.
Support for Policy SKA3 which sets out a number of housing allocations within Sutton which are proposed to contribute towards providing the Plans proposed housing requirement of 8,268 dwellings over the Plan period. In particular, there is support for Site SKA3j (Fisher Close/Stanton Crescent) as a suitable site allocation and for it to be taken forward as a housing allocation in the next version of the Local Plan (publication version).	Support acknowledged.
Page 88 - ACCESS has no objection to the proposals within SKA3, supporting all especially site SKA3al, as it will deliver a new primary school, commercial centre and quality open-space all of which will additionally benefit the existing built community.	Support acknowledged.
Support for Policy SKA3 which sets out a number of housing allocations within Sutton which are proposed to contribute towards providing the Plans proposed housing requirement of	Support acknowledged.



8,268 dwellings over the Plan period.	
<b>Object</b>	
<u>Highways &amp; Access</u>	
<p>a) The road network in and around Kirkby-In-Ashfield is not fit for the current purpose and would continue to cause problems with an increase in the local housing as you propose.</p> <p>b) Any access roads to link the development to A38 would merely compound existing traffic problems experienced on both Sutton Road and Kirkby town centre.</p>	<p>We have received no objections from the Highway Authority in this respect.</p> <p>In developing the Local Plan the Council has worked closely with Highways Department at the County Council to understand and plan for the highways infrastructure needed to support the development proposed in the Plan. This information will be used to help negotiate s106 agreements with future developers, to help secure funds to deliver the infrastructure needed.</p> <p>In addition to consultation with the Highways Department, the Council has commissioned an update to the Transport Study that will include an assessment of traffic impact resulting from the proposed sites and potential mitigation needed to help reduce that impact.</p> <p>No changes proposed</p>
<p>Concerns expressed regarding public transport and road capacity in the area covered by the Neighbourhood Forum. Whilst neither the Local Plan nor the Neighbourhood Plan can, on their own, remedy the problem, it needs to be acknowledged so that the issue feeds into future decisions. For example, I don't believe it follows that new development will lead to an improvement of bus and other services from an unregulated and increasingly unsupported public transport</p>	<p>The Council acknowledges the concerns on this aspect. A Transport Study update has been commissioned to determine what mitigations measures can be undertaken to negate the impact of additional traffic on the roads.</p> <p>In a deregulated bus system decisions on bus services are largely down to the operators unless subsidies by the County Council. However, the development of major sites proposed off</p>

<p>system. There is much concern within the Neighbourhood Area about the adequacy of the road network and the lack of public transport provision in large portions of the Area. It is accepted that it is unlikely that this issue will be unique to the Neighbourhood Area within the Ashfield district but it has an effect on the vitality of the Area, individual mobility and consequently the ability to escape deprivation which affects a large section of the Neighbourhood Area.</p>	<p>the MARR are likely to generate interest from bus operators in providing a bus service to meet needs.</p> <p>No changes proposed.</p>
<p><u>Natural Environment</u></p>	
<p>Greenfield sites should only be used as means of last resort not as the primary (cost effective) easy option for developers.</p>	<p>The Council has allocated a number of brownfield sites within Preferred Approach Local Plan, which can accommodate approximately 1268 dwellings. A very small number of brownfield sites have been rejected due to severe constraints e.g. the majority are located in high flood risk areas (flood zones 2 or 3). Unfortunately the supply of brownfield sites has reduced, due to the successful redevelopment sites in the recent past and the need to provide land for business / jobs growth.</p>
<p>Development would take away one of the few areas where local residents can enjoy open countryside and outdoor recreational activities.</p>	<p>In order to help meet the future housing needs of the District, the Council has had to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites deemed deliverable and sustainable, as required by national planning policy.</p> <p>No changes proposed.</p>
<p>A number of the proposed allocations appear to directly affect Local Wildlife Sites. It is requested that all proposed allocations affecting LWSs are omitted from the Local Plan, or</p>	<p>The Council has generally looked to ensure that any allocation avoids sites which have an ecological value including local wildlife sites. However, the Council as the local planning</p>

<p>the boundaries of these proposed allocations are amended to specifically exclude the LWSs. Alternatively, it should be explicitly stated that the LWSs should be retained and incorporated within the allocations as part of the open space provision.</p>	<p>authority is required to balance the economic, social and environmental dimensions of sustainability. This has meant in a limited number of cases local wildlife sites are included in an allocation. For example Mowlands SKA3al and Vere Avenue SKA3v (which has permission granted on appeal). In these cases the sites are retained within the boundaries of the propose allocation to ensure than mitigation measures are undertaken to minimise the impact on local ecology.</p> <p>The next stage of the Local Plan will include concise development briefs for the larger site allocations which do not currently have the benefit of planning permission. These will help to clarify the approach to LWSs among many other requirements in respect of detailed proposals.</p> <p><b>Add supplementary text in supporting paragraphs to clarify that Local Wildlife sites will be taken into account in detailed development proposals</b> (where relevant to individual site allocations).</p>
<p><u>Infrastructure</u></p>	
<p>There would need to be substantial increases to the surrounding infrastructure which is currently struggling to meet existing demands.</p>	<p>In developing the Local Plan the Council has worked closely with Education Department at the County Council, the Clinical Commissioning Groups and other infrastructure providers to understand and plan for the infrastructure needed to support the development proposed in the Plan. This will lead to an update of the Infrastructure Delivery Plan to support the Local Plan. This information will be used to help negotiate s106 agreements with future developers to help secure funds to deliver the infrastructure needed. In some cases this may lead to the</p>

	<p>delivery of new infrastructure as part of the development.</p> <p>No changes proposed.</p>
<u>Historic Environment</u>	
<p>Historic conservation areas should be “retained and enhanced” for future generations. A major new housing development adjoining it does nothing to improve or enhance its setting.</p>	<p>Local Plan Policy EV10 promotes the protection, conservation, and, where appropriate, enhancement of conservation areas in Ashfield.</p> <p>New development which is sensitively designed, taking into consideration the character of a conservation area (CA), should promote the protection and conservation of the CA.</p> <p>Development can also promote the enhancement of the CA if negative elements are replaced with more sensitively designed features.</p> <p>No changes proposed.</p>
<u>Other Objections</u>	
<p>Objection to any building.</p>	<p>Paragraph 47 of the National Planning Policy Framework (NPPF) states that, ‘to boost significantly the supply of housing, Local Authorities should use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing’. Therefore, the Council has no option but to plan for the future housing needs of the District. National planning policy specifies that, Local Plans should be drawn up over an appropriate timescale, preferably a 15 year time horizon.</p> <p>The 2015 Strategic Housing Market Area Assessment (SHMA) identifies that the Council needs to deliver 480 dwellings per annum between 2013 and 2033. Taking into consideration</p>

	<p>development that that has been delivered since 2013, the Council has been required to identify sites for over 8000 dwellings over the Local Plan period (2017 to 2032).</p> <p>No changes proposed.</p>
<b>Comment</b>	
<p>All new development should be small scale to prevent areas being overwhelmed.</p>	<p>The Council needs to allocate land for over 8000 dwellings in order to deliver the objectively assessed housing needs of the District over the next 15 years. The Council consider that the range of sites included in the Local Plan Preferred Approach is both appropriate and deliverable.</p> <p>The Plan includes 74 housing allocations which range in size from a yield of 10 to 495 dwellings. In addition, it includes 2 more strategically sized sites (SKA3al – Mowlands and HA3t, Rolls Royce) which offer the opportunity to provide a greater range of on-site benefits whilst being able to fulfil the needs of the District later in the Plan period.</p> <p>The Local Plan does not allocate sites below 10 dwellings, however, an additional supply of approximately 400 dwellings can be sourced from these smaller sites and are counted towards the overall supply for the District (ALPPA Table 1).</p> <p>No changes proposed.</p>
<p>The estate would be of little benefit to the local population as the houses will be out of the financial reach of most of them.</p> <p>The development is unlikely to reflect the current needs of an</p>	<p>The Local Plan contains a separate policy (HG4 Housing mix) which requires developers to engage with the Local authority to discuss an appropriate mix of housing early in the planning application process. In addition it requires that 10% of new</p>

<p>aging populations for smaller, single story dwellings.</p>	<p>dwellings should be accessible or easily adaptable homes for occupation by the elderly or people with disabilities.</p> <p>No changes proposed.</p>
<p>The proposed proportions of new housing focus too heavily on Sutton/Kirkby at 65%. The proposed large allocations at Selston are highly questionable as is identifying settlements such as Kirkby Woodhouse as being within the “main urban areas”. Hucknall is underprovided with new homes at 30% of the overall proposed development. Many of the sites are small – the type where viability may be disproportionately affected by economic factors leading to failed delivery. Hucknall has excellent accessibility by public transport with the tram/Rail and bus services and is capable of absorbing more of the Plan’s housing allocations. This would help sustain Hucknall town centre and local jobs whilst offering the district’s population ready access by public transport to higher level facilities and employment opportunities offered in the City.</p> <p>It may also help improve retention of skills in Ashfield of residents who might otherwise migrate to adjacent areas such as Broxtowe or Gedling in order to access higher paid jobs in Nottingham. Retention is less likely to occur as a result of allocations in Selston and Skegby. Additionally it will help meet the City’s housing need.</p>	<p><u>Distribution</u></p> <p>The distribution of housing sites across Ashfield is considered to be appropriate. Strategic Objective S08 sets out that new housing will be situated in the most appropriate locations within and adjoining the towns of Hucknall, Sutton and Kirkby and the villages of Selston , Jacksdale and Underwood. Policy S2 further sets out that development will be primarily directed towards the 3 towns (and areas in the District adjacent to Mansfield).</p> <p>For the above reason it is considered that 65% of housing sites allocated towards a combined area of Sutton and Kirkby is broadly equivalent to the 30% allocated to Hucknall, thereby attributing a comparable level of growth across the 3 main towns. The remaining 5% has been allocated to the ‘Rurals’ area (Selston, Underwood, Jacksdale area) to support rural infrastructure and sustainable growth.</p> <p>Ashfield District Council have not been requested to take on board any under-provision from the City of Nottingham. The City is located within a separate Housing Market Area (Nottingham Core HMA) which plan to meet housing need between the constituent authorities.</p> <p><u>Deliverability/ Viability</u></p>

	<p>With regard to the Selston allocations, these sites have been assessed as developable and deliverable and have the support of the Neighbourhood Forum.</p> <p>The Council consider that the range of sites included in the Local Plan Preferred Approach is appropriate and deliverable. The Plan includes 74 housing allocations which range in size from a yield of 10 to 495 dwellings. In addition, it includes 2 more strategically sized sites (SKA3al – Mowlands and HA3t, Rolls Royce) which offer the opportunity to provide a greater range of on-site benefits whilst being able to fulfil the needs of the District later in the Plan period.</p> <p>The Local Plan does not allocate sites below 10 dwellings, however, an additional supply of approximately 400 dwellings can be sourced from these smaller sites and are counted towards the overall supply for the District (ALPPA Table 1).</p> <p>With regard to viability, all sites put forward as allocations have been assessed as deliverable. In addition, The Council has commissioned an update of the Whole Plan Viability Assessment, which includes the impact of all policies in the Local Plan. Any issues raised as a result will be addressed at the Publication Stage of the Local Plan.</p> <p><u>Retention of skills</u> There is no evidence to support the notion that a skilled workforce is only required in the City of Nottingham.</p> <p>No changes proposed.</p>
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None	

### Proposed Amendments

Issue/Policy	Amendment
SKA3 supporting text, paragraphs 6.74. Amend text to reflect the Local wildlife sites are within or adjacent to some allocations.	<p>Add reference to Local Wildlife Sites as follows:-</p> <p>Paragraph 6.53:  <b>“Site SKA3c Ashland Road West, Sutton....</b>identified that this can be mitigated..... <b>A local Wildlife Site lies adjacent to the boundary and any development would need to include mitigation of any negative impact on this.</b> The site has been assessed...”</p> <p>Paragraph 6.62:  <b>“Site SKA3I Alfreton Road, Sutton.....</b>topography/landscape to the west....<b>Included within/adjacent to the boundary of the site is a Local Wildlife Site. Development would need to include mitigation of any negative impact on this. An unimplemented....”</b></p> <p>Paragraph 6.64:  <b>“Site SKA3n Quantum Clothing, North Street....</b> “sensitively designed. <b>A local Wildlife Site lies adjacent to the boundary and any development would need to include mitigation of any negative impact on this.</b> The site has been ...”</p>



	Paragraph 6.74: “ <b>Site SKA3al Mowlands, Kirkby.</b> ....Included within/adjacent to the boundary of the site are Local Wildlife Sites. Development would need to include mitigation of any negative impact on these. The site has potential to deliver a new primary school...”
<b>Officer Amendments</b>	
Policy SKA3, Paragraph 6.74 - amend text for clarification.	Amend paragraph 6.74 to read: “ <b>Site SKA3al Mowlands, Kirkby.</b> .....Access to the site is currently restricted, but consultation with the Highways Authority has indicated that this could potentially be mitigated as a new access road from the A38 has been proposed by the developer/landowner.
SK3 supporting paragraphs 6.51 to 6.78 as necessary.	Add text to cross refer to site briefs where relevant to individual site allocations.
Policy SKA3 - site list and supporting paragraphs.	Update as necessary with regard to site specific/alternative site responses and any new sites which have secured planning approval since April 2015.

<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Environment Agency	1870		√		Parker	6602	√		

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Johnson	1886		√		Manders	6640		√	
Lathall	1917		√		Taylor Wimpey UK Ltd	6644		√	
Collier	1918		√		Bacon S	6695	√		
Lathall	2631		√		Bidwells on behalf of David Wilson Homes (East Midlands)	6705		√	
Cooper	2811		√		Lewis	6729		√	
A. J. Knowles	3758	√			Eyre	6897		√	
Collins J	3034	√			Morton	6898		√	
ACCESS - Annesley Community Committed to Ensuring Sustainable Settlements	5359		√		Morton	6899		√	
Ward	5807		√		Elkington	6977		√	
Lathall	5819		√		M. Redfern	6580	√		
Vardy	5933	√							

**Policy SKA3: Sutton-in-Ashfield and Kirkby-in-Ashfield Housing Allocations – Site specific responses**

**SKA3b Site: Blackwell Road, Huthwaite**

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Site Allocation</b>	
<b>Support</b>	

**Ashfield District Council - Statement of Consultation**

N/A	
<b>Object</b>	
<u>Historic Environment</u>	
Area is next to a previously listed C18th building but it says no impact on heritage assets.	The site does not lie adjacent, or in close proximity, to a listed building. There is a building that is included on the local heritage list and the potential impact on this from a future development will be assessed at the planning application stage (a heritage assessment will be required).

**Proposed Amendments**

<b>Issue/Policy</b>	<b>Amendment</b>
N/A	

**List of Respondents**

<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
M Thorne	3888	√							

**Policy SKA3c: Site: Ashland Road West, Sutton in Ashfield**

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Site Allocation</b>	

<b>Support</b>	
<p>Currently the site is very untidy and quality homes would be suitable and enhance the area.</p> <p>Supports Strategic Objective S08 – Provision of Sustainable Housing.</p> <p>Supports the Spatial Strategy which seeks to focus new development towards existing urban areas and settlements, as the most sustainable locations within Ashfield.</p>	Support acknowledged.
<p>Support for the allocation of Land North of Ashland Road West, Sutton-in-Ashfield for approximately 235 dwellings, under Policy SKa3c. The site has been identified and assessed within the Ashfield District Strategic Housing Land Availability Assessment (SHLAA) (2015) under Site Reference S55 (Appendix 1) which concluded that the site was deliverable. The sites is a sustainable and suitable residential development on the edge of the town which would help meet the housing needs of the District. The site is available now. A planning application has been submitted by David Wilson Homes and any residential proposal on the site would be delivered within a short period of time.</p>	Support and comments acknowledged.
<b>Object</b>	
<u>Highways and Access</u>	
<p>Question the findings of the Transport Statement. At peak times turning into Huthwaite Road from Ashfield Road West is a problem, as is turning into Ashland Road West from</p>	We have received no objections from the Highway Authority in this respect.

<p>Huthwaite Road. Extra cars using the junction will inevitably increase congestion. Increased risk of accidents due to increased number of vehicles on the road.</p> <p>Ashland Road West is already very busy. It is used as a rat run to and from Stanton Hill to Huthwaite/Sutton. I foresee many accidents happening if the development goes ahead.</p> <p>Local roads cannot accommodate such an increase in volume of traffic. 2013 Transport Survey is out of date.</p> <p>Ashland Road could become even worse than Westerman Road (Carsic Estate) for heavy traffic conditions.</p> <p>Little way of mitigating the effect of extra traffic.</p> <p>Alder Way to Westbourne Road is the most direct route to Sutton town centre. Due to the combination of resident parking and traffic calming measures, Alder Way is already choked and a hazard to both car drivers and pedestrians. Due to the hill on Alder Way forward visibility for drivers is very limited in particular around and beyond parked vehicles. Alder Way should be closed to non-residents.</p> <p>Traffic light will be needed at the top of Ashland Road.</p> <p>Rear exit should be provided to the new estate. The new road should run from Huthwaite to Skegby.</p> <p>Only two entrances to the proposed area, which are close together and would cause congestion.</p>	<p>In developing the Local Plan the Council has worked closely with the Highways Department at the County Council to understand and plan for the highways infrastructure needed to support the development proposed in the Plan. This information will be used to help negotiate s106 agreements with future developers, to help secure funds to deliver the infrastructure needed.</p> <p>In addition to consultation with the Highways Department, the Council has commissioned an update to the Ashfield Transport Study that will include an assessment of traffic impact resulting from the proposed sites and potential mitigation needed to help reduce that impact.</p> <p>This study, together with consultation with the County Council's Highways Department, will inform the design of any future development and s106 negotiation related to wider highways infrastructure mitigation.</p> <p>Negotiations with developers in respect of section 106 contributions towards the highway infrastructure are undertaken at the planning application stage. This will be informed by planning policy and the Infrastructure Delivery Plan in order to achieve a sustainable development.</p>
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All local roads need maintenance.	Road maintenance is not an issue for the Local Plan.
<u>Infrastructure</u>	
<p>The current infrastructure is not able to support the buildings proposed and the financial input of any development in terms of roads, schools, doctor surgeries and social housing.</p> <p>More houses mean more traffic, more children in schools, more people needing doctors, shopping etc. and none of that is planned to improve. Infrastructure (schools and health requirements) should be in place before new homes are built.</p> <p>Hospitals and doctors are grossly overworked and will be inadequate.</p> <p>Shortfall / lack of infrastructure: schools, doctor's surgeries, dentists, roads and recreational facilities.</p> <p>No provision to increase/improve the educational place available and or resources at the local GPs/hospitals. Already going to be a massive impact on amenities from the development on the B6018.</p> <p>Already problems regarding getting appointments at local GPs, often weeks to get a regular appointment at Willowbrooks.</p> <p>Schools are already full / overcrowded. Will a new school be built?</p>	<p>The Council acknowledges that there is increased pressure on a range of infrastructure. These pressures are not isolated to Ashfield, and are influenced by national Government policy and funding.</p> <p>With every development site there will be negotiations undertaken (at the planning application stage) between the Council and developers to secure appropriate levels of infrastructure contributions needed to support and mitigate the proposed development (via s106 agreements). In undertaking such negotiations the Government requires the Council to consider development viability and need for a developer to return a reasonable profit. Whilst the Council will seek to secure the greatest infrastructure gains through s106 agreements, it must align with national policy.</p> <p>In developing the Local Plan the Council has worked closely with the Education Department at the County Council, the Clinical Commissioning Groups and other infrastructure providers to understand and plan for the infrastructure needed to support the development proposed in the Plan. This information is being used to update the Infrastructure Delivery Plan which supports the Local Plan, and will ultimately assist in negotiating s106 agreements developers to help secure funds required to deliver the infrastructure needed. In some cases this may lead to the delivery of new infrastructure as part of the</p>

<p>Last year at St. Mary's reception intake there was 110 applications for 30 places.</p> <p>NCC statistics show that local primary schools do not have the capacity to admit the potential number of pupils the 200+ houses will generate. Primary age pupils should be able to walk to school and be educated within their local community, this will not be possible for children living on the proposed development, or for other children within the community due to increased number of applicants.</p> <p>Complete breakdown of infrastructure already.</p> <p>There are no recreational areas within the proposed development, no playground, no shops.</p> <p>Our police station has closed.</p>	<p>development.</p>
<p><u>Flooding</u></p> <p>The site acts as a soak-away for excess rain water from the streets opposite. Even so, some building adjacent the site still get flooded in really bad weather. Local knowledge demonstrates that flooding occurs on site.</p> <p>Site is prone to flooding, building on the site could cause flooding in other residential areas.</p> <p>Fields act as a natural soakaway. They are damp and boggy even in summer.</p>	<p>A flood risk assessment would need to be undertaken for any site over 1 hectare as part of the planning application process. Any future development on the site will be expected to install a Sustainable Urban Drainage System (SuDS) to manage any surface water drainage issues currently present on site and those generated through new development. National planning guidance sets out that sustainable drainage systems, which are designed to control surface water run off close to where it falls and mimic natural drainage as closely as possible, provides opportunities to:</p> <ul style="list-style-type: none"> <li>• reduce the causes and impacts of flooding;</li> </ul>

<p>A flood disaster (2007 – please check).</p> <p>42 Riley Avenue has been flooded several times causing us in 2008 to leave the property for 6 weeks. The main drainage system on the road was unable to deal with the excess water. Severn Trent advised that present drains unable to cope but because they complied with current regulations they weren't going to do anything.</p> <p>Low lying land with natural springs – flood risk.</p> <p>Field itself is currently flooded and we have not had rain recently.</p> <p>My property is at the bottom of Ashland Road West, each time we have heavy rain my garden floods, this can only be exasperated by placing 235 properties on the hill above my property.</p> <p>Site located within a Flood Zone. Potential for the sink and swell of the land to have an adverse effect on the surrounding area, with the possible increase in insurance costs.</p>	<ul style="list-style-type: none"> <li>• remove pollutants from urban run-off at source;</li> <li>• combine water management with green space with benefits for amenity, recreation and wildlife.</li> </ul> <p>The Lead Local Flood Authority is a statutory consultee and the Council will seek advice on planning applications on what sort of sustainable drainage system they would consider to be reasonable. The installation of such a system is likely to help resolve any existing flooding issues derived from run off from the site. If a SuDs scheme is deemed inappropriate or unfeasible, e.g., due to site geology etc., any future development will still need to manage surface water drainage on site.</p>
<p><u>Sewerage / Drainage</u></p>	
<p>Drains inadequate - 13 and 15 Rooley Drive flooded out. Sewage on 11 Rooley Drive back garden. Residential home – sewerage has to be pumped out. Ashland Road West – manhole cover lifts out when heavy rain occurs.</p> <p>42 Riley Avenue has been flooded several times causing us in</p>	<p>The Council has, and will continue to work with Severn Trent on such matters. The Council has not received any objections from the sewerage provider in this respect. The Infrastructure Delivery Plan provides details of sewerage requirements. Severn Trent Water has a statutory duty to provide, improve and extend a system of sewers to ensure an area is effectively</p>



2008 to leave the property for 6 weeks. The main drainage system on the road was unable to deal with the excess water. Severn Trent advised that present drains unable to cope but because they complied with current regulations they weren't going to do anything.	drained (section 94, water Industries Act 1991).
<u>Natural Environment</u>	
<p>Site is rural land adjacent to Brierley Forest Park a Local Nature Reserve and Local Wildlife Park, any development would adversely affect the character of the countryside, in particular its openness.</p> <p>Planning was refused on the site on 1989 and turned down on appeal, as it would spoil the valley. Application (V1988/0990) Appeal (APP/W3005/A/89/127643).</p> <p>Considers that the site should be retained and protected as countryside.</p> <p>It would be a blot on the landscape.</p>	<p>The Council is required, by the NPPF, to provide for the housing needs of the District.</p> <p>The Council's analysis (through the SHLAA) identified that there are insufficient brownfield sites (including derelict sites) available to meet the housing needs for the District, therefore in order to help meet this need, the Council has had to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites it believes to be deliverable and sustainable, as required by national planning policy.</p>
To take away this piece of countryside is 'the thin edge of the wedge' in terms of eating into open space. In direct conflict with policy EV5.	Policy EV5 is not applicable to this policy. The purpose of Policy EV5 is to protect open space which is public accessible. The site is private land.
<p>The Green Space Strategy (2008) quotes 'The most widely valued spaces tendered to be Country Parks and Town Parks.</p> <p>Development will destroy the area of Green Space which the Local Plan purports to protect.</p>	<p>It is acknowledged that Brierly Forest Park is a valued open space.</p> <p>The Council is required, by the National Planning Policy Framework (NPPF), to provide for the housing needs of the District. The Council's analysis (through the SHLAA) identified</p>

<p>Adverse effect on 'Green Space' which provides an important buffer between Brierley Forest Park and urban development.</p> <p>Natural barrier between Brierley Forest Park and the residential area.</p> <p>Housing will impact adversely on the peace and tranquillity the park affords the local population and on the positive outcome such experiences give in terms of health and well-being. People use it for walking (with dogs) and meeting people, do not have to worry about traffic.</p> <p>Fields are an integral part of Brierley Forest both from visual and sustainability aspects – irrespective of ownership.</p> <p>Any development should include a 100m exclusion zone for Brierley Park boundary.</p>	<p>that there are insufficient brownfield sites (including derelict sites) available to meet the housing needs for the District, therefore the Council has had to make the difficult decision to propose the allocation of greenfield land / countryside for development. In doing so the Council has selected sites it believes to be deliverable and sustainable, as required by national planning policy.</p> <p>The fields / proposed housing allocation do not form part of Brierley Forest Park.</p> <p>There is no evidence which indicates that Brierley Forest Park should have a 100m exclusion zone.</p>
<p>Only area of land preventing Sutton from merging with the village of Huthwaite. Land forms a gap between Sutton and Huthwaite.</p>	<p>Whilst the Council acknowledges the different settlements that comprise the District's large urban areas of Sutton and Kirkby, as these area have grown and developed they have in some cases physically merged, creating the wider conurbation. This is acknowledged with the Settlement Hierarchy in the Local Plan.</p> <p>In order to help meet the future housing needs of the District, the Council has had to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites it believes to be deliverable and sustainable, as required by national planning policy.</p>

<p>Brierley Forest Park is important for SINC's and the Local Biodiversity Action Plan (LBAP). This demonstrates the importance of the park and the adjacent countryside. If housing is developed adjacent to the park it will drive away the wildlife and take-away the tranquillity and upset the natural balance that has took 20 years to build up.</p> <p>Moles, bats owls, pheasants, foxes are dependent on the fields. Deer regularly graze on the fields.</p> <p>Possible water vole habitat.</p> <p>Impact on the park would be devastating. Countryside park not a town park and has fantastic diversity of wildlife living therein.</p> <p>Need to keep space for wildlife.</p> <p>Preserve the wildlife on these sites.</p> <p>Serious damage to the local ecology, water system and environment on and around Brierley Forest Park. Valuable habitat for wildlife and its loss would be a serious detriment to the area.</p> <p>Since it is no longer being farmed it has become an extension of the park for wildlife.</p> <p>The Park is an important are for birds, there are many resident species including Tawny Owls, Willow Tit, Skylark, Meadow Pipit, Bulfinch, House Sparrow, Sparrow Hawk and buzzard. It</p>	<p>Any future develop on the site will be required to undertake ecological surveys to understand what wildlife is currently present on the site. These surveys will then inform mitigation or retention measure that would need to be applied to the development. Where appropriate, the Council would seek to retain existing mature hedgerows and trees.</p>
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<p>is also used by various birds seasonally, in winter visiting flocks of Siskin, Redpoll, Fieldfare and Redwing. In summer Chiffchaff, Blackcap, Whitethroat, Willow Warbler, Reed Warbler and Grasshopper Warbler.</p> <p>It would destroy the wildlife corridor and the character of the landscape.</p> <p>Little way of mitigating the loss of flora and fauna.</p> <p>Fields provide a safe haven to the park especially to the lakes wildlife.</p>	
<p>Agricultural land, cut as a hay meadow, which needs preserving as they are rapidly disappearing nationwide.</p> <p>Negative impact in terms of agricultural production.</p>	<p>The Council has to make difficult decisions in balancing the needs for housing against the environment / agriculture. Some of the proposed development sites will result in a loss of countryside. The Council's analysis (through the SHLAA) identified that there are insufficient brownfield site (including derelict sites) available to meet the housing requirements. In proposing sites, the Council has tried to select the poorer quality agricultural land over the higher quality, where possible. This approach aligns with paragraph 112 of the NPPF.</p>
<p>I don't agree to building on Green Belt land.</p>	<p>Comment noted. This site is not located within the Nottingham-Derby Green Belt.</p>
<p><u>Alternative sites</u></p>	
<p>Brownfield sites available locally. These should be considered/ prioritised for housing development before those which are considered to be greenfield.</p>	<p>The Council has allocated a number of brownfield sites within Preferred Approach Local Plan, which can accommodate approximately 1268 dwellings. But unfortunately the supply of brownfield sites has reduced, due to the successful</p>

<p>The use of brownfield sites is far more appropriate over the destruction of greenfield areas.</p> <p>More suitable sites in Sutton in Ashfield that have stood empty for years....these site may be designated for industry, but which is the greater need.</p> <p>Why not build on the land designated as a business park on the A617 – good roads and infrastructure already in place.</p> <p>Please consider land already desecrated like the summit Site and MARR road.</p> <p>Whilst the land at Fisher Cl, also bordering Brierley and Stubbin Hill Farm Fields at Stanton Hill are also sensitive areas, they are not as strategic to the Forest as the Ashland Road West proposed development.</p> <p>Adjacent to Ashland Road is the old CWS factory, a typical brownfield site, ready to be developed.</p>	<p>redevelopment sites in the past and the need to provide land for business / jobs growth. As a result, the Council has had to make the difficult decision to propose the allocation of sites within the countryside to meet the District's future housing needs, as required by national planning policy.</p> <p>Approximately 31 ha of brownfield land has been developed in Ashfield for housing since 2001. The Employment Land Forecasting Study, which forms part of the evidence basis, identifies the land requirement to meet future employment needs over the period of the Plan. It identifies that additional land is required for employment purposes. However, it is anticipated that this can largely be met from existing employment allocations.</p> <p>There are a very small number of brownfield sites have been discounted due to severe constraints, for example the majority of sites are located in high flood risk areas (flood zones 2 or 3).</p>
<p><u>Viability</u></p>	
<p>Not proven that the site is viable.</p>	<p>With every development site there will be negotiations undertaken (at the planning application stage) between the Council and developers to secure appropriate levels of infrastructure contributions needed to support and mitigate the proposed development (via s106 agreements). In undertaking such negotiations the Government requires the Council to consider development viability and need for a developer to return a reasonable profit.</p>

<u>Pollution</u>	
<p>Impact of noise and activity during building works will be detrimental to the ambience of Brierley Forest Park.</p> <p>Development would adversely increase pollution – light, air and noise.</p> <p>Noise and disruption would be hugely detrimental to the wildlife in Brierley Forest Park. The land acts as a wildlife corridor.</p> <p>200 houses on the parks boundary will bring noise, exhaust fumes, dirt, dust, litter etc. plus the additional waste and upheaval for three years whilst construction take place.</p> <p>Extra traffic – negative effect on air quality and pollution.</p> <p>More vibrations from the road rumble strip outside my house.</p> <p>Traffic pollution and congestion destroying wildlife on the park.</p> <p>There will be too much traffic and this is not good for the environment.</p>	<p>The Council's Environmental Health Officers have not raised any objections to the proposed allocation in terms of noise. This could be addressed at the planning application stage. It is not anticipated that future residential use will present unacceptable noise levels in an existing residential area.</p> <p>The Council's Environmental Health Department have been consulted on all the sites proposed within the Preferred Approach Local Plan and they have not raised any objections related to air pollution. For sites over 30 dwellings an air quality assessment will need to be submitted for consideration by the Environmental Health Department at the planning application stage.</p> <p>The Council has no statutory requirement to monitor particulates at present. Mobile monitoring does take place and where appropriate air quality assessments may be asked to include particulate data sourced from DEFRA, where it is available.</p> <p>The monitoring of particulates is required within Air Quality Management Areas (AQMA). However, no part of the District has this designation.</p> <p>The Council will continue to monitor air quality across the District.</p>
<u>Character of area</u>	
The type of properties proposed are not in keeping with other	The Local Plan does not considered the specific types or

<p>properties in the area.</p> <p>Two storey properties would be prominent from within Brierley Forest Park and would not be in keeping with the surrounding.</p> <p>Single storey buildings only in keeping with the area.</p> <p>Too many houses on development.</p>	<p>number of floors of houses that may be developed on the site. The number of houses identified on housing allocations will consider density in general terms taking into account the location of the site in relation to town centres and transport hubs. The specific nature of the homes to be built on any allocated site will be considered as part of any planning application.</p>
<p><u>Other</u></p> <p>The 5 year housing shortfall can be made up from sites within Ashfield that would not require the use of countryside.</p> <p>The Council now has a 5 years housing land supply (Planning meeting in February).</p>	<p>As detailed above, unfortunately the District does not have sufficient brownfield sites to accommodate the District's future housing need.</p> <p>The Council may have a 5 year land supply at present, but it must allocate a sufficient number of sites to sustain this in the future.</p>
<p>We are an island, what happens in drought, what happens if our water runs dry?</p>	<p>The Council would seek to support development that minimise water consumption as detailed within draft policy CC2.</p>
<p>Development would increase crime, as it would allow for an easy escape into BFP. Police policy is not to enter the park after dark.</p> <p>Increase in anti-social behaviour with more entrances on to the park.</p>	<p>The Local Plan and Residential Design Supplementary Planning Document contain policies and guidance on designing out crime. Any future planning proposal will need to be well designed and need to demonstrate that crime has been taken into consideration.</p> <p>The Council would not support a future design that created un-surveyed spaces that could encourage anti-social behaviour.</p>
<p>Don't the Council Planning Committee ever consider the views of the local people?</p>	<p>Councillors have to make very difficult decisions in balancing the needs of the whole District, not just their own Wards. Failure</p>

One has to question the integrity and competence of those individuals who voted this parcel of land for inclusion within the Local Plan.	to adopt a sound local plan will ultimately lead to central Government stepping in, with a risk of unplanned, ad-hoc development in the interim period. Further, national planning guidance provides that councils have to maintain a 5-year supply of housing land at all times. If the Council does not have a 5-year supply of sites, then we must “consider favourably planning applications for housing” even on sites constrained by current planning policy (i.e. countryside) and those that may not be a ‘preferred’ site for the Council.
The application is flawed due to a conflict of interest between Council Offices and the Developer.	Strongly disagree. The Council is not aware of any of its officers breaching the code of professional conduct. Any evidence to this effect will be acted upon accordingly.
When we bought this land to build there was a covenant stating it would not be built on.	The Council are not aware of any covenants on the land, and in any case this is not a planning consideration. The land is not in the Council’s ownership. Any covenants on the land would be a matter for the landowner / developer to resolve.
Estimated cost of housing is between £240,000 and £340,000, this does not equate to affordable housing.	Existing and proposed policy requires a 10% affordable housing contribution in this part of Ashfield. However, this Policy will need to be reconsidered as the Housing and Planning Act 2016 specifies “ <i>the Secretary of State may by regulations provide that an English planning authority may only grant planning permission for a residential development of a specified description if the starter homes requirement is met.</i> ” The Act includes a definition of Starter Homes as including a requirement that that it is sold for less than the price cap, which for outside Greater London is £250,000 (Effectively this means that the market value of the dwelling will be £312,500). Until



	<p>regulations are issued by the Secretary of State it is not certain how this will impact on properties in the District.</p> <p>In addition, draft Local Plan policy HG4 requires proposals for new development to contribute to a mix of housing types, tenures and sizes in order to create mixed and balanced communities.</p>
Japanese knotweed - Growing on at least two separate areas of the land. No development should take place until this has been addressed (4 years).	<p>If Japanese knotweed is located on the site the land needs to be managing in an appropriate way. Advice to developers is set out by the Environment Agency 'Managing Japanese knotweed on development sites' 2013. The presence of Japanese Knotweed does not prevent the site being developed but a condition may be necessary for the eradication of Japanese Knotweed. This could result in a longer lead in period for the site to be developed.</p>
Views - Building will damage the views of Brierley Forest Park. Impairs views out of houses along Norwood Close and Ashland Road West.	<p>New development is likely to impact on existing views. National policy does not enable the Council to considered loss of view as a factor in assessing the suitability of a potential housing site.</p> <p>The Council's Residential Design Supplementary Planning Document sets out the required separation distances of new properties. Any future planning application would be expected to comply with planning policies relating to residential amenity.</p>
<p>Quality of life - Development will impact on the quality of life for the current residents.</p> <p>Quality of life for existing residents will be adversely affected by assuming existing facilities can cope.</p>	<p>As detailed above, the Council is working closely with infrastructure providers to plan for the future infrastructure needs resulting from future development.</p> <p>It is not known who will reside in any future homes. It cannot be</p>

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Worry about disruption from inconsiderate individuals nearby.	assumed they will be inconsiderate.
Policy ST2 states that development will be concentrated within the main urban areas. The proposed development is located outside the main urban area of Sutton-in-Ashfield.	Policy S2 states that 'development in Ashfield will be primarily directed towards locations within or adjoining the main urban areas .....
I have yet to find the cash machine / post office within a 10 minutes' walk of the site.	There is a cash machine at Costcutter located on The Oval.
As a tax payer – where is my money being spent? Will I have to pay more to subsidise these new properties, roads, drainage, sewerage, waste?	The housing is to be provided by a private developer. The Council will negotiations with the developers in respect of section 106 contributions towards the highway infrastructure are undertaken at the planning application stage. This will be informed by planning policy and the Infrastructure Delivery Plan in order to achieve a sustainable development.
Extra work on the Council regarding the removal of waste as there is only 1 waste tipping centre and that is in Kirkby.	Comment noted.
The fields should be bought by the Council to integrate into Brierley.	The Council does not have the fund to purchase sites.
Mining faults on land.	The Coal Authority have been consulted on the draft Local Plan and will be consulted further if any future development is proposed.
Possible effect the registration to country park status which ADC is filing the paperwork.	Comment noted.
Impact of house prices and house saleability.	Whilst this is not a planning consideration, the Council is not aware of any evidence to support this claim.

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<b>Comment</b>	
This proposed allocation is on the perimeter of the urban area of Sutton in Ashfield, therefore any proposals should take into account the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone ML21 Brierley Forest Park. Any proposals need to be developed to mitigate any negative impacts on Brierley Forest Park, and to provide links into the park.	Comments acknowledged.

**Proposed Amendments**

<b>Issue/Policy</b>	<b>Amendment</b>
No amendments proposed.	None

<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Morton	2182	√			Lee	6750	√		
Nottinghamshire County Council	2803			√	Howells	6751	√		
Beighton	3029	√			Barnes	6752	√		
Marshall	3177	√			Shannon	6753	√		
Jackson	3709	√			Williams	6754	√		
Portas	3718	√			McLuckie	6755	√		
Burnham	5398	√			Severn	6756	√		
Nunn	5399	√			Moore	6757	√		
Burton	5403	√			Flowers	6758	√		

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Wray	5404	√			Dalby	6759	√		
Beazley	5408	√			Maskell	6760	√		
Hedgecock	5413	√			Rowley	6761	√		
Harrison	5417	√			Hawley	6762	√		
Dyson	5418	√			McKie	6763	√		
White	5420	√			Peat	6764	√		
Hill	5436	√			Fox	6765	√		
Morrell	5442	√			Johns	6766	√		
Clarke	5519		√		Millington	6767	√		
Randall	5520	√			Crafts	6768	√		
Burnham	5528	√			Radcliffe	6769	√		
Parmenter	5530	√			Johnson	6770	√		
Barnes	5535	√			Ball	6771	√		
Hull	5551	√			Millington	6772	√		
Hernon	6523	√			Woodward	6773	√		
Hernon	6524	√			Walker	6774	√		
Jones	6541	√			Bailey	6775	√		
Bailey	6617	√			Roberts	6776	√		
Homes	6621	√			Dalby	6777	√		
Bearley	6655	√			Robertson	6778	√		
Carpenter	6656	√			Ansell	6779	√		
Burton-Carpenter	6657	√			Beardsmore	6780	√		
Kowalenko	6658	√			Morrell	6781	√		
Kowalenko	6659	√			Rudhall	6782	√		
Buttery	6660	√			Dalby	6783	√		

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Edwards	6661	√			Scothern	6784	√		
Buttery	6662	√			Dalby	6785	√		
Powell	6663	√			Simmonds	6786	√		
Powell	6664	√			Crafts	6787	√		
Obertelli	6665	√			Williams	6788	√		
Hayes Bradley	6666	√			Martin	6789	√		
Hallam	6667	√			Key	6790	√		
Barnes	6668	√			Moore	6791	√		
Stallings	6669	√			Collins	6792	√		
Webb	6670	√			Hayes	6793	√		
Pollock	6671	√			Fox	6794	√		
Ellis	6672	√			Fullwood	6795	√		
Gregory	6673	√			Peters	6796	√		
Pollock	6674	√			Clarke	6797	√		
Lace	6675	√			Jones	6798	√		
Burnham	6676	√			Straw	6799	√		
Burnham	6676	√			Calow	6811	√		
Burnham	6667	√			Eyre	6812	√		
Burnham	6679	√			Wardle	6813	√		
Froggatt	6680	√			Hutchinson	6814	√		
Burnham	6681	√			Marsh	6815	√		
Froggatt	6682	√			Singleton	6816	√		
Binch	6683	√			Attewell	6817	√		
Bills	6684	√			King	6818	√		
Bills	6685	√			Monk	6819	√		

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Morrell	6686	√			Hardy	6820	√		
Holmes	6687	√			Hardy	6821	√		
Flowers	6688	√			Constance	6822	√		
Phillips	6689	√			Gregory	6823	√		
French	6690	√			Jeffery	6824	√		
Hutchinson	6691	√			Moody	6825	√		
Bidwells on behalf of David Wilson Homes (east Midlands)	6705		√		Moody	6826	√		
A Herne-Smith	6719	√			Simpson	6827	√		
Barnett	6720	√			Simpson	6828	√		
Randall	6721	√			Klitofsky	6829	√		
Coleman	6722	√			Simpson	6830	√		
Barnett	6723	√			Hallam	6831	√		
Dyson	6724	√			Hallam	6832	√		
Hill	6725	√			Hallam	6833	√		
Dobb	6726	√			Manning	6834	√		
Clarke	6727	√			Manning	6835	√		
Jackson	6730	√			Hill	6836	√		
Mellor	6741	√			Hull	6837	√		
Brewer	6742	√			Roberts	6838	√		
Morrell	6743	√			Roberts	6839	√		
Hutchinson	6744	√			Limb	6840	√		
Barker	6745	√			Ingham	6841	√		
Philips	6746	√			Limb	6842	√		
McLuckie	6747	√			Limb	6843	√		

Furness	6748	√			Limb	6844	√		
Collins	6749	√			Johnson	6845	√		

### SKA3d Site: Clegg Hill Drive, Huthwaite

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Support	
<p>My client fully supports the identification of site SKA3d within the Local Plan Preferred Approach document for housing purposes. It is considered that the site consists of a sustainably located housing development site that is available, achievable and deliverable. The development of this site for housing purposes will make a positive contribution to the Council's future housing provision for the District.</p> <p>My client provides the following comments to the conclusions set out for site SKA3d within the Technical Paper in support of the allocation of this land for residential development:</p> <p>The site is immediately available and all landowners are in agreement to develop the site for residential purposes.</p> <p><u>Access / Highways</u> An appropriate and safe access to this site is achievable off Chesterfield Road. A detailed Access Assessment that was</p>	<p>The Council welcomes the support from seeking develop on the site and the information submitted with the representation.</p>

<p>submitted with planning application ref V/2015/0391. The proposed access provides adequate visibility and has the full support of Nottinghamshire County Councils Highway Department.</p> <p><u>Natural Environment</u> The site can be developed whilst protecting the existing hedgerows and other ecologically important species on the site.</p> <p><u>Other</u> The site is sustainably located with access to public transport and other key facilities and services. As stated in the Technical Paper there is a major employment area to the south of the site, a local shopping centre with a good range of convenience provision, primary schools, open space (Brierley Forest Park and Huthwaite Recreation Ground), a golf course, a medical centre and a regular bus service with good connections to facilities and services in Sutton in Ashfield.</p>	
<b>Object</b>	
N/A	-
<b>Comment</b>	
<p>This proposed allocation is on the perimeter of the urban area of Huthwaite, therefore any proposals should take into account the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone NC08 River Meden Valley.</p>	<p>Comments acknowledged.</p>



### Proposed Amendments

Issue/Policy	Amendment
No amendments proposed.	None

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Nottinghamshire County Council	2803			√	P Money on behalf of landowner	5917		√	

### SKA3e: Site: Newark Road, Sutton in Ashfield

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
<b>Support</b>	
N/A	-
<b>Object</b>	
<u>Natural Environment</u>	
Currently the land is used to grow needed crops to feed the UK population.	While it is acknowledged that the countryside is important for agriculture, the Council has to make difficult decisions in balancing the needs for housing against the environment/agriculture. Some of the proposed development sites will result in a loss of countryside. The Council's analysis (through the SHLAA) identified that there are insufficient brownfield site (including derelict sites) available to meet the

	housing requirements. Therefore the Council has had to make the difficult decision to propose the allocation of greenfield sites which by necessity will include agricultural land.
The land should be returned to Green Belt	The site has never been located in the Green Belt.
What about the effect development will have on the wildlife within the fields and hedgerows?	Any future develop on the site will be required to undertake ecological surveys to understand what wildlife is currently present on the site. These surveys will then inform mitigation or retention measure that would need to be applied to the development. Where appropriate, the Council would seek to retain existing mature hedgerows and trees.
<u>Site Constraints</u>	
Parts of the site was an old quarry.	The Council is aware that part of the site was used as a quarry and was landfilled. The Council's Environmental Health Department have not identified any issues related to this, but any future developments will need to consult closely with them.
Houses perched on a lot higher ground staring back through our now private windows and gardens fill me with dread ! Along with extra noise of people going about their business. can you guarantee I and my other residents will not have our privacy compromised by this possible development? and what will those measures be?	Any future development on the site would need to successfully align with a number of planning policies prior to it being approved for development. Minimum privacy distances are contained with the Ashfield Residential Design SPD, requiring new residential development to be a minimum distance away from existing properties. These requirements will be applied to all new development, reducing their impact on existing properties.
<u>Economic</u>	

Before building more houses Ashfield need to attract businesses to the area to provide employment to the unemployed.	The Preferred Approach Local Plan must provide sufficient land for the future employment and housing needs of the District. In order to support employment growth, new homes are needed, and vice versa. The District has a number of employment sites, with a range of successful businesses, from small local enterprises to multi-national businesses. The Council continues to support the growth of these existing businesses and encourage new businesses into the area.
The Referendum in June could mean the reduced amount of housing needed in the Ashfield area and Britain. - Ashfield Council's Planning dept need to defer any decisions until after this referendum has taken place.	Ashfield's housing need is based on a number of factor including population growth, an aging population, change in household formations, households who are unable to buy a home due to the recession, and migration. Migration represent a small element of need and the majority of migration is from within the East Midlands.
Why can't the old Prologis site be used for housing? The services are already there.	As detailed above, the Local Plan must allocate sufficient sites for future employment uses as well as housing. Prologis is one such site. Whilst the site has remained undeveloped during the recession, the Council is confident that employment uses will be developed on the site. Equally the owners of the site have not indicated to the Council any intention of pursuing other uses on the site.
<u>Flooding / Drainage</u>	
Building on the site will increase the already major problems with flooding in the local community.	The Council recognises that areas of the existing residential estate suffered from surface water flooding issues.
Part of the site have springs.	A flood risk assessment would need to be undertaken for any site over 1 hectare as part of the planning application process.

<p>There is a lot a surface run-off from the field during rainy periods. The current ditches does not function as it should.</p>	<p>Any future development on the site will be expected to install a Sustainable Urban Drainage system (SUDs) to manage any surface water drainage issues currently present on site and those generated through new development. Systems used to do this vary from open swales and ponds, to tanks under roads. The installation of such a system is likely to help resolve the existing flooding issues derived from run off from the site. This system is likely to either incorporate the existing ditch on the Newark Road site or replace it. Exact details of a future scheme are not know at this stage. This will form part of a planning application.</p>
<p>Concern regarding the flooding of the field to the rear of Western Close at Sutton Junction. From past experience areas of the estate have flooded. Any increase in housing would create more runoff and increase the risk of flooding on the estate. As the water will go into the River Maun it will also could potentially effect the Mowland Close Estates which regularly flooded as open land 60 years ago.</p>	<p>Any development would be required to retain greenfield run off rates through an appropriate SuDS system. It is important to establish the soil, geological and hydrological conditions of a site through ground investigation before coming to any conclusions about the suitability of any particular SuDS system.</p>
<p>Kirkby Folly Road/Newark Road is well known to be at flood risk from surface water. The Sutton Junction area is a natural bowl with no outlet with excess water overwhelming the existing drainage system.</p> <p>The agricultural land current absorbs rainwater and prevents flooding. SuDS are intended to infiltrate water into the ground which will not work on a clay soil.</p>	
<p><u>Access &amp; Highways</u></p>	
<p>Currently the area has major traffic issues with cars using the roads around this area as shortcuts for the over used A38.</p> <p>Issues with traffic related to the Sutton Junction Level Crossing. At least 4 times per hour the barriers are closed for an excessively long time. This already causes delays. The roads are used as an alternative route into Mansfield rather than the A38. Additional housing will make these problems worse.</p>	<p>In developing the Local Plan the Council has worked closely with Highways Department at the County Council to understand and plan for the highways infrastructure needed to support the development proposed in the Plan. This information will be used to help negotiate s106 agreements with future developers, to help secure funds to deliver the infrastructure needed.</p> <p>In addition to consultation with the Highways Department, the Council has commissioned a Transport Study that will include an assessment of traffic impact resulting from the proposed</p>

<p>The level of traffic using Coxmoor Road, Newark Road and Kirkby Folly Road has increased drastically over the past 20+ years. More development will increase these issues.</p> <p>it is already very difficult at times to get out of the Searby Ave &amp; Farndon Road because of the amount of traffic</p>	<p>sites and potential mitigation needed to help reduce that impact.</p>
<p>At a recent meeting planners stated any access to these site would be via a junction at Newark/Coxmoor road junction and possibly Coxmoor road. It has come to my attention that this is not fixed and they may want to make searby road an access route? I am in total opposition to this plan if true.</p> <p>Possible exist at the corner of Searby Road isn't mentioned, but must be tempting. This would ruin the existing estate.</p>	<p>The Council has worked with the County Council Highways Department in order to understand where they would seek to take vehicular access into the site from. They have informed the Council that for the Newark Road site, primary access should be taken from Newark Road, with the possibility of a secondary access from Coxmoor Road.</p>
<p><u>Infrastructure</u></p>	
<p>Lack of Schools places including secondary schools, increased pressure on Health care/Doctors/Hospitals.</p>	<p>The Council acknowledges that there is increased pressure on a range of infrastructure. These pressures are not isolated to Ashfield, and are influenced by national Government.</p> <p>In developing the Local Plan the Council has worked closely with Education Department at the County Council, the Clinical Commissioning Groups and infrastructure providers to understand and plan for the infrastructure needed to support the development proposed in the Plan. This information will be used to negotiate s106 agreements with future developers, to help secure funds to help deliver the infrastructure needed.</p>
<p><u>Other</u></p>	
<p>Whilst there are still many brownfield sites in the area which could have houses built on them, why look to deplete green</p>	<p>The Council has allocated a number of brownfield sites within Preferred Approach Local Plan, which can accommodate</p>

spaces?	approximately 1268 dwellings. But unfortunately the supply of brownfield sites has reduced, due to the successful redevelopment sites in the past and the need to provide land for business / jobs growth. As a result, the Council has had to make the difficult decision to propose the allocation of sites within the countryside to meet the District's future housing needs, as required by national planning policy.
Additional homes will lead to addition cars, which will increase air pollution.	The Council's Environmental Health Department have been consulted on all the sites proposed within the Preferred Approach Local Plan and they have not raised any objections related to air pollution. It is hoped, that by proposing a housing site close to the Parkway Train Station, some journeys will be made by train rather than car.
The housing should be located on Prologis Park which has not been developed for jobs.	Summit Park (as Prologis Park is now known) is an important employment site allocated off the MARR. It has been developed to the extent that the infrastructure to facilitate the building of employment units has been constructed. It is understood from the Council's Regeneration Section that there is significant interest in the site from occupiers.
There is no requirement for the housing development proposed the houses will not be affordable and should be built in the more affluent south of Ashfield. This is a tick box exercise imposed by Government. The lack of jobs means that residents will be commuting to and from work in counties that have invested in jobs.	As is required by national planning policy the Local Plan is based on evidence, which identifies the objectively assess housing needs of Ashfield (The Strategic Housing Market Assessment) as well as the land anticipated to be required in relation to jobs (Employment Land Forecasting Study). It is widely recognised that not enough houses are being built and the Council has identified sites which it considers are the best sites to meet the identified need. Houses have been identifies

	<p>within the areas of Hucknall, Sutton/Kirkby and The Rurals (Selston, Jacksdale, Bagthorpe and Underwood) based on the evidence from the SHMA. In relation to jobs, relatively, forecasts anticipate that Ashfield will see one of the highest level of job growth in Nottinghamshire.</p>
<b>Comment</b>	
<p>No doubt a large scale development will occur on the site due to national and local political attitudes to housing.</p> <p>The main consideration that must be addressed by any development is the drainage on the site, which comprises magnesium limestone and sandstone. Before the land is covered, full preparation must be made for drainage.</p>	<p>The Government has highlighted its desire for local authorities provide sites to the housing needs of its area, through national planning policy. As such, the Council has proposed to allocate a number of deliverable sites in the Preferred Approach Local Plan.</p> <p>The Council acknowledges that the existing housing suffers from flooding, largely derived from surface water draining of the surrounding sites. Any future development on the site will be required to appropriately manage water within the site, which it is hoped, will also benefit existing homes.</p>
<p>Directly at the back of our property is land between us and the farmer's field. Is there an option for residents to buy this land?</p>	<p>If residents would like to enquire about buying a piece of land they would need to contact the land owner. The land is not owned by the Council.</p>
<p>I urge the powers that be, be more inventive when it comes to development in the Ashfield area, instead of taking the easy option viewed from a helicopter and ticking boxes without any real consideration for the long term problems of their actions.</p>	<p>The Preferred Approach Local Plan has been created using a wide range of evidence base, to create a deliverable local plan, as required by national policy. Whilst the Council has had to take the difficult decision to propose the allocation of greenfield sites, their selection has been guided by the evidence base and statutory consultees such as the Highways Authority. The final judgement on whether the Council made sound decisions will be made by the appointed Planning Inspector.</p>

<p>The proposal protrudes beyond the southern edge of the Sutton conurbation, presumably for no better reason than that is the historic agricultural field boundary. The allocation should be limited to a line level with the southern section of Searby Road and thus limit the impact on residents locally and also the view of the landscape from Coxmoor Road; making a natural green break between the new houses and existing single plots strung along Coxmoor Road.</p> <p>I think the development should be limited in nature, reducing the amount of houses to 150.</p>	<p>The Council acknowledges this comments. The proposed development site reflects land ownership. Whilst the whole site has been indicated as appropriate / deliverable for development, if taken forward, the Council will seek to a future design acknowledges its setting and includes appropriate landscaping. This could lead to the green break / buffer being created.</p> <p>The Council believes the approximate yields detailed for the site is appropriate, taking into account the need for onsite infrastructure, constraints and landscaping / green space.</p>
<p>This proposed allocation is on the perimeter of the urban area of Sutton in Ashfield, therefore any proposals should take into account the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone SH11 Lindhurst Wooded Farmlands.</p>	<p>Comments acknowledged.</p>

### Proposed Amendments

Issue/Policy	Amendment
N/A	None

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
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Nottinghamshire County Council	2803			√	R Cornwell	4812	√		
M Bennett	3478	√			P Wimbleton	4826	√		
C Ainscough	3542	√			J Jones	4832	√		
E Frost	3642			√	S Allsop & L Ball	6603	√		
S Hastings	3747	√			D Curzon	6629	√		
P Hardstaff	3768			√	B Betts	6701	√		
R Matthews	4584	√			K Stringfellow	6871	√		
G Stevenson	4697	√			K Drew	6606	√		
B Rawson	4796	√			S Shaw	2707	√		√
A Betts	4800	√							

**SKA3e & SKA3ah Combined Site Response: Lowmoor Road & Newark Road**

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Site Allocation</b>	
<b>Support</b>	
The proposals to allocate land east of Sutton Parkway and Newark Road are supported. Both sites represent highly sustainable development opportunities that can make an important contribution to future housing requirements over the plan period. It is also logical that higher densities are promoted on the land east of Sutton Parkway Station reflecting the site's proximity to a public transport interchange.	The Council acknowledge the comments made and welcomes the commitment to undertake future studies related to flood risk and surface water management for the sites.

<p>It is understood from previous consultations that there are local concerns particularly in relation to surface water flooding experienced by existing residents. The developments will provide for sustainable drainage solutions to deal with surface water drainage from the proposed developments. These solutions are likely to consist of a combination of swales and ponds. It is likely that these solutions will help to address problems experienced by residents from uncontrolled run-off from the land.</p> <p>As part of the ongoing technical work being undertaken on the development proposals, Hallam Land will be producing reports setting out in more detail the flood risk and surface water management solutions for development in this location.</p>	
<p><b>Object</b></p>	
<p><u>Natural Environment</u></p>	
<p>Currently the land is used to grow needed crops to feed the UK population.</p>	<p>While it is acknowledged that the countryside is important for agriculture, the Council has to make difficult decisions in balancing the needs for housing against the environment/agriculture. Some of the proposed development sites will result in a loss of countryside. The Council's analysis (through the SHLAA) identified that there are insufficient brownfield site (including derelict sites) available to meet the housing requirements. Therefore the Council has had to make the difficult decision to propose the allocation of greenfield sites which by necessity will include agricultural land. In proposing sites, the Council has tried to select the poorer quality agricultural land over the higher quality, where possible. This approach aligns with paragraph 112 of the NPPF.</p>
<p>What about the effect development will have on the wildlife</p>	<p>Any future develop on the site will be required to undertake</p>

within the sites?	ecological surveys to understand what wildlife is currently present on the site. These surveys will then inform mitigation or retention measure that would need to be applied to the development. Where appropriate, the Council would seek to retain existing mature hedgerows and trees.
The removal of the last few green spaces in the area which will effectively merge Kirkby, Sutton and Mansfield	<p>Whilst the Council acknowledges the different settlements that comprise the District's large urban areas of Sutton and Kirkby, as these area have grown and development they have in some cases physically merged, creating the wider conurbation. This is acknowledged with the Settlement Hierarchy in the Local Plan.</p> <p>In order to help meet the future housing needs of the District, the Council has had to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites it believes to be deliverable and sustainable, as required by national planning policy.</p>
In the proposed plan I saw no development of green space or parks how can all these proposed developments have no green space implemented for wellbeing of the community and workforce it aims to target these homes to?	Amenity and green space requirements related to any future development will be assessed at the planning application stage. Through proposed policy HG3, the sites proposed will need to include appropriate green / play space provision for its residents.
<p>This site which is currently agricultural and acts as a true "Green Field site" which is defined in your document as: An area of land surrounding a city having five distinct purposes</p> <ul style="list-style-type: none"> <li>To check the unrestricted sprawl of large built up areas;</li> </ul>	The five distinct purposes identified related to Green Belt. Green Belt is a national policy designation which serves the five purposes identified (NPPF para 80). The site in question is not in the Green Belt and therefore do not apply to the area in question.

<ul style="list-style-type: none"> <li>• To prevent neighbouring towns from merging into one another;</li> <li>• To assist in safeguarding the countryside from encroachment;</li> <li>• To preserve the setting and special character of historic towns;</li> <li>• To assist in urban regeneration by encouraging the recycling of derelict and other urban land.</li> </ul> <p>Should not be redefined for building use as it seems to me that it meets most, if not all of the above criteria and only by ignoring the definition could it possibly be considered for this scheme?</p>	
<p><b>Site Constraints</b></p>	
<p>The site contain former landfills and an old quarry.</p> <p>Have ADC or potential developer carried out a complex assessment, using site specific data, which is relevant to non hazardous substances and pollutants contained within leachate?</p> <p>Please confirm you have carried out a site conceptual risk assessment and that a monitoring programme is in place, in relation to the old landfill.</p>	<p>The Council and landowners are aware of the historic uses on the site and will ensure the appropriate works and site investigation are undertaken prior to any future development taking place. Part of the site was used as a quarry and was landfilled. The Council's Environmental Health Department have indicated that Any change of use to residential with gardens would in this area require a comprehensive ground investigation and any necessary remedial works to be carried out. This would be regulated by attaching a suitable condition to any future planning permission. Any future developments will need to consult closely with them to ensure appropriate assessments /</p>

<p>Can you confirm geological boreholes are insitu and regular logging is taken?</p> <p>Would you also confirm appropriate leaching tests are carried out at appropriate time in compliance with EC Council Decision (2003/33/EC), annex, section 3, along with (DQRA) risk assessment?</p>	<p>investigations and any required mitigation is undertaken.</p>
<p>Air Pollution – concerned about air quality and particularly particulate matter which can have a negative effect on lung and heart condition, particularly of young people and babies. My focus is on nitrous oxide, which is the only one ADC monitor, but at few sites throughout the District. I find the information from this very misleading. Further development on these sites will increase air pollution within the wider area.</p>	<p>The Council's Environmental Health Department have been consulted on all the sites proposed within the Preferred Approach Local Plan and they have not raised any objections related to air pollution. For sites over 30 dwellings an air quality assessment will need to be submitted for consideration by the Environmental Health Department at the planning application stage.</p> <p>The Council has no statutory requirement to monitor particulates at present. Mobile monitoring does take place and where appropriate air quality assessments may be asked to include particulate data sourced from DEFRA, where it is available.</p> <p>The monitoring of particulates is required within Air Quality Management Areas (AQMA). However, no part of the District has this designation.</p> <p>The Council will continue to monitor air quality across the District.</p>
<p>Houses perched on a lot higher ground staring back through our now private windows and gardens. Can you guarantee I</p>	<p>Any future development on the site would need to successfully align with a number of planning policies prior to it being</p>

and my other residents will not have our privacy compromised by this possible development? and what will those measures be?	approved for development. Minimum privacy distances are contained with the Ashfield Residential Design SPD, requiring new residential development to be a minimum distance away from existing properties. These requirements will be applied to all new development, reducing their impact on existing properties.
<u>Economic</u>	
Before building more houses Ashfield need to attract businesses to the area to provide employment to the un-employed.	The Preferred Approach Local Plan must provide sufficient land for the future employment and housing needs of the District. In order to support employment growth, new homes are needed, and vice versa. The District has a number of employment sites, with a range of successful businesses, from small local enterprises to multi-national businesses. The Council continues to support the growth of these existing businesses and encourage new businesses into the area.
Why can't the old Prologis site be used for housing? The services are already there.  This area is also accessible to the river Maun area and within a reasonable walking and cycling distance to Mansfield town centre, which should help with any travel plan for the area.	As detailed above, the Local Plan must allocate sufficient sites for future employment uses as well as housing. Prologis is one such site. Whilst the site has remained undeveloped during the recession, the Council is confident that employment uses will be developed on the site. Equally the owners of the site have not indicated to the Council any intention of pursuing other uses on the site.
<u>Flooding / Drainage</u>	
Searby Road residents continually suffer from gardens being flooded, despite efforts by Ashfield District Council who constructed three large ditches. During periods of moderate to heavy rain Newark Road near to the railway crossing floods.	The Council recognises that the areas of the existing residential estate suffered from surface water flooding issues.  A flood risk assessment would need to be undertaken for any

<p>Despite reporting this to Nottinghamshire County Council a number of times I am advised it is a capacity issue with the drains that service the area.</p> <p>Building on the site will increase the already major problems with flooding in the local community.</p> <p>Part of the site have springs.</p> <p>There is a lot a surface run-off from the field during rainy periods.</p> <p>Existing ditch used to help mitigate flooding is not work / has not been maintained.</p> <p>There are 21 natural springs on the site.</p> <p>Nottinghamshire is known for the quantity of subterranean water. The sites around Searby Road and properties on the estate suffer from a range of issues related to this, with water running under the floors of properties, flooded foundation to property extensions and water logged gardens.</p> <p>Concerns raised regarding the River Maun by Mowlands Close. The response identifies that since the developments off Kirkby Folly Road and Midland Road the respondent's garden has near constant ground water due to the high level of the water table. The banks of the stream are being eroded by the flow of water when the holding tanks release the water, which causes the level of the stream to rise dramatically to within</p>	<p>site over 1 hectare as part of the planning application process.</p> <p>Any future development on the site will be expected to install a Sustainable Urban Drainage system (SUDs) to manage any surface water drainage issues currently present on site and those generated through new development. Systems used to do this vary from open swales and ponds, to tanks under roads. The installation of such a system is likely to help resolve the existing flooding issues derived from run off from the site. This system is likely to either incorporate the existing ditch on the Newark Road site or replace it. Exact details of a future scheme are not know at this stage. This will form part of a planning application.</p> <p>As detailed in the above comments, the developer promoting the sites have acknowledged the issues on the site and will be undertaking further assessment to ensure appropriate management if the sites come forward.</p> <p>The Council is aware of the flooding history and issues experienced by existing residents. The flooding issues and concerns highlighted by residents will be forwarded onto the site promoters / developer for appropriate consideration.</p> <p>As set out above, any housing allocated will be subject to future planning applications. Any planning application will require a Site Specific Flood Risk Assessment, which sets out how surface water will be disposed of and green field rates maintained. The application is reviewed by Nottinghamshire County Council as the Lead Local Flood Authority who are a</p>
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<p>inches if the top of the banks. Concerns that further development in the area will result in gardens being flooded and houses damaged.</p> <p>What the site is currently rated as under the Flood Zone provisions and what plans are in place to prevent flooding on the Sutton Junction Estate from the springs that are on the site?</p>	<p>statutory consultee. There is already a scheme which has been implement for land adjacent to Lowmoor Road/Searby Road where water is collected and directed to the River Maun.</p> <p>The sites are identified in Flood Zone 1 which is at the lowest risk from flooding from watercourses. Part of the land is identified as at risk from surface water flooding which is a common aspect to many sites. Any development over 1 hectare would be required to undertake a site specific flood risk assessment to identify how any surface water issues would be resolved. The flood risk assessment would be reviewed by the Lead Local Flood Authority as a statutory consultee.</p>
<p><u>Access &amp; Highways</u></p>	
<p>The level of traffic using Coxmoor Road, Newark Road and Kirkby Folly Road has increased drastically over the past 20+ years. More development will increase these issues.</p> <p>Substantial investment is needed in our road system before any more development occurs.</p> <p>The traffic at rush hours on Newark Road and Kirkby Folly Road is already often at a standstill for long periods. Traffic has to queue behind right-turners waiting to cross into Searby Road and Farndon Road, and of course has to queue when the level crossing gates are closed. Development of the proposed sites should demand proper co-ordinated management of both road and rail traffic.</p>	<p>In developing the Local Plan the Council has worked closely with Highways Department at the County Council to understand and plan for the highways infrastructure needed to support the development proposed in the Plan. This information will be used to help negotiate s106 agreements with future developers, to help secure funds to deliver the infrastructure needed.</p> <p>In addition to consultation with the Highways Department, the Council has commissioned a Transport Study that will include an assessment of traffic impact resulting from the proposed sites and potential mitigation needed to help reduce that impact.</p> <p>The Council acknowledges that the level crossing at Sutton Parkway Station will result in slight disruption to road users. However, it believes the advantages of having this rail service outweigh the level of disruption caused to road users.</p>



<p>The culmination of increased traffic resulting from 700+ homes and the sand quarry will cause gridlock on all adjacent roads.</p> <p>The level crossing at Sutton Junction interrupts the flow of traffic at regular intervals throughout the day. This issue will be enhanced if any future housing developments in the Sutton Junction area are given planning permission.</p> <p>What plans are in place that answer the relevant Local Transport Plans for the District which states that “any proposed development must demonstrate that a sufficient package of measures are proposed as part of the development to ensure that the integrity of the transport system is not threatened as a whole”?</p>	<p>The Highway Authority are a statutory consultee on planning applications and identify any highway requirements to mitigate the impact of development proposals as part of their response</p>
<p>Since the A38 road was routed from kings mill to the motorway noise levels have continually increased year on year as more road traffic becomes heavier and faster. Along with the increase of industrial units back ground noise is becoming a big problem in the area. I have the concern that approx 10000 more vehicles will blight our life's.</p>	<p>Development of the A38 and the subsequent employment development that has followed has helped economic growth in Ashfield and Mansfield. Unfortunately a by-product of this growth has been an increase in road and employment activity, which can have noise implications. But these negatives have to be balanced against the economic benefits of these developments. This same balance must also be applied to the development of new houses for people to create homes.</p>
<p>Planners stated any access to these site would be via a junction at Newark/Coxmoor road junction and possibly coxmoor road. It has come to my attention that this is not fixed and they may want to make searby road an access route?</p> <p>More traffic would use the estate as a cut through and</p>	<p>The Council has worked with the County Council Highways Department in order to understand where they would seek to take vehicular access into the site from. They have informed the Council that for the Newark Road site, primary access should be taken from Newark Road, with the possibility of a secondary access from Coxmoor Road.</p>

proposed exists would be dangerous and cause accidents.	The design of any access points would need to comply with highway standards, outlined by the County Council.
<p>Penny Emma Way is an under utilised connection to the A38 that is through an industrial area. Coxmoor road is an already heavily utilised link between Sutton/A38 and Ravenshead and then onto Nottingham. It strikes me that a sensible future development would be to extend Penny Emma Way over to the crossroads of the A611/B6139. However, this wouldn't be possible if a developer builds a full housing development on Site SKA3ah. This is why we absolutely need a long term plan for our local infrastructure so that medium term plans like this local plan do not prevent the development of the longer term plans.</p> <p>I would like to see a road connecting Penny Emma Way to Coxmoor Road to help reduce traffic on Newark Road and reduce people rat-running through the estate.</p> <p>It has been mentioned that if the County Council want to relief road, this would need to link from Penny Emma Way across to Coxmoor Road or Derby Road. If houses were built on the site, this would need to be planned for or it could never be built.</p>	The Council acknowledges this comment. If there is a future desire and funding to secure such a route, the development of houses would not necessary prevent this occurring. These considerations would need to be taken at the detailed design stage. However, at this time the Council is not seeking to create such a route.
<b>Infrastructure</b>	
There is a lack of schools places. Which schools will the new inhabitants use? Surely the whole point of a local plan is to understand how housing demand can be satisfied in the area and surely an integral part of that is where and when additional	The Council acknowledges that there is increased pressure on a range of infrastructure. These pressures are not isolated to Ashfield, and are influenced by national Government policy and

<p>education capacity will need to be brought online.</p> <p>All local primary schools that are in the catchment of Sutton Junction are near to full capacity an example of this is Croft Primary School which is the nearest school to Sutton Junction. Leamington Primary School is the only primary school that I am aware of that has spaces available, Leamington is approximately 3 miles from Sutton Junction.</p> <p>Nearest GP practises to Sutton Junction are Oats Hill near to High Pavement which is approximately 2 miles from Sutton Junction, further afield are practises on Brook Street Sutton, if these developments are proposed work would need to be carried out to ensure residents have access to a GP.</p> <p>Hospitals are working at full capacity.</p>	<p>funding.</p> <p>In developing the Local Plan the Council has worked closely with Education Department at the County Council, the Clinical Commissioning Groups and infrastructure providers to understand and plan for the infrastructure needed to support the development proposed in the Plan. This will lead to the creation of an Infrastructure Delivery Plan, to support the Local Plan. This information will highlight the infrastructure needed and inform negotiations with future developers, to help secure funds to deliver this infrastructure.</p> <p>Projecting which schools parents will send their children to is very difficult to project with the current admissions process. However, the County have used historic catchment areas and will continue to minor capacities to highlight shortfalls that can then also be used to inform s106 negotiations.</p>
<p>The area indicated for development has an over ground electrical distribution system based on 13 pylons. Total access to this installation is a legal requirement. Will such access be retained?</p>	<p>The Council acknowledges that part of a pylon route is located on the southern boundary of the Newark Road site. Access and an appropriate easement will need to be considered and designed into any further development proposal.</p>
<p>Consider the impact of the following on district's road network:</p> <ul style="list-style-type: none"> <li>• Main drainage from site to sewerage works</li> <li>• Gas supplies installation</li> <li>• Water mains installation</li> <li>• Electrical cabling installation</li> </ul>	<p>If the sites come forward for development in the future, the developer will need to install the relevant infrastructure to service the homes built. The Council has undertaken initial consultation with service providers and no issues in relation to capacity have been raised.</p> <p>Whilst the site is being constructed, there may be short term</p>

<ul style="list-style-type: none"> <li>Telephone &amp; internet cabling installation</li> </ul>	<p>disruption to the road network, where on site services need to link to the network.</p>
<p>It has been stated that Sutton station would take some of the extra commuter traffic off the roads, if this massive development went ahead. I recently had to go to Nottingham and thought, just park at the station and travel in. no chance! I had to take the car back and walk to catch the train as all parking spaces were already taken on the week days and times I needed.</p> <p>As I can see there is no space left to expand the car park or alternative? if people wish to use the train and no parking is left normally you find them parking as close as possible in residential areas blocking roads causing congestion ,park half on pavements causing dangers for pedestrians, blocking residents driveways etc. Will it be the case that more and more of our open green space be used to solve this issue?</p>	<p>The Council believes the proximity of the Sutton Park Way station to the proposed site, could enable some journey to be made by train rather than by car. It would also be hoped, that given the close proximity of this station to the sites, people would choose to walk rather than use their cars.</p> <p>The Council and the County Council are not aware of any on-street parking issues, resulting from the station car parking being full. But, it will continue to monitor this. Equally the Council will continue to work with Network Rail and the Robin Hood Line operators to highlight consistent car parking issues that need to be considered and mitigated in the future.</p>
<p>Viability concerns</p> <p>If, and only if, all the actual assumptions were dealt with i.e. Contamination, Flooding, Transport, Amenities (health and sports centres, schools etc) etc I would actually be 'for' such a scheme. The likely reality however is that most of what is 'assumed' or 'anticipated' by yourselves simply <i>will not</i> happen on these two plots.</p> <p>Building on this land will be a) expensive b) fraught with pitfalls (water, topography, contamination, S106/CIL payments/free builds, other 'infrastructure') and therefore anyone 'brave' enough to take on building would not be interested in a) free open space b) affordability for locals c) good design d)</p>	<p>With every development site there will be negotiations undertaken (at the planning application stage) between the Council and developers to secure appropriate levels of infrastructure contributions needed to support and mitigate the proposed development (via s106 agreements). In undertaking such negotiations the Government requires the Council to consider development viability and need for a developer to return a reasonable profit. Whilst the Council will seek to secure the greatest infrastructure gains through s106 agreements, it must align with national policy.</p> <p>The impacts of the recession and resulting cuts to public finances, has led to more infrastructure providers seeking funds</p>

<p>contributing to infrastructure in any way other than cosmetically and certainly not to the extent you 'anticipate'.</p> <p>It would 'cost' the best house-builder around a 'minimum' of £63,700 - £91,000 to build a basic 91m2 house and this does not include any of the issues present on this site which would cause costs to rocket, nor the 'free' houses that they are obliged to build, nor all the 'amenities' on top. This, as you can see, far outweighs the local ability to get a mortgage for what they would inevitably cost 'retail' to the customer. So, apart from the 'free' houses (that they are obliged to build) for which council housed tenants are in dire need, how would these sites (K23 and especially S60) promote affordability?</p>	<p>from new developments via s106 agreements. These requests, coupled with on-site works and mitigation, may impact on the viability of a development. In such cases, there will be a need to priorities the contributions that are viable.</p> <p>The Council is updating the Infrastructure Delivery Plan, which will highlight the infrastructure needs resulting from the proposed development in the Local Plan, which will inform future negotiations. A revised Viability Assessment is also being undertaken, which will highlight any specific viability issues within the proposed Local Plan and its sites.</p> <p>In addition to infrastructure, s106 agreements are also used to help secure affordable housing as part of the development. As with infrastructure, the Government requires the Council to also negotiate on these contributions. In addition, the Government is proposing to redefine the definition of affordable housing to include starter homes (80% market value). Whilst this may impact on the delivery of traditional affordable homes, it may aid development viability.</p>
<p><u>Other</u></p> <p>Whilst there are still many brownfield sites in the area which could have houses built on them, why look to deplete green spaces?</p> <p>What is the current percentage of "Brownfield " sites given over to new housing and what is given to the needless increase in unwanted warehousing?</p>	<p>The Council has allocated a number of brownfield sites within Preferred Approach Local Plan, which can accommodate approximately 1268 dwellings. But unfortunately the supply of brownfield sites has reduced, due to the successful redevelopment sites in the past and the need to provide land for business / jobs growth. As a result, the Council has had to make the difficult decision to propose the allocation of sites within the countryside to meet the District's future housing needs, as</p>

	<p>required by national planning policy.</p> <p>Approximately 31 ha of brownfield land has been developed in Ashfield for housing since 2001. The Employment Land Forecasting Study, which forms part of the evidence basis, identifies the land requirement to meet future employment needs over the period of the Plan. It identifies that additional land is required for employment purposes. However, it is anticipated that this can largely be met from existing employment allocations.</p>
Additional homes will lead to increase air pollution	<p>The Council's Environmental Health Department have been consulted on all the sites proposed within the Preferred Approach Local Plan and they have not raised any objections related to air pollution. It is hoped, that by proposing a housing site close to the Parkway Train Station, some journeys will be made by train rather than car.</p>
Who are going to buy these dwellings? A look on the internet indicates that something in excess of 2,500 homes in Ashfield are vacant or for sale, and that does not take account the fact that Mansfield are carrying out the same exercise. Nor does it take account of available housing stock controlled by Ashfield Homes. Nor does it take account of affordability issues across the whole spectrum.	<p>The Government requires all Council to undertake a Strategic Housing Market Assessment (SHMA) across a Housing Market Area, to understand the future housing needs of their area so it can be planned for. Ashfield lies within the Outer Nottingham Housing Market Area, with Mansfield and Newark &amp; Sherwood. As such, the 3 Council jointed commissioned at SHMA. This document provided the District with its housing target of 480 homes a year as well as information on affordable and specialist housing need. It has done this for all 3 Councils. This target has be derived from household projects, coupled with analysis of aging population, changing household sizes, migration and people unable to get on the property ladder due to the</p>

	<p>recession.</p> <p>Having understood its need, the Council has proposed the allocation of sites to meet that future need. This has included existing planning permissions that have not been built and new sites.</p> <p>In order for a housing market to function there needs to be an appropriate amount of vacant properties to enable movement to take place. The Council's Strategic Housing Team is also working proactively with property owners to bring vacant homes back into use.</p> <p>The housing stock controlled by Ashfield Homes are social rented properties. Whilst this sector forms an important part of the District's housing offer, the target within the Local Plan related to private market housing.</p> <p>The Council wants to ensure there is wide range of homes provided across the District, including different forms of affordable housing. Over recent years the Council has been successful in building its own new properties, but it also negotiates with private developer to secure an element of affordable housing on private housing development sites.</p>
Can I raise a concern that if the planned development of Sutton junction sites goes ahead what will happen to the value of our property? I think there is only one way and that down!	National planning policy does not allow any potential impact on property values to be taken into account within the planning process.
When developers face viability difficulties like these, they offset	Any future development on the site would need to successfully

the cost of improving the land by increasing the density of the housing. My concern therefore is that the land earmarked in east Sutton, because of the difficulties we have mentioned, could all too easily become high density housing that would be out of keeping with adjacent existing suburban housing.	align with a number of planning policies prior to it being approved for development. Whilst the Council is required to consider development viability as part of this assessment, the Council will also seek to ensure the design of a future scheme is in keeping with its surrounding character. Further details in relation to these requirements are outlined in the Ashfield Residential Design Supplementary Planning Document.
How does this plan fits in with the pledge that “growth within the District will be accommodated in a manner that achieves the protection, restoration and enhancement of the environmental assets and creates safer environments including Green Infrastructure networks and habitat creation”?	The whole plan is orientated towards meeting the additionally identified housing and employment needs whilst protecting environmental assets. It is widely acknowledged that there is a need to build more houses and the objectively assessed housing need for Ashfield means that the Council has no option but to allocate land which is currently green field. However, the allocations reflect an extensive evidence base and substantially avoid designated environment site. Where there are local wildlife site potentially effected by developed mitigation measures would be required to minimise any adverse impact.
<b>Comment</b>	
<p>We were very pleased to see that the local plan included brownfield sites and I was also pleased to hear that work is being done locally to bring disused properties back into use but I would like to know if more could be done.</p> <p>I would ideally like to see some sort of cap on greenfield site development that is proportionally linked to the amount of undeveloped brownfield sites in the District. However, I expect this would need to be something implemented at a national level as if implemented at a District level the developer would</p>	<p>The Council welcomes the support for allocating appropriate and deliverable brownfield sites, and bringing vacant properties back into use.</p> <p>The Council agrees that in some cases brownfield sites have constraints that result in viability issues for redevelopment. In these scenarios, the Council agrees that grants or incentive may need to be applied to aid viability. Given the high costs often associated with the remediation of say contaminated land, these assistance would need to be provided by the</p>



<p>simply appeal it and win. But, are there incentives that could be put in place at a District level? e.g. a 3 year council tax/ business rates holiday for properties built on a brownfield site to make them more attractive to develop?</p> <p>I am pleased to see listed within the “Ashfield Preferred Approach Site Selection Technical Paper” a number of dwellings specified for a site. I was also pleased to see the densities listed for the sites near us at something close to appropriate given the densities of the existing housing in the area. I am concerned though that these densities are only guidelines and that a developer will do all they can to dramatically push these figures upwards. Is there anything that can be done with the plan to define enforceable boundaries to this? e.g. a developer can only apply for a number of dwellings +/- 5% of that listed within the Technical Paper?</p>	<p>Government. The Council does not have the finances to support this. Whilst Council or Business Tax incentive would help the end users, any such scheme would need to focus on the viability of development.</p> <p>National planning policy does not allow the Local Plan to have such a prescriptive policy as requested. However, when assessing planning applications or discussing the detail of a proposal with a developer, the Council, through use of design policies, will seek to ensure future development aligns with their surrounding character and densities where appropriate. However, the Government highlights the development viability must also be a key consideration, as such the Council must balance the need to create a high quality scheme, with its overall viability.</p>
<p>Whilst the proposals to allocate land to the east of Lowmoor Road (SKA3ah) and south of Newark Road (SKA3e) are supported, the conclusions that other land to the east of Lowmoor Road is not suitable for development on landscape or delivery grounds is not supported.</p> <p>Hallam Land Management has been working to promote a sustainable development opportunity on land to the east of Lowmoor Road for the last few years, making appropriate representations at relevant stages of the local plan process. Discussions have been held with officers and members looking at how a more comprehensive development option to the east of Lowmoor Road could deliver a number of potential benefits, including the provision of a link road between Lowmoor Road</p>	<p>The Council is aware of the larger development aspirations of Hallam Land and acknowledges the comments made in relation to this.</p>

and Newark Road, a new local centre and primary school, along with new areas of public open space and comprehensive surface water management solutions. This more comprehensive development option could provide between 1,000 1,400 homes to the east of Lowmoor Road, delivered in three phases. It is considered that this represents the most sustainable option for the delivery of a sustainable urban extension to the east of Lowmoor Road and one that the Council should seriously consider for allocation in the submission version of the Local Plan.	
It is good that access to the two proposed sites in east Sutton is separate from the Searby Road / Farndon Road estate	The Council acknowledges these comments.
A mini-roundabout on Newark Road at the Searby Road junction would help straightaway, as would a revised level crossing at Sutton Junction if it could reduce delays to the much more efficient provision at the Coxmoor Road level crossing.	The Council acknowledges these comments.
Residents were promised 4/5 years ago that no building work would commence around the estate before 2026. This raises a serious question, can we have trust in anything that we are told?	It is assumed this statement was linked to the previous Withdrawn Local Plan. Due to the concerns raised by the Inspector, the Council has had to review and update its evidence base, which had led to the reassessment of proposed housing sites.

### Proposed Amendments

Issue/Policy	Amendment
Development Brief for Newark Road/Lowmoor Road,	Any Development Brief should identify the concerns raised by a

**Ashfield District Council - Statement of Consultation**

	respondent at Mowlands Close regarding additional water into the River Maun.
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<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Evans	2123	√			H Martin	4823	√		
P Beardsley	3125	√			S Martin	4823	√		
R Foster	3136	√			G Vincent	4829	√		
D Hayfield	3143	√			E Ledger	4836	√		
P Smith	3198	√			K Orton	5179	√		
Cllr Carroll	3348	√			Pegasus Planning on behalf of Hallam Land	6036		√	√
J Gateley	3486	√			A Butt	6557	√		√
A & S Dutton	3501	√		√	D Watts	6558	√		√
D & G Stevenson	3627	√			P Relf	6568	√		√
M Relf	3655	√		√	G Marriott	6597	√		
R & H Walters	3748	√			B Woodiwiss	6598	√		
P Archer	3752	√			K Drew	6606	√		
G Stevenson	4697	√			P Baker	6872	√		
B Rawson	4796	√			J Woodhall	6873	√		
A Betts	4800	√			C Foster	6874	√		
T Hurt	4802	√							

## SKA3g Site: Rookery Farm, Sutton

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Support	
N/A	
Object	
General	
Disappointment that the site has been put forward for housing.	Comment noted.
<p>Whilst it is acknowledged that affordable housing is needed, there are plenty of areas in need of regeneration/brownfield sites available which should be developed prior to greenfield sites.</p> <p>Once these areas are lost to development future generations will have lost a valuable resource and open area. It will make the area less attractive.</p>	<p>There are not enough brownfield sites available for allocation in the District. As set out in the National Planning Policy Framework, the Council is required to meet the objectively assessed housing needs of the District. Unfortunately it has been necessary to allocate greenfield sites in order to ensure that the housing needs of the District are fully met. This approach accords with national planning policy.</p>
<p>Access / Highways</p> <p>Regarding the Housing Site selection technical paper: Page 16, Land at Rookery Farm / SKA3g.</p> <p>Within the conclusion section you refer to the fact that the adjacent site has planning permission where access is achieved via the removal of an existing building.</p>	<p>As highlighted by the comments, site SKA3ac has outline planning permission and access is proposed to be achieved by removing an existing house. In order to achieve access to site SKA3g, a similar scenario is required, as is suggested in the Site Selection document.</p> <p>Access to SKA3g and its adjacent sites would need to be taken</p>

<p>The removal of the existing building is only associated with the outline permission granted on SKA3ac. I find that the inclusion of the removal of the exiting dwelling to be misleading and unassociated to SKA3g and open to interpretation that access to the land could be achieved through the consent already granted in SKA3ac.</p> <p>The inclusion of this land for residential allocation without an indication of the preferred suitable highways access point is premature.</p> <p>Where options are agreed to unlock SKA3g these should form part of the residential development.</p> <p>The proposal would impact on a road which is already busy with heavy goods vehicles and other traffic. The road is in a very poor state of repair and this also makes it very noisy.</p> <p><u>Other - Pollution</u></p> <p>The Council promotes policy to reduce air and noise pollution as part of the preferred approach. A robust assessment against adjacent properties of any proposed access needs to be considered as part of the PA to ensure that the Highways solutions are sufficient distance from dwellings so as not to adversely impact the health of the occupants.</p>	<p>from Alfreton Road. Any future developer would need to work with the County Council Highways Department to understand where and how this access could be achieved. At this stage, the Highways Authority have agreed that access into the site can be achieved.</p> <p>If the sites are adopted within the new Local Plan, the Council would be seeking to create a comprehensive development across all the sites at the rear of Alfreton Road, with appropriate access points created.</p> <p>The Highway Authority has not raised any objections to the allocation of the site for housing.</p> <p><u>Other - Pollution</u></p> <p>Any future development on the Alfreton Road sites will need to align with the highway requirements of the County Council.</p> <p>Consultation will also be undertaken with the Council's Environmental Health Department. Any development of 30 dwellings or over is required to submit an air quality assessment as part of a planning application. This will enable the Environmental Health Department to assess any potential issues resulting from the development.</p>
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<p><b>Infrastructure</b></p> <p>Will development of the site generate an improvement in local services and infrastructure e.g. doctors, schools, emergency services etc?</p> <p>What facilities does the Council propose for the young in the area to reduce anti-social behaviour?</p>	<p>In developing the Local Plan the Council has worked closely with Education Department at the County Council, the Clinical Commissioning Groups and other infrastructure providers to understand and plan for the infrastructure needed to support the development proposed in the Plan. This will lead to an update of the Infrastructure Delivery Plan to support the Local Plan. This information will be used to help negotiate s106 agreements with future developers to help secure funds to deliver the infrastructure needed. In some cases this may lead to the delivery of new infrastructure as part of the development.</p>
<p><b>Comment</b></p> <p>Whilst the Land owners of SKA3g have been consulted last year the adjacent land owners of the dwellings whom have the holdings to unlock the site were not consulted so it is again premature to indicate that the site could be delivered within the medium term.</p>	<p>Consultation of the Preferred Approach Local Plan was open to any resident, business or organisation.</p> <p>As is indicated within the draft Trajectory in the Preferred Approach Local Plan, the site is not anticipated to come forward within the first 5 years, due to the access constraints highlighted. Once a landowner / developer has certainty that their site has been allocated within the Local Plan, then they will be in a position to discuss access requirements with the County Council and then approach an appropriate landowner to try and achieve the access needed.</p>
<p>Any proposals need to be developed to mitigate any negative impacts on the restored colliery open space, and to provide links into the open area.</p>	<p>Comments acknowledged.</p>
<p><b>Responses received relating to Policy supporting text</b></p>	

N/A	
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### Proposed Amendments

Issue/Policy	Amendment
N/A	

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Nottinghamshire County Council	2803			√					
C Wakelin	6058	√							
H. Brewster	5887	√							

### SKA3h Beck Lane

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
<b>Support</b>	
The landowners support the allocation of the site and have confirmed that development is deliverable. Development can commence within the first five years.	The Council welcomes the support for the proposed allocation and confirmation that development is deliverable.
<b>Object</b>	
Evidence is out of date (some evidence documents are	The evidence base is considered to be appropriate for the

<p>between 3 and 5 years out of date). The Plan is considered to be unsound due to major important sections missing and out of date evidence. Essential consultant survey delivery reports on schools, transport and healthcare have not currently been compiled or published with the Local Plan preferred approach.</p>	<p>purposes of assessing the suitability of sites submitted for consideration. The evidence base is regularly reviewed and updated where necessary. The Council has, and will continue to work with service providers to identify the infrastructure requirements associated with the proposed site allocations. The Infrastructure Delivery Plan has been updated and supports the Local Plan Publication document.</p>
<p>Site selection is manipulated in favour of developers and not in the interest of the community.</p>	<p>This statement is incorrect. There will be developers with interests in the sites put forward under the Strategic Housing Land Availability Assessment (SHLAA) as under national planning practice guidance councils are required to be “proactive in identifying as wide a range as possible of sites and broad locations for development (including those existing sites that could be improved, intensified or changed).” This will include sites put forward by developers. All sites submitted to the Council, as part of the ‘Call for Sites’ process, have been assessed using a consistent approach. The Site Selection Technical Paper and Housing Spatial Options paper clarify the approach taken to site selection and the overall strategic approach for the direction for growth</p> <p>Paragraph 47 of the National Planning Policy Framework (NPPF) states that, ‘to boost significantly the supply of housing, Local Authorities should use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing’. The Council is required, by national planning policy, to plan for the future of the District. The NPPF specifies that, crucially Local Plans should be drawn up over an appropriate timescale, preferably a 15 year time</p>



	<p>horizon. The 2015 Strategic Housing Market Area Assessment (SHMA) identifies that the Council needs to deliver 480 dwellings per annum between 2013 and 2033. Taking into consideration development that has been delivered since 2013, the Council has been required to identify sites for over 8000 dwellings over the Local Plan period (2017 to 2032). Approximately two thirds of the District is Green Belt land, in the southern part of the District. The NPPF states that Local Authorities must demonstrate 'exceptional circumstances' if they are seeking to amend the Green Belt boundary. Whilst it is proposed to release some Green Belt land in Hucknall and Selston in order to accommodate housing need, the situation in the north of the District is different.</p> <p>Given that the northern part of the District is designated Countryside, which is a less restrictive policy, the Council does not consider that there are exceptional circumstances for Green Belt release in Kirkby in Ashfield. This has resulted in the need to allocate sites currently designated Countryside due to the lack of available land within the Main Urban Area and Named Settlements.</p>
<p>The weighting of the site assessment has been manipulated to promote it at the exclusion of other sites, including brownfield sites.</p>	<p>This statement is incorrect. Page 15 of the Sustainability Appraisal (SA) clearly sets out that large brownfield sites (over 10 dwellings) will be awarded a double positive (++), small brownfield sites (under 10 dwellings) will be awarded a single positive (+) and greenfield sites will be awarded a negative (-) result. Natural England has been consulted on the SA and support the proposed methods of assessment.</p>

Development plans are already underway with Lovel Developments for the site and negotiations between the Council and the developer have taken place.	<p>Lovel Developments has produced a masterplan of their proposal for part of the site in order to undertake early consultation with local residents. This is a common approach taken by many developers prior to submitting a planning application.</p> <p>The Council does offer a pre-application advice service to any person wishing to seek planning advice about development prior to submitting an application. This service provides guidance on planning policies and material considerations which would need to be taken into account as part of the planning application process. It would provide an indication as to whether a proposal would comply with planning policy.</p>
The weighting process is not transparent and there are contradictions with the current choice of sites	<p>The site selection document and Housing Spatial Options Paper set out the reasoned justification for the location and choice of sites. A range of evidence has been used, including the Sustainability Appraisal, to assess the suitability and deliverability of sites submitted to the Council for consideration as housing allocations. The Site Selection document sets out the process that the Council has used in order to ensure that the most suitable and deliverable sites are taken forward. The Council acknowledges that some minor amendments to the Site Selection document would clarify the reasons why the sites have been selected.</p>
Greenfield sites have outscored other sites.	<p>This statement is incorrect. The Sustainability Appraisal awards a double positive for large brownfield sites (over 10 dwellings) and a single negative for greenfield sites. The majority of brownfield sites submitted to the Council for consideration have been taken forward in the Local Plan as housing allocations. A</p>

	very small number of brownfield sites have been discounted due to severe constraints, for example the majority of sites are located in high flood risk areas (floodzones 2 or 3).
Has the Council seriously considered brownfield sites?	Yes. See previous answer.
The process has not been fair or democratic. It has resulted in derision and serious accusations of malpractice, undemocratic and bias decisions resulting in an unsafe Local Plan.	The Council strongly disagrees with this statement and is disappointed that some residents feel that this is the case. The record of consultation highlights the numerous methods of consultation undertaken by the Council, including several manned exhibitions, meetings with local residents groups, site notices, newspaper articles/public notices etc. The Council has engaged with the public for a six week period in order to ensure that local residents can make their views known. The Council have taken on board all comments received and made necessary amendments to the Local Plan, where appropriate, prior to publishing the Local Plan Publication document for public consultation.
Residents urged the Council to reject Beck Lane and allocate alternative sites on the Sutton/Mansfield boundary; sites SM45, SM46 and S65 which adjoin Derby Road. These sites could form part of sites SM319, SM358 and SM378 which the Council is considering more favourably. These sites would have less of an impact on local residents and would trigger greater CIL or s106 for improving facilities, medical, education and highways infrastructure. These sites have the following benefits: 1. Immediate vicinity of open space 2. It would contribute towards affordable housing	<p>The sites suggested are located approximately 800 metres from the urban boundary in the countryside. Paragraph 12.1 of the Council's Strategic Housing Land Availability Assessment Methodology sets out that the Council will only assess sites in and immediately adjoining identified settlements. As such, the suggested sites do not comply with the site assessment criteria.</p> <p>With regard to the suggested benefits, the sites would not assist in meeting the objectives of the Local Plan. They are in an isolated locations away from existing services and facilities.</p>

<ol style="list-style-type: none"> <li>3. It is within a 10 minute walk of a bus stop</li> <li>4. There are no national or local designations on the site</li> <li>5. Strategic GI route. Potential to enhance ecological connections;</li> <li>6. The site is in Floodzone 1. Potential for Surface water flooding but this could be mitigated through a SuDS system;</li> <li>7. The site wouldn't impact on Sutton Town Centre as evidence from the Retail Study (2011) indicates that shopping is directed towards Mansfield.</li> <li>8. Positive links to the arterial roads for easy access with no impact on local residents;</li> <li>9. Could deliver approximately 2000 homes;</li> <li>10. Could contribute towards affordable housing and other essential infrastructure.</li> </ol>	<p>In terms of supporting town centre regeneration in Ashfield, as mentioned in the suggested benefits, the sites are closer to Mansfield and are likely to direct shoppers away from town centres in Ashfield. This would have an adverse effect on town centre regeneration in Ashfield.</p> <p>All sites taken forward as housing allocations are in floodzone 1, all can deliver the number of homes required, all can contribute towards delivering affordable housing and all have good links to the strategic road network. Overall, they offer the best opportunity for delivering sustainable development and meeting the objectively assessed housing needs of the District.</p>
<p>The sustainable impact of this proposal is flawed as the nearest services are not accessible and they are already fully. Negative impacts of opting for Beck Lane sites:</p> <ol style="list-style-type: none"> <li>1. Poor access to services – 99% of the site is not within 800 metres/10 minutes walking distance of a cash point, GP, Post office, school or bus service. The majority of residents will have to travel 395metres from their property to Beck Lane then a further 1046 metres to a cash machine and other services.</li> <li>2. Disabled and OAP residents will always need transport from this type of proposed site.</li> <li>3. The nearest doctors is 2525 metres;</li> <li>4. Nearby primary schools are full. The proposal does not take into consideration the number of children or</li> </ol>	<p>The Council strongly disagrees; the evidence relating to the site is not considered flawed. The evidence clearly states the distances from services and facilities and the Council acknowledges that there are some challenges in this respect. We have worked closely with service providers to identify the infrastructure requirements associated with development. Details are included in the 2016 Infrastructure Delivery Plan.</p> <p>Many of the sites submitted to the Council have severe access constraints which creates a high risk that development would not be delivered within the 15 year Plan period. If such sites are taken forward there is a high risk that the Plan would be found to be unsound at examination. Beck Lane has fewer physical constraints and there is more certainty that development can</p>

<p>resulting school places required. It is totally unsustainable. At a Council meeting on 1/3/16 ADC staff discussed the need for a new primary school to serve Beck Lane and other sites in the area. This brings issues of child safety depending on where the school is located due to the sites being located adjacent to the MARR.</p> <p>5. The 2013 Transport Study assumes an available bus service of 15 minute intervals. The nearest bus service is over 800 metres away and is an hourly service. The nearest regular bus service is over 1 mile away. The site will be totally reliant on car transport.</p>	<p>be delivered within the Plan period.</p> <p>There is also an extant planning permission for a football academy on the site (which includes an indoor football centre). The impact of the building on the landscape and the associated movement of traffic has been taken into account in determining the suitability of the site in the site selection process.</p> <p>The site also lies adjacent to the MARR, which is a regeneration corridor supported by D2N2, which development on the site will help support.</p>
<p><u>Highway accessibility/transport issues</u></p>	
<p>The proposal contravenes ADC's policies for development to reduce reliance on private vehicle transport:</p> <ol style="list-style-type: none"> <li>1. There are severe highway access constraints which cannot be overcome without major highway alterations (as identified in the 2013 Transport Study);</li> <li>2. Other sites within the vicinity (both in Mansfield and Sutton in Ashfield) will exacerbate the congestion further.</li> <li>3. A single access point on Beck Lane cannot be deemed safe. At least 2 access points will be required. This would affect access for emergency vehicles.</li> <li>4. To imply that access can be achieved with major highway improvements and that the site is deliverable is not sustainable evidence. This phrase is said about most sites. To proceed with this plan will expose ADC to be made responsible for corporate damages.</li> <li>5. The 6Cs guidance is not being followed in the proposed</li> </ol>	<p>The Council acknowledges that there are some highway issues to address. We have been working closely with the Highway Authority throughout the site selection process to ensure that the sites taken forward are suitable in highways terms. There is a requirement for highway improvements in the area which will aid traffic management.</p> <p>We have received no objections from the Highway Authority in this respect.</p> <p>The 2016 Transport Study is being undertaken, which will assess the impact of new development on the highway network and suggest mitigation measures that will help overcome capacity issues at identified junctions.</p> <p>Infrastructure requirements have been included in the</p>

<p>Preferred Local Plan.</p> <ol style="list-style-type: none"><li>6. Sites with severe access constraints are being put forward to accommodate developers putting little or no funds into the s106 to help improve surrounding infrastructure. Funds may not even go towards any infrastructure of the Skegby community.</li><li>7. The 2013 Transport Study indicates that the junctions are at capacity.</li><li>8. The Transport study assumes that there is a bus service every 15 minutes within 500 metres of the site. There is no bus service within 500 metres of the site.</li><li>9. There is no room for road widening to improve the junction at Beck Lane and Skegby Lane.</li><li>10. HGV traffic from Stanton Hill towards the junction at Beck Lane is excessive. It impacts on the road surface.</li><li>11. There are not enough pedestrian crossings.</li><li>12. There have been fatal accidents on Mansfield Road, Skegby and Abbot Road, Mansfield. This proposal will exacerbate the problem.</li><li>13. To proceed with this site would be irresponsible.</li><li>14. Beck Lane is a heavily congested single carriageway. The road will be gridlocked with traffic at a standstill if this goes ahead. Development would also result in an increase in traffic accidents. Skegby cannot cope with more traffic.</li><li>15. Mansfield District Council plan to have 2000 homes in this area. This will create even more congestion.</li><li>16. Any new school, doctors' surgery or dentist required as a result of this development will cause additional traffic to the area.</li></ol>	<p>Infrastructure Delivery Plan and Site Development Brief.</p> <p>Negotiations with developers in respect of section 106 contributions are undertaken at the planning application stage. This will be informed by planning policy and the Infrastructure Delivery Plan in order to achieve a sustainable development.</p> <p>The Council has worked closely with Clinical Commissioning Groups (CCG) and County Education Department to understand the health and education infrastructure needed to support development.</p>
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<p>17. Traffic problems exist on local roads due to school traffic. Blocking of driveways at school times causes problems for local residents and ambulances. Development of the site will cause further problems.</p> <p>18.</p>	
<p>Two access points into the site cannot be deemed safe. An accident at the site entrances will inevitably occur.</p>	<p>The requirement for 2 vehicular access points has come from the Highway Authority.</p>
<p><u>Natural and Historic Environment</u></p>	
<p>Listed Historic Assets: The proposal has the potential to cause substantial harm to Dalestorth House (Grade II Listed Building) from vibration and air pollution due to increased traffic.</p>	<p>The Conservation Officer has been involved in the site assessment process and has not identified that there would be 'substantial harm' in accordance with paragraph 134 of the NPPF.</p>
<p>Environment:</p> <ol style="list-style-type: none"> <li>1. The site lies adjacent to EV4nhr (local wildlife site) and EV4nbs (SSSI) nature sites and has the potential to cause substantial harm from air pollution and vibration.</li> <li>2. Open spaces should be preserved in order to protect and preserve wildlife.</li> <li>3. It does not appear that any wildlife assessments have taken place on the site. The importance of the site for wildlife cannot be overstated. Several bat species use the site to feed and roost nearby. Birds of prey and flocks of goldfinch are seen every day. Foxes, hedgehogs and squirrels use the land to catch food. It is understood that a comprehensive survey over a full year cycle must be undertaken as a legal requirement to ascertain the number of species on site.</li> </ol>	<ol style="list-style-type: none"> <li>1. There are no local or national designated wildlife areas on the site. An ecology assessment report would be required at the planning application stage. Any necessary planning conditions would be imposed as part of a future planning approval.</li> <li>2. Natural England, the Lowland Derbyshire and Nottinghamshire Local Nature Partnership, and Nottinghamshire Wildlife Trust have not raised any objections to the site being allocated for housing.</li> <li>3. As stated above, an ecology assessment report would be required at the planning application stage and conditions imposed accordingly.</li> </ol>
<p>Open spaces:</p>	<p>New development often assists in the regeneration of an area.</p>

<p>The site lies within 25% of the most deprived areas in England in the 2010 Index of Multiple Deprivation. Development will have a detrimental impact on the landscape/natural open space. Allowing open space for recreation on land that floods is not sustainable to wellbeing or health. The growing of trees to allow the building of 2 and a half storey houses is totally inappropriate.</p>	<p>It is acknowledged that development will inevitably impact on the landscape. The Council's landscape architects have undertaken an assessment of the site and have identified appropriate mitigation. This would be addressed in more detail as part of any future planning application. A Sustainable Drainage Scheme will address surface water issues as required.</p>
<p>Greenfield development/Agricultural land/loss of countryside:</p> <ol style="list-style-type: none"> <li>1. The development of greenfield land is inappropriate. It will have a negative impact on agricultural production, habitat/species and amenity/recreation value.</li> <li>2. The agricultural land is now linked so Grade 2 land has become Grade 3 and is now also considered to be contaminated. There is a misrepresentation of evidence made to look as though the site is appropriate.</li> <li>3. The Local Plan implies that the lack of brownfield sites has resulted in the inclusion of Grade 2 greenfield sites. This is a misrepresentation of the evidence. There are many brownfield sites excluded and not looked at.</li> <li>4. The land is valuable for food production and must never be built on. Development of such sites will result in a need to import food from abroad.</li> <li>5. The Council should put development on unattractive/disused/brownfield sites, not on fields. How can we become more environmentally friendly if green fields are developed?</li> </ol>	<p>The Council is required, by the NPPF, to provide for the housing needs of the District. The Council has only taken forward greenfield sites where it has been necessary to do so in order to meet housing need. The majority of brownfield sites submitted to the Council for consideration have been taken forward in the Local Plan as housing allocations. A very small number of brownfield sites have been rejected due to severe constraints e.g. the majority are located in high flood risk areas (flood zones 2 or 3). Over the past two decades the Council has been very successful in terms of the redevelopment and reclamation of brownfield sites, particularly with regard to former colliery sites. This has resulted in there being very few brownfield sites available for development.</p> <p>It should be noted that the Council cannot allocate sites which are not 'developable' as set out in the NPPF. Under these terms, the site must be available. Only sites submitted to the Council by landowners (or with the landowner's permission) can be considered for allocation in the Local Plan. The Local Plan would be found to be 'unsound' if the Council allocated sites which were unavailable.</p>



<u>Flooding</u>	
<p>Flooding:</p> <ol style="list-style-type: none"> <li>1. The site is unsuitable because it floods regularly. If taken forward it will need a SuDS program as the site is located near to Nature Conservation sites (EV4nbr &amp; EV4nbs).</li> <li>2. Development will cause flooding to neighbouring properties.</li> <li>3.</li> </ol>	<p>Comments noted. This would be addressed at the planning application stage. A flood risk assessment would need to be undertaken as part of the planning application process. Subsequently, a SuDs scheme would be required if necessary and would aim to prevent flooding of neighbouring properties.</p>
<u>Infrastructure</u>	
<p>Sewage and Waste:</p> <ol style="list-style-type: none"> <li>1. New treatment works will be required, as stated in reports from ENTEC and Severn Trent. Network sewerage capacity (pipes) has been identified as a serious constraint to this proposed site. Previous incidents have been reported of sewage flooding near to the site.</li> <li>2. The access to Woodhouse Lane has seen a worsening of flooding. Developers linked to the site have indicated that sewerage will be taken through existing pipes on adjoining roads. The pipe on Abbott Road is 300mm in width and only serves approximately 30 dwellings. A development of hundreds of houses plus surface water drainage doesn't seem to equate. This is worrying. The development is wrong.</li> <li>3.</li> </ol>	<p>The Council has, and will continue to work with Severn Trent Water on such matters. The Council has not received any objections from the sewerage provider in this respect. The Infrastructure Delivery Plan provides details of sewerage requirements.</p> <p>Severn Trent Water has a statutory duty to provide, improve and extend a system of sewers to ensure an area is effectively drained (section 94, water Industries Act 1991).</p>
<u>General comments</u>	
<p>Employment:</p> <p>The site will not increase employment. It will decrease employment due to the loss of agricultural land/jobs.</p>	<p>The Council disagrees. The 'ripple' effect of increased economic activity including job creation, as a result of house building is widely acknowledged. A study (The Economic Footprint of UK House Building) undertaken by NLP / HBF in</p>

	<p>2015 identified that over the previous 12 months, 4.3 jobs were created for every new home built in the UK.</p> <p>The development of housing supports growth in the local economy, thereby increasing the number of jobs in the area e.g. in relation services e.g. education, healthcare, retail etc.</p>
<p>Rights of Way</p> <p>Suggested that the stones forming the entrance to the Right of Way off Mansfield Lane should be retained or relocated.</p>	<p>Comment noted.</p>
<p>Unsuitable sites:</p> <ol style="list-style-type: none"> <li>1. The site is unsuitable as set out in SHLAA guidance, where development would result in urban sprawl e.g. sites adjoining ribbon development which are not well contained by existing development or physical features.</li> <li>2. Sites with severe access constraints where no mitigation is possible.</li> <li>3. The site is within a Minerals Safeguarding Area – Limestone.</li> </ol>	<p>The SHLAA assessment indicates that the site could be suitable if policy changes. The Council has reviewed all sites put forward and has concluded that this is a suitable site to be taken forward for allocation/development. Consequently, the Council is proposing a change in policy from 'designated countryside' to 'housing allocation', redefining the Main Urban Area as a consequence.</p> <p>The Highway Authority has been consulted and they have not raised any objections. They have advised the Council that highway constraints can be mitigated.</p> <p>Throughout the planning process, the Council will continue to consult Nottinghamshire County Council (NCC) on sites located in Minerals Safeguarded Areas to identify the most appropriate outcome. No objections have been raised by NCC. As such, this should not prevent development of the site.</p>
<p>Health issues:</p> <ol style="list-style-type: none"> <li>1. Development of the site would impact air quality due to</li> </ol>	<p>Part IV of the Environment Act 1995 requires Local Authorities to review and assess the current and future air quality in their</p>

<p>urbanisation and increased traffic Air pollution is particularly bad at the junction with Beck Lane and Skegby Lane at peak times.</p> <ol style="list-style-type: none"> <li>2. Some felt that the Council did the minimum necessary when measuring air quality. Question raised: Can the Council state that there has not been a reading above National safe limits/guidelines? Since 2010 what has the Council done?</li> <li>3. Increased journeys to access health services.</li> <li>4. We have an obesity problem and the Council should not be allowing development on sites which encourage car use.</li> <li>5. Skegby needs additional sports facilities e.g. football and rugby pitches.</li> </ol>	<p>areas against objectives set out for key air pollutants, under the provisions of the National Air Quality Regulations 2000 and the Air Quality (Amendment) Regulations 2002.</p> <p>Ashfield District Council has not had to declare any Air Quality Management Areas due to the exceedance of any of the air quality objectives. Since 2010 Ashfield District Council has not had to undertake any detailed Assessments due to the exceedance of any of the air quality objectives.</p> <p>In addition the Environmental Protection Team will request and review Air Quality Assessments when being asked to comment on significant commercial and housing developments.</p> <p>All Air Quality Reports that have been submitted to Defra are available as public register documents.</p> <p>The site selection process ensures that the most suitable sites in appropriate locations are put forward as allocations. In addition, detailed planning layouts which will form part of any planning application will be required to conform to policy, in particular SD1 with regard to the integration of footpaths, cycle routes etc.</p> <p>The Council is currently undertaking an update of the 2012 Playing Pitch Strategy which will inform any future requirements in this respect.</p>
<p>Boundary issues:</p> <ol style="list-style-type: none"> <li>1. No suitable consideration has been given for mitigation to lessen the impact of development on the landscape, perhaps through tree screening of the site boundaries.</li> <li>2. No suitable consideration has been given to fencing of a</li> </ol>	<p>It is acknowledged that development will have an adverse effect on the landscape. The Council's landscape architects have undertaken an assessment of the site and have identified appropriate mitigation. This would be addressed in more detail as part of any future planning application. Any future proposal</p>

<p>suitable height and type along existing boundaries.</p> <p>3. Suitable consideration has not been given to the types of properties which will be on the site i.e. height of new dwellings/impact on adjoining properties.</p>	<p>will need to comply with planning policy contained within the Local Plan which are aimed at preventing any adverse effect on residential amenity of properties on the site boundary.</p> <p>Further guidance on these issues will be contained in the site's development brief.</p>
<p>Security issues:</p> <ol style="list-style-type: none"> <li>1. Community safety has not been addressed. A single road into the site will result in an increase in crime.</li> <li>2. Suitable consideration has not been given to the types of housing, in particular social housing.</li> <li>3. The large number of houses will have a detrimental effect on community safety and should score a minus.</li> <li>4. Any footpath connections have not been considered as they will increase the risk of rat runs for antisocial behaviour.</li> <li>5.</li> </ol>	<p>The Local Plan and Residential Design Supplementary Planning Document contain policies and guidance on designing out crime. Any future planning proposal will need to be well designed and it will need to demonstrate that crime has been taken into consideration.</p>
<p>Consultation and Public Input:</p> <ol style="list-style-type: none"> <li>1. Ashfield District Council's draconian actions have not allowed any public consultation to take place prior to publishing the Preferred Forward Plan.</li> <li>2. Notices have been posted on lamp posts at the bottom of each street to be seen by a minimum number of residents. The public are being hoodwinked with this secretive and none transparent Local Plan. Notices should have been posted at the beginning of streets to be seen by all residents. The inadequate posting has been reported and has now been rectified.</li> <li>3. The public are only being allowed to comment following the publication of a very draconian policy. It appears it is</li> </ol>	<p>The Local Plan Preferred Approach is a draft Plan based on substantial evidence, together with information from previous iterations of the Plan. The document is the preferred option of the Council which has then been consulted upon.</p> <ol style="list-style-type: none"> <li>1. The Council have undertaken more than six weeks of public consultation in order to ensure that local residents and other interested parties have an opportunity to make their views known. This approach complies with the requirements of regulation 18 of the Town and Country Planning (Local Plans) (England) Regulations (2012).</li> <li>2. The posting of notices is not a requirement of consultation and it is over and above usual methods of advertisement. The</li> </ol>

<p>already a done deal. This is totally undemocratic.</p> <ol style="list-style-type: none"> <li>4. The drop in services are only available 3 weeks into the 6 week consultation period. This is totally inadequate.</li> <li>5. The library depicts minimal information in the document along with poor maps which are difficult to understand and see clearly.</li> <li>6. A six week consultation is all well and good but how are residents supposed to comment on a Plan which is far from complete.</li> <li>7. It is clear how many residents don't feel represented with the 100s of representations submitted c/o Skegby Action Group in addition to those emailed and posted.</li> <li>8. Residents feel that their comments will not be publicised or even acted upon within the amended Forward Plan. This would be a totally unconstitutional situation. Skegby residents need to be assured that this will not be the case.</li> </ol>	<p>Council wanted to take a pro-active approach to try to raise awareness of the Local Plan, in particular where local residents would be directly affected by site allocations. Officers responded to a request to place more notices at the bottom of the streets adjoining the site at an early stage in the consultation.</p> <ol style="list-style-type: none"> <li>3. Strongly disagree. The comments received during the consultation period will be taken into account and any necessary changes will be undertaken.</li> <li>4. See point 1.</li> <li>5. Officer contact details were left at all libraries for anyone experiencing problems with the documents.</li> <li>6. The Preferred Approach isn't the final Local Plan document, it is a consultation document. The consultation process has enabled the Council to gain the views of residents, statutory consultees and other interested parties in order that the necessary amendments can be made prior to the completion of the final document (the Local Plan Publication).</li> <li>7. The Council understands and acknowledges the dissatisfaction of local residents who have submitted comments. Unfortunately, the Council is faced with making very difficult, unpopular decisions in order to meet the housing needs of the District over the next 15 years.</li> <li>8. All comments received have been considered and summarised in this document, which is published on the Council's website. Any necessary amendments have been made to the Local Plan.</li> </ol>
<p>The Local Plan evidence is misleading and contradictory. This implies that further evidence is required.</p>	<ol style="list-style-type: none"> <li>1. As stated earlier, the Preferred Approach is not the final document. The Council has worked with, and will</li> </ol>

<p>Examples include:</p> <ol style="list-style-type: none"> <li>1. 'We may need a school'; 'the sewage treatment plant may need upgrading'; 'Access could be achieved'; 'public transport may improve'; 'traffic flow may increase'.</li> <li>2. It states 'local infrastructure will improve'. Large developments will always negatively impact on local services.</li> <li>3. Surface water impact will not have a significant impact' – how can this be stated when there has been no flood risk assessment?</li> <li>4. Extant permission for football training pitches means that housing planning approval is proven. This is a misrepresentation of evidence.</li> <li>5. 'The development will not affect the open aspect for the countryside'. This is not correct.</li> <li>6. Agriculture - Grade 2 land becomes Grade 3 land and is considered to be contaminated.</li> <li>7. The development will benefit Ashfield and Mansfield. There's no co-ordination between Mansfield and Ashfield's Plan as there are 100s of houses planned in Mansfield.</li> <li>8. 'Traffic flow may increase'.</li> </ol> <p>Contradictory text in relation to:</p> <ol style="list-style-type: none"> <li>9. Access (single or double access);</li> <li>10. 'The site is well linked to the MARR road'.</li> <li>11. Countryside Policy (some sites are suitable and others aren't);</li> <li>12. Access to services and facilities (some site adjoining Beck Lane have poor access, Beck Lane has suitable</li> </ol>	<p>continue to work with service providers. Infrastructure requirements associated with the proposed site allocations have been included in the 2016 Infrastructure Delivery Plan. Development Briefs have now been completed for large allocations.</p> <ol style="list-style-type: none"> <li>2. The conclusion in the Site Selection document states: 'the development could assist in supporting improved infrastructure including a new primary school, open space and public transport provision'. No amendments are proposed as this is considered to be a valid statement.</li> <li>3. Surface water flooding - the Sustainability Appraisal and Site Selection document acknowledge: 'Areas of the site are identified as having surface water flooding but it is not <u>anticipated</u> it will have any significant impact on the development of the site'.</li> <li>4. Extant planning permission for an indoor football centre has been taken into account as part of the site allocation process. The indoor football centre would impact on the landscape to some degree and it would change the use of the site from agriculture to leisure. The Council considers that it is appropriate to consider extant planning permissions in this respect.</li> <li>5. The evidence is very clear that development will have an adverse impact on the landscape. The evidence does not indicate that 'the development will not affect the open aspect for the countryside'.</li> <li>6. The evidence sets out the agricultural land classifications and identifies issues relating to land contamination. The Council's Environmental Health</li> </ol>
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<p>access);</p> <p>13. Employment (claims will improve but would result in a loss);</p> <p>14. Sewage – (spare capacity available/sewage capacity full)</p>	<p>Officers have been consulted and have raised no objections. No amendments are required.</p> <p>7. Ashfield District Council will continue to work closely with Mansfield District Council as part of the duty to cooperate.</p> <p>8. The evidence indicates that highway constraints will need to be addressed. It is unclear where the term 'traffic flow may increase' is set out in the evidence.</p> <p>Suggested 'contradictory evidence':</p> <p>9. The Council has worked with the Highway Authority to establish the most appropriate access arrangements for the site. The evidence for the Preferred Approach does not identify how many points of access will be required. This level of detail will be included in the Development Brief for the site.</p> <p>10. The site is located on the MARR route.</p> <p>11. The evidence has been used to determine the most suitable and deliverable sites in designated countryside. The fact that a site is designated countryside has not prevented it coming forward as an allocation for housing.</p> <p>12. The evidence indicates that Beck Lane has poorer access to services and facilities than some other sites. This has not been denied. However, when balancing out all site considerations, including the deliverability of development, the Council has concluded that this site is capable of helping to deliver the housing needs of the District. Unfortunately, some sites which have better access to services and facilities are severely constrained by poor access to the public highway with no opportunity for mitigation.</p>
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	<p>13. The development of housing supports growth in the local economy, thereby increasing the number of jobs in the area e.g. in relation services i.e. education, healthcare, retail etc.</p> <p>14. The Council has received no objections from Severn Trent with regard to the impact on the sewerage system. The 2016 Infrastructure Delivery Plan includes details of utility services relating to the site.</p> <p>15.</p>
<p>Planners with outside interests not declared: The Planning Department now appears to have its own agenda and interest with housing developers. One of the team was found having direct interests with a property developer associated with the sites proposed. This indicates a worrying trend which is non transparent in nature.</p>	<p>Strongly disagree. The Council is not aware of any of its officers breaching the code of professional conduct. Any evidence to this effect will be acted upon accordingly.</p>
<p>Skegby was a much smaller village. It is becoming larger and is quickly losing its identity. Residents want to continue living in a village and don't want urban sprawl.</p>	<p>Comments noted. The Council will expect local character to be taken into account in the design of any future scheme.</p>
<p>The geology of the site is not suitable due to the shallow soil surface. The soil depth will only be 30 to 45 cms before it changes to bed rock sand stone base. This is obvious when looking at the quarry adjacent to the north of the site. This will affect the cost of developing the site i.e. laying of gas pipes, electricity etc.</p>	<p>No issues have been identified in this respect. The Council is not aware of any evidence to support this claim.</p>
<p>Development will devalue properties adjoining the site.</p>	<p>Whilst this is not a planning consideration, the Council is not aware of any evidence to support this claim.</p>



Some residents indicated that they do not want to live adjacent to affordable housing.	Comments noted.
Noise levels will increase.	The Council's Environmental Health Officers have not raised any objections to the proposed allocation. This could be addressed at the planning application stage. It is not anticipated that future residential use will present unacceptable noise levels in an existing residential area.
There is Japanese Knotweed growing on the site.	Comment noted. This can be mitigated.
There will be an 18% increase in the population of Skegby.	Comment noted.
The views from nearby properties would be adversely affected.	This is not a planning consideration. The Council's Residential Design Supplementary Planning Document sets out the required separation distances of new properties. Any future planning application would be expected to comply with planning policies relating to residential amenity.
Why haven't the areas of Quarrydale and Stoneyford Road been considered? This would be infill of a current area and is nearer to the town centre and schools.	All sites submitted to the Council for consideration as housing allocations have been considered and the most suitable sites have been taken forward. This includes some sites in the Stoneyford Road area.
Why is the outline plan not to scale?	The Policies Map is to scale.
Why is the number of dwellings to be built far greater than the illustration? Where will they go?	The site is in separate ownerships. One of the landowners has produced a masterplan which only includes their site. The Council will be seeking to ensure that the site is brought

	forward comprehensively i.e. all owners of sites will be expected to work together.
Is this phase one of a future development?	The extent of any development will be constrained to the allocated site. Land beyond this will remain as designated Countryside in this Local Plan which is designed to plan to the year 2032.
Where are the footpaths?	The development brief will identify indicative footpath routes.
How will the development affect access for emergency vehicles? Emergency vehicles already have difficulty travelling through this area and often have to mount the kerb to get past other vehicles.	Any future development will need to take this into account and make any necessary highway improvements. The Council will consult the Highway Authority at the planning application stage.
What access is there for disabled and older people?	Highway and planning authorities must comply with the Disability Equality Duty under the Disability Discrimination Act 2005 (DDA). The 6Cs Design Guide, the Highway Authorities adopted highway guidance, closely aligns with the Government's Manual For Streets document. Manual for Streets sets out the key principles to adhere to in order to help ensure compliance with the DDA.
What will happen in the shaded area of the plan (owned by Nottinghamshire County Council)?	The Council is seeking the comprehensive development of the whole site. There are no detailed plans for this area at the present time, however the land is allocated for housing.
The development will be very close to existing property boundaries. This would inevitably affect insurance and property values.	Whilst this is not a planning consideration, the Council is not aware of any evidence to support this claim.
Councillors are elected to represent local residents. If the development is allowed to go ahead, Councillors won't be	The Council is required, by the NPPF, to deliver development to meet its housing needs for the next 15 years.

representing the local community.	Councillors are required to represent the community as a whole. In total there are 122,508 people living in the District (6766 people live in the Skegby Ward), of this 191 people objected to the site being allocated. This equates to 0.15% of the District's population and 3% of the Ward population. Councillors have to make very difficult decisions in balancing the needs of the whole area, not just their own Wards. Failure to adopt a sound local plan will ultimately lead to central Government stepping in, with a risk of unplanned, ad-hoc development in the interim period.
The type of housing proposed by the developer will not meet local needs i.e. an aging population. It will only meet the needs of families.	The Local Plan has a policy HG4 which seeks a mix homes. It also includes a policy which seeks 10% of homes on new developments to be adaptable to address the needs of the disabled and elderly.
The development of this site will close one of the last remaining gaps between Mansfield and Sutton in Ashfield. It is one of the first areas of land when arriving from Mansfield and it will result in the two settlements being indistinguishable.	The land opposite the site will be retained as designated Countryside. This will maintain a green gap between Sutton in Ashfield and Mansfield.
The site is located within 25% of the most deprived areas (Index of Multiple Deprivation) in England.	Comment noted.
It is clear that the Plan favours anyone other than the local residents. It is clearly not in the interest of local residents.	The Local Plan seeks to deliver development to meet the needs of the District in the most appropriate and available locations. Site selection is evidence based with no bias. The Council is required by the NPPF to deliver the objectively assessed housing needs of the District over the next 15 years.
Development will have a detrimental impact on the landscape. Allowing for open space on the site will not compensate for the	The evidence indicates that there will be an adverse impact on the landscape. The Landscape Assessments recommend that

impact on the landscape. Growing trees and hedges to allow 2 and a half storey houses is totally inappropriate.	properties should be no higher than 2 storeys. The development brief will highlight the need for future development to reflect the site's surroundings, including the dominance of single storey dwellings directly adjacent to the site.
This area of the District is disadvantaged as the Green Belt is located at the other side of the District.	The Nottingham Derby Green Belt is a national designation which requires exceptional circumstances in order to amend its boundary. The Council is proposing to do this in Selston and Hucknall to accommodate the growth in the District. Exceptional circumstances cannot be demonstrated in the Kirkby area for Green Belt release. It is considered that the distribution of growth across the District is proportionate and appropriate taking into consideration constraints in relation to Green Belt land/policy.
Criticism of the length of time left to enable residents/objectors to gather further evidence.	The Council considers that the public consultation was undertaken over an appropriate length of time.
Concern was raised about the consultation being a fait de accompli rather than true consultation.	The Council strongly disagrees. All comments received have been considered and any necessary amendments have been made. The consultation has enabled the Council to identify issues which may affect the suitability and deliverability of sites/development. The Local Plan consultation document identified the Council's 'Preferred Approach' which was developed following a lengthy process of evidence gathering and site assessments. It is inevitable that there will be very few sites, if any, found to be unsuitable following the consultation.
There is a footpath off Mansfield Road which contains a pair of stones. The Council should consider if the stones should be safeguarded or relocated.	Comment noted. This would be considered at the planning application stage.
<b>Comments</b>	

<p>Mansfield District Council raised in respect of the Housing proposals North of Kings Mill hospital (SKA3a for 250 units) and at Beck Lane (SKA3h for 400 units), Ashfield District Council should ensure that it is satisfied, along with NCC Highways, that the existing highway infrastructure can accommodate the increase in traffic on both a site by site basis and cumulatively (including nearby sites allocated within Mansfield), or alternatively identify the necessary highway infrastructure improvements required and how they will be implemented. Mansfield District Council would welcome the opportunity of working with Ashfield District Council in looking at the potential masterplanning of this general area.</p>	<p>The Council has liaised with the Highway Authority regarding the development of the sites including the sites allocated or with planning permission in the District of Mansfield. In addition the Council is undertaking an update Strategic Transport Assessment to identify highway issues from the proposed development and potential mitigation measures.</p>
<p>Disagreement to proposed timetable for delivery of development (beyond five years). The site is being actively promoted by a developer and a planning application is imminent. The site is deliverable within the first five years.</p>	<p>Comments noted. The housing trajectory will be amended to reflect the proposed timetable of delivery.</p>
<p>Any references in the Plan to the phasing of development of the site should be removed. The Inspector for the South Worcestershire Plan indicated that this approach is not justifiable.</p>	<p>As set out in Policy SKA3h, the Council is seeking to take forward a comprehensive development. ADC are not proposing a phasing policy. The table included in appendix 10 is purely indicative of when each site is anticipated to deliver homes over the Plan period based on known information and average delivery rates.</p>
<p>Will the gap between Mansfield and Sutton in Ashfield be maintained beyond the Plan period?</p>	<p>The Council cannot predict what will happen beyond the Local Plan timescale (2032). Once adopted the Plan will be regularly reviewed and updated as and when necessary. The Council will continue to work with Mansfield District Council as part of the Duty to Cooperate to determine the most appropriate</p>

	locations for growth as part of any future review of the Local Plan.
Paragraph 6.58 states that development will be limited to 400 dwellings due to highway constraints. Will proposed development in Mansfield also impact further on the issue?	Yes, development in Mansfield will impact on the road network and this has been taken into account in the Transport Study. The Council is continuing to work with Mansfield District Council and Nottinghamshire County Council to identify appropriate mitigation, informed by recommendations in the 2016 Transport Study.
This proposed allocation is on the perimeter of the urban area of Skegby, therefore any proposals should take into account the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone ML23 Skegby Plateau	Comments acknowledged.

### Proposed Amendments

Issue/Policy	Amendment/Development Brief Requirement
The landowner has confirmed that development can be delivered within the first five years of the Plan.	Amendment to the housing trajectory to reflect an earlier commencement of development.
The reasons for selecting sites is not transparent and there are contradictions in the Site Selection Document.	Review and amend, where necessary, the Site Selection document in order to ensure that the conclusions clarify the reasons why the sites have been selected for allocation.
2.5 storey dwellings would not be appropriate for this landscape.	Development Brief: development to reflect and acknowledge the surrounding vernacular of single storey units.

<b>List of Respondents</b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Swift	2226		√	√	Y. & K. Daniels	5714	√		
C Oldfield	2553	√			J. Redfern	5733	√		
Mr. & Mrs. Spears	2591	√			E. Hutchinson	5737	√		
P. Marshall	2750	√			R. & P. Hallam	5738	√		
Nottinghamshire County Council	2803			√	J. Wordley	5746	√		
Thorpe	3344	√			T. Renshaw	5748	√		
A. Knowles	3758	√			E. & N. Cooke	5749	√		
M. Roebuck	4701	√			I. Wilson	5752	√		
M. Bingley	5339	√			A. & J. Kapakurt	5754	√		
G. Coupe	5387	√			M. Adams	5755	√		
Vincent & Gorbing on behalf of Notts County Council	5480		√		I. & M. Dyer	5756	√		
C & K Hunt	5580	√			S. & J. Payne	5761	√		
J. Oakes	5583	√			C. Hallam	5762	√		
Mr. & Mrs. T. Wesley	5585	√			B. Weston	5769	√		
Mrs. Hendy	5588	√			Mr. & Mrs. Shaw	5770	√		
D. Caunt	5590	√			C. Wright	5776	√		

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M. Moore	5593	√			J. Brewster	5777	√		
I. & C. Brown	5606	√			M. Randall	5791	√		
Mr. & Mrs. Mee	5609	√			A. Bennett	5856	√		
S. Kirton	5630	√			R. & M. Facer	5889	√		
D. Swain	5640	√			D. & J. Smith	5897	√		
J. Dare	5648	√			M. Earnshaw	5901	√		
A. Pitchford	5653	√			A. Holmes	5904	√		
J. Bacon	5711	√			C. Fitt	6532	√		
Mr. & Mrs. Marnix	5909	√			P. Haines	6533	√		
R. Brown	5910	√			T. Waring & S. Taylor	6534	√		
D. Raybould	5952	√			C. Roebuck	6535	√		
C. Clay	5954	√			I. Dring	6536	√		
B. Millett	5956	√			C. Sharpe	6537	√		
Mr. & Mrs. Bustin	5969	√			M. Hall	6538	√		
A. Stokes	5973	√			D. Mansell	6539	√		
B. Anthony	5978	√			Mr. & Mrs. Levy	6540	√		
J., P., & J. Green	5981	√			B. Hassall	6544	√		
J. West	5982	√			J. Tucker	6547	√		
I. Redfern	5995	√			K. Reeve	6548	√		
M. Ford	6018	√			M. Richardson	6549	√		
P. R. Nicoll	6021	√			A. Udall	6550	√		
A. Keeling	6024	√			Mr. & Mrs. Brown	6551	√		
P. Shelton	6049	√			Mr. & Mrs. Olley	6552	√		
H. B. Nicoll	6063	√			K. Cleveland	6553	√		



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Mr. & Mrs. Waterfield	6123	√			W. Turk	6560	√		
Mr. & Mrs. Lawrence	6126	√			Mr. & Mrs. Harrold	6561	√		
Prospect Planning on behalf of Lovel Developments	6485		√		J. Commons	6562	√		
P. Baxter	6520	√			K. R. Clarke	6563	√		
S. Harvey	6527	√			R. Bunting	6569	√		
S. Smalley	6528	√			A. Holden	6570	√		
Mr. & Mrs. Gumbley	6530	√			Mr. & Mrs. Gilkes	6613	√		
G. Barker	6571	√			R Williams	6698	√		
A. Taylor	6572	√			C. Hill	6878	√		
Mr. & Mrs. Hall	6573	√			Mr. & Mrs. Oliver	6879	√		
R. Crispy & A. Beaver	6582	√			J. Aldread	6880	√		
S. Hallam	6583	√			Mr. & Mrs. Staniforth	6881	√		
D. Vickers	6584	√			L., R., & R. Walker	6882	√		
H. Tomlinson	6585	√			J. & M. Morley	6883	√		
L. Knowles	6587	√			Mr. & Mrs. Stone	6884	√		
J. Willey	6589	√			A. Walton-Mowbry	6885	√		
A. Turner	6591	√			J. Maxwell	6886	√		

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C. Twigg	6592	√			Mr. & Mrs. Thomas	6900	√		
E. Stones	6594	√			J. D. Bust	6901	√		
P. Hardy	6595	√			J. Wetton	6902	√		
R. Jordan	6596	√			S. Goodcrown	6903	√		
Mr. & Mrs Lewis	6599	√			J. Stacey	6904	√		
Mr. & Mrs. Bryan	6604	√			J. Pickering & K. Yates	6905	√		
Mr. & Mrs. Swain	6605	√			A. Crossland	6906	√		
T. Severn	6607	√			Mr. & Mrs. Grindle	6907	√		
S. Patchett	6608	√			Mr. & Mrs. Clark	6908	√		
K. Broughton	6609	√			Mr. & Mrs. Pownall	6909	√		
Mr. & Mrs. Winstanley	6610	√			D. Blount	6910	√		
S. Kay	6611	√			D. Gravestock, M. Walters	6911	√		
R. Kay	6612	√			H. Brown	6912	√		
D. Shaw	2707			√	T. Chi-Lee	6937	√		
M. E. Hawksford	6913	√			A. Grant	6938	√		
D. R. Thorpe	6914	√			M. Moore	6939	√		
R. Brooks	6915	√			J. Smith	6940	√		
Mr. & Mrs. Balstridge	6916	√			B. Tooner	6941	√		
M. E. Wadley	6917	√			J. Anthony	6942	√		
P. & J. Elliott	6918	√			S. H. Whitton	6943	√		

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Mr. & Mrs. Nuttall	6919	√			T. Sage	6944	√		
G. Smith	6920	√			A. Mitchell	6945	√		
S. Barnes	6921	√			M. J. Young	6946	√		
D. Beastall	6922	√			J. Orwin	6947	√		
D. S. Cook	6923	√			A. Slack	6948	√		
Mr. & Mrs. Spencer	6924	√			W. Gillespie	6949	√		
M. Lee	6925	√			S. Davies	6950	√		
D. Wilkinson	6926	√			M. Ray	6951	√		
P. Atherley	6927	√			N. Eyre	6952	√		
A. Shaw	6928	√			J. Clarke	6953	√		
D. & J. Thompson	6929	√			M. Briddon	6954	√		
N. Leighton	6930	√			B. Morley	6955	√		
A. O'Connor	6931	√			A. Beeby	6956	√		
D. Lowe	6932	√			M. Holloway	6957	√		
G. Fleet	6933	√			R. Davies	6958	√		
A. Bennett	6934	√			R. Bonsall	6959	√		
J. Kennedy	6935	√			P. A. Fairbrother	6960	√		
Mr. & Mrs. Alsop	6936	√			E. Hurst	6565	√		
T. M. Durancie	6961	√			S. Keeling	6966	√		
I. E. Keeling	6962	√			O. Morley	6967	√		
C. Cordin	6963	√			B. & G. Wardle	6968	√		
R. G. Carter	6964	√			Mansfield DC	1872			√
Mr. & Mrs. Brooks	6965	√							

## SKA3j Site: Fisher Close

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Support	
<p>There is support for Site SKA3j (Fisher Close/Stanton Crescent) as a suitable site allocation and for it to be taken forward as a housing allocation in the next version of the Local Plan (publication version). Land off Fisher Close, Sutton-in-Ashfield immediately adjoins the existing urban area of Sutton-in-Ashfield. The site is not subject to any landscape, ecological or heritage constraints and is located within Flood Zone 1 (probability of river or sea flooding less than 1 in 1000 years). As such, there is a low risk of fluvial flooding that may affect the site. A suitable vehicular access can also be achieved via Fisher Close. The site has been identified in the Ashfield District Strategic Housing Land Availability Assessment which concluded that the site was suitable, available and achievable. The 'Housing Site Selection Technical Paper' concludes this is a suitable site to take forward as an allocation following.</p>	<p>The Council welcomes support for this allocation and confirmation that there are no significant constraints to development.</p> <p>The Highway Authority has indicated that access via Fisher Close would not be supported. There are opportunities to access the site via adjoining land on Stanton Crescent. As such, it is considered that the site is deliverable within the Plan period.</p>
Object	
Highways & Access	

<p>a) Traffic on Stoneyford Road is already over busy especially at school time and additional 80 houses with two cars at least each, would make the road more dangerous.</p> <p>The proposal to knock houses down in Carsic to give entrance to the development, this would lead to additional traffic exiting Carsic on to Stoneyford Road which that junction is already busy and at key times queues form to get off the estate. In addition this would increase the amount of cars on Carsic Road which is not wide enough with everyone parking on each side presenting dangerous levels of traffic near the primary school.</p> <p>b) You have stated that this development would be separate to Fisher Close, how would you get the second emergency service entrance into the proposed estate?</p> <p>c) Road conditions in Sutton/Stanton are in a poor state of repair due to excessive traffic.</p>	<p>a) The Council acknowledges that any future development on the site will need to undertake highway improvements to help mitigate the impacts of the development. Whilst the principle of how the site can be accessed has been agreed with the County Council Highways Department, more detailed work related to Highway improvements will be undertaken at the planning application stage.</p> <p>To help inform future discussions with developers, the Council has commissioned a Transport Study, which will assess the impact on new development on the highway network and present mitigation measures to help manage the impact.</p> <p>b) A development of the scale proposed at Fisher Close, would not require a secondary emergency access.</p> <p>c) This issue would be dealt with by the Highway Authority as part of their road maintenance programme.</p>
<b>Infrastructure &amp; Drainage</b>	
<p>The new houses would bring more families in the area. Is there general practice and school provision for all the proposed housing development going to be increased?</p>	<p>The Council has worked closely with the County Council Education Department and the Clinical Commissioning Groups to understand the infrastructure needs of new development. These needs will be detailed within the Local Plan's Infrastructure Delivery Plan and will form the basis of negotiations with developers to secure developer contributions to help pay for the infrastructure needed.</p>
<p>We understand our drainage is insufficient to support</p>	<p>The Council has, and continues, to work with Severn Trent</p>

additional development. We need our drainage to work well and not be overwhelmed.	<p>Water to ensure the future water and drainage needs can be met. Severn Trent has not highlighted any specific issues with this site.</p> <p>Any future development on the site will need to successfully manage surface water drainage on the sites.</p>
Concern raised that local infrastructure cannot support the development. The health summary for Ashfield indicates that most areas are significantly worse than England average.	The Council continues to work closely with infrastructure provides to ensure future infrastructure needs are identified and appropriately planned for. The infrastructure needs related to the Local Plan will be contained within the updated Infrastructure Delivery Plan.
GCSE achievement in Ashfield is lower than national average.	Whilst the planning system can help secure funding for education infrastructure, it has no influence on the education system.
<u>Natural Environment</u>	
<p>a) You advise that all brownfield had been reviewed, it is very sad that we are using green fields which are supposed to be protected!</p> <p>b) Objection on the basis of paragraph 4.42, 4.43 and 4.44 of the Local Plan (relating to the natural and historic environment)</p>	<p>a) The Council has allocated a number of brownfield sites within Preferred Approach Local Plan, which can accommodate approximately 1268 dwellings. But unfortunately the supply of brownfield sites has reduced, due to the successful redevelopment sites in the past and the need to provide land for business / jobs growth. As a result, the Council has had to make the difficult decision to propose the allocation of sites within the countryside to meet the District's future housing needs, as required by national planning policy.</p> <p>b) Objection noted. The Council is committed to protecting and enhancing the natural and built environment. The Council is</p>

Ashfield District Council - Statement of Consultation

I object to the proposed allocation. If the land was built on it would not maintain the natural environment and visual appeal.	required, by national planning policy, to deliver the objectively assessed housing needs of the District. Unfortunately there are not enough brownfield sites available to meet the housing needs of the District. This has resulted in the need to allocate greenfield sites on land which is currently designated Countryside. The Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity and designated and non-designated heritage assets. Where development is proposed, the Council will always seek to protect and enhance the environment in this respect.
c) Description leads reader to believe the site is surrounded by housing. This is incorrect, it is green fields.	c) The Council acknowledges that the site is currently a greenfield site that has residential uses at its south and east boundary.
d) Will the hedgerows and trees be protected?	d) The Council will seek to ensure any hedgerows and trees that are of value will be retained and integrated, where possible, into any future development. The landscape assessment undertaken for the site will be used to help inform this requirement.
<u>Other - Residential Privacy</u>	
The land is on a higher level than existing properties, as such privacy to existing properties will be lost.	Any future development will need to align with the privacy distance requirements in the Ashfield Residential Design Supplementary Planning Document. These requirements help ensure acceptable levels of privacy are retained between existing and new properties.
<u>General comments</u>	
Objection raised due to coal mining issues.	The Coal Authority has informed the Council that coal mining issues associated with the site would not restrict development

**Ashfield District Council - Statement of Consultation**

	as there are opportunities for mitigation.
<b>Comment</b>	
Any proposals need to be developed to mitigate any negative impacts on Brierley Forest Park, and to provide links into the Park.	Comments acknowledged.

**Proposed Amendments**

<b>Issue/Policy</b>	<b>Amendment</b>
A development brief will be created for the site providing broad principles and site specific considerations that will need to be taken into account by future development.	<p>As a result of comments received, the Council proposes to ensure the development brief for Fisher Close will include information related to:</p> <p>The retention and protection of existing mature trees and hedgerows.</p>

**List of Respondents**

<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Nottinghamshire County Council	2803			√	R. Doncaster	6555	√		
S Brooke	2670	√			Taylor Wimpey UK Ltd	6644		√	
A. Warren	6554	√			N Bromirski	6714	√		



### SKA3k - Hilltop Farm, Skegby

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Object	
Highways & Access	
It will put traffic on to Mansfield Road as the primary route through the local area. It will almost certainly require parking for 2 vehicles per dwelling and this will mean a minimum of 40 additional vehicles (probably many more), the majority of which will impact on Mansfield Road. Mansfield Road is already causing huge local concern as there is currently a development at the detailed planning stage that will impact severely on traffic on Mansfield Road.	<p>We have received no objections from the Highway Authority in this respect.</p> <p>In developing the Local Plan the Council has worked closely with Highways Department at the County Council to understand and plan for the highways infrastructure needed to support the development proposed in the Plan alongside new development proposals in neighbouring authorities.</p> <p>In addition to consultation with the Highways Department, the Council has commissioned an update to the Transport Study that will include an assessment of traffic impact resulting from the proposed sites and potential mitigation needed to help reduce that impact.</p> <p>This study, together with consultation with the County Council's Highways Department, will inform the design of any future development and s106 negotiation related to wider highways infrastructure mitigation.</p>

Historic Environment	
Our property is a listed building, just yards away from the proposed sites. As part of the Skegby Heritage Trail we can bear witness to the number of visitors to the area who spend time walking around the trail and the lanes and who clearly appreciate the history of our property and others close by and the unspoilt nature of the area.	The Council acknowledges that the respondent's property is a Listed Building. This heritage asset will be a key consideration that any future developer will need to acknowledge with a high quality design, that does not have an unacceptable impact on the building's setting.
Site constraints	
The land is low-laying and would provide an air pollution sink for poor quality air to reside. The local authority is extremely poor at assessing both air quality and environmental issues and could find themselves in either a National law court or a European law court for breaching EU air quality regulations.	As part of any future planning application on this site, the Council's Environmental Health Department will be consulted. If they raise concerns about air pollution, this will be taken into account when determining the application. The Council's Forward Planning Team will pass these comments on to the Environmental Health Department. As far as the Forward Planning Team is aware, the Council is fulfilling its statutory requirements in relation to air quality monitoring.
Other	
More thought should be given to the existing residents and the type of existing housing. Too many houses being built in the available space will destroy local villages.	The housing sites proposed within the Preferred Approach Local Plan are to meet the future housing needs of the District's communities. The amount of housing proposed (480 homes a year), has been informed by the Strategic Housing Market Assessment.  The Government requires all council's to undertake a Strategic Housing Market Assessment (SHMA) across a Housing Market Area to understand the future housing needs of their area. Ashfield lies within the 'Outer Nottingham Housing Market Area', with Mansfield and Newark & Sherwood Districts. The 3 Councils jointly commissioned a SHMA which provided Ashfield

	<p>with its housing target of 480 homes a year, as well as information on affordable and specialist housing need. This requirement has been derived from government household projections, coupled with analysis of aging population, changing household sizes, migration and people unable to get on the property ladder due to the recession.</p> <p>Having understood its need, the Council has proposed the allocation of sites to meet that future need. This has included existing planning permissions that have yet to be implemented and new sites.</p>
<p>Consideration of the local available amenities, schools and doctors appears to play no role in the housing plan. Local schools are full, the doctors surgery is bursting at the seams and to accommodate the additional housing school playing fields and local football fields will be sacrificed to extend the school and doctors surgery. This will not help with the growing obesity and obesity related health issues. Travel to schools and doctors will impact on road congestion and reduced air quality.</p>	<p>In developing the Local Plan the Council has worked closely with the Education Department at the County Council, the Clinical Commissioning Groups and other infrastructure providers to understand and plan for the infrastructure needed to support the development proposed in the Plan. This information has fed into the updated Infrastructure Delivery Plan, to support the Local Plan. This information will be used to help negotiate s106 agreements with future developers to help secure funds to deliver the infrastructure needed. In some cases this may lead to the delivery of new infrastructure as part of the development.</p>
<p>Skegby is a village and we would like to keep it as one. Skegby residents do not want to lose our green land, there isn't any room for more houses or room on the roads for more cars. We would like to keep what countryside we have so people can enjoy their walks and horse riding thank you.</p>	<p>Where ever possible, the Council has allocated brownfield sites within Preferred Approach Local Plan. The allocated brownfield sites can accommodate approximately 1,268 dwellings. A very small number of brownfield sites have been rejected due to severe constraints e.g. the majority are located in high flood risk areas (flood zones 2 or 3). The supply of brownfield sites has reduced, due to the successful</p>

	<p>redevelopment sites in the recent past for housing and to meet the need to provide land for business / jobs growth. In order to help meet the future housing needs of the District, the Council has no option but to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites deemed deliverable and sustainable, as required by national planning policy.</p>
<b>Comments</b>	
<p>Permission was requested on this site a couple of years ago but the area was considered to be an important piece of green area and should be kept as such.</p>	<p>An element of the proposed site was subject to a planning application for residential use, the application was subsequently withdrawn by the applicant.</p>
<p>If housing is permitted on this land you must insist that access is from Back Lane and not Mansfield Road. Frankly it would be insane for your council to allow any new access on to Mansfield Road opposite to the Bakers shop a little higher up the road than the school.</p>	<p>Any access will be submitted and agreed on with a planning application, not in the housing allocation. As of now, no specific access has been arranged, but the Council has worked closely with the County Council Highway Department, to ensure 'in-principle' access can be achieved on all the sites proposed.</p>
<p>The land ska3k originally had planning permission for one dwelling which would fit well into the surrounding housing framework.</p>	<p>The Council acknowledges this comment.</p>
<p>The ADC website is a clear indicator that there is no driving force with regard to environmental issues as most targets, particularly for carbon management are hugely out of date and comments written within yearly air quality progress reports are never followed up on.</p>	<p>The Council's Forward Planning Team will pass these comments on to the Environmental Health Department. As far as the Forward Planning Team is aware, the Council is fulfilling its statutory requirements in relation to air quality monitoring.</p>
<p>This proposed allocation is on the perimeter of the urban area</p>	<p>Comments acknowledged.</p>

of Skegby, therefore any proposals should take into account the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone NC07 Stanley and Silverhill

### Proposed Amendments

Issue/Policy	Amendment/Development Brief Requirement
N/A	

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Nottinghamshire County Council	2803			✓	G. Coupe	5387	✓		✓
W. Taylor	2818			✓	E. Hurst	6565	✓		
A. J. Knowles	3758	✓			R Williams	6698	✓		
Ms M Bingley	5339	✓		✓					

## Policy SKA3l: Site: Alfreton Road, Sutton

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Site Allocation</b>	
<b>Support</b>	
<p>a) I would like to say I am fully supportive of the Local Plan and would like to see it progress. I am happy to work with adjacent land owners to help bring forward development.</p> <p>b)</p>	<p>a. The Council acknowledge and welcome the comment and support to progress the wider Alfreton Road site.</p>
<b>Object</b>	
<b>Impact</b>	
<p>a. The small amount of remaining Greenfield land help prevent the merging of Sutton, Kirkby and Huthwaite.</p> <p>b. The proposals set out a minimum housing density of 30 dwellings per hectare, this is approaching 3 times the density of the existing housing. If permitted will significantly change the local semi rural community to one of urbanised sprawl.</p> <p>c. The plan identified the negative impact on the locality – increased noise, loss of Greenfield land, loss of amenity / recreational value, poor air quality and impact on the landscape, it is unreasonable the existing residents should be expected to shoulder such a burden.</p>	<p>a. Whilst the Council acknowledges the different settlements that comprise the District's large urban areas of Sutton and Kirkby, as these area have grown and development they have in some cases physically merged, creating the wider conurbation. This is acknowledged with the Settlement Hierarchy in the Local Plan. The Council recognises the importance of retaining key pieces of green space within the District's urban areas, with areas such as Brierley Forest Park and Rookery Park providing vital spaces for recreation and biodiversity.</p> <p>b. The densities proposed within the Preferred Approach Local Plan are estimations at this stage. The exact details will be determined by the planning application. In</p>

<p>d. Identified in the plan (4.34) the increased density and general quality of housing will have an adverse effect on the retention and draw of professional workers to the area which are essential for the successful development of local businesses.</p>	<p>estimating an approximate density for the site, the Council has considered the suburban nature of the surroundings and the density of similar new developments within the area. Whilst acknowledgement must be made of the surrounding character of the built up area, consideration must also be given to the viability of a site and the most resourceful use of land.</p> <p>c. Unfortunately new development in any location will result in some negative impact on its surroundings. These considerations are highlighted within the Sustainability Appraisal, which illustrates how the Council must balance the social, economic and environmental needs of the District. A key need for the District's communities and a primary requirement from Government, is to deliver housing. As such this has led to the proposed allocation of sites in the Local Plan. Unfortunately in order to meet the District's future housing need, the Council has had to take the difficult decision to propose the allocation of greenfield sites.</p> <p>d. Through the dispersal of proposed housing sites across the District, the Council hopes to deliver a range of house types to meet the varied needs of its residents.</p>
<p><u>Highways &amp; Access</u></p>	
<p>a. The plan makes bold statements about improving local public transport to support the new developments. There are already high levels of congestion along the A38 and M1 junction 28 is already. The junction at the A38 - Kirkby Road is already dangerous as school children cross to Ashfield School and the developments will increase the</p>	<p>a. The Council acknowledges that areas of the District's road network suffer from congestion. However, the Government will only consider this a reason to refuse a development it has a 'severe' impact on the highway network. Whilst the Government has not defined 'severe', the Council does not believe proposals within the Plan will constitute severe in</p>

<p>risk. Many of the local feeder roads to the A38 are in a poor state of repair and more traffic will only exacerbate the problem.</p> <ul style="list-style-type: none"> <li>b. The inclusion of this land for residential allocation without an indication of the preferred suitable highways access point is premature.</li> <li>c. A robust assessment against adjacent properties of any proposed access needs to be considered as part of the PA to ensure that the Highways solutions are sufficient distance from existing dwellings so as not to adversely impact the health of the occupants. The acceptance that there is a negative impact on air quality should this site come forwards but is then accepted.</li> <li>d. Other sites have the capacity to be purposely designed access not shoe horned between existing dwellings.</li> </ul>	<p>the eyes of the Government. To aid this assessment, the Council has commissioned a Transport Study to understand the impact of proposals on the road network, with details of potential mitigation measures. This work will help inform future discussions with developers, when negotiating developer contributions.</p> <ul style="list-style-type: none"> <li>b. Access would need to be taken from Alfreton Road, utilising third party land.</li> <li>c. Any future development on the Alfreton Road sites will need to align with the highway requirements of the County Council.</li> </ul> <p>Consultation will also be undertaken with the Council's Environmental Health Department. Any development of 30 dwellings or over is required to submit an air quality assessment as part of a planning application. This will enable the Environmental Health Department to assess any potential issues resulting from the development. Consultation will also be undertaken with the Council's Environmental Health Department.</p> <p>The Sustainability Appraisal highlights that air pollution will be generated through the construction of the homes and once in use. Whilst increases in air pollution need to be appropriately controlled and monitored, the potential impact on air pollution from this site does not out weight the need for housing.</p> <ul style="list-style-type: none"> <li>d. The Council has undertaken assessment on a range of potential housing sites, which have a range on constraints. Whilst the sites at Alfreton Road do have access constraints, the Council in consultation with the Highways Authority believes these constraints can be overcome. The</li> </ul>
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	ability to access the proposed sites at Alfreton Road has been demonstrated by the planning permission on site SKA3ac.
<u>Infrastructure</u>	
<p>a. The key mitigation of SUDS scheme and third party land required to access this allocation would in my view make this development unviable.</p> <p>b. Will there be another doctor's surgery as both are very busy as it is? Will the local schools be improved/supported to cope with further demand? Will the ambulance and fire service be improved/upgraded so they can cope with the increase in demand that these extra houses will cause? What facilities does the council propose for the young of the area to help reduce antisocial behaviour?</p>	<p>a. The Council acknowledges that third party land and a SUDs system will be needed to achieve development, but believes a comprehensive development site that includes SKA3l, SKA3ac &amp; SKA3g can create a viable site. The need for third party land is why the Council has projected to would not come forward in the short term.</p> <p>b. In developing the Local Plan the Council has worked closely with Education Department at the County Council, the Clinical Commissioning Groups and other infrastructure providers to understand and plan for the infrastructure needed to support the development proposed in the Plan. This information will be compiled within the revised Infrastructure Delivery Plan and used to help negotiate s106 agreements to help deliver the infrastructure needed. In some cases this may lead to the delivery of new infrastructure within the new development.</p>
<u>Other</u>	
<p>Whilst I understand new affordable housing is needed I am sure there are plenty of areas that need regeneration or brown field sites that should be used before using greenfield sites that are desperately needed for the local community and wildlife.</p>	<p>Where ever possible, the Council has allocated brownfield sites within Preferred Approach Local Plan. The allocated brownfield sites can accommodate approximately 1,268 dwellings. A very small number of brownfield sites have been rejected due to severe constraints e.g. the majority are located in high flood risk areas (flood zones 2 or 3). The supply of brownfield sites has reduced, due to the successful redevelopment sites in the recent past for housing and to</p>

	meet the need to provide land for business / jobs growth. In order to help meet the future housing needs of the District, the Council has no option but to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites deemed deliverable and sustainable, as required by national planning policy.
<u>Alternative Sites</u>	
Many opportunities exist to create a new community, which has little impact on the existing Ashfield communities, between the M1 junctions 27 to 28 corridor north of the M1 to provide all the necessary local housing requirements for the foreseeable future. With appropriate roads taken out to the relatively lightly used M1 junction 27 the new community would be served with good road access whilst eliminating further burden of the existing A38 / M1 junction network	The majority of land between junctions 27 and 28 lies within the Green Belt. The Government places great importance on the preservation of the Green belt, with only clearly justified release considered during the development of a new local plan. The Council has proposed small elements of Green Belt release in Hucknall and Selston, but it does not believe it could justify large scale release of Green Belt when there remains areas of countryside within the District (the Government does not give equal weight to countryside).
<b>Comment</b>	
It is wrong for the plan to expect existing residents to accept such significant changes to our local community and must be rejected.	The Government requires all Councils to appropriately plan for the future housing needs of their areas, resulting from population growth, changing family structure, an elderly population and people unable to get a foot on the property ladder. The Council believes the sites proposed within the Preferred Approach Local Plan, are the most sustainable and deliverable sites for achieving this legal requirement.
Any proposals need to be developed to mitigate any negative	Comments acknowledged.

impacts on Brierley Forest Park, and to provide links into the park.	
<u>Responses received relating to Policy supporting text</u>	
N/A	

### Proposed Amendments

Issue/Policy	Amendment
It has come to light that part of the land is now unavailable (approximately 2 hectares of land to the north west of the site). This area needs to be removed from the allocation.	Remove land to the north west reducing the site by approximately 2 hectares.

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Mrs Vale	2233		√		H Brewster	5887	√		
Nottinghamshire County Council	2803			√					
A Clark	5859	√							
C Wakelin	6058	√							

### SKA3m Site: The Avenue, Sutton

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Support	
N/A	
Object	
<u>Access / Highways</u>	
Land 'off the Avenue' is a private road and could not accommodate any further access.	The Council acknowledges that the site does have access constraints and requires third party land to overcome this. However, in consultation with the County Highways Department, the Council believes acceptable access can be achieved.
<u>Infrastructure</u>	
There are no utilities and services which would cause further problems.	Any future development would need to appropriately connect to relevant utilities and services.
<u>Natural Environment</u>	
Wildlife would be destroyed as bats are nesting in trees.	If there are reports of bats on the site, any future development proposal would need to undertake a bat survey and submit this as part of the planning application. There may also be a requirement to undertake a wider wildlife survey of the site. As a result of these assessments, the developer maybe required to undertake appropriate mitigation.

<u>Other</u>	
I would strongly object to 3 storey houses, as they would cause overlooking problems.	Any future development would need to align with the Council minimum privacy distance requirement, outlined within the Residential Design Supplementary Planning Document. This will ensure overlooking is minimised.

### Proposed Amendments

Issue/Policy	Amendment
N/A	

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
C Marsden	6542	√							

### SKA3n Quantum Clothing, North Street, Huthwaite

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Support	
Support for the building being converted into apartments due to its historic character. Proposed if demolished:	Comments notes. The Council, if viable, also wish to see the historic elements of the building retained as the building is on

<ul style="list-style-type: none"> <li>• should retain key stones and other features;</li> <li>• should be art work in recognition of the hosiery trade.</li> </ul>	the Council Local Heritage List.
The proposed allocation of this site for residential development is supported and the conclusions reached with regards to the sustainability credentials of the site are agreed. The potential conversion of the factory buildings on the site are unrealistic and are not viable. Any requirement to convert these buildings will have a significant impact on the likelihood of development coming forward on the site.	<p>The Council acknowledges the support for allocating the site.</p> <p>The Council would like to work constructively with the property owners to develop a mutually acceptable and viable scheme for the site.</p>
<b>Object</b>	
<u>Historic Environment</u>	
North Street factory should never have been passed through planning to be demolished. This is a heritage asset which makes a statement. It is locally listed. Any development should involve advice from the conservation officer so a large part of the building could remain, whilst changing the interior into apartments or similar.	<p>The landowners submitted a prior notification to the Council to demolish the existing building. This notification is a method statement, it is not an application to seek approval for demolition. As such, the Council only has the ability to comment on the method statement submitted, not the principle of demolition.</p> <p>The Council recognises the local importance of the historic building and won a planning appeal related to this status. The Council wish to support appropriate development on the site that successfully balanced the historic environment with a viable future use. The Council's Conservation Officer will play an important role in achieving this outcome.</p>
<b>Comment</b>	
This proposed allocation is on the perimeter of the urban area of Huthwaite, therefore any proposals should take into account	Comments acknowledged.

the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone MI21 Brierley Forest Park.	
<b>Responses received relating to Policy supporting text</b>	
N/A	

### Proposed Amendments

<b>Issue/Policy</b>	<b>Amendment</b>
N/A	

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Mr.S.Swift	2226		√		M Thorne	3888	√		
Freeths LLP	2260		√						
Nottinghamshire County Council	2803			√					

### SKA3o: Site: Land adjacent to Stubbin Hill Farm, Brand Lane, Stanton Hill

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Support	
N/A	
Object	
<u>Site constraints</u>	
<ul style="list-style-type: none"> <li>a) Any new property would severely encroach on our privacy by the line of site looking directly into both upstairs and downstairs windows.</li> <li>b) Properties at Hawthorne Close enjoy views across the valley which would potentially be obscured by any development.</li> <li>c) Northern element of the sites is not of sufficient size to accommodate development and its required highway.</li> <li>d) Do not feel the site adjacent to 20,22,24,26 Hawthorne Close would meet a number of the design requirements in the Ashfield Residential Design SPD, particularly in relation to impacting on the character of the area, overshadowing / overbearing impact on existing properties, reducing the outlook from existing properties, creation of a cul-de-sac, size of area could make parking difficult and does not feel minimum privacy distances can be achieved.</li> <li>e) There is the potential to significantly impact on the value of my property.</li> </ul>	<ul style="list-style-type: none"> <li>a) Any future development on the site would need to successfully align with a number of planning policies prior to it being approved for development. Privacy distances are contained with the Ashfield Residential Design SPD, requiring new residential development to be a minimum distance away from existing properties. These requirements will be applied to all new development, reducing their impact on existing properties.</li> <li>b) New development is likely to impact on existing views. National policy does not enable the Council to considered loss of view as a factor in assessing the suitability of a potential housing site.</li> <li>c) The northern element of the site has a width of approximately 33.5 metres at its northern point and 41.3 metres at its southern point. Whilst this width, the topography and the proximity of existing properties would need to be appropriately considered and addressed by any future development, the Council does not feel it is an undevelopable area of the site.</li> </ul>



<ul style="list-style-type: none"> <li>f) Further housing development will diminish the village character of Stanton Hill, to take the form of a small town.</li> <li>g) Concerned the existing footpath along the northeast parameter will become an ally attracting anti-social behaviour.</li> <li>h) Objection raised because there are documented mining issues with the site.</li> </ul>	<ul style="list-style-type: none"> <li>d) The Residential Design SPD is used to help assess the design quality of residential planning applications. Most of the guidance related to how the proposal should be laid out and designed. At this stage, the Local Plan only looks at the principle of development and fundamental issues such as potential access. At this stage, the Council does not feel it can make an appropriate assessment on whether a future scheme could align, or not, with the requirements outlined.</li> <li>e) National planning policy does not allow any potential impact on property values to be taken into account within the planning process.</li> <li>f) The Council has sought to appropriately distribute growth across the District, whilst ensuring sites are deliverable, in line with national policy. The Council feels the proposed housing site at Brand Lane is of a scale appropriate to Stanton Hill and will not impact unduly on its built character.</li> <li>g) Existing footpaths will need to be incorporated into any future development. The exact design or location of this is unknown at this stage. However, the Council would not support a future design that created un-surveyed spaces that could encourage anti-social behaviour.</li> <li>h) Objection noted. The Coal Authority has confirmed that such issues would not prevent the development of the site as there are opportunities to mitigate such constraints.</li> </ul>
<p><u>Historic Heritage and Natural Environment</u></p>	

<ul style="list-style-type: none"> <li>a) This area needs to be checked for heritage assets before any excavating or building is done. The site, is a site of a deserted medieval village of Alwalthwaite. Any future housing development on the site must have a condition that an archaeological survey is carried out and any features of historic interest are recorded and protected.</li> <li>b) Rural landscape provides habitat for a diverse assortment of wildlife</li> <li>c) Please consider the use of Brown Field sites in preference to countryside / Green Field / Agricultural sites</li> <li>d) Development within the northern element of the site would impact on existing mature trees along the boundary.</li> <li>e) I object the development on Greenbelt at the rear of my property.</li> <li>f) Development would impact on the setting and quality of Brierley Forest Park.</li> <li>g) Object on the basis of paragraphs 4.42, 4.43 and 4.44 (which indicate that the Council is committed to protecting, conserving and enhancing the natural and historic environment).</li> <li>h) Skegby is a village and we would like to keep it as one. Skegby residents do not want to lose our green land, there isn't any room for more houses or room on the roads for more cars, we would like to keep what country side we have so people can enjoy there walks and horse riding thank you.</li> </ul>	<ul style="list-style-type: none"> <li>a) The Council has consulted Nottinghamshire County Archaeology Department in relation to this response. They have stated that they have no records of a deserted medieval village on the site. But that have stated that there could be Archaeology related to the historic farmstead, as such have advised that the potential for archaeology should be highlighted, with a potential requirement for geophysical investigation, followed by field evaluation and any mitigation at planning application stage.</li> <li>b) The Council acknowledges that wildlife may be present on the site. As such, any future development proposals will need to undertake appropriate ecological surveys of the site, together with any necessary mitigation measures.</li> <li>c) The Council has allocated a number of brownfield sites within Preferred Approach Local Plan, which can accommodate approximately 1268 dwellings. But unfortunately the supply of brownfield sites has reduced, due to the successful redevelopment sites in the past and the need to provide land for business / jobs growth. As a result, the Council has had to make the difficult decision to propose the allocation of sites within the countryside to meet the District's future housing needs, as required by national planning policy.</li> <li>d) The Council acknowledges this comment and will ensure any mature trees are appropriately protected and incorporated into any future development proposal.</li> <li>e) The Brand Lane site does not lie within Green Belt. There is no Green Belt around Sutton or Stanton Hill.</li> </ul>
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	<p>f) The proposed development site is within close proximity of Brierley Forest Park, but the Council does not believe development on the site would directly impact on the quality of this space. It acknowledges that the loss of countryside may have an impact on the wider setting of the Park, but the Council has had to take the difficult decision to allocate deliverable sites within the countryside in order to provide sufficient sites to meet the District's future housing needs.</p> <p>g) Objection noted. The Council is committed to protecting and enhancing the natural and built environment. The Council is required by national planning policy to deliver the objectively assessed housing needs of the District. Unfortunately there are not enough brownfield sites available to meet the housing needs of the District. This has resulted in the need to allocate greenfield sites on land which is currently designated Countryside. The Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity and designated and non-designated heritage assets. Where development is proposed, the Council will always seek to protect and enhance the environment in this respect.</p> <p>h) See response to g above.</p>
<u>Highways</u>	

<ul style="list-style-type: none"> <li>a) Brand Lane is extremely narrow &amp; often down to one lane due to parked vehicles. Alternative parking arrangements are needed.</li> <li>b) It is also used to access Brierley Park by dog walkers &amp; horse riders, which will become more dangerous.</li> <li>c) Fackley Way will receive more traffic. It was not designed for this.</li> <li>d) The junction at the bottom end of Fackley Way (on to Fackley Road) needs improving as it is dangerous. The bus company has removed its service due to this.</li> <li>e) Access should be taken from Frackley Road, which would impact on existing residents.</li> <li>f) Development is likely to cause significant congestion at Brand Lane, High Street, Stoneyford Road &amp; New Lane.</li> <li>g) Proposals would increase congestion at Mansfield Road.</li> <li>h) Road conditions in Sutton and Stanton Hill are in a poor state of repair due to excessive traffic.</li> </ul>	<ul style="list-style-type: none"> <li>a) The Council acknowledges that Brand Lane requires enhancement to bring it up to the standards required by the County Council. The Council has worked with the County Council when proposing the Brand Lane site and they have advised that such works are feasible. Alternative parking facilities for existing residents may need to form part of these works.</li> <li>b) As part of any future highway improvement works, appropriate footpaths will need to be provided. Access to Brierley Forest Park will need to be considered when designing these enhancements.</li> <li>c) In consultation with the County Council Highways Department, vehicular access to the site will be taken from Brand Lane. Whilst the Council cannot guarantee the people will not drive along Fackley Way, Brand Lane will be the primary route used.</li> <li>d) The Council acknowledges that the Fackley Way / Fackley Road junction may need enhancement as part of any future development. The Council will consult with the County Council on this issue.</li> <li>e) Access to the site will be taken from Brand Lane, not Fackley Way.</li> <li>f) If development on the site goes ahead, there will be a need for the future developer to undertake appropriate highway improvement works in consultation with the County Council Highways Department. The Council has also commissioned a new Transport Assessment which will highlight the key improvement that may be required as a result of the sites proposed in the Preferred Approach Local Plan.</li> </ul>
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	<p>g) See response to f).</p> <p>h) This issue would be dealt with by the Highway Authority as part of their road maintenance programme.</p>
<u>Infrastructure</u>	
<p>a) What will be done about school and health provision? They are already over subscribed.</p> <p>b) There is a lack of public transport in the area.</p> <p>c) Potential for flooding due to the gradient of land.</p> <p>d) The northern part of the sites is of an insufficient size to accommodate appropriate drainage.</p> <p>e) Concern raised that local infrastructure will not be able to support the development.</p> <p>f) Most areas of health are significantly worse than England average.</p>	<p>a) The Council has worked closely with the Clinical Commissioning Groups and the County Council Education Department to understand the future health and education requirements resulting from the sites proposed, which will eventually feed into an Infrastructure Delivery Plan. This work will then be used to help negotiate developer contributions for the health and education infrastructure needed.</p> <p>b) The Trent Barton 141 bus service has an hourly service routed through Stanton Hill (Stoneyford Road) during the day, providing access to Sutton, Mansfield and Nottingham.</p> <p>c) Any future planning application will require a flood risk assessment that will identify the measures required to address any flood risk on the site. Any future development on the site is likely to need to install a Sustainable urban drainage system that holds and manages surface water on the site. These systems are designed to reduce the potential for surface water flooding with the developer. This in turn may also provide</p>

	<p>benefit to adjacent dwelling who may suffer from surface water flooding derived from the surrounding land.</p> <p>d) As detailed above, any future development will need to manage surface water drainage on site where necessary. Systems used to do this vary from open swales and ponds, to tanks under roads. Whilst the designed design needs to be undertaken, the Council is of the view that a solution could be designed into any future scheme.</p> <p>e) The Council has worked with infrastructure providers to identify requirements associated with the site. Details are included in the Infrastructure Delivery Plan.</p> <p>f) Comment noted.</p>
<b>Comment</b>	
<p>a) When I purchased by property I was informed the adjacent fields had a covenant restricting building.</p> <p>b) Consultation has been tampered by site notices being removed.</p> <p>c) Believe other sites proposed are more suitable for housing development.</p> <p>d) GCSE attainment levels</p>	<p>a. The landowners have indicated to the Council that the site is available for development. The Council is not aware of any covenants restricting building on the site.</p> <p>b. The Council has used cable ties to try and ensure notices could not be removed, but is unable to stop people who may wish to remove the notices. The Council attempted to provide notices in a range of locations and responded to requests for more notices during the consultation period.</p> <p>c. In order to help meet the future housing needs of the District, the District will requires all the site proposed within the Preferred Approach Local Plan. A key test performed by the Planning Inspector will be the deliverability of the site proposed. The Council believes all the sites proposed are deliverable. Unfortunately in</p>

	order to provide the sufficient number of deliverable sites, the Council has had to take the difficult decision of proposed sites currently in the countryside as the District has in insufficient supply of appropriate brownfield sites to meet the housing need.
This proposed allocation is on the perimeter of the urban area of Stanton Hill, therefore any proposals should take into account the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone MI 20 Kirkby Plateau.	Comment acknowledged.
<b>Responses received relating to Policy supporting text</b>	
N/A	

### Proposed Amendments

Issue/Policy	Amendment
A development brief will be created for the site providing broad principles and site specific considerations that will need to be taken into account by future development.	<p>As a result of comments received, the Council proposes to ensure the development brief for Brand Lane will include information related to:</p> <p><u>Highways</u>  Access to the site must be taken from Brand Lane.  In consultation with the County Council Highways Department, the developer must enhance Brand Lane to adoptable standards and create a safe route Brierley Forest Park for a range of users.  Consideration must be given to providing safe car parking for the terraced properties on Brand Lane to ensure suitable</p>

	<p>highway standards are achieved. In consultation with the County Council Highways Department, highway enhancements may be sought via s106 agreement to help mitigate the impact of the development on the wider highway network.</p> <p><u>Archaeology</u> Developers must undertake a geophysical investigation, field evaluation and propose any appropriate mitigation measures in consultation with the Nottinghamshire County Archaeology Department.</p> <p><u>Residential Amenity</u> Development proposals must ensure they align with the Council's minimum privacy distances outlined within the Residential Design SPD.</p>
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<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Nottinghamshire County Council	2803			√	M Stokes	6651	√		
M. Thorne, Sutton Heritage Society	3888	√			T Stokes	6652	√		
L. Henstock	6043			√	S Donnelly	6653	√		
D Williams	6546	√			A Jones	6654	√		
A. Warren	6554	√			R Jefferies	6707	√		
Mrs Froggatt	6559	√			D Hall	6716	√		



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A & J Litchfield	6593	√			P Toplis	6717	√		
J Murphy	6578	√			R Toplis	6718	√		
Mr & Mrs Place	6600	√			R. Doncaster	6555	√		
V Parker	6602	√			E. Hurst	6565	√		

### **SKA3p Site: South of West Notts College**

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Site Allocation</b>	
<b>Support</b>	
County Property supports the proposals of the Local Plan which relate to land allocations for housing on County owned land.	The Council welcomes and acknowledges this comment.
<b>Object</b>	
<b>Natural Environment</b>	
Please stop churning up all our green fields.	Where ever possible, the Council has allocated brownfield sites within Preferred Approach Local Plan. The allocated brownfield sites can accommodate approximately 1,268 dwellings. A very small number of brownfield sites have been rejected due to severe constraints e.g. the majority are located in high flood risk areas (flood zones 2 or 3). The supply of brownfield sites has reduced, due to the successful redevelopment sites in the

	recent past for housing and to meet the need to provide land for business / jobs growth. In order to help meet the future housing needs of the District, the Council has no option but to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites deemed deliverable and sustainable, as required by national planning policy.
<b>Infrastructure</b>	
Our roads, our doctors and schools cannot cope with more development in this area.	In developing the Local Plan the Council has worked closely with Education Department at the County Council, the Clinical Commissioning Groups and other infrastructure providers to understand and plan for the infrastructure needed to support the development proposed in the Plan. This information will be compiled in the revised Infrastructure Delivery Plan, which will be used to help negotiate s106 agreements with future developers to help secure funds to deliver the infrastructure needed.
<b>Comment</b>	
<p>I appreciate the need for new housing and see the logic of putting housing on the Cauldwell Road/Nottingham Road location IF the Mansfield Lindhurst development goes ahead.</p> <p>The residents would be far from the necessary services and facilities of the Ashfield urban centres so would have to rely on those of Mansfield. It would also add to the congestion on the roads at that very busy intersection of the A60 and A617.</p> <p>It would also spoil the rural character of the area between the</p>	<p>The Council acknowledges that the proposed site creates a logical extension to the Lindhurst development in Mansfield. Within the draft Trajectory, the Council does not anticipate the site coming forward until 2019, building out over approximately 6 years.</p> <p>Given the site's proximity to Mansfield, it is likely that any future residents would utilise some services and facilities within Mansfield.</p>

MARR and Thieves' Wood, at present a distinctive boundary.	<p>In developing the Local Plan the Council has worked closely with Highways Department at the County Council to understand and plan for the highways infrastructure needed to support the development proposed in the Plan alongside new development proposals in neighbouring authorities.</p> <p>In addition to consultation with the Highways Department, the Council has commissioned an update to the Transport Study that will include an assessment of traffic impact resulting from the proposed sites and potential mitigation needed to help reduce that impact.</p> <p>The Council has had to take the difficult decision to propose the allocation of greenfield sites in order to meet the District's housing need. The Council acknowledges that the site is currently countryside, but as the Lindhurst site develops, the Council believes this character will be eroded and changed. The site south of West Notts College is well contained by existing roads, with the MARR acting as a strong physical boundary between the urban area and Thieves wood beyond.</p>
However, there are two situations where Ashfield D. C. has identified land for housing but the neighbouring authority, Mansfield Council, has not matched the allocation on that part of the land parcel which lies within its administrative area. These situations appear illogical and warrant a more co-ordinated approach.	The Council acknowledges these comments and will continue to work with Mansfield Council to help ensure comprehensive development is supported where appropriate.
This proposed allocation is on the perimeter of the urban area of Mansfield, therefore any proposals should take into account	Comments acknowledged.

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the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone SH11 Lindhurst Wooded Farmlands	
<b>Responses received relating to Policy supporting text</b>	
N/A	

**Proposed Amendments**

<b>Issue/Policy</b>	<b>Amendment</b>
None	-

**List of Respondents**

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
S Holland	2653			√	M Allen	5944		√	
Nottinghamshire County Council	2803			√	K Drew	6606	√		
D Rixson on behalf of Nottinghamshire County Council	5480		√	√					

### SKA3r Site: Davies Avenue

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Support	
N/A	-
Object	
N/A	-
Comment	
<p>Please keep the footpath between Edale Court open with the new houses. There is another by the allotments, but this does not feel safe.</p> <p>Could I please have a copy of the housing layout? We had been told previously that only bungalows would be built there.</p>	<p>At present the Local Plan only highlights the principle of developing the allocated sites. The detailed design of any future scheme will be assessed via a planning application, using the policies contained within the Local Plan and the Residential Design Supplementary Planning Document. Through this process, the Council will seek to try and ensure existing pedestrian routes are retained, to help integrate the new development into its surroundings.</p> <p>The Council is unable to specify the exact housing types that may be constructed on the site. However, it will use design policies and the assessment of local housing need, to help influence the types of homes built.</p>

<b>Responses received relating to Policy supporting text</b>	
N/A	

### Proposed Amendments

<b>Issue/Policy</b>	<b>Amendment</b>
N/A	

### List of Respondents

<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
P Smith	6525			√					

### SKA3v Site: Gillcroft St, St Andrews St & Vere Av, Skegby

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Site Allocation</b>	
<b>Support</b>	
My clients welcome and support the inclusion of their land as a housing allocation in the draft consultation document.	The Council welcomes and acknowledges the comments.

<p>The land benefits from outline planning consent for up to 230 dwellings and is currently the subject of an application for reserved matters approval.</p>	
<p><b>Object</b></p>	
<p><u>Natural Environment</u></p>	
<p>a) I have concerns about the abolition of many of our open spaces in our area - Open spaces that will never be returned and when so many other areas of our town are in desperate need for renovation / investment or preferably demolition.</p> <p>Too many times do Ashfield District council bulldoze plans through without a good strategic review of the town. This must stop.</p> <p>b) Objections raised in relation to 4.42, 4.43 and 4.44 of the Local Plan (which sets out that the Council is committed to protecting, conserving and enhancing the natural environment.</p>	<p>a) The Council has allocated a number of brownfield sites within Preferred Approach Local Plan, which can accommodate approximately 1268 dwellings. A very small number of brownfield sites have been rejected due to severe constraints e.g. the majority are located in high flood risk areas (flood zones 2 or 3). Unfortunately the supply of brownfield sites has reduced, due to the successful redevelopment of sites in the recent past and the need to provide land for business / jobs growth. In order to help meet the future housing needs of the District, the Council has had to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites deemed deliverable and sustainable, as required by national planning policy.</p> <p>b) Objection noted. The Council is committed to protecting and enhancing the natural and built environment. The Local Plan contains policies which seek to protect and enhance biodiversity and geodiversity and designated and non-designated heritage assets. Where development is proposed, the Council will always seek to protect and enhance the environment in this respect. The Council is required by national planning policy to deliver the objectively assessed housing needs of the District. As set out previously, unfortunately there are not enough brownfield sites</p>

	<p>available to meet the housing needs of the District.</p> <p>The Council did not support the planning application for the sites at Vere Avenue, St Andrews Street and Vere Avenue. Planning permission was granted via a planning appeal.</p>
<u>Highways &amp; Access</u>	
No to building on this area due to traffic pressures locally and across our town centre. (in part due to building of large leisure centres, large superstores and pedestrianising other through routes)	<p>In developing the Local Plan the Council has worked closely with the Highways Department at the County Council to understand and plan for the highways infrastructure needed to support the development proposed in the Plan, alongside new development proposals in neighbouring authorities. This information will be used to help negotiate s106 agreements with future developers, to help secure funds to deliver the infrastructure needed.</p> <p>In addition to consultation with the Highways Department, the Council has commissioned an update to the Transport Study that will include an assessment of traffic impact resulting from the proposed sites and potential mitigation needed to help reduce that impact.</p>
Road conditions in Sutton/Stanton Hill are in a poor state of repair due to excessive traffic.	This issue would be dealt with by the Highway Authority as part of their road maintenance programme.
<u>Infrastructure</u>	
No to building on this area due to pressures on services, GPs, Schools and policing	In developing the Local Plan the Council has worked closely with Education Department at the County Council, the Clinical Commissioning Groups and other infrastructure providers to



<p>I strongly object to the need for new housing in an overcrowded, deprived area. Firstly investment should come in existing infrastructure and a proven policy of good maintenance and upkeep of our area should be delivered FIRST before further developments.</p> <p>Local infrastructure would not be able to support this development.</p>	<p>understand and plan for the infrastructure needed to support the development proposed in the Plan. This has resulted in an update of the Infrastructure Delivery Plan to support the Local Plan.</p> <p>Unfortunately due to national spending cuts, public funding for new infrastructure has reduced considerable. As such, infrastructure providers are increasingly trying to secure funding from new developments to help deliver the infrastructure needed.</p>
<p>Object due to documented mining issue.</p>	<p>The Coal Authority has informed the Council that coal mining issues associated with the site would not restrict development as there are opportunities for mitigation.</p>
<p>With regard to health, most areas in Ashfield are significantly worse than the English average.</p>	<p>Comment noted.</p>
<p>Ashfield has lower GCSE achievement than the national average.</p>	<p>Comment noted.</p>
<p><b>Comment</b></p>	
<p>If the UK has a need for houses then build them in Alfreton - It is close and there are many, many undeveloped open spaces. Do not destroy these rare spaces in Ashfield forever.</p>	<p>National planning policy requires local planning authorities to understand the housing needs across the Housing Market Area in which they lie. Once established, the planning authorities within this Housing Market Area must seek to accommodate this need in full.</p> <p>Ashfield shares a Housing Market Area with Mansfield and</p>

	Newark & Sherwood, with each area having a housing target that collective will seek to meet the needs of the whole Housing Market Area. All 3 authorities believes it has sufficient land to accommodate their housing needs. As such, we do not have to ask neighbouring authorities such as Amber valley to accommodate any of our housing need.
Anyhow, I wanted to research the proposed development on Vere Avenue via your local plan map I could not cross reference it to a SHLAA code referenced in your appendixes nor could I find a reference to Vere Avenue.	The SHLAA reference for the Vere Avenue site and its reference in the Preferred Approach Local Plan are different. The Local Plan reference is SKA3v.
<u>Responses received relating to Policy supporting text</u>	
N/A	

### Proposed Amendments

Issue/Policy	Amendment
N/A	

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
IBA Planning on behalf of land owners	5495		√		A. Warren	6554	√		
A Keeling	6632	√			R. Doncaster	6555	√		
E. Hurst	6565	√			A. J. Knowles	3758	√		

## SKA3y Site: Pleasley Road, Skegby

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Support	
<p>My clients welcome and support the inclusion of their land as a housing allocation in the draft consultation document.</p> <p>The land benefits from outline planning consent for residential development and is therefore suitable and immediately available for housing development.</p>	<p>The Council welcomes and acknowledges these comments.</p>
Object	
<p>Skegby is a village and we would like to keep it as one. Skegby residents do not want to lose our green land. There isn't any room for more houses or room on the roads for more cars, we would like to keep what country side we have so people can enjoy there walks and horse riding thank you.</p> <p>The fields in question offer valuable wildlife habitat and feeding area for a number of species in the area including owls, bats, bees, butterflies, frogs and toads, and many species of birds.</p> <p>Development of this site would bring more traffic to the already very busy Mansfield Road and Beck Lane respectively, without</p>	<p>Unfortunately the supply of brownfield sites has reduced, due to the successful redevelopment sites in the recent past and the need to provide land for business / jobs growth. In order to help meet the future housing needs of the District, the Council has had to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites deemed deliverable and sustainable, as required by national planning policy.</p> <p><b>This site already has planning permission for residential development, via a planning appeal. Therefore a number of the concerns raised should have been appropriately</b></p>

<p>new junctions and more cars in the area.</p> <p>Our property is a listed building, just yards away from the proposed sites.</p> <p>Whilst I am aware of the need for more housing, I do strongly feel that there are other sites within the Ashfield area, such as former factory sites which would be more appropriate for such development.</p>	<p><b>assessed and considered by the Planning Inspector.</b></p>
<b>Comment</b>	
N/A	

### Proposed Amendments

<b>Issue/Policy</b>	<b>Amendment</b>
N/A	

### List of Respondents

<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
IBA Planning on behalf of P Bluff	2646		√		E. Hurst	6565	√		
R Williams	6698	√							

### SKA3ac: Site: rear of 249 Alferton Road, Sutton

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Site Allocation</b>	
<b>Support</b>	
<p>My clients welcome and support the inclusion of their land as a housing allocation. The land has recently been marketed for disposal with the benefit of the outline consent and the landowners will shortly be in a position to agree to its disposal.</p> <p>The Council can therefore regard the site as being suitable and immediately available for housing development.</p>	<p>The Council welcomes the comments received on behalf of the land owners, who are committed to promoting the site for residential development.</p>
<b>Object</b>	
<u>General</u>	
<p>The redline boundary for the housing consent associated with SKA3ac does not include the land associated with 249 Alferton Rd. This is incorrect.</p>	<p>The Council acknowledge this comment and apologise for the drawing error. The site boundary will be redrawn to reflect the planning permission.</p>
<p>A robust assessment against adjacent properties of any proposed access needs to be considered as part of the PA to ensure that the Highways solutions are sufficient distance from dwellings so as not to adversely impact the health of the</p>	<p>The site to the rear of 249 already has outline planning permission. Any future reversed matters application will need to align with the policies / requirements of the Highways Authority and the Council's Environmental Health Department.</p>

occupants.	
Disappointment that the site has been put forward for housing.	Comment noted.
<p>Whilst it is acknowledged that affordable housing is needed, there are plenty of areas in need of regeneration/brownfield sites available which should be developed prior to greenfield sites.</p> <p>Once these areas are lost to development future generations will have lost a valuable resource and open area. It will make the area less attractive.</p>	<p>There are not enough brownfield sites available for allocation in the District. As set out in the National Planning Policy Framework, the Council is required to meet the objectively assessed housing needs of the District. Unfortunately it has been necessary to allocate greenfield sites in order to ensure that the housing needs of the District are fully met. This approach accords with national planning policy.</p>
<u>Access/Highways</u>	
The proposal would impact on a road which is already busy with heavy goods vehicles and other traffic. The road is in a very poor state of repair and this also makes it very noisy.	The Highway Authority has not raised any objections to the allocation of the site for housing.
<u>Infrastructure</u>	
<p>Will development of the site generate an improvement in local services and infrastructure e.g. doctors, schools, emergency services etc?</p> <p>What facilities does the Council propose for the young in the area to reduce anti-social behaviour?</p>	<p>In developing the Local Plan the Council has worked closely with Education Department at the County Council, the Clinical Commissioning Groups and other infrastructure providers to understand and plan for the infrastructure needed to support the development proposed in the Plan. This will lead to an update of the Infrastructure Delivery Plan to support the Local Plan. This information will be used to help negotiate s106 agreements with future developers to help secure funds to deliver the infrastructure needed. In some cases this may lead to the delivery of new infrastructure as part of the development.</p>

Comment	
Any proposals need to be developed to mitigate any negative impacts on the restored colliery open space, and to provide links into the open area.	Comment acknowledged.

### Proposed Amendments

Issue/Policy	Amendment
The site boundary has been drawn incorrectly to include 249 Alfreton Road.	The site boundary will be redrawn to match the site which has planning permission. 249 Alfreton Road, will be removed from the site.

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Nottinghamshire County Council	2803			√	C Wakelin	6058	√		
iba Planning on behalf of J & R Doncaster	6432		√		H. Brewster	5887	√		

## SKA3ah: Site: Lowmoor Road

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
<b>Support</b>	
I suggest this site would make a good site for a school.	Any future development on the site is likely to be required to contribute to education provision. This may result in new school as part of the development.
The site should include a new road that links Penny Emma Way to Newark Road via the proposed site SKA3e. I feel the Council should bring both sites forward.	Comments are noted.
<b>Object</b>	
<u>Site Constraints</u>	
Parts of the site was an old land fill, other parts consists of local springs.	The Council acknowledges that the site contains an old landfill site and requires works to manage water. These issues would need to be appropriately mitigated and designed into any future scheme prior to any development taking place on the site. The Council's Environmental Health Department and County Council will be involved in ensuring the measures proposed are satisfactory and effective.
Stop this urban sprawl and return the land back to green belt.	The Council has allocated a number of brownfield sites within Preferred Approach Local Plan, which can accommodate



	<p>approximately 1268 dwellings. But unfortunately the supply of brownfield sites has reduced, due to the successful redevelopment sites in the past and the need to provide land for business / jobs growth. As a result, the Council has had to make the difficult decision to propose the allocation of sites within the countryside to meet the District's future housing needs, as required by national planning policy.</p> <p>The site is not located within the Nottingham-Derby Green Belt, but is currently designated as 'Countryside' under the 2002 Local Plan policy EV2.</p>
<p>There is no requirement for the housing development proposed the houses will not be affordable and should be built in the more affluent south of Ashfield. This is a tick box exercise imposed by Government. The lack of jobs means that residents will be commuting to and from work in counties that have invested in jobs.</p>	<p>As is required by national planning policy the Local Plan is based on evidence, which identifies the objectively assess housing needs of Ashfield (The Strategic Housing Market Assessment) as well as the land anticipated to be required in relation to jobs (Employment Land Forecasting Study). It is widely recognised that not enough houses are being built and the Council has identified sites which it considers are the best sites to meet the identified need. Houses have been identified within the areas of Hucknall, Sutton/Kirkby and The Rurals (Selston, Jacksdale, Bagthorpe and Underwood) based on the evidence from the SHMA. In relation to jobs, forecasts anticipate that Ashfield will see one of the highest level of job growth in Nottinghamshire.</p>
<u>Natural Environment</u>	
<p>Currently the land is used to grow needed crops to feed the UK population.</p>	<p>While it is acknowledged that the countryside is important for agriculture, the Council has to make difficult decisions in</p>

<p>The proposal will result in the loss of beautiful green field and utilise the last piece of open land between Sutton and Kirkby</p>	<p>balancing the needs for housing against the environment/agriculture. Some of the proposed development sites will result in a loss of countryside/Green Belt. The Council's analysis (through the SHLAA) identified that there are insufficient brownfield site (including derelict sites) available to meet the District's housing needs to 2032 and therefore homes will need to be built on greenfield sites which by necessity will include agricultural land.</p> <p>Whilst the Council acknowledges the different settlements that comprise the District's large urban areas of Sutton and Kirkby, as these area have grown and development they have in some cases physically merged, creating the wider conurbation. This is acknowledged with the Settlement Hierarchy in the Local Plan. In order to help meet the future housing needs of the District, the Council has selected sites it believes to be deliverable and sustainable, as required by national planning policy.</p>
<p><u>Economic</u></p>	
<p>Before building more houses Ashfield need to attract businesses to the area to provide employment to the un-employed.</p> <p>Employers need to be coax into the area, otherwise these estates will either be populated with commuters and the roads will need to the widen, and/or there will be a large number unemployed.</p> <p>In either case the envisaged rejuvenation of either town centre may not bear fruit, as it may be simply a task of jumping on a</p>	<p>The Preferred Approach Local Plan must provide sufficient land for the future employment and housing needs of the District. In order to support employment growth, new homes are needed, and vice versa. The District has a number of employment sites, with a range of successful businesses, from small local enterprises to multi-national businesses. The Council continues to support the growth of these existing businesses and encourage new businesses into the area.</p> <p>The Council jointly commissioned the Employment Land Forecasting Study with other authorities within Nottinghamshire,</p>

<p>train to be entertained in Nottingham, and those with car driving to the supermarkets for their groceries.</p>	<p>the outcomes of which projected that Ashfield will receive one of highest levels of job growth in the County over the next 15 years.</p> <p>Whilst the Council believes the job growth forecast for the District are very positive and wants to enhance opportunities for residents, the Council also accepts that an element of the District's population will commute out of the District for work and elements of leisure. However, the Council believes it has a number of positive assets it hopes will continue to attract businesses to the District.</p> <p>The Council believes it is important to continue to support and enhance the District's town centre to provide a range of local services and facilities. However, as a regional centre, Nottingham will always have a larger retail and leisure offer that the District's residents will make use of.</p>
<p><u>EU Referendum</u></p>	
<p>The Referendum in June could mean the reduced amount of housing needed in the Ashfield area and Britain. - Ashfield Council's Planning dept need to defer any decisions until after this referendum has taken place.</p>	<p>Ashfield's housing need is based on a number of factors including population growth, an aging population, change in household formations, backlog of need/concealed households (e.g. those who have been unable to buy a home due to the recession), and migration. The majority of migration is 'internal' from within the East Midlands. Of the total population change in Ashfield between 2001 to 2013, 5% (less than 45 people per annum) could be attributed to international migration, equivalent to 0.4% of the total district population.</p> <p>It is imperative to get a Local Plan in place as soon as</p>

	<p>practically possible. The Council is required by national planning policy to deliver development to meet its housing needs for the next 15 years. Where Councils have not delivered a Local Plan by 2017, the Government has indicated that they will step in and produce a Local Plan.</p> <p>It is anticipated that Local Plans, whilst planning for the longer term, will be reviewed every 5 years and will take account of any changes in respect of delivery performance and housing need among other issues.</p>
<u>Water/Drainage</u>	
<ul style="list-style-type: none"> <li>• Building on the current countryside will only increase the already major problems with flooding in the local community.</li> <li>• Concern regarding the flooding of the field to the rear of Western Close at Sutton Junction. Any increase in housing would create more runoff and increase the risk of flooding on the estate, as the water will go into the River Maun it also has the potential to effect the Mowland Close Estate.</li> <li>• Kirkby Folly Road/ Lowmoor Road near the station is well known to be at flood risk from surface water. Building in this area places additional risk flooding to houses from run-off. It will also result in higher insurance premiums or refusal of flood cover.</li> </ul>	<p>The Council recognises that the areas of the existing residential estate suffered from surface water flooding issues.</p> <p>A flood risk assessment would need to be undertaken for any site over 1 hectare as part of the planning application process.</p> <p>Any future development on the site will be expected to install a Sustainable Urban Drainage system (SUDs) to manage any surface water drainage issues currently present on site and those generated through new development. Systems used to do this vary from open swales and ponds, to tanks under roads. The installation of such a system is likely to help resolve the existing flooding issues derived from run off from the site. This system is likely to either incorporate the existing ditch on the Newark Road site or replace it. Exact details of a future scheme are not know at this stage. This will form part of a planning application. Any Site Specific Flood Risk Assessment application will be subject to review by the Lead Local Flood</p>

	Authority.
<b>Infrastructure &amp; Highways</b>	
<ul style="list-style-type: none"> <li>• Lack of Schools places including secondary schools, increased pressure on Health care/Doctors/Hospitals.</li> <li>• Currently the area has major traffic issues with cars using the roads around this area as shortcuts for the over used A38.</li> <li>• Issues with traffic related to the Sutton Junction Level Crossing. At least 4 times per hour the barriers are closed for an excessively long time. This already causes delays. The roads are used as an alternative route into Mansfield rather than the A38. Additional housing will make these problems worse.</li> <li>• Shopping facilities are not immediately accessible.</li> <li>• Sports or entertainment establishments are not immediately accessible</li> </ul>	<p>The Council acknowledges that there is increased pressure on a range of infrastructure. These pressures are not isolated to Ashfield, and are influenced by national Government.</p> <p>In developing the Local Plan the Council has worked closely with Education and Highways Departments at the County Council, the Clinical Commissioning Groups and infrastructure providers to understand and plan for the infrastructure needed to support the development proposed in the Plan. This information will be used to help negotiate s106 agreements with future developers, to help secure funds to deliver the infrastructure needed. In some cases this may lead to the delivery of new infrastructure as part of the development.</p> <p>In addition to consultation with the Highways Department, the Council has commissioned a Transport Study that will include an assessment of traffic impact resulting from the proposed sites and potential mitigation needed to help reduce that impact.</p> <p>The Council believes the Sutton Parkway station is a great public transport asset for the surrounding area, enabling residents and businesses to link with the wider county and beyond.</p> <p>National planning policy highlights that retail and leisure uses should be focused within town centres. The Council supports</p>

	<p>this approach and is continuing to try and enhance the District's town centres. Where appropriate the Council will support the development of single shops or small shopping parades in residential areas, but these must not compete directly with the town centres. The Trent Barton three service enable residents in the Coxmoor Road area to access services in Sutton, Kirkby, Hucknall, Mansfield and Nottingham.</p>
<b>Comment</b>	
<p>A corridor should be safeguarded through the site for a prospective Kirkby North eastern by-pass from Penny Emma Way East to the A611 at Derby Road.</p>	<p>The Council acknowledges this comment.</p>
<p>The proposed development destroys the separation of the two settlements in this area. The council is being inconsistent in its policies by proposing this development since elsewhere in the assessment process parcels of land have been rejected due to their impact of connecting two separate settlements, including land on Penny Emma Way.</p>	<p>There are areas within the District where an emphasis has been placed on retaining important green breaks between existing settlements. This approach has been supported by Inspectors at planning appeals.</p> <p>Whilst the Council recognises and identifies individual settlements that collectively create the area of Sutton and Kirkby, overtime a number of these smaller settlements have physically merged, creating the large urban area it is today. Whilst the Council believes there is policy justification for supporting green breaks, such as between Sutton and Stanton Hill; where this break has been considerably eroded, such as between Sutton &amp; Kirkby, it does not believe there is such justification. In addition, in selecting sites the Council needs to balance economic, social and environmental factors, with the need to allocated deliverable sites. These different considerations and issues can often conflict with one another, resulting in decisions and proposals that may not gain universal</p>

	support.
<p>The assessment of the site K23 in the Land Availability Assessment states the impact on views as being significant and that the strategy for the landscape natural features as being to conserve and create. For K33 the assessment is that it is a 'prominent' site and the landscape strategy is to conserve and create. Under these circumstances it is difficult to see why development of either site has been considered appropriate.</p>	<p>It is acknowledged that development will have an adverse effect on the landscape. The Council's landscape architects have undertaken an assessment of the site and have identified appropriate mitigation which would be addressed in more detail as part of any future planning application. Any future proposal will need to comply with planning policies contained within the Local Plan which are aimed at preventing any adverse effect on residential amenity of properties on the site boundary</p>
<p>Again the council appear to consider that historic field boundaries and land availability are a good basis for allocation of land use for housing. I disagree. Part of the site could be developed along Lowmoor Road from points opposite Maun View Gardens to Julias Way, leaving a green break on the part of the site which is most sensitive from a landscape point of view. This might allow for around 250 houses, half of current plans.</p> <p>The back (south) of the site could also be more sensitively developed by excluding from the allocation land which is beyond the line of Weston Close and up to the corner of the Industrial estate. In such a case the development could be described better as an infill and not extending the urban boundary to the south, and would exclude at least some of the highest ground. This would have a potential yield of around 450 houses compared to the current plan of 495.</p>	<p>The Council acknowledges this comments. The proposed development site reflects land ownership. Whilst the whole site has been indicated as appropriate / deliverable for development, if taken forward, the Council will seek to a future design acknowledges its setting and includes appropriate landscaping. This could lead to a green break / buffer being created.</p> <p>National planning policy requires the Council to consider potential viability issues related to a development. Whilst the Council believes the site is a sustainable and deliverable site, it acknowledges that there are on-site constraints and infrastructure requirements that will need to be addressed by any future development. As such, the Council is aware that there will be a need to balance the need to mitigate the landscape impacts of the development, with the viability of a future scheme. These detailed issues will be dealt with at the planning application stage.</p>

This proposed allocation is on the perimeter of the urban area of Sutton in Ashfield, therefore any proposals should take into account the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone SH11 Lindhurst Wooded Farmlands.	Comments acknowledged.
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### Proposed Amendments

Issue/Policy	Amendment
N/A	

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
S Swift	2226		√		Lewis	3058			√
D Shaw	2707			√	Matthews	4584	√		
Nottinghamshire County Council	2803			√	Allen	4952	√		
Collins J	3034	√			A Betts	4800	√		
M Bennett	3478	√			S Sum	6639	√		
C Jelonek	4669	√			K Drew	6606	√		



## SKA3ai Wheatley's Yard and Lowmoor Inn Public House

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Support	
<p>a) The landowners support the proposed site allocation SKA 3ai - Wheatley's Yard and the former Lowmoor Inn for residential development.</p> <p>b) Wheatley's Yard is currently populated by industrial buildings of variable quality and occupied by tenants with varying shorthold tenancies. The adjoining public house is vacant and derelict. The landowners are currently considering alternative use developer interest for the pub site which may potentially reduce but will not prejudice the potential for residential development for the greater part of the site.</p> <p>c) The site is currently recorded as being deliverable beyond 5 years, yet this should not prevent the site coming forward earlier as tenancies expire or are mutually terminated.</p> <p>d) The site benefits from three existing access points along the Lowmoor Road site frontage. Two of these previously served the public house and are currently security blocked. The other frontage access serves the autocentre, the PFA and Tesco Express (outside the site allocation boundary) and all the businesses currently operating out of Wheatley's Yard. The</p>	<p>a) The Council welcomes the support for the allocation of the site.</p> <p>b) Comments noted. The Council is required by national policy to only take forward deliverable sites. If evidence comes to light that the site is no longer available it will be removed from the allocation.</p> <p>c) Comments noted. No amendments proposed as existing businesses will need time to relocate and five years is considered to be a reasonable period for commencement of development given any potential contamination constraints which will need to be addressed.</p> <p>d) Comments noted. The assessment acknowledges that there are no significant access constraints.</p>

<p>northern site boundary has a significant road frontage to Pavilion Road which is capable of serving a residential development of the whole, or indeed part, of the site should independently accessed 'commercial' uses be pursued for the Lowmoor Road site frontage.</p> <p>e) The Technical Paper supporting the housing site selection indicates that redevelopment of this employment site could result in a loss of employment with consequent impacts on the local economy. In this respect, I would advise that the current levels of employment across the site are relatively low and a number of the buildings are coming towards the end of their useful life. We are not aware of any shortfall of employment land availability of all types across the District and the current proposal for a housing allocation reflects the Council's view that a residential redevelopment is the preferred regeneration use of this site in view of the immediate proximity of residential properties to the north and south and a public sports facility to the east.</p> <p>f) The presence and aspect of retail warehousing across Lowmoor Road to the west does not restrict potential residential development but may influence the nature of uses on the Lowmoor Road site frontage.</p> <p>g) The Housing Technical Paper also references the potential for site contamination and surface water flood risk. These are acknowledged and the landowners are to undertake site investigation to establish the extent of any potential contamination and mitigation requirements. An FRA will be</p>	<p>e) Comments noted. The Council will seek to ensure that housing development would not result in a loss of employment by working with businesses on the site where necessary.</p> <p>f) Comment noted.</p> <p>g) Comments noted. The Council welcomes this proactive approach.</p>
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<p>required in due course yet surface water management would be integral to any housing scheme and is not a constraint to development.</p> <p>h) As local plan paragraph 6.71 states, this site is part of a key gateway route into Kirkby and its redevelopment will significantly improve this approach into the town as well as providing accessible and affordable housing on a previously developed site.</p> <p>i) The landowners support the proposal for a housing allocation across the site (subject to consideration of the Lowmoor Road frontage) and can actively deliver the site for development.</p>	<p>h) The Council agrees with this comment.</p> <p>i) The Council welcomes this support.</p>
<b>Object</b>	
This is a former landfill site which is subject to flooding.	These are issues which can be satisfactorily mitigated.

### Proposed Amendments

Issue/Policy	Amendment/Development Brief Requirement
N/A	

### List of Respondents

Respondent	Database	Object to	Support the	Comment on the	Respondent	Database	Object to the	Support	Comment on the
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	Number	the Policy	Policy	Policy		Number	Policy	the Policy	Policy
Collins J	3034	√			M. Downes, Asbury Planning on behalf of The Wheatley Group	6638		√	

### SKA3al: Site: Mowlands, Kirkby

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Object	
<u>Highways &amp; Access</u>	
The Housing Site Selection Technical Paper refers to the new road proposed by the developer – are you assuming that this will be built, despite the reservations expressed by the Highway Authority and Historic England?	<p>Whilst it is acknowledged that there have been issues with the proposed access arrangements submitted as part of the planning application which proposes a much larger development, the statement in the Site Selection Paper refers to the principle of a potential access linking Sutton road with the A38. The Highways Authority have indicated that access constraints could be overcome.</p> <p>Reference to landowners/developers in the HSSP and para 6.74 of the Plan has originated from requests for site information in respect of the SHLAA exercise as the Council</p>

	<p>needs to demonstrate that sites are deliverable at that stage.</p> <p><b>Amend text in HSSP and para 6.74 of the preferred Approach as detailed below.</b></p>
Local plan allocations do not indicate access arrangements but it would be irresponsible of the Council to allocate a large development site which could not be accessed in an appropriate manner.	In developing the Local Plan the Council has worked closely with Highways Department at the County Council to understand and plan for the highways infrastructure needed to support the development proposed in the Plan.
Our entire road Infrastructure in all directions in and out of Kirkby will need addressing not just Kirkby Cross area, which is close to the recommended capacity of traffic. Your plan proposes another road from the A38 causing further congestion.	<p>Indicative potential access points have been established for all sites in the Plan and will be set out in site briefs for the larger housing sites at the Publication stage of the Local Plan.</p> <p>In addition to consultation with the Highways Department, the Council has commissioned an update to the Transport Study that will include an assessment of traffic impact resulting from the proposed sites and potential mitigation needed to help reduce that impact.</p> <p>Negotiations with developers in respect of section 106 contributions towards the highway infrastructure are undertaken at the planning application stage. This will be informed by planning policy and the Infrastructure Delivery Plan in order to achieve a sustainable development, with appropriate levels of supporting infrastructure.</p>
A road from the A38 to Kirkby Cross would create a convenient and direct route that would allow traffic to flow directly from the heavily trafficked A38 along Chapel Street and Victoria Road and through the already congested Kirkby town centre (and vice versa). This would be a natural vehicular	<p>See Above.</p> <p>Any new route will need to be approved by the Highway authority at the planning application stage.</p>

<p>desire line, avoiding congestion at the busy A38-Sutton Road junction. It is far preferable that such traffic stays on the A38 and MARR road, which were built to relieve built-up areas of through traffic. The developer's proposed road through the Mowlands site would work in reverse – it would relieve the through road and divert traffic through the built-up area. This would be a nonsense.</p>	<p>Additional routes will offer more choice with the result of dispersing traffic and helping to relieve some areas of congestion.</p> <p>There is no evidence to support the assumption that vehicles will choose to drive via Kirkby Town Centre, if a future development create a link from the A38 to Sutton Road. The Transport Study will highlight potential increases in traffic flow and potential mitigation linked to the proposed housing sites. At a future planning application stage, more detailed assessments will be undertaken.</p>
<p>Notwithstanding the statement in the Council's SA that "considerable highway constraints and issues have been raised by the Highway Authority", the Council's HSSTP states that "the Council believes that the highway constraints could be mitigated". There is no evidence to support this claim. At the public meeting Council Officers stated that a highway study was being carried out and the results are awaited. Therefore, such a claim is clearly premature and should be withdrawn. The allocation should not have been made in the absence of full knowledge of the traffic implications.</p>	<p>The Council has worked closely with Highways Department at the County Council. As a result only those sites where access can be achieved have been proposed in the Plan.</p> <p>The role of the Transport Study is to identify the impact of the proposed sites alongside potential mitigation measures needed to help reduce that impact.</p> <p>This study, together with consultation with the County Council's Highways Department, will inform the design of any future development at the planning application stage and s106 negotiations related to wider highways infrastructure mitigation.</p>
<p>Pedestrian safety on Church and Chapel Street has not been accounted for. Chapel Street is very narrow in places and already very dangerous.</p> <p>Chapel Street is likely to be exhausted with traffic travelling from the suggested relief road. The traffic is likely to be doing U turns along all the joining streets off Chapel Street in order</p>	<p>Pedestrian safety is integral to any new scheme. Any new proposal will need to be approved by the Highway authority at the planning application stage in this respect.</p> <p>It is anticipated that new development will offer an opportunity to improve existing pedestrian access.</p>

to turn left or right at Kirkby Cross. This will place vulnerable pedestrians from the primary school, old peoples housing and the Mencap housing at risk.	
This development does not take into account the safety of the pupils from Orchard School. Pupils will have a major road junction to cross.	
Safety - if I can't get out as Sutton Rd gridlocked how can emergency services get through, they struggle now. Increase the traffic and the top of Kirkby could be at significant risk.	As above, the detail of any future road scheme will be undertaken in consultation with the County Council during pre-application and planning application stages. Highways and pedestrian safety will be integral to any future scheme.
Pupils attending Ashfield School will still be dropped off near the Sutton Road entrance by parents on their way to work.	
<i>Site Constraints</i>	
The landscape features should be cherished and protected from development. Furthermore, they are physically unsuitable for development.	Any future development scheme will aim to protect key landscape features and integrate any areas which are unsuitable for development into the overall detailed proposal. These areas could, for example, incorporate green corridors, informal open space and water attenuation/Sustainable urban drainage schemes.
<u>Economic</u>	
The houses will not benefit Kirkby Town centre as they will be bought by commuters to reach the M1 to travel north and south to work because housing is much cheaper in this area.	<p>The latest Retail Study for Ashfield (2016) indicates that this site falls within 'Zone 2' where 71% of people currently use Kirkby town centre for convenience shopping.</p> <p>As a regional centre, Nottingham will always have a larger retail and leisure offer that the District's residents will make use of.</p>

	<p>Whilst residents may seek employment opportunities outside the District, as residents the Council believes they will still contribute and help support the local economy.</p> <p><b>No proposed amendments.</b></p>
<p>You suggest that the businesses in Kirkby town centre will benefit from the increased population, I would ask 'where are these customers going to park'? It is already nearly impossible to park with the number of cars we have now.</p>	<p>Taking into consideration Morrison's car park and on street parking there are over 550 car parking spaces available in Kirkby Town Centre. It is acknowledged that car parking opportunities in Kirkby have reduced in recent years. Capacity will continue to be monitored via the Council's Asset Management team and Town Centre Manager, and options for managing any shortfall will be investigated.</p> <p>In addition, Strategic Objective SO13 in the Plan aims to reduce the need to travel by car. It is anticipated that through the promotion of alternative methods of transport, such as improving opportunities for cycling, walking and the quality of public transport, the relative need for car parking will be reduced in the longer term.</p>
<p>There is not enough employment, paragraph 15, to support so many extra people and this site would be used as a mini commuter town.</p>	<p>The Council jointly commissioned the Employment Land Forecasting Study with other authorities within Nottinghamshire, the outcomes of which projected that Ashfield will receive one of the highest levels of job growth in the County over the next 15 years.</p> <p>Whilst the Council believes the job growth forecast for the District are very positive and wants to enhance opportunities for residents, the Council also accepts that an element of the District's population will commute out of the District for work and</p>
<p>How will this development improve the employment prospects for the people of Ashfield, it won't.</p>	
<p>Land has been identified along the A38 or industrial units. There are a number of industrial parks in Ashfield that have</p>	



quite a few for sale or to let – why then would they attract jobs when we have so many empty/unused units which are not attracting companies into the area, providing jobs, contributing to business rates etc.

elements of leisure. However, the Council believes it has a number of positive assets it hopes will continue to attract businesses to the District.

There will always be some industrial units that are empty at a single point in time as occupiers move to alternative sites or units. Nathaniel Litchfield and Partners undertook the Employment Land Forecasting (ELF) Study 2015. The Study undertook a review of employment space in the Nottingham Outer Housing Market Area (The districts of Ashfield, Mansfield and Newark and Sherwood). In relation to the stock of employment space, the Study concluded that Ashfield had an industrial vacancy space (floor area) of 1% of the total industrial stock. This was a low level of vacant space compared against a typical market average identified as 8-10%. The Study sets out that property agents identified the industrial market as being 'buoyant' which may explain the low vacancy rates. (See ELF Study, Table 3.5 Outer HMA Vacancy Rates, available on the Council's website).

In accordance with national planning practice guidance the ELF Study arrives at a conclusion on employment land requirements (office, industrial and distribution) to 2033. The Local Plan Preferred Approach 2016 reflects this level of demand and identifies sites, which are anticipated to be suitable for industrial purposes including Castlewood and West of Fulwood off the A38. Both these sites have seen significant development in terms of industrial units in the past. The location, close to the M1, means that they are anticipated to be attractive to the market over the longer term. However, demand for employment land

	and units will reflect the local and national market conditions / economy.
<u>Infrastructure</u>	
Local schools are full to capacity 900 plus homes will make this worse. We are told that a new primary school may be built, this was also promised for the new estate off Kirkby Road but as yet a new school hasn't been built. Ashfield School is also over- subscribed and does not have the capacity for extra pupils.	<p>The Council acknowledges that there is increased pressure on a range of infrastructure. These pressures are not isolated to Ashfield, and are influenced by national Government.</p> <p>In developing the Local Plan the Council has worked closely with Education Department at the County Council, the Clinical Commissioning Groups and other infrastructure providers to understand and plan for the infrastructure needed to support the development proposed in the Plan. This information is being used to update the Infrastructure Delivery Plan which supports the Local Plan, and will ultimately assist in negotiating s106 agreements with developers to help secure funds required to deliver the infrastructure needed. In some cases this may lead to the delivery of new infrastructure as part of the development.</p>
The site is not within 800m or 10 minutes walking distance of a GP. It is very difficult to get an appointment at local surgeries at the moment and we are told that there are a shortage of GPs. With 900 houses being proposed it would be very difficult to provide medical care for such a large increase in numbers.	
Kingsmill Hospital is already struggling at coping with the amount of people visiting and being looked after there, we cannot sustain another 2,500+ new people moving into this area only to use the facilities which are already at breaking point.	<p>It is anticipated that a primary school will be required as part of the development based on information provided by the Education Department. This will be incorporated into a development brief for the site at the next stage of the Local Plan.</p>
<u>Flooding/Drainage</u>	
Flooding is also a problem as water run-off from the fields gets absorbed at the min but when concrete drives and buildings	The site is not shown within an area indicated on contemporary records as susceptible to fluvial flooding from major

take that absorbency we will find water flooding onto the Sutton rd area. There is a water table underneath that area. All the chemicals that will filter down will also be detrimental.	watercourses or to pluvial (surface water) flooding, however future development may increase the risk of flooding to properties.
Elements of the site have recorded surface water flooding issues which cannot be rectified due to the level of the magnesian limestone aquifer that lies beneath and the close proximity to the water courses.	National planning guidance sets out that sustainable drainage systems, which are designed to control surface water run off close to where it falls and mimic natural drainage as closely as possible, provides opportunities to:
I know that SUDs have been suggested but with 900 properties being built, new roads, drives, and garden hard landscaping, this will causing even more water run-off and storm water issues creating more water to drain away.	<ul style="list-style-type: none"> <li>• reduce the causes and impacts of flooding;</li> <li>• remove pollutants from urban run-off at source;</li> <li>• combine water management with green space with benefits for amenity, recreation and wildlife.</li> </ul> <p>The installation of such a system is likely to help resolve any existing flooding issues derived from run off from the site, and those generated through new development. If a SuDs scheme is deemed inappropriate or unfeasible, e.g., due to site geology etc., any future development will still need to manage surface water drainage on site.</p> <p>The Lead Local Flood Authority is a statutory consultee and the Council will seek advice on planning applications on what sort of sustainable drainage system (SuDS) they would consider to be reasonable.</p>
<u>Natural Environment</u>	
Development would impact on Boar Hill and Springfield	Local Wildlife sites EV4ni and EV4nao fall outside of the site

<p>Cottage Local Wildlife Sites (EV4ni and EV4nao), Green Space EV5/165, and Bloomer Wood and The Dumbles Ancient Woodlands (EV6b and EV6k).</p> <p>The road connection to the A38 proposed by Westerman goes straight through the middle of the Green Space and Local Nature Reserve / Local Wildlife Site that your plan aims to protect.</p> <p>The magnesian limestone escarpment that forms a substantial part of the southern and western boundary of the proposed Mowlands allocation and its associated dip-slope is a major landscape feature of the local environment. The escarpment is highly prominent being visible from the surrounding area and affords panoramic views to the south and west. A stream running south-westwards from Sutton-in Ashfield has cut an attractive tree lined valley into the escarpment, known locally as The Dumbles. A series of steep undulations that fall towards the Dumbles create a highly characteristic and attractive landscape.</p> <p>The proposal would result in a massive loss of open countryside (traditionally known as The Cowpastures, the escarpment, The Dumbles) that is accessible from Cowpasture Lane and Doles Lane and by a network of public footpaths. This land provides a valuable amenity for local residents. Green spaces are needed for quality of life, providing opportunities for formal and informal recreation.</p>	<p>boundary. Bloomer Wood and The Dumbles Ancient Woodlands (EV6b and EV6k) currently fall partially within the site along the western boundary, however, it is proposed to amend the site allocation boundary to now exclude both of these. Any future development would still need to protect the Dumbles Ancient Woodland at its western boundary.</p> <p>The site includes a Local Wildlife Site (EV4nl) and an area of Protected Green Space (EV5/165) to the north, some of which may be required to achieve access only. In such a scenario, the Council believes the benefits resulting from a future development would outweigh the potential loss of part of the site for a means of access. As a result of any loss / impact, a future development would need to include appropriate mitigation to help offset this loss.</p> <p>As detailed within the introduction to the Housing Site Selection Technical Paper, due to the lack of deliverable housing sites and the need to balance other considerations, the Council has had to propose the allocation of sites on greenfield land.</p> <p>SKA3al will be subject to additional guidance in the form of a Housing Site Brief which will identify broad requirements at planning application stage. This will include minimising the potential impact on the ancient woodlands and adjacent Local Wildlife Sites.</p> <p><b>The site boundary will be refined to exclude the ancient woodland.</b></p>
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Proposal is flawed as it fails to protect natural assets (SO17), e.g. core footpath networks, wildlife habitat and corridors, ancient woodlands.	
The southern element of the site lies within the SSSI consultation zone for Kirkby Grives.	Site SKA3al lies outside the impact zone for Kirkby Grives SSSI.
<p>The importance of agricultural land for food production should not be overlooked. With rising regional and national population we need more land to grow food and we should be reducing the carbon footprint not increasing it.</p> <p>The Mowlands site is Grade 2 and there is no Grade 1 agricultural land in Ashfield. This is some of the highest quality agricultural land in the district.</p> <p>The NPPF states that where significant development of agricultural land is necessary, that “local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality” (Para 112, NPPF). This requires the local planning authority to apply a sequential test in relation to site selection.</p> <p>There clearly are realistic opportunities for development elsewhere. The Mowlands site should not have been allocated in relation to the agricultural land quality issue alone.</p> <p>Grade 2 land should not be built on when there are brown field sites and lesser grade of land that have not been considered.</p>	<p>The Local Plan evidence has utilised the available information to examine the agricultural land classifications for each site. This has been taken into account in the site selection process. In determining the most suitable sites, the Council needs to ensure that sites are capable of delivering development within the Local Plan period (the next 15 years). This has resulted in some sites with higher grade soils being taken forward.</p> <p>The Plan is orientated towards meeting the additionally identified housing, employment and social needs whilst protecting environmental assets. It is widely acknowledged that there is a need to build more houses and the objectively assessed housing need for Ashfield means that the Council has no option but to allocate land which is currently greenfield.</p> <p>Natural England has been consulted on the Local Plan and have raised no objections to any of the sites taken forward for allocation.</p> <p>The Housing Site Selection Paper sets out the process and reasons why the selected sites have been proposed in preference to any other available site.</p>

<p>Development of the proposed Mowlands site would be in direct conflict with the Preferred Approach Local Plan Policy EV11: Protection of Landscape Character, which states that proposals that have an adverse effect on distinctive landscape character areas will not be permitted.</p> <p>The Magnesian outcropping on the Mowlands site is one of only two in the whole of Europe, the other one I believe is in Poland.</p>	<p>The evidence indicates that there will be a moderate adverse impact on the landscape. The Landscape Assessments recommend that properties should be no higher than 2 storeys, this will be reflected in the Housing Development Brief as part of the Local Plan Publication stage.</p>
<p>The site is within a Minerals Safeguarding Area – Limestone.</p> <p>The escarpments composition which is Magnesian limestone is a valuable resource. In your SHLAA Ref. K79 there is even an option for prior extraction of the material before development as a mitigating measure.</p>	<p>The Nottinghamshire Submission Draft Minerals Plan contains a draft policy (Policy DM13) related to Minerals Safeguarding and Consultation Areas. The policy is focused on ensuring minerals are safeguarded against sterilisation and where non-minerals development is proposed, they are extracted prior to development taking place where practical and environmentally feasible.</p> <p>The northern area of the District, including the proposed Mowlands site, lies within the Limestone safeguarding and consultation area. In line with the draft policy, the County Council were consulted on the Preferred Approach Local Plan and raised no comments in relation to the Minerals Safeguarding Area.</p>
<p>Is there not a legal obligation to maintain/keep such public rights of way? How can this be ignored?</p>	<p>There are several statutory rights of way (ROW) crossing the site which are identified on the Definitive maps held by Nottinghamshire County Council Highways department (Bridleway 1, Footpaths 2 and 5).</p> <p>The details of a housing scheme would be addressed at</p>

	<p>planning application stage and would need to take account of these ROWs. Incorporating pedestrian and cycle links in a development is crucial in promoting alternative forms of travel and integration with the surrounding area. Policies SD1 and SD9 of the Preferred Approach Local Plan require development to create permeable and legible layouts.</p> <p>The closure or diversion of any ROW can only be achieved through a proper legal process.</p>
<u>Historic Environment</u>	
<p>The conservation area will be greatly affected by the new development, with increased traffic, removal of stonewalls and demolition of significant buildings and boundaries that forms the conservation area. The ancient monument will be at increased risk of damage from vibration and collision with the increase in traffic. Historic England have said work to road and pavements in this area would be harmful.</p>	<p>Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special attention to be paid to the desirability of preserving or enhancing the character or appearance a conservation area. The Council acknowledges that development has the potential to cause harm to the character and appearance of Kirkby Cross Conservation Area. Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 further requires the setting of listed buildings to be preserved, again, any proposals that failed to preserved the setting could be refused.</p>
<p>At the southern end, where the allocated site adjoins the Kirkby Cross Conservation Area, the proposed access road would cause significant harm to the setting of the Kirkby Cross scheduled monument and the nearby Nos.2 &amp; 6 Church Street grade II listed building. The proposed road would necessitate the demolition of the former Waggon &amp; Horses Public House, (identified as a key feature of the Kirkby Cross Conservation Area), which would constitute substantial harm to this heritage asset. The public house makes an important contribution to the setting of the scheduled Kirkby Cross. In my view, the historic building cannot fall far short of meeting the criteria for statutory</p>	<p>Any planning application would require heritage statements of significance that describe the significance of each aspect of the conservation area affected. New development in a conservation area can preserve or enhance its character and appearance subject to suitably acknowledging the heritage assets affected and avoiding harm or by applying suitable mitigation measures, especially in reducing risk to a heritage asset.</p>

<p>listing.</p> <p>The proposed road would transform the attractive, narrow, Cowpasture Lane into a major traffic artery. The proposed link road would destroy the very attractive and historic hedge-lined Cowpasture Lane that leads into the countryside, and the existing well-defined nodal point in the conservation area that forms the setting of Kirkby Cross. The historic street pattern would be drastically altered and transformed into an area dominated by a traffic light controlled road system. These are all features that contribute to the character and appearance of the conservation area.</p> <p>Section 72 of the Planning (Listed Buildings &amp; Conservation Areas) Act 1990 requires development in a conservation area to preserve or enhance its character and appearance. This duty applies to plan-making as well as decision-taking. The courts have held that “considerable importance and weight” must be given to any harm caused by a proposal.</p>	<p>In this case highway requirements and vehicular routes would be a significant consideration that could have a substantial impact on the character and appearance of the area. The demolition of buildings of architectural and historic interest potentially would not preserve the character or appearance of a conservation area.</p> <p>NPPF part 12 has a presumption against harmful development unless public benefits of a scheme can be considered to outweigh the harm. Whilst recognising the harm that may be caused, it is also necessary to acknowledge that there are opportunities to enhance the character and appearance of the Conservation Area through a suitably designed scheme. Taking into consideration the ability of the site to deliver a significant proportion of the objectively assessed housing needs of the district, the Council considers that the public benefits of delivering housing, including affordable housing, and associated infrastructure, will outweigh any potential harm.</p>
<p>The setting of Kirkby Cross, a scheduled monument and the pre-eminent feature of the conservation area would be seriously debased. The ancient Cross would be flanked by traffic lights and fronted by an enormous area of tarmac.</p>	<p>The setting of heritage assets are not fixed and may change as their surroundings evolve. An assessment of the significance of the current setting of Kirkby Cross would form part of a heritage statement for any planning application. There is potential for the setting to be enhanced as well as harmed through new development. Development that is considered harmful would not be supported but a suitably designed development could result in no harm or enhancement.</p>
<p>The proposed housing would have an extremely harmful effect</p>	<p>The site allocation does not include the setting of the</p>



on the setting of the Kirkby Cross Conservation Area and the listed St Wilfrid's Parish Church. The proposed allocation would result in the suburbanisation of the open fields that form the wider countryside setting of the conservation area. The church's attractive broach spire is an important landmark feature crowning this part of the magnesian limestone escarpment. There are fine views of the spire from public footpaths on the escarpment and the fields to the west of the conservation area. The intrusion of housing in views towards the conservation area and the listed church would be extremely harmful and has clearly not been properly considered in the Council's Technical Study or Sustainability Appraisal.	conservation area to the west or to St Wilfrid's Church. The views of the escarpment towards the conservation area and the church from the west and south-west will be a key design consideration that would need to be acknowledged and positively utilised by any future development.
The existing field pattern to the immediate west of Kirkby, which is a survival of the historic field pattern, includes attractive narrow fields enclosed by historic hedges. These fields, which form an important part of the setting of the conservation area, would be obliterated by the proposed housing development.	The majority of the site proposed is a large agricultural plot free of hedgerow boundaries. The smaller western elements of the site contains smaller / historic field patterns, containing a number of hedgerows, which the Council will seek to retain and where appropriate enhance.
There is no mention of the area where the prisoner of war camp was. This whole area needs to be investigated more thoroughly to protect our heritage before excavating and building with the heavier industrial machinery is even considered. Damage done will be irreparable.	No camp has been identified in the site allocation area when checked against the HER and Historic England records.
<u>Alternative Sites</u>	
The allocation should be extended to include additional land to	Comment noted. At this time the Council is not proposing to

<p>the south, as a minimum to include land to the south of Cow Pasture Lane and bounded by existing allotments and Titchfield Park. This area of land lies to the north of Boar Hill and relates directly to the development of land adjacent to Cow Pasture Lane as proposed to be allocated. Its inclusion would enable a more cohesive and active approach to the site from Sutton Road, Chapel Street junction.</p> <p>Further additional land, in accordance with the planning application, could also be included in the allocation. This could be included as an allocation now or identified as land to be brought forward to meet long term needs. This land would help to meet the requirements of the NPPF in terms of long term planning, with the site capable of delivering housing over a long period, including beyond the Plan period. This is a 'crucial' requirement of Local Plans as set out at paragraph 157 of the NPPF.</p>	<p>increase the size of the proposed housing allocation, as details related to access have not been confirmed at this time.</p> <p>The Council considers that it is unnecessary to safeguard land for development beyond the plan period. Consideration of longer term boundaries is only a requirement of the NPPF in areas constrained by Green Belt. The proposed Local Plan satisfies long term provision to 2032. The Spatial Approach Paper sets out the approach to safeguarded land in greater detail.</p>
<p>Other possible sites have been discounted that would be more suitable and less environmentally harmful.</p> <p>For example, site S067 which is within walking distance of Sutton Parkway Station, could accommodate 1000 houses on Grade 3 agricultural land. The site generally scores well in the Council's SA and it is in Flood Zone 1. This site can easily be accessed via A38, A60 and the Marr route, without creating major traffic congestion in and around Kirkby Town Centre. It is given a double-negative red in the SA for adverse landscape impact, which is surprising as the landscape impact would be considerably less than would result from</p>	<p>The Council needs to ensure that sites are capable of delivering development within the Local Plan period (the next 15 years). This has resulted in some sites with higher grade soils being taken forward.</p> <p>Site S067 is a strategic sized site which incorporates sites K023, K033 and S060 from the SHLAA. The Council have put forward these latter sites as housing allocations in the Preferred Approach Plan, with an approximate combined yield of 760 dwellings. The Council maintains the view that the remainder of this site is unsuitable due to the adverse impact development would have on the landscape in this area.</p>

<p>development of the Mowlands site, which is only assessed as amber. Development of site S067 would constitute a more appropriate rounding off of urban form and less of an unnatural extension into surrounding countryside than development of the Mowlands site. There are no public rights of way through site S067, which does not provide a recreational asset in the way that the Mowlands site does. It is important to note that development of site S067 would result in no adverse impact on heritage assets.</p> <p>The Preferred Approach Local Plan allocates sites SKA3ah and SKA3e, which leaves a residual area of adjoining countryside. Allocation of SHLAA site S067site, and the associated site S062, would be entirely logical. It would create a more substantial, well-placed development area that would have a far less environmentally harmful impact than development of the Mowlands site.</p> <p>The obvious place for large scale development is the land in and around the Junction on Penny Emma Way. That would satisfy nearly all requirements. It has excellent (walkable) existing public transport links. The road/cycle network is already in place so would only need extending. It has few surrounding properties so very little impact on existing residents. It's not visible across half the county. A link (bypass)</p>	<p>Furthermore it is considered that the strategy of two smaller urban extensions alongside dispersed development is more deliverable, particularly taking into consideration past delivery rates, and the outcome of the report published by the HBF in August 2015 'Responding to demand; Understanding private housing supply' which indicates that a greater number of smaller sites enables development to be delivered more quickly. The allocation of a larger site in one location would bring into question the soundness of the Local Plan due to the uncertainty regarding delivering development on the whole site within the Plan period.</p> <p>To allocate and rely on the additional land at S067 as oppose to allocating land at the Mowlands site would not deliver the OAHN and would put at risk the soundness of the Local Plan. As set out in paragraph 182 of the National Planning Policy Framework, local authorities should submit a plan for examination which it considers is "sound" – namely that is positively prepared (based on a strategy which seeks to meet the OAHN), justified (the most appropriate strategy when considered against reasonable alternatives), effective (it should be deliverable) and consistent with national policy.</p> <p>All sites taken forward as housing allocations are in floodzone 1, all can deliver the number of homes required, all could contribute towards delivering affordable housing and gain access to link with the strategic road network.</p>
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<p>road could be made from Penny Emma way to the A611 Derby Road which would reduce the traffic flow in Kirkby Town Centre. A further link could be provided to the MARR road which would reduce traffic on the Hamilton Road area. Substantial amounts of land are not in crop production and effectively wasteland.</p>	
<p>Investigate land adjoining Derby Road and the MARR route (SHLAA references SM45, SM46 and S065). We were that these sites had not been considered because they did not adjoin other development. They do in fact adjoin allocations proposed by Mansfield District Council. There is an obligation on Council's to co-operate with adjoining authorities. Therefore consideration should also be given to these sites.</p> <p>These sites could form part of the other local sites SM319, SM358 and SM378, which the Council is considering more favourably. This larger urban extension would have less impact on local residents and together with the sites being considered around the Sutton Junction estate would trigger a greater CIL or S106 for improving local facilities, medical, educational and highways infrastructure.</p> <p>Moreover, this site has the following benefits:</p> <ul style="list-style-type: none"> <li>• Site is immediate vicinity of accessible open space.</li> <li>• The housing site will contribute towards 10% affordable</li> </ul>	<p>The sites suggested are located in the countryside, away from the urban area. Paragraph 12.1 of the Council's Strategic Housing Land Availability Assessment Methodology sets out that the Council will only assess sites in and immediately adjoining identified settlements. As such, the suggested sites do not comply with the site assessment criteria since none adjoin an urban area, including Mansfield. This is a joint methodology prepared in partnership with Mansfield and Newark &amp; Sherwood District Councils.</p> <p>Mansfield District Council have not allocated any sites adjoining the suggested sites. The land adjoining site SM46 is identified for Strategic Green Infrastructure in the Mansfield Draft Local Plan 2016.</p> <p>Sites SM319 and SM358 are not being promoted by the Council. Site SM378 is a proposed site which is located adjacent to the urban edge at West Notts College.</p> <p>With regard to the suggested benefits, the sites would not assist in meeting the objectives of the Local Plan. They are in an isolated locations away from existing services and facilities. In</p>

housing (as set out the Affordable Housing SPD, 2009). It is located within 800 m or 10 minutes walk of a bus stop.

- There are no identified national or local designations on the site.
- Strategic GI. This is a corridor through Thieves Wood, linking further north into Mansfield. Much of the eastern stretch of the corridor follows stretches of the Robin Hood Way and Hidden Valleys Trails. S14 also runs to the north west of the site, this is an existing link along the new MARR road connecting Kingsmill reservoir (and GI20) to the east towards Cauldwell and Thieves Wood. Potential to enhance the ecological connections along this stretch and also enhance the green character for those travelling along it.
- The site is located within Flood Zone 1. A small areas of potential surface water flooding is identified to the east of the site, the development of the site here could solve that problem via a SUDs system.
- The site would not impact on the town centre of Sutton in Ashfield as the evidence from the Retail Study 2011 identifies shopping is directed towards Mansfield District.
- It has incredibly positive access links onto major arterial roads for easy access and egress with no impact on other local residents.
- The site has the potential to be large scale major development sites anticipated to deliver approximately 2000

terms of supporting town centre regeneration in Ashfield, as mentioned in the suggested benefits, the sites are closer to Mansfield and are likely to direct shoppers away from town centres in Ashfield. This would have an adverse effect on town centre regeneration in Ashfield.

All sites taken forward as housing allocations are in floodzone 1, all can deliver the number of homes required, all could contribute towards delivering affordable housing and gain access to link with the strategic road network. Overall, they offer the best opportunity for delivering sustainable development and meeting the objectively assessed housing needs of the District.

<p>dwelling and will potentially contribute towards affordable housing and other infrastructure requirements.</p>	
<p><u>Other Objection</u></p>	
<p>Pollution:</p> <p>Nottinghamshire PCT in 2014 reported that the health of Ashfield residents is much worse than the national average, this development will only compromise our health further in the area, by increased pollution.</p> <p>The site provides a 'green lung' between the M1 motorway and Ashfield, which has a high history of respiratory problems associated with tradition local industries.</p> <p>The benefit provided by this grade 2 agricultural land is that it is a filter of pollution from the M1. The part of the motorway at the point between junctions 27 and 28 is one of the steepest inclines along the whole it's whole length, causing heavy goods vehicle to change down several gears pumping out corrosive and highly toxic particulates.</p> <p>It is anticipated that the site will have a negative impact on air quality. The houses themselves would create more pollution from, vehicle movements - harmful particulates, hydrocarbons</p>	<p>The Council's Environmental Health Department have been consulted on all the sites proposed within the Preferred Approach Local Plan and have not raised any objections related to air pollution. For sites over 30 dwellings an air quality assessment will need to be submitted for consideration by the Environmental Health Department at the planning application stage.</p> <p>The monitoring of particulates is required within Air Quality Management Areas (AQMA). However, no part of the District has this designation. The Council therefore has no statutory requirement to monitor particulates at present. Mobile monitoring does take place and where appropriate air quality assessments may be asked to include particulate data sourced from DEFRA, where it is available.</p> <p>The Council will continue to monitor air quality across the District.</p>

<p>and nitrogen oxides from around 1500 vehicles belonging to residents of the proposed homes, central heating systems, "carbon monoxide", plus the filter from the motorway would not be effective and the new residents would be exposed to all of the toxic fumes and, being nearer to the M1, added noise pollution.</p> <p>The effect on young children walking along Sutton Road for 20 minutes twice a day at its most polluted both, with traffic fumes and, of course, vehicles - these are children at their most vulnerable stage 11 to 18 years old.</p>	
<p>There has been no consideration given to light pollution.</p> <p>I was told that the housing would follow the contours of the land. This could cause greater sound trajectory as houses are being built on higher contours than existing houses.</p>	<p>It is expected that any housing development on a greenfield site will experience an increase in light levels. Detailed design at the planning application stage will be expected to minimise any negative impacts.</p> <p>Proposed Local Plan policies SD2 and SD8 require all development proposals to be considered in respect of the potential for pollution, including light spillage, air pollution, noise and contamination.</p>
<p>The boundary on the south-west side seems to us to be irrational. It doesn't follow any boundary and cuts diagonally across the magnesium limestone escarpment that your Landscape Assessment identifies as a major feature. It then follows around a very awkward shaped field and embraces a series of steep undulations that fall towards the Dumbles.</p>	<p>It is acknowledged that some parts of the site boundary have not been identified precisely on the Preferred Approach Policies Map. The boundary will be refined accordingly to reflect a logical boundary having regard to the site contours. It is anticipated that the approximate yield will remain the same with regard to housing delivery.</p>

<p>Your Landscape Appraisal describes this area as a flat plateau – it is anything but.</p>	<p>The Landscape Appraisal states <i>‘the main area of the site forms a large plateau in the east of the site. To the west and south, the land slopes down, from a steep escarpment from the top of Boar Hill. The land also slopes north westwards from the edge of the plateau towards the A38’</i>. The Council considers this to be correct.</p> <p><b>Proposed amendment detailed below.</b></p>
<p>The Preferred Approach Local Plan described as <i>“evidence-based”</i> but the evidence contained in the Housing Site Selection Technical Paper and the Sustainability Assessment is clearly deeply flawed and seriously under-estimates the environmental harm that would be caused by the development of the Mowlands site (SKA3a1).</p>	<p>The Council does not consider that evidence contained in its Sustainability Assessment (SA) and Housing Site Selection Technical Paper (HSSTP) is flawed.</p> <p>The SA document assesses all sites using a consistent approach and the conclusions are therefore directly comparable. The HSSTP draws together information from a variety of different sources which form part of the Local Plan evidence base, including the Strategic Land Availability Assessment (SHLAA), the Green Belt Review, SA and landscape Assessments.</p> <p>The National Planning Policy Framework sets out 3 dimensions to sustainable development, i.e, economic, social and environmental. In planning for future development the Council needs to balance all 3 of these aspects.</p>
<p>The National Planning Policy Framework requires local planning authorities to <i>“create a shared vision with communities of the residential environment and facilities they</i></p>	<p>The Council understands and acknowledges the dissatisfaction of local residents who have submitted comments. However, the Council is faced with making very difficult, unpopular decisions</p>



<p><i>wish to see</i>” (para 69, NPPF). No-one in the Kirkby Cross community, apart from those who stand to make enormous financial gains, wishes to see the Mowlands scheme proceed.</p>	<p>in order to meet the housing needs of the District over the next 15 years.</p> <p>The Local Plan consultation document identified the Council's 'Preferred Approach' which was developed following a lengthy process of evidence gathering and site assessments.</p> <p>The record of consultation highlights the numerous methods of consultation undertaken by the Council, including several manned exhibitions, meetings with local residents groups, site notices, newspaper articles/public notices etc. This latest consultation has enabled the Council to gain the views of residents, statutory consultees and other interested parties in order that the necessary amendments can be made prior to the completion of the final document (the Local Plan Publication) which will be subject to a final round of consultation in late 2016 prior to submission to the Secretary of State and examination in public.</p> <p>If concerns remain amongst the Kirkby Cross community, they can request these are heard at the examination in public and considered by the Inspector.</p>
<p>The Mowlands allocation (SKA3al) was not included in the earlier version of the Local Plan that was thrown out by the Government Inspector. Are we not correct to assume that it has been included in this version of the plan simply <i>“to make up the numbers”</i> regardless of the environmental impacts?</p>	<p>Site SKA3al was not included in an earlier iteration of the Local Plan which had a plan period of 10 years (i.e., it only needed to plan for 10 years worth of housing). That plan was the subject of an 'exploratory meeting' ahead of the Examination in Public. In response to the Planning Inspector's comments following this meeting, the Council withdrew the Plan prior to Examination in order to address the concerns raised.</p>

	<p>Two of the key changes which have resulted in further/ alternative sites being proposed are:-</p> <ul style="list-style-type: none"> <li>• A longer plan period of 15 years in line with government policy, resulting in additional housing requirements to meet the needs.</li> <li>• No green belt release around Kirkby. The Inspector specifically raised concerns in respect of proposed changes to the Green Belt boundary in relation to Kirkby. He considered that since all possible site option outside of the Green Belt had not been exhausted that the 'exceptional circumstances' required by the NPPF had not been demonstrated.</li> </ul>
<p>There is no requirement for the housing development proposed, the houses will not be affordable and should be built in the more affluent south of Ashfield. This is a tick box exercise imposed by Government. The lack of jobs means that residents will be commuting to and from work in counties that have invested in jobs.</p>	<p>As is required by national planning policy the Local Plan is based on evidence, which identifies the objectively assessed housing needs of Ashfield (The Strategic Housing Market Assessment) as well as the land anticipated to be required in relation to jobs (Employment Land Forecasting Study). It is widely recognised that not enough houses are being built nationally and the Council has identified sites which it considers are the best sites to meet the identified need for the District and its residents.</p> <p>Housing sites have been identified within the areas of Hucknall, Sutton/Kirkby and The Rurals (Selston, Jacksdale, Bagthorpe and Underwood) based on the evidence from the SHMA.</p> <p>In relation to jobs, forecasts anticipate that Ashfield will see one of the highest level of job growth in Nottinghamshire.</p>

<p>Part of the site is located within the 25% most deprived areas in England in the 2010 Index of Multiple Deprivation (IMD). Over development and loss of natural open space will have a detrimental impact on this.</p>	<p>The housing site will contribute towards affordable housing as set out the Affordable Housing policy HG2. This currently set at 10%, but may be subject to change in order to reflect proposed changes by the Government with regard to the Starter Homes initiative.</p> <p>Employment land studies identify that deprived areas can benefit from close proximity to employment sites.</p>
<p>How will bringing into the area 2,000 + additional cars (2.3 spaces per dwelling est.) plus Lorries, HGVs, Buses, Commercial traffic etc. aim to improve the environment and reduce carbon emissions.</p>	<p>As stated above, the Council have identified the future level of housing need in accordance with Government policy. Having understood its need, the Council has proposed the allocation of sites to meet that future need.</p> <p>A range of evidence has been used to assess the suitability and deliverability of sites submitted to the Council for consideration as housing allocations. The National Planning Policy Framework sets out 3 dimensions to sustainable development, i.e, economic, social and environmental. In planning for future development the Council needs to balance all 3 of these aspects.</p> <p>All sites taken forward are considered to present the best option with regard to delivering development in the most sustainable locations. This aims to reduce the reliance on private vehicles through encouraging alternative modes of travel.</p>
<p>These homes will not be affordable housing for most who live in Kirkby and are needing an affordable home.</p>	<p>Existing and proposed policy requires a 10% affordable housing contribution in this part of Ashfield (this may be revised prior to</p>

	<p>the Publication stage of the Local Plan in order to reflect proposed changes in Government policy in respect of the Starter Homes initiative).</p> <p>In addition, draft Local Plan policy HG4 requires proposals for new development to contribute to a mix of housing types, tenures and sizes in order to create mixed and balanced communities.</p>
<p>could you tell me if as was said at the KARA bentinck Tuesday evening meeting that no decision has been taken then why is it my understanding that Westerman Homes have already bought properties around the Kirkby Cross area ?</p>	<p>Developers frequently purchase land/buildings speculatively, or secure Option Agreements on them in advance of gaining planning permission for development. This is common practice where there may be potential for future schemes.</p> <p>Since the site is a potential housing allocation and is also partly the subject of a pending planning application, purchase/options on land or buildings by developers is unsurprising.</p> <p>No decision has been made on the current planning application which refers to a larger site.</p>
<b>Support</b>	
<p>Mowlands (SKA3a1) is generally a good place for an urban extension if one is required, however with some alterations to the current plan allocations.</p> <p>1. The current plan shows an area of employment land allocated at Pj2Kg which would be better allocated as housing development.</p>	<p>General support is acknowledged.</p> <p>1. The site is considered to offer opportunities for a mixed used development. The Employment Land Forecasting Study 2015 identifies that jobs relating to a requirement for offices are likely to increase over the Plan Period. It is anticipated that the development with good access to the A38 and the M1 motorway has the potential to offer accommodation similar to The Village Office Park, South</p>

<p>2. Wildlife areas are affected by the development, not least EV5/165-EV4nl which is shown as being totally incorporated into the housing development. This should not be lost and I see no reason why this cannot be left as it is currently. Other wildlife areas are shown as being abutted or incorporated into the development along the Dumbles, being of important historical significance which should be protected. <b><u>These areas should also be protected from development by a 10m buffer.</u></b></p> <p>3. The wildlife areas shown as being abutted or incorporated include areas shown as being Ancient Woodland. These areas are particularly important to be protected. Ancient Woodland cannot be recreated and its loss cannot be mitigated against and will be a permanent and complete loss of biodiversity. Natural England say that Ancient Woodland is irreplaceable and its loss should be avoided at all cost. <b><u>The Ancient Woodland should be removed from the planned allocation and a 20m buffer should be provided.</u></b></p> <p>4. I am not clear why the council insists on using agricultural field boundaries as the basis for allocation of land for planned development. I can see that the process followed might lead to land owners putting forward land on the basis of a field system however there seems no reason to me why part rather than all of a particular field could be</p>	<p>Normanton.</p> <p>2. The housing allocation will be subject to additional guidance in the form of Housing Site Briefs which will identify the requirements from the allocation linked to Housing Policy SKA3al. This includes minimising the potential impact on the ancient woodland and local wildlife sites which are anticipated to remain largely unchanged. It may however be necessary to access the site through part of the wildlife site to the north.</p> <p>3. In allocating sites, the Council will seek to use clearly defined boundaries - these are often delineated by field boundaries. It is not always the case where topography plays a particularly key role, however, in this instance any detailed housing scheme will take account of the landscape to ensure a design layout and incorporate landscape buffers/open space etc. into the most sensitive locations.</p> <p>In addition to the above, many sites are based on land ownership and therefore the land which is available for development.</p> <p>In light of comments received, the Council is proposing to remove the ancient woodland from the allocation.</p> <p>The land to which is referred situated to the south west of the site has been excluded since it has not been submitted to the Council as being available for development. It should be noted that the Council cannot allocate sites which are not</p>
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<p>accepted for inclusion in the plan if this is more appropriate. Nor should it prevent the council from allocating land outside but adjacent to the land put forward where that makes sense. Clearly if the owner of the land does not want it developing that it won't happen, but in some cases it might assist a better all-round development. On this basis at Mowlands, there is an in-cut to the south west of the allocation which might be logically included and might off-set any loss in developable land highlighted in my comments above.</p>	<p>'developable' as set out in the NPPF. Under these terms, the site must be available. Any sites submitted to the Council by landowners (or with the landowner's permission) can be considered for allocation in the Local Plan. The Local Plan would be found to be 'unsound' if the Council allocated sites which were unavailable.</p> <p>4. Comment noted. In light of comments received and reassessing the proposed site, the Council is proposing to draw the site boundary around the edge of the escarpment. In turn, it is considered the proposed extension suggested, would no longer align with the revised site.</p>
<p>Endorse the allocation of SKA3a1 as it will provide vibrancy to Kirkby West, a much-needed school and the site situation has good infrastructure connections to the locality and particularly to J28 of the M1 which has recently been upgraded.</p>	<p>General support is acknowledged.</p>
<p>Support for Mowlands development but expressed concerns regarding access to the development at Kirkby Cross. Considers that a roundabout is required, rather than traffic lights, and that any access road into Mowlands needs to be for two-way traffic to enable proper movement to and from Kirkby Town centre. Housing on Waggon &amp; Horses site not practical under these circumstances due to proximity of traffic pollution. Proposed the ancient monument of Kirkby Cross could be moved into the centre of the roundabout.</p>	<p>General support is acknowledged.</p> <p>The Local Plan establishes that the principle of sites for development is acceptable and deliverable, alongside fundamental issues such as potential access. The council will consult with various statutory and non-statutory bodies in determining detailed design at planning application stage. This includes the Highways Authority, Environmental Protection and Conservation Officer among others.</p>
<p>The proposal site is suitable for development and will make a</p>	<p>Support is acknowledged.</p>

significant contribution to meeting housing needs in a sustainable high quality environment outside of the Green Belt. It provides the opportunity to deliver a comprehensive mixed use development with a range of supporting services and facilities including; primary schools, shops, health centre, community buildings, formal and informal open spaces. It also provides an opportunity to enhance transport links in the area.	
Its scale enables it to provide significant infrastructure benefits, which small schemes cannot, and enable it to better mitigate environmental impacts with a more comprehensive approach to green space and biodiversity enhancement.	Support is acknowledged.
It provides an important balance to the growth of the Borough which is otherwise largely dominated by smaller sites. The size of the site will enable a scheme to be developed which can establish its own identity and sense of place whilst integrating with, and relating to Kirkby.  The site is suitable for development, it is available now, it is viable and it can contribute significantly to meeting the housing needs of the area in the short, medium and longer term.	Support is acknowledged.
Provides an opportunity to help meet employment needs through a highly sustainable mixed use development.	Support is acknowledged.
<b>Comment</b>	
A roundabout is required at Kirkby Cross, rather than traffic lights, and any access road into Mowlands needs to be for two-way traffic to enable proper movement to and from Kirkby	Comment noted.  The council consults with various statutory and non-statutory

Town centre.	bodies in determining detailed design at planning application stage. This includes the Highways authority.
The northern part of the proposed allocation appears to have three designations. The broken yellow lines do not appear on the key. What do they refer to? (presumably Green Space EV5. Central part is EV4nl: Local Nature Reserve / Local Wildlife Site).	<p>The Council acknowledges that the Policies map is not particularly clear in this area. Unfortunately this is a result of attempting to indicate several layers of designation on a printed plan. This area all falls within the overall housing allocation, although the intention is to minimise any direct impact on the ecological assets which can be incorporated into a wider development scheme.</p> <p>A short development brief will be included in the next stage of the Local Plan and will give more details of what will be expected with regard to submitting a detailed design layout.</p>
<p>Sustainable development has to satisfy three roles, which includes an environmental role of “contributing to protecting and enhancing our natural, built and historic environment” (para 7, National Planning Policy Framework)</p> <p>Pursuing sustainable development involves <i>“seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life ...”</i> (para 9, National Planning Policy Framework)</p> <p>can you please explain why you have allocated the Mowlands site (SKA3al) when:</p> <p>(a) It fails to satisfy the definition of sustainable</p>	<p>To achieve sustainable development, economic, social and environmental gains should be sought jointly through the planning system. All aspects of sustainable should therefore be considered on balance, taking account of any adverse impacts which would significantly outweigh the benefits of a proposal.</p> <p><i>Para 14 – local authorities should positively seek to meet the development needs of their area. Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change, unless:</i></p> <ul style="list-style-type: none"> <li><i>any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole;</i></li> <li><i>or</i></li> <li><i>specific policies in this Framework indicate development</i></li> </ul>



<p>development under the NPPF</p> <p>(b) it is so obviously contrary to the Vision, the Strategic Objectives, and Policies that seek to protect the environment set out in the Preferred Approach Local Plan, and</p> <p>(c) there are clearly other sites that could be developed with less harm?</p> <p>The draft plan contradicts itself. It is not tenable. It's perverse. This makes it unsound. This makes it vulnerable to go the same way as the previous version, which was heavily criticised for the failings of the Sustainability Appraisal.</p>	<p><i>should be restricted.</i></p> <p>The latter paragraph refers to, for example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.</p> <p>Although Site SKA3al is currently open countryside, incorporating local wildlife sites to the north and east, it has no national designation and does not fall into a specific policy in the NPPF. It is considered that a detailed proposal will be able to minimise any direct impact on the ecological assets through sensitive design.</p> <p>The council considers that this site is capable of accommodating a housing scheme which will deliver sustainable development in accordance with the NPPF.</p>
<p>Why hasn't the current Mowlands application by Westerman Homes been refused as it is contrary to both the existing development plan and the emerging development plan?</p> <p>I have read the reports from the Statutory Consultees, there are few if any positive comments from any of them, and at this time you appear to be placing your evidence on the developers, who obviously have a high financial investment in this and not the best interest of the electorate. It is the elected</p>	<p>This comment relates to a planning application and is not a comment on the Local Plan preferred Approach.</p>

representatives responsibility protect the environment and wellbeing of the residents of the Ashfields.	
<p>KARA considers that the Mowlands site should constitute both countryside that forms a high quality landscape and green infrastructure with a high degree of public access, and that these attributes should be protected by Preferred Approach Local Plan Policies EV2, EV4 and EV11.</p> <p>KARA considers that the grade 2 agricultural land of the Mowlands site should be protected by Preferred Approach Local Plan Policies EV9 and that the heritage assets in the adjoining Kirkby Cross Conservation Area should be protected by Preferred Approach Local Plan Policies EV11.</p> <p>KARA considers that, given these policies, it would be perverse to allocate the Mowlands site (SKA3a1). Inclusion of the site would contradict the vision, strategic objectives, and environmental policies of the Preferred Approach.</p>	Comments noted.
KARA does not take issue with the amount of development proposed in the Preferred Approach Local Plan – concern is limited to the inappropriateness of the Mowlands site to accommodate development.	Comments noted.
Having one large site makes the likelihood of the Council's plan failing even greater because if that single site cannot be delivered then the Council could not deliver its five-year housing land supply. Having more varied smaller sites makes the plan far more sustainable.	<p>The Council consider that the range of sites included in the Local Plan Preferred Approach is appropriate and deliverable.</p> <p>The Plan includes 74 housing allocations which range in size from a yield of 10 to 495 dwellings. In addition, it includes 2 more strategically sized sites (SKA3a1 – Mowlands and HA3t, Rolls Royce) which offer the opportunity to provide a greater</p>

	<p>range of on-site benefits whilst being able to fulfil the needs of the District later in the Plan period.</p> <p>The Local Plan does not allocate sites below 10 dwellings, however, an additional supply of approximately 400 dwellings can be sourced from these smaller sites and are counted towards the overall supply for the District (ALPPA Table 1).</p>
ONS 2011 show that the population density in Ashfield is high compared with other areas. Ashfield is 10.9, Nottinghamshire is 3.8, East Midlands is 2.9 and England is 4.1.	<p>This figure simply reflects the nature of administration boundaries. All Local Authority boundaries were originally drawn up in the 1970s to include an approximate population of 100,000. As Ashfield District includes 3 towns and 3 substantial villages which are located in close proximity to each other, it necessarily covers a small geographical area and hence has a high population density. For comparison, neighbouring authority Mansfield has a density of 13.7 people/ha: Broxtowe, 13.9; Gedling 9.6: and Nottingham City 41.7.</p>
We need to improve the area for the existing and projected increase in our local population, before we encourage residents from outside the area to move in for cheaper housing, which is unlikely to generate any money to the town centre.	<p>Paragraph 47 of the National Planning Policy Framework (NPPF) states that, 'to boost significantly the supply of housing, Local Authorities should use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing'. The Council has no option but to plan for the future housing needs of the District.</p> <p>The Government requires all council's to undertake a Strategic Housing Market Assessment (SHMA) across a Housing Market Area to understand the future housing needs of their area. Ashfield lies within the 'Outer Nottingham Housing Market Area', with Mansfield and Newark &amp; Sherwood Districts. The 3</p>

	<p>Councils jointly commissioned a SHMA which provided Ashfield with its housing target of 480 homes a year, as well as information on affordable and specialist housing need. This requirement has been derived from government household projections, coupled with analysis of aging population, changing household sizes, migration and people unable to get on the property ladder due to the recession.</p> <p>Having understood its need, the Council has proposed the allocation of sites to meet that future need. This has included existing planning permissions that have yet to be implemented and new sites.</p> <p>The latest Retail Study for Ashfield (2016) indicates that this site falls within 'Zone 2' where 71% of people currently use Kirkby town centre for convenience shopping.</p>
ADC shouldn't sell off green belt land for development.	This site is not owned by Ashfield District Council, nor is it located within the Nottingham-Derby Green Belt.
If the Mowlands site is retained, KARA will argue at the Examination in Public that the plan is not sound.	Comment noted.
For the normal member of the public, the documents provided and the language used in the preferred plan makes no sense.	<p>It is acknowledged that some of the terminology used in planning policy documents can be fairly technical and therefore sometimes a little difficult to follow. Unfortunately the majority of this is a reflection of national policy, guidance and regulations to a large extent.</p> <p>A glossary of terms and abbreviations is included at Appendix 1</p>

	<p>of the Preferred Approach Plan. This will be updated and continued through to the next stage of the Plan.</p> <p>The Council will refine the document at Publication stage in order to make it easier to navigate, including additional referencing and more detailed contents pages in order to assist clarity.</p>
<p>This proposed allocation is on the perimeter of the urban area of Kirkby, therefore any proposals should take into account the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone ML20 Kirkby Plateau.</p>	<p>Comments noted.</p>
<p><b><u>Responses received relating to Policy supporting text</u></b></p>	
<p>None.</p>	<p>N/A</p>
<p><b><u>Responses received relating to the Sustainability Appraisal</u></b></p>	
<p>This seems a particularly woolly area that appears to be based on the subjective opinions of a group of people. Various issues are then colour coded according to this groups views and opinions.</p> <p>This process seems fraught with ambiguity as there appears to be no uniformity or clarity to the appraisal. Another problem is that a considerable amount of future mitigating circumstances are taken into account that are probably inaccurate. An</p>	<p>The purpose of the SA is to promote sustainable development through the consideration of the environmental, social and economic considerations of the Local Plan. It is a legal requirement under the Planning and Compulsory Purchase Act 2004.</p> <p>The methodology for this appraisal was developed in accordance with the following guidance:</p>

example of this is Item 7. The impact on the landscape can be mitigated by appropriate design..."this includes two storey properties near Boar Hill and set back properties on ridgeline". This development is on one of the highest points in Nottinghamshire and visible 17 miles away. How does a row of 2 storey houses mitigate that! The same applies to the Historic Environment which is mitigated by "good design" what does that mean exactly? The Gherkin building in London is "good design" but you don't want it next to Kirkby Cross! It's not my intension to itemise every issue on the appraisal because the very process is flawed and lacks clarity. Effectively any site in the Ashfield area could be classified "good" for development provided an unspecified group of people consider it to be so. Secondly, it appears any detrimental attributes no matter how damaging can be written off with mitigating circumstances and good design!

- *Planning Practice Guidance on Sustainability Appraisal November 2015.*
- *A Practical Guide to the Strategic Environmental Assessment (SEA) Directive* (ODPM, 2005).
- Planning Advisory Service (PAS) Sustainability Appraisal guidance online.

All policies and site allocations are assessed against the SA objectives and a judgement is made regarding the likely effect against each objective utilising the "Decision Making Criteria". As set out in the Sustainability Framework (Draft Sustainability Appraisal 2016, Table 2).

This approach gives consistency in assessing the impact across all sites and policies. It helps to identify aspects which maximise the benefits of the Plan as well as helping to identify where improvements can be made or where mitigation will reduce negative effects.

With regard to the example given (Item 7), 'mitigation' refers to lessening the impact of any proposed scheme. It is acknowledged that development will have an impact on the landscape and this is reflected in the amber score. The Landscape assessments have been undertaken by professional landscape architects, using a standardised approach.

The methodology for the Landscape Site Assessment is based on best practice guidance from the "Guidelines for Landscape and Visual Impact Assessment" 3rd edition (2013 edition) as

	<p>published by The Landscape Institute and Institute of Environmental Management and Assessment.</p> <p>The aim of the methodology is to ensure that the assessment of the sites across Ashfield is undertaken in a consistent documented process, using a standard template.</p> <p>Reference to good design again refers to the lessening of impact arising from a development scheme.</p> <p><b>No proposed amendments</b></p>
<p><u>3. Historic Environment</u></p> <p>The SA acknowledges that the development is likely to cause less than substantial harm but fails to note that under case law (Barnwell Manor, Forge Field and South Lakeland) such harm must be given “<i>considerable importance and weight</i>” and should be considered as a statutory presumption against development. Do you appreciate the implications of Section 72 of the P(LB&amp;CA)Act 1990?</p> <p>(Also see comments on the Housing Sites selection Paper below)</p> <p><b>The Assessment is Amber but it should be a red double-negative</b></p>	<p>All policies and site allocations are assessed against the SA objectives and a judgement is made regarding the likely effect against each objective utilising the “Decision Making Criteria”. As set out in the Sustainability Framework (Draft Sustainability Appraisal 2016, Table 2).</p> <p>This approach gives consistency in assessing the impact across all sites and policies.</p> <p>The Council acknowledges the statutory duties of section 66 (1) and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and that planning decisions are not simply a balancing exercise of public benefit against harm and there is a statutory presumption preserve the character and appearance of a conservation area and the special interest of listed buildings and their setting. The site allocation does not</p>

	<p>entirely contain heritage assets and therefore could be developed without harm to heritage assets or their setting.</p> <p>The SA acknowledges that development of the site has the potential to cause some harm ('less than substantial harm' is the terminology used in the NPPF para. 234) to heritage assets. It is not considered that development would result in substantial harm which would warrant a red double negative. The Conservation Officer has been consulted in this respect.</p> <p><b>No proposed amendments.</b></p>
<p><u>6. Biodiversity and Green Infrastructure</u></p> <p><b>This is given a red double-negative.</b> Astonishingly, it is claimed that in mitigation there is potential to enhance such assets. It is difficult to envisage how carving a major road through them and building 900 houses alongside could conceivable result in an enhancement.</p> <p>The only place you could create an access from the A38 would result in the road carving straight through land designated as subject to Policy EV4.</p>	<p>The term 'mitigation' refers to lessening the impact of any proposed scheme. It is acknowledged that development will have an impact on the existing biodiversity and GI and this is reflected in the red double negative score.</p> <p><b>No proposed amendments.</b></p>
<p><u>7. Landscape</u></p> <p>The landscape is assessed as "<i>Poor-Moderate</i>". This is a gross under-assessment. I completely refute this statement and feel it should be subject to further inspection, as the person making this initial judgment needs to explain</p>	<p>The SA document summarises the Ashfield Landscape and Visual Impact Assessment (Dec 2015) which can be viewed on the Council's website.</p>



<p>themselves further!</p> <p>The magnesium limestone escarpment is one of the most dramatic and finest undeveloped landscape features in the district which should be recognised as such and protected.</p> <p>The SA notes that the development will be prominent from Pinxton Road but does not acknowledge that the site to the west of Cowpasture Lane is crossed by a network of well-used public footpaths.</p> <p>Dispute the conclusions in the SA that the landscape has a medium capacity to accommodate development. The SA assumes that the site is a flat plateau but it is not. Much of the western side of the site is made up of steep slopes and a series of deep undulations that make the land very attractive and physically unsuitable to build on.</p> <p>The SA states that the impact on the landscape could be mitigated by appropriate design. This is ridiculous. Development would destroy the landscape quality of the area and would be irreversible. Cutting the proposed road into the slope as suggested in the SA would not mitigate the harm, it would destroy the natural landform.</p> <p><b>The Assessment should be a red double-negative not amber.</b></p>	<p>The Landscape assessments have been undertaken by professional landscape architects, using a standardised approach.</p> <p>The methodology for the SHLAA Landscape Site Assessment is based on best practice guidance from the “Guidelines for Landscape and Visual Impact Assessment” 3rd edition (2013 edition) as published by The Landscape Institute and Institute of Environmental Management and Assessment.</p> <p>The aim of the methodology is to ensure that the assessment of the sites across Ashfield is undertaken through a consistent documented process, using a standard template.</p> <p>The Landscape Appraisal states <i>‘the main area of the site forms a large plateau in the east of the site. To the west and south, the land slopes down, from a steep escarpment from the top of Boar Hill. The land also slopes north westwards from the edge of the plateau towards the A38’</i>. The Council considers this to be correct.</p> <p>The term ‘mitigation’ refers to lessening the impact of any proposed scheme. It is acknowledged that development will have an impact on the landscape and this is reflected in the amber score.</p> <p><b>No proposed amendments.</b></p>
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<p><u>8. Natural Resources</u></p> <p>The SA notes that the land is very good Grade 2 Agricultural land and <b>scores a red double-negative</b>.</p> <p>Furthermore, the NPPF states that where significant development of agricultural land is necessary, that <i>“local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality”</i> (Para 112, NPPF).</p> <p>Where is the evidence that you have applied the sequential test required by para 112 of the NPPF.</p>	<p>Whilst it is acknowledged that the countryside is important for agriculture, the Council has to make difficult decisions in balance the needs for housing against the environment/ agriculture. Some of the proposed development sites will result in a loss of Countryside/Green Belt. The Council's analysis (through the SHLAA) identified that there are insufficient brownfield sites (including derelict sites) available to meet the District's housing needs to 2032, and therefore homes will need to be built on greenfield sites which by necessity will include agricultural land.</p> <p>In determining the most suitable sites, the Council needs to ensure that sites are capable of delivering development within the Local Plan period (the next 15 years). This has resulted in some sites with higher grade soils being taken forward.</p> <p>It should be noted that the Council cannot allocate sites which are not 'developable' as set out in the NPPF. Under these terms, the site must be available. Sites submitted to the Council by landowners (or with the landowner's permission) can be considered for allocation in the Local Plan. The Local Plan would be found to be 'unsound' if the Council allocated sites which were unavailable.</p> <p><b>No proposed amendments.</b></p>
<p><u>14. Travel and Accessibility</u></p>	

<p>The SA gives this a green double-positive. <b>The Assessment should be a red double-negative.</b> Considerable highway constraints and issues have been raised by the Highway Authority. The site is in fact very difficult to access. Access to the A38 would cause conflict with Green Infrastructure. Access to Kirkby Cross as proposed by Westerman Homes would cause harm to the ancient monument, listed buildings and conservation area and would create a highly sub-standard junction which would not allow residents living along Church Street to turn left into the new development to enjoy the proposed facilities.</p> <p>It would be highly irresponsible of the Council to allocate this land for such a large number of dwellings without resolving the access arrangements.</p> <p>The Council's SA gives the issue of 'Travel and Accessibility' a green double positive. At the public meeting on the 15 March 2016, the Council Officers stated that this only considers 'nearness to public transport'. However, sustainable development has to take account of environmental effects. The Council's SA does not include a heading for adverse impacts caused by access arrangements to proposed sites, so such impact should be considered under this heading. For the reasons given above, KARA considers that the assessment in the SA for Accessibility should be a red double-negative.</p>	<p>All policies and site allocations are assessed against the SA objectives and a judgement is made regarding the likely effect against each objective utilising the "Decision Making Criteria". As set out in the Sustainability Framework (Draft Sustainability Appraisal 2016, Table 2).</p> <p>This approach gives consistency in assessing the impact across all sites and policies.</p> <p>Objective 14 clearly sets out that its aim is '<i>to improve travel choice and accessibility, reduce the need to travel by car and shorten the length and duration of journeys</i>'. The indicators therefore focus on distance to key facilities and public transport stops. The impact of allocating the site on other subject matters are covered elsewhere in the SA and taken together give an overall balanced approach. For instance, historic environment at objective 3 (single negative), biodiversity at objective 6 (double red negative) etc. To take account of these aspects under more than one objective would therefore constitute double-counting.</p> <p><b>No proposed amendments.</b></p>
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<p><u>17. Town Centres</u></p> <p>An access road connecting to Kirkby Cross as proposed by Westerman Homes would result in major traffic flow along Chapel Street/Victoria Road and through Kirkby Town Centre, which is already heavily congested.</p> <p><b>The Assessment should be a red double-negative not green.</b></p>	<p>All policies and site allocations are assessed against the SA objectives and a judgement is made regarding the likely effect against each objective utilising the “Decision Making Criteria”. As set out in the Sustainability Framework (Draft Sustainability Appraisal 2016, Table 2).</p> <p>This approach gives consistency in assessing the impact across all sites and policies.</p> <p>The town centre masterplans identify that housing development is considered to facilitate the town centres if the Retail study identifies that the housing development is located in an area where the largest percentage share for the main food shop is a specific town centre, this will have a minor positive effect on the town centre. The latest Retail Study for Ashfield (2016) indicates that this site falls within ‘Zone 2’ where 71% of people currently use Kirkby town centre for convenience shopping.</p> <p><b>No proposed amendments.</b></p>
<p>Consequently, the Mowlands site should get six red double-negatives.</p>	<p>Comment noted. The Council considers that the outcomes from the SA are consistent with the methodology applied to assess all sites and policies.</p> <p><b>No proposed amendments.</b></p>

<p><b><u>Responses received relating to the Housing Site Selection Technical Paper</u></b></p>	
<p>Your Housing Site Selection Technical Paper states on page 8 that it is necessary to building on Grade 2 land as there is a lack of available land of a poorer grade. This is simply not true. For example, SHLAA site S067 which is within walking distance of Sutton Parkway Station, could accommodate 1000 houses on Grade 3 agricultural land. There are numerous examples in the Appendix 2 SA, which lists discarded sites, of developable land that is either grade 3 or grade 4 quality. A group of sites in Selston, Underwood and Jacksdale are discounted from development with a single double negative red assessment on the grounds of loss of grade 4 quality agricultural land (V9, V010, V12, V19, V89, and V91)</p>	<p>The Council needs to ensure that sites are capable of delivering development within the Local Plan period (the next 15 years). This has resulted in some sites with higher grade soils being taken forward.</p> <p>Page 8 of the Housing Site Selection Technical Paper (HSSTP) does refer to the lack of available land on sites with poorer grade soil. It is acknowledged that this is misleading and the text will be amended to refer to a lack of available and suitable sites on poorer grade soils.</p> <p>Site S067 is a strategic sized site which incorporates sites K023, K033 and S060 from the SHLAA. The Council have put forward these latter sites as housing allocations in the Preferred Approach Plan, with an approximate combined yield of 760 dwellings. The Council maintains the view that the remainder of this site is unsuitable due to the adverse impact development would have on the landscape in this area.</p> <p>Furthermore it is considered that the strategy of two smaller urban extensions alongside dispersed development is more deliverable, particularly taking into consideration past delivery rates, and the outcome of the report published by the HBF in August 2015 'Responding to demand; Understanding private housing supply' which indicates that a greater number of smaller sites enables development to be delivered more quickly. The allocation of a larger site in one location would bring into question the soundness of the Local Plan due to the uncertainty</p>

	<p>regarding delivering development on the whole site within the Plan period.</p> <p>To allocate and rely on the additional land at S067 as oppose to allocating land at the Mowlands site would not deliver the OAHN and would put at risk the soundness of the Local Plan. As set out in paragraph 182 of the National Planning Policy Framework, local authorities should submit a plan for examination which it considers is “sound” – namely that is positively prepared (based on a strategy which seeks to meet the OAHN), justified (the most appropriate strategy when considered against reasonable alternatives), effective (it should be deliverable) and consistent with national policy.</p> <p>In respect of the group of sites in Selston, Underwood and Jacksdale, all of these sites (with the exception of V12 which scores a green positive) score a double red negative under ‘Natural Resources’ due to the fact that they are greenfield sites and are located within a Minerals Safeguarded Area. This is consistent with the Sustainability Framework (table 2) on page 15 of the SA which states that any two of the various criteria will result in a double negative score. The score does not reflect the agricultural value in this instance. The sites were not discounted on the grounds of agricultural value, but due to their contribution to Green Belt as clearly set out in the HSSTP in the conclusion for each site. The HSSTP does not list the loss of agricultural land as a negative impact for any of these sites.</p> <p><b>Proposed amendments detailed below.</b></p>
There is a major discrepancy with regard to housing numbers	The figure as stated in the final column (conclusion) within the

<p>– it refers to 900 dwellings in the fourth column and 1015 in the final Conclusions column. The rejected part of the site refers to over 1000 houses also, so that is well over 2,000 for the whole site, which is far more than the ‘up to 1,800 houses proposed by Westerman.</p>	<p>Housing Site Selection paper is an error and will be amended to 900 accordingly.</p> <p><b>Proposed amendments detailed below.</b></p>
<p>Why does the Council’s Housing Site Selection Technical Paper (under reference K79) not give proper regard to the following negative impacts with regard to proposed allocation SKA3a1?</p> <ul style="list-style-type: none"> <li>• High not moderate impact on Landscape Character. Development would permanently destroy landscape character and quality and would thus cause substantial harm. It is stated that the land is not prominent in the landscape, which is incorrect. Almost all the site can be appreciated from the network of lanes and footpaths that cross the land. I do not see how building 900 homes (some probably 3 stories high) on what is virtually the highest point in Nottinghamshire could be classed as moderate. The ridge on which they will be built has clear uninterrupted views to Critch Stand in the West and Radcliffe Power Station to the south. That means this estate will be visible for at least 9 miles in one direction and 17 miles in the other. It will also be clearly visible for the majority of the distance between junctions 27 and 28 of the M1.</li> <li>• Access difficulties and highway congestion that would result along Chapel Street/Victoria Road and through Kirkby Town Centre. Notwithstanding the statement in the Council’s SA that “<i>considerable highway constraints and issues have been raised by the Highway Authority</i>”, the Council’s</li> </ul>	<ul style="list-style-type: none"> <li>• The Council maintains the view that development would have a moderate impact on the landscape. As stated previously The Landscape assessments have been undertaken by professional landscape architects, using a standardised approach. The methodology for the SHLAA Landscape Site Assessment is based on best practice guidance from the “Guidelines for Landscape and Visual Impact Assessment” 3rd edition (2013 edition) as published by The Landscape Institute and Institute of Environmental Management and Assessment. The aim of the methodology is to ensure that the assessment of the sites across Ashfield is undertaken through a consistent documented process, using a standard template.</li> <li>• The statement “<i>considerable highway constraints and issues have been raised by the Highway Authority</i>” is taken out of context since this refers to a pending planning application on a substantially larger site which plans double the amount of housing than the proposed allocation. As stated previously,</li> </ul>

<p>HSSTP states that <i>“the Council believes that the highway constraints could be mitigated”</i>. There is no evidence to support this claim. At the public meeting on the 15 March 2016, the Council Officers stated that a highway study was being carried out and the results are awaited. Therefore, such a claim is clearly premature and should be withdrawn. The allocation should not have been made in the absence of full knowledge of the traffic implications.</p> <ul style="list-style-type: none"> <li>• Harm to Green Infrastructure, Biodiversity and Geodiversity</li> <li>• Harm to Green Spaces and Recreational Facilities. The area currently is one of the few places locals can go for recreational exercise. The numerous footpaths are in continuous use by walkers, ramblers, joggers and dog walkers. These paths are so popular that organised rambling groups come from around the county to start their walks from Titchfield Park before heading out across the various footpaths to different destinations.</li> <li>• Adverse impact on the Historic Environment including demolition of The Waggon and Horses PH, which the Council has identified as a key feature of the Kirkby Cross Conservation Area. No adverse impact is identified in the Council’s HSSTP, as a result of the developer’s proposed access road. The Council’s HSSTP concludes that the proposed road would ease congestion on Sutton Road (which is highly questionable) but does not mention any of the substantial adverse impacts of the road. No consideration is given to the adverse, harmful impact that would result from the intrusion of the proposed housing in views towards the conservation area from the open fields and footpaths to the west. The adverse impact of the</li> </ul>	<p>the Council have worked closely with Highways Department to understand and plan for the highways infrastructure needed to support all of the development proposed in the Plan. In respect of this site, the Highways authority have indicated that current access constraints can be overcome, with opportunities for potential access from Sutton Road and the A38. Additional text will be included in the HSSTP conclusion for clarity.</p> <ul style="list-style-type: none"> <li>• Additional text will be included in the HSSTP conclusion with regard to Green Infrastructure and Green Spaces.</li> <li>• Additional text will be included in the HSSTP conclusion with regard to the Historic Environment.</li> </ul>
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<p>suburbanisation of the open fields that form the wider countryside setting of the conservation area is not acknowledged. No consideration is given to the adverse impact on views of the fine broach tower of St Wilfrid's Church from the footpaths that cross the open fields. No consideration is given to the transformation of the narrow, hedge-lined Cowpasture Lane that would result from construction of the developer's road. Only the alleged benefit of the road in easing congestion on Sutton Road is taken into account. This is a one-sided and inadequate assessment. It should be noted that the disgraceful condition of the now closed Waggon &amp; Horses Public House, is entirely due to the actions of the hopeful developers of the Mowlands site, who have acquired the building to demolish it. This was done in the full knowledge that it is identified as a building that makes a positive contribution to the townscape of the conservation area and should therefore be retained.</p>	
<p>The adverse landscape effects of the rejected part apply to the accepted part.</p>	<p>Landscape Assessments have been undertaken by professional landscape architects, using a standardised approach.</p> <p>The methodology for the SHLAA Landscape Site Assessment is based on best practice guidance from the "Guidelines for Landscape and Visual Impact Assessment" 3rd edition (2013 edition) as published by The Landscape Institute and Institute of Environmental Management and Assessment.</p> <p>The aim of the methodology is to ensure that the assessment</p>

	<p>of the sites across Ashfield is undertaken through a consistent documented process, using a standard template.</p> <p>The southern part of the Mowlands site as identified in the pending planning application scores 'high' (meaning 'total or major alteration to key elements, features or characteristics of the local or wider landscape resource, so that post development the baseline situation will be fundamentally change') with regard to capacity to accommodate development due to the topography and views from the surrounding area. The northern part of the site – that part proposed as a housing allocation - scores medium in this respect.</p>
<p>The Conclusion states that “the Council believes the highway constraints could be mitigated”. The Westerman proposal has been live for some years, so why hasn't the highway aspect been resolved? What you mean is, you are going to accept a highly damaging and harmful highway arrangement.</p>	<p>As stated previously, the Council have worked closely with Highways Department at the County Council to understand and plan for the highways infrastructure needed to support all of the development proposed in the Plan. In respect of this site, the Highways authority have indicated that current access constraints can be overcome, with opportunities for potential access from Sutton Road and the A38.</p> <p>It is re-iterated that this public consultation was undertaken in respect of the Local Plan and associated land allocations, and not the pending planning application which refers to a larger site.</p>
<p>The Council's HSSTP concludes that the developer's proposed road would ease congestion on Sutton Road by helping to disperse traffic. Additionally, the HSSTP claims that development will support Kirkby Town Centre (as a result of</p>	<p>The Council acknowledges this comment and will revise the HSSTP to highlight the need to consider wider potential impact on the highway network and using the Transport Study &amp; detailed transport assessment (at application stage) to identify potential</p>

increased trade). However, the HSSTP makes no mention of the increased traffic flow along Chapel Street and Victoria Road and the adverse impact on the already congested Kirkby town centre. KARA considers this aspect of the assessment to be one-sided, misleading and deeply flawed.	issues and potential mitigation.
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### Proposed Amendments

Issue/Policy	Amendment
General	The Council will refine the document at Publication stage in order to make it easier to navigate, including additional referencing and more detailed contents pages to assist clarity.
Policy SKA3, Paragraph 6.74 - Amend text to remove reference to proposed developer access and to identify Local Wildlife Sites are located within the allocation.	Amend paragraph 6.74 to read: <b>“Site SKA3a1 Mowlands, Kirkby. ....Access to the site is currently restricted, but consultation with the Highways Authority has indicated that this could potentially be mitigated as a new access road from the A38 has been proposed by the developer/landowner. Included within/adjacent to the boundary of the site are Local Wildlife Sites. Development would need to include mitigation of any negative impact on these. The site has potential to deliver a new primary school...”</b>
Housing Site Selection Technical Paper	Amend text in HSSP as follows:  <b>“Access to the site is currently restricted, but consultation with the Highways Authority has indicated that this could potentially be mitigated as a new access road from the A38 has been</b>

	proposed by the developer/landowner.”
Housing Site Selection Technical Paper	Amend text to correct error in Conclusion as follows:  “The housing trajectory indicates that the wider Mowlands site (as promoted by the landowner) cannot be delivered within the 15 year Plan period. It has been determined that it could deliver <del>approximately 900 dwellings</del> a maximum of just over 1000 dwellings”.
Housing Site Selection Technical Paper	Amend text in HSSP page 8 for clarity as follows:  <b>Agricultural Land Quality</b> – “.... There is a lack of available <del>and suitable</del> land on sites with poorer grade soil”.
Housing Site Selection Technical Paper	Additional text will be included in the HSSTP conclusion with regard to Green Infrastructure and Green Spaces.
Housing Site Selection Technical Paper	Additional text will be included in the HSSTP conclusion with regard to the Historic Environment.
<b>Proposed Officer Amendments</b>	
Revised boundary.	<del>Mowlands SKA3a1 - Amend boundary of the site allocation to follow ridgeline and remove The Dumbles/Bloomer Wood ancient woodlands and Local Wildlife Sites from the allocation boundary.</del>

**Ashfield District Council - Statement of Consultation**

<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Woodland Trust	1878	√			White G & S	6703	√		
Johnson	1886		√		Wiblin G	6706	√		
Peck	1902	√			Haughton B	6709	√		
Anstock M	1909	√		√	Navin N	6711	√		
Lathall	1917		√		Alford R	6713	√		
Collier	1918		√		Lewis S & A	6729		√	
Shaw D	2707		√		Lewis R	6800	√		
Swift	2226	√			Paylor N	6802	√		
Oxalis for Westermans	2235		√		Ratcliffe P	6804	√		
Nottinghamshire County Council	2803			√	Madden	6805	√		
Cooper	2811		√		Sheen A	6846	√		
Lewis	3058	√			Waring N	6847	√		
Bennett S	3174	√			Binnell N	6849	√		
Johnson J	3555	√			Hunt D	6850	√		
Wilks J	3701	√			Bonnert R	6851	√		
Slack	3702	√		√	Wright J	6852	√		
Yates G	3769	√			Vardy C	6853	√		
Twiss F & P	3774	√			Cotterill C	6854	√		
KARA (Kirkby Area Residents' Association)	3792	√		√	Hunter J	6855	√		
Smith M	3798	√			Angell S	6856	√		
Clarke A	3804	√			Angell A	6857	√		

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Vardy J	3805	√			Vallance F	6858	√		
Monk C	3818	√			Dyer J	6859	√		
Monk S	3837	√			Dyer S	6860	√		
Cleever K	3846	√			Donson A	6861	√		
Stimpson K	3847	√			Dawson J	6862	√		
Stevenson C	3850	√			Dawson B	6863	√		
Graney S	3855	√			Peck D	6864	√		
Thorne M for Sutton Heritage Society	3888	√			Graney S	6865	√		
Matthews R	4584				Williams A	6866	√		
Bonnert D	5084	√			Wheeldon J	6867	√		
Slack JD	5113	√			Donson G	6868	√		
Amos	5118	√			Vernon C	6869	√		
Knight C	5131	√			Vernon E	6870	√		
Cotterill J	5150	√			Eyre	6897		√	
Williams M	5153	√			Anstock	6976		√	√
Hawksley J	5164	√			Elkington	6977		√	
Twiss P	5286	√			Manders N	6640	√		
Ball S	5296	√			Teece S	6699	√		
Smith D	5298	√			Storer R	6499	√		
Turner B	5300	√			Heath N	6618	√		
Freeman B	5311	√			Perry J	6622	√		
Edwards S	5326	√			West R	6623	√		
Ward	5807		√		Bennet D	6625	√		
Lathall	5819		√		Stevenson D	6636	√		
Alford A	6497	√			Storer R	6499	√		

## SKA3am Site: Kirkby House, Chapel Street, Kirkby-in-Ashfield

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Support	
N/A	
Object	
This has problems regarding Highway Safety on a very busy road system and would impact on the Conservation Area.	Comments noted. However, as part of the SHLAA the highway and Conservations Area implications have been taken into account. If taken forward any development would need to be sensitive to its location within the Conservation Area in terms of design and layout.

### Proposed Amendments

Issue/Policy	Amendment
N/A	

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Madden	6805	√							

### SKA3an Site: Laburnum Avenue, Kirkby

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Support	
N/A	
<b>Object</b>	
<p>The land is no longer owned by the person who submitted the land to the Council. The land is presently held and is in the process of being recovered by the courts by an insolvency firm.</p> <p><u>Access / Highways</u> Highway safety is a major concern.</p> <p>In a previous hearing at Ashfield DC the issue of traffic and access was a particular issue, it appears there is no viable access with 90 mtrs visibility for the in and out of traffic to the site. Mill lane as I understand it is not a road that is recognised to take the amount of traffic a housing development will necessitate.</p> <p>The Mowlands development has already attached a proposed significant increase of traffic that will significantly increase the flow of traffic around Kirkby and specifically down Mill lane to Junc 27 on the M1</p>	<p>The Council acknowledges this comment and will investigate this further.</p> <p><u>Access / Highways</u> Part of the proposed site has received planning permission via a planning appeal.</p> <p>The Council has consulted with the Highways Authority when assessing the suitability of potential housing sites, and they have indicated that the larger site proposed could provide deliver a more suitable access point.</p> <p>The sites proposed within the Preferred Approach Local Plan will generate additional traffic movement. As such, the Council has commissioned an update to the Transport Study to understand what the impacts of development will be and highlight any mitigation that could lessen this impact.</p>



<p>The site will also be compromised by the permission granted to build a traveller site already increasing traffic on a considerably dubious junction, heading into a national speed limit on either side of the site.</p>	<p>The traveller site adjacent to the proposed housing site received planning permission via a planning appeal. Whilst the Council did not support the development, the Planning Inspector should have considered all potential issues when making their judgement.</p>
<p><u>Site Constraints</u>                      The land is also the site of one electricity pylon and a second in a field next to the development, the proposed housing will be situated directly between these two pylons and underneath the electric cables that span both.</p> <p>The site has also been subject to thousands of tons of inert concrete waste which has been dumped illegally and buried in a natural water run off, this issue though delayed for some reason should be addressed by the environment agency, before any proposed development agreed</p>	<p><u>Site Constraints</u>                      A pylon route does run through the adjacent site, but not through the proposed allocation. The Council does not believe this would impact on site's potential to be developed.</p> <p>The Council has no records of the site being landfilled or tipped, although it acknowledges that this has suggested to have been done illegally. Any future development would need to undertake ground investigation works prior to any development taking place.</p>
<p><b>Comment</b></p>	
<p>This proposed allocation is on the perimeter of the urban area of Kirkby therefore any proposals should take into account the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone NC05 Kirkby Coalfield Farmlands/Kirkby Vales.</p>	<p>Comments acknowledged.</p>

### Proposed Amendments

Issue/Policy	Amendment
N/A	

<b>List of Respondents</b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Nottinghamshire County Council	2803			√	R Madden	6805	√		
J Satterthwaite	6803	√							

### SKA3a: Site: North of Kingsmill Hospital, Sutton in Ashfield

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Site Allocation</b>	
<b>Support</b>	
County Property supports the proposals of the Local Plan which relate to land allocations for housing on County owned land.	The Council welcomes and acknowledges this comment.
<b>Object</b>	
Skegby is a village and we would like to keep it as one. Residents do not want to lose green land and there isn't any room for more houses or cars. We'd like to keep our countryside so we can enjoy recreational activities.	The Council has to make very difficult decisions in balancing the needs of the whole District and is required, by national planning policy, to deliver development to meet its housing needs for the next 15 years. Failure to adopt a sound local plan will ultimately lead to central Government stepping in, with a risk of unplanned, ad-hoc development in the interim period.

	<p>Unfortunately the supply of brownfield sites has reduced, due to the successful redevelopment sites in the recent past and the need to provide land for business / jobs growth. In order to help meet the future housing needs of the District, the Council has had to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites deemed deliverable and sustainable, as required by national planning policy.</p>
<b>Comment</b>	
<p>Mansfield District Council - In respect of the Housing proposals North of Kings Mill hospital (SKA3a for 250 units) and at Beck Lane (SKA3h for 400 units), Ashfield District Council should ensure that it is satisfied, along with NCC Highways, that the existing highway infrastructure can accommodate the increase in traffic on both a site by site basis and cumulatively (including nearby sites allocated within Mansfield), or alternatively identify the necessary highway infrastructure improvements required and how they will be implemented. Mansfield District Council would welcome the opportunity of working with Ashfield District Council in looking at the potential masterplanning of this general area.</p>	<p>The Council has liaised with the Highway Authority regarding the development of the sites including the sites allocated or with planning permission in the District of Mansfield. In addition the Council is undertaking an update Strategic Transport Assessment to identify highway issues from the proposed development and potential mitigation measures.</p>
<p>However, there are two situations where Ashfield D. C. has identified land for housing but the neighbouring authority, Mansfield Council, has not matched the allocation on that part of the land parcel which lies within its administrative area. These situations appear illogical and warrant a more co-ordinated approach.</p>	<p>The Council acknowledges these comments and will continue to work with Mansfield Council to help ensure comprehensive development is supported where appropriate.</p>

**Ashfield District Council - Statement of Consultation**

This proposed allocation is on the perimeter of the urban area of Sutton in Ashfield, therefore any proposals should take into account the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone ML23 Skegby Plateau.	Comment acknowledged.
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**Proposed Amendments**

<b>Issue/Policy</b>	<b>Amendment</b>
N/A	

**List of Respondents**

<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Mansfield District Council	1872			√	D Rixson on behalf of Nottinghamshire County Council	5480		√	√
Nottinghamshire County Council	2803			√	E. Hurst	6565	√		

**SKA3ao - Walesby Drive, Kirkby in Ashfield**

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Site Allocation</b>	
<b>Object</b>	
Highways & Access	

<p>It is a dangerous area for an access road; 150 houses will mean 150+ cars. There will be a vast amount of traffic and congestion in the area should the access road be opened up and it will impact nearby roads in the area.</p>	<p>The Council acknowledges that new development will generate traffic. The Council has worked closely with the County Council's Highway Department to ensure appropriate access can be achieved to the sites proposed in the Preferred Approach Local Plan.</p> <p>The Council has also commissioned a Transport Study that will assess the transport impacts of the proposed development and suggest appropriate highway improvements to help mitigate the impact. This work, together with guidance from the County Council, will be used to influence the detailed design of any future scheme at the planning application stage.</p>
<p>Flooding / Drainage</p>	
<p>This site is in an area of high flooding, even in light rain. More houses will create more issues in regards to flooding. Particularly into the nearby greenspace/woodland (EV5).</p>	<p>Using information sourced from the Environment Agency website, the site does not have recorded incidents on surface water flooding. Nor does the site lie within a flood plain. However, it is acknowledged, that within the wider area there are surface water flooding issues.</p> <p>A flood risk assessment would need to be undertaken for any site over 1 hectare as part of the planning application process.</p> <p>Any future development on the site will be expected to install a Sustainable Urban Drainage system (SuDS) to manage any surface water drainage issues currently present on site and those generated through new development. National planning guidance sets out that sustainable drainage systems, which are designed to control surface water run off close to where it falls and mimic natural drainage as closely as possible, provides opportunities to:</p>

	<ul style="list-style-type: none"> <li>• reduce the causes and impacts of flooding;</li> <li>• remove pollutants from urban run-off at source;</li> <li>• combine water management with green space with benefits for amenity, recreation and wildlife.</li> </ul> <p>The Lead Local Flood Authority is a statutory consultee and the Council will seek advice on planning applications on what sort of sustainable drainage system they would consider to be reasonably. The installation of such a system is likely to help resolve any existing flooding issues derived from run off from the site. If a SuDs scheme is deemed inappropriate or unfeasible, e.g., due to site geology etc., any future development will still need to manage surface water drainage on site.</p>
<u>Natural Environment</u>	
The housing will have an adverse impact on the nearby greenspace (EV5) and which has a large mix of rare fauna. It will break the food chain for birds and animals; the site should be a nature reserve.	The Council recognises the site lies adjacent to protected green space. As such, it will ensure any future development proposal acknowledge this within a future design and does not impact on it. This may result landscape mitigation or buffers if appropriate.
The housing will ruin the nearby greenspace, particularly in terms of wildlife and recreation.	Any future develop on the site may be required to undertake ecological surveys to understand what wildlife is currently present on the site. These surveys will then inform mitigation or retention measure that would need to be applied to the development.
Views across greenspace will be lost.	Where ever possible, the Council has allocated brownfield sites within Preferred Approach Local Plan. The allocated brownfield sites can accommodate approximately 1,268

	<p> dwellings. A very small number of brownfield sites have been rejected due to severe constraints e.g. the majority are located in high flood risk areas (flood zones 2 or 3). The supply of brownfield sites has reduced, due to the successful redevelopment sites in the recent past for housing and to meet the need to provide land for business / jobs growth. In order to help meet the future housing needs of the District, the Council has no option but to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites deemed deliverable and sustainable, as required by national planning policy.</p>
<u>Alternative sites</u>	
Try repairing all houses boarded up in Kirkby and use that for housing instead.	<p>The Council Strategic Housing Team are proactively seeking to bring empty properties back into use. To date, they have been very successful at this, but the process requires willing property owners and often financial support. However, the Council will continue to work with property owners to reduce the amount of vacant properties across the District.</p>
<u>Infrastructure</u>	
There are not enough doctor's surgeries for the number of housing.	<p>In developing the Local Plan the Council has worked closely with the Education Department at the County Council, the Clinical Commissioning Groups and other infrastructure providers to understand and plan for the infrastructure needed to support the development proposed in the Plan. This information has fed into the updated Infrastructure Delivery Plan, to support the Local Plan. This information will be used to help negotiate s106 agreements with future developers to help secure funds to deliver the infrastructure needed. In some cases this may lead to the delivery of new infrastructure as part</p>
The local schools are already at capacity and would not be able to ask on more pupils.	

	of the development.
<b>Other</b>	
Devalue property.	National planning policy does not allow any potential impact on property values to be taken into account within the planning process.
Concerns with the type of people that will be the residents in new houses in this area.	The Council, nor any future housing developer, can influence who will live in new or existing houses.
<b>Comments</b>	
Additional housing should benefit the needs of the local community rather than degrading existing community amenities.	<p>The housing sites proposed within the Preferred Approach Local Plan are to meet the future housing needs of the District's communities. The amount of housing proposed (480 homes a year), has been informed by the Strategic Housing Market Assessment.</p> <p>The Government requires all council's to undertake a Strategic Housing Market Assessment (SHMA) across a Housing Market Area to understand the future housing needs of their area. Ashfield lies within the 'Outer Nottingham Housing Market Area', with Mansfield and Newark &amp; Sherwood Districts. The 3 Councils jointly commissioned a SHMA which provided Ashfield with its housing target of 480 homes a year, as well as information on affordable and specialist housing need. This requirement has be derived from government household projections, coupled with analysis of aging population, changing household sizes, migration and people unable to get on the property ladder due to the recession. Having understood its need, the Council has proposed the allocation of sites to meet that future need. This has included</p>



	existing planning permissions that have yet to be implemented and new sites.
This proposed allocation is on the perimeter of the urban area of Kirkby therefore any proposals should take into account the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone SH11 Lindhurst Wooded Farmlands.	Comments acknowledged.

### Proposed Amendments

Issue/Policy	Amendment/Development Brief Requirement
N/A	

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Nottinghamshire County Council	2803			✓	D Green	6648	✓		
K Drew	6606	✓			D Redfern	6649	✓		
S Elsby	6421	✓			P Osborne	6650	✓		
S Winfield	6646	✓							

## SKA3ap Diamond Av, Kirkby

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Object	
Natural Environment	
I am concerned about the possibility that the disused allotments to the East of Diamond Avenue allotments may be allocated for building. This fairly small plot supports a range of local wildlife under much pressure nationally due to reduction in suitable habitat.	The Council acknowledges that that may be wildlife currently using and occupying the site. As such, as part of any future planning application a developer will be required to undertake appropriate wildlife / ecology surveys to undertake what is present on the site and what mitigation / protection measures are required.
Diamond Avenue allocation should continue to be aspirational by remaining a Carbon Neutral site as it was under the current Local Plan.	The Ashfield Local Plan Review 2002 does not identify the site as carbon neutral. The Local Plan Preferred Approach in Policy CC1 looked to have a carbon neutral policy. However, Government policy has set out that local planning authorities should not set in their emerging Local Plans any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings subject to viability issues.
Alternative sites	
Within the overall scope of the local plan, including significant developments planned near Ashfield School and the Coxmoor estate, leaving this area alone would hardly be much of a sacrifice, and would offer many benefits to local residents.	The Diamond Avenue site is an existing housing allocation within the adopted 2002 Ashfield Local Plan. The Council believes the site is deliverable within the plan period, as such has chosen to retain this allocation.

	<p>The Council needs to allocate a range of deliverable housing sites across the District to meet the future housing needs of its communities. Unfortunately the Council has had to take the difficult decision to propose the allocation of a number of greenfield sites within the countryside to achieve this. In committing to this difficult decision, the Council has also ensured the Local Plan has proposed to allocate appropriate and deliverable sites within the urban area that are underutilised have also be allocated, such as that at Diamond Avenue.</p> <p>Whilst large development sites can deliver a large number of homes, smaller sites are also important to help ensure the District retains a 5 year land supply, as required by Government; and to provide a variety of sites for residents and developers.</p>
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### Proposed Amendments

Issue/Policy	Amendment/Development Brief Requirement
N/A	

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
R Nevin	6581	✓			R Madden	6805	✓		

## Policy SKA3: Alternative Housing Sites Proposed in Sutton in Ashfield and Kirkby in Ashfield

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Object</b>	
<p>Object to the omission of Annesley Miners Welfare Building from the Local Plan housing allocations. Positive impacts include:</p> <ul style="list-style-type: none"> <li>• Potential to accommodate up to 63 dwellings;</li> <li>• Site is within 200 metres of accessible open space;</li> <li>• Good access to services including primary school, bus stop, post office/cash machine;</li> <li>• Development will help support employment/economy;</li> <li>• Partial redevelopment of brownfield land;</li> <li>• Development will support Ashfield's town centres.</li> </ul> <p>The Council will be aware that an outline application for mixed use development is currently under consideration by the Council. Various surveys and reports have been submitted which demonstrate that there are no technical constraints preventing, limiting or delaying development on the site. The Council is aware of the difficulties facing the site i.e. long term vacancy and deteriorating state. A transport assessment and residential travel plan have been submitted and the implications have been discussed with the Highway Authority who have raised no objections to the principle of the junction improvements. The proposed development will provide the funds for securing the necessary junction improvements. The Council's reasons for not allocating the site (safeguarding</p>	<p>Objection noted. As this is now a planning application, the Council will need to determine if the merits of the proposal accord with national and local planning policy and whether there are any other material considerations. The outcome will be known in due course.</p>

<p>of the playing pitch and severe access constraints) are not justified or effective, both of which go to the heart of the ability to meet the soundness test if the plan progresses on the basis it is at present.</p> <p>Without funds secured by development on the site, the redevelopment and regeneration of the former Annesley Miners' Welfare building and car park fronting the public highway and the improvements to the existing junction are simply not viable. In the absence of sufficient funds available in the public purse, there are no other means of securing the same important benefits.</p>	
<p><b>Thoresby Avenue, Kirkby in Ashfield – (SHLAA Ref. K34)</b></p> <p>The Council's Green Belt Review and our own independent Green Belt Review indicate that the site makes a limited contribution to the purposes of the Green Belt. Due to this and the permanent boundary of the A611 and proximity of residential properties it is considered suitable for Green Belt release to enable residential development.</p> <p>With regard to Policy S2, we consider that there is scope for an uplift to the objectively assessed housing need. The site would assist the Council in meeting the OAHN for the District.</p>	<p>Given the number of deliverable sites located in designated Countryside in Kirkby and Sutton in Ashfield, the Council does not consider that there are exceptional circumstances for Green Belt release in Kirkby in Ashfield. Consequently the site is not considered to be suitable for allocation.</p> <p>The Council is satisfied that the Nottingham Outer SHMA is a robust evidence base. As such, there is no requirement to amend the OAHN.</p> <p>No amendment proposed.</p>
<p><b>Land between Chesterfield Road and Blackwell Road, Huthwaite (SHLAA Ref. S63)</b></p> <p>Please consider including this site as an allocation in the Local Plan. It would allow the developer of site SKA3b to leave a ransom strip thus preventing future development and reducing the value of the land.</p> <p>If included it would round off the proposal (SKA3b);</p> <p>The site is prominent but on the opposite side of the valley large industrial units have been allowed by Bolsover District</p>	<p>Development of the site would not be appropriate as it is very steep, prominent and it has the lowest capacity to accommodate development (it scores 3 out of 3 in the landscape assessment). It would be difficult to mitigate the visual impact of the site due to its elevated position where it meets Chesterfield Road.</p> <p>No amendments proposed.</p>

<p>Council which are also prominent and at the same altitude. Visual impact can be mitigated by appropriate landscaping.</p>	
<p><b>Derby Road, Kirkby in Ashfield (SHLAA site ref. K24) –</b>  Disappointment that the site has been retained within the Green Belt as it was previously taken forward for allocation in the withdrawn Local Plan in 2013/2014). In reference to paragraph 11 of the Inspector's letter, why has the site not been removed from the Green Belt?  The housing need is less per annum than previously considered by the inspector. There is very little land allocated for housing in Kirkby in Ashfield.</p>	<p>The Inspector appointed to examine the 2013 Local Plan, Mr Jeremy Youle, indicated that the Council had not considered reasonable alternatives when determining the most suitable sites for allocation. The Council has taken on board the Inspector's comments and has concluded that the most suitable sites are located in designated Countryside and that there are no exceptional circumstances for Green Belt release in Kirkby in Ashfield. The Housing Options Spatial Approach paper provides details of the justification for this approach.  Paragraph 11 of the Inspector's letter (dated 15<sup>th</sup> April 2014) suggests that the Council may want to consider safeguarding Green Belt land. This would safeguard the land beyond the plan period (2032); it would not allocate it for development.  The Council does not consider it necessary to safeguard Green Belt land because there may be opportunities to allocate other land at the end of the Plan period (2032) e.g. designated Countryside or brownfield sites within the urban area. The Council will continue to plan, monitor and manage over the plan period to ensure that the housing needs of the District are met.</p> <p>No amendment proposed.</p>
<p><b>Beacon Farm, Derby Road, Kirkby in Ashfield (SHLAA site ref. K27)</b>  1. Objection - The lack of opportunity given to participate and comment on the Green Belt Review and Council findings and decisions is a fundamental failing of the Local Plan preparation process.  2. The consultation period stated in paragraph 1.10 is</p>	<p>1. Disagree. The six week public consultation on the Local Plan Preferred Approach provided an opportunity for people to participate and comment on the Local Plan and supporting documents.  2. The Local Plan Preferred Approach was prepared for a six week period of public consultation which should have commenced in January 2016 through to February 2016.</p>

<p>incorrect and misleading.</p> <ol style="list-style-type: none"> <li>3. Support for the vision statement but object to the omission of Beacon Farm because this is contrary to the aims and aspirations of the vision. Development of the site would fully accord with the vision.</li> <li>4. Support Objective SO8 Provision of Sustainable Housing but object to the failure to allocate Beacon Farm which would accord with SO8.</li> <li>5. Support objective SO14 Environmental Responsibility but object to omission of Beacon Farm from the Local Plan as the Council has not given full, open, objective consideration to the site.</li> <li>6. Support for objective SO19 Character of District but object to failure to allocate Beacon Farm. The poor state of the site impacts on the environment and redevelopment would improve the character of the District.</li> <li>7. Object to the Spatial Strategy which indicates there will be no Green Belt release in Kirkby in Ashfield. Any objective assessment of Beacon Farm (Green Belt Review ref KA03, site 5) would conclude that it is definitely not characterised by openness. The site is dominated and characterised by buildings, most of which are dilapidated. Approximately a third of the site is hard standing which have become characterised by weeds and coarse grasses. Being a former depot the land is brownfield. Given its prominent, urban location, the land has no beneficial use without remedial action involving development.</li> <li>8. The NPPF paragraph 83 reminds LPAs that “once</li> </ol>	<p>Unfortunately the decision to go out to consultation was called in by a small group of Members in January, prior to the commencement of the public consultation and this delayed it for a couple of weeks.</p> <p>3. The site is Green Belt land and the Council has determined that there are no exceptional circumstances for Green Belt release around Kirkby in Ashfield. It is therefore unsuitable for allocation. The Housing Options Spatial Approach paper provides details of the justification for this approach. It is the Council's opinion that the Local Plan would be found to be unsound if Green Belt sites were taken forward in Kirkby in Ashfield because there are more suitable alternatives available.</p> <p>4, 5, 6, and 7. Comments noted. As stated previously, the Council does not consider that there are exceptional circumstances for Green Belt release when there are other suitable and available sites which are not in Green Belt. The NPPF clearly sets out that the Plan must be justified, it should be the most appropriate strategy when considered against the reasonable alternatives based on proportionate evidence.</p> <p>8. The Housing Options Spatial Approach provides detailed justification for the approach taken. The document will be amended to clarify that the Council does not consider it necessary to identify safeguarded land due to the land which is potentially available in designated countryside and brownfield sites in the urban area. This will continue to be monitored and reviewed through the Strategic Housing Land Availability Assessment process.</p> <p>9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27 Comments noted. As stated previously, the Council does not consider that there are exceptional circumstances for Green</p>
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<p>established Green Belt boundaries should only be altered in exceptional circumstances, through preparation of Local Plans". LPAs should have regard to the intended permanence of Green Belt boundaries in the long term, so that they are capable of enduring beyond the Plan period. We see no evidence in published documentation that full and proper consideration has been given to this. We would urge the Council to rectify this before it is examined by an inspector.</p> <p>9. Support Policy S1 Sustainable development. Request that consideration is given to the allocation of Beacon Farm which would fully accord with this policy.</p> <p>10. Support Paragraph 4.6 (page 38) which sets out that national guidance places an emphasis on the efficient use of land. Request for Beacon Farm to be reconsidered as it is an eyesore in a potentially sustainable location, but is a highly inefficient use of essentially 'urban land' which could help meet the housing needs of the District.</p> <p>11. Strongly support Paragraph 4.7 (page 40) "Proposed development and uses of land within the District should not be harmful to the environment in terms of the character, quality, amenity or safety of the environment". The site is in need of development in order to address its downward spiral towards dereliction.</p> <p>12. Support the intent of Policy S2 - Overall Strategy for Growth but object to the way in which it has been interpreted in the Local Plan. Whilst strongly supporting</p>	<p>Belt release when there are other suitable and available sites which are not in Green Belt.</p> <p>28, 29, 30, 31, 32, 33, 34, 35 &amp; 36 The Council welcomes support for these policies.</p> <p>37. Disagree. The Council has clearly set out the reasons for not taking Green Belt sites in Kirkby in Ashfield forward as allocations in the Site Selection Technical Paper and Housing Options Spatial Strategy paper.</p> <p>38. Objection noted. The Council is still of the opinion that these sites are the most suitable to be allocated after taking into consideration the alternatives. The Council is taking forward the majority of the brownfield sites have been submitted for consideration. A very small number of brownfield sites have not been taken forward because they have severe physical constraints (most are in high risk flood zones).</p> <p>39. Objection noted. No amendment required.</p> <p>40. The fact that the site has scored 6 out of 20 points indicates that it does meet the 5 purposes of the Green Belt, albeit to a lesser extent than some other sites. As such, there is no justification for removing the site from Green Belt.</p> <p>41. Disagree. The Council is satisfied that the scoring is correct in the Green Belt Review. The public highway adjoining the site on Balls Lane and Derby Road does not form an 'urban' boundary as both roads adjoin open countryside in this location. With regard to the score for 'Assist in safeguarding countryside from encroachment' the Council is satisfied that the assessment is correct. The bungalow and poultry sheds accommodate approximately 20% of the site (not 50% as stated in the submitted response).</p> <p>With regard to the 'urban regeneration' section, the Green Belt</p>
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<p>this, we would point out that taking no action to address the evident problems associated with Beacon Farm is in conflict with and contradicts these stated aims. The appearance of this site in this prominent location alongside the busy A611 detracts from the local environment and detracts from the image of Kirkby and thereby deters inward investment. There are opportunities to promote healthier lifestyles in relation to the adjoining woodland.</p> <p>13. Support for Housing Growth (page 43) regarding the Council's intention to meet the objectively assessed housing needs (480 dpa).</p> <p>14. Paragraph 4.12 is supported (regarding intent to identify deliverable sites) but object to the fact that Beacon Farm (which is deliverable) hasn't been selected.</p> <p>15. Paragraph 4.13 the Council's sequential approach to site selection is supported but objection raised to none allocation of Beacon Farm the reasons for which are not understood.</p> <p>16. Support paragraph 4.39 'development will be encouraged in locations which support sustainable travel choices'. The site has good access to bus stops and cycle paths.</p> <p>17. Support for paragraph 4.50 with regard to the growth of Kirkby in Ashfield. Object to the omission of Beacon Farm from the Local Plan allocations.</p> <p>18. Object to SKA3 Sutton and Kirkby housing allocations due to the omission of Beacon Farm, Kirkby in Ashfield.</p> <p>19. Support Policy SKA5 new and improved infrastructure in Kirkby and Sutton. Beacon Farm has areas of</p>	<p>assists the urban regeneration process because it severely restricts development in countryside, thereby promoting the regeneration of the urban area.</p> <p>42. Disagree. The Council is satisfied that the assessments of all KA03 sites are robust.</p> <p>43. Disagree. The Council is satisfied that the evidence is robust.</p> <p>No amendments proposed.</p>
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<p>woodland to support this.</p> <p>20. Support paragraph 8.39 sequential approach to flooding and site selection. Object to inclusion of SKAah and SKAai which have known flooding problems. Beacon Farm is a better alternative as there are no flooding problems.</p> <p>21. Support for Policy EV1 Green Belt but object to the fact that Beacon Farm has not been removed from Green Belt. Policy EV1 would continue to preclude any viable action to address the brownfield, semi-derelict problems on the site.</p> <p>22. Support the statement “The main purpose of the Nottingham Derby Green Belt is to contain the outward growth of Nottingham City and Derby City and to prevent the coalescence of these and other settlements within it by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence”. Strong objection to the Council’s failure to apply this clear policy directive to Beacon Farm (Green Belt Review ref KA03 Site 5).</p> <p>23. Support for Policy EV4 as Beacon Farm has the potential to contribute towards the improvement of green infrastructure via the adjoining wooded embankment.</p> <p>24. Support for Policy EV6 Trees, woodland and hedgerows. Wooded embankments have the potential to support wildlife habitats.</p> <p>25. Support for Policy HG2 affordable homes. Development of Beacon Farm would comply with this policy.</p> <p>26. Support Policy HG3 Public Open Space. Development</p>	
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<p>of Beacon Farm would comply with this policy.</p> <p>27. Support Policy HG3 Housing Mix – the site would fully comply with this policy.</p> <p>28. Support Policy HG5 Housing Density.</p> <p>29. Support Policy SD1 Good Design.</p> <p>30. Support Policy SD2 Amenity.</p> <p>31. Support Policy SD3 Recycling and refuse provision.</p> <p>32. Support Policy SD4 Infrastructure Provision &amp; Developer Contributions.</p> <p>33. Support Policy SD8 Environmental Protection.</p> <p>34. Support Policy SD9 Traffic Management &amp; Highway Safety.</p> <p>35. Support Policy SD10 Parking.</p> <p>36. Support the intent of Policy SD13 Designing out crime and the fear of crime but consider that a cautious approach should be taken when designing footpaths which link to existing neighbourhoods due to the implications for escape routes for burglars.</p> <p>37. SA Preferred Approach document – Object to Paragraph 4.95 which sets out the Council's reasoning for not allocating land in Green Belt on the edge of Kirkby. In our view it is barely conceivable that such scant, cursory consideration has been given to whether it is appropriate to revise the Green Belt boundaries around Kirkby. Whether or not the land in question continues to fulfil the 5 criteria deemed necessary by National Guidance for inclusion in the Green Belt does not even get scant consideration. Clearly this is unacceptable.</p> <p>38. Objection to the allocation of sites in countryside in</p>	
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<p>Kirkby in Ashfield and Sutton in Ashfield (SHLAA refs. SM44; S47; S55; S60; S51, S61, S108, S350; S68, S71, S337, S363, S394; S94; S374; S378; K23, K33; K79; K334, K359; K325. The Council has failed to identify suitable brownfield sites prior to allocating countryside.</p> <p>39. Objection to the allocation of sites in Green Belt in Hucknall H9, H51, H52, H81, H99.</p> <p>40. In an effort to demonstrate inter-authority co-operation and joint working (Duty to Co-operate), the various authorities agreed to adopt a common 'Assessment Framework' for assessing the purposes of Green Belt, as set out in Part 9 of the National Planning Policy Framework (NPPF). This was commendable. Quite rightly, any releases from Green Belt would need to demonstrate 'exceptional circumstances'. However, from examination of all the publicly available documents, there is no evidence to suggest that <u>any</u> consideration has been given to the possible release of KA03 Site 5 (Beacon Farm) from the Green Belt, despite its very low 'performance score' regarding the purpose and function of Green Belt. From the Green Belt Review methodology adopted, the lowest possible total score is 4 and the Council's assessment has resulted in a score of just 6 for KA03 Site 5 (Beacon Farm). The second lowest of any site in the Kirkby and Annesley Green Belt Area. This is important, since the lower the score, the less important the site is considered to be as Green Belt. The highest possible score would be 20.</p>	
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<p>41. We believe the Green Belt Review assessment is generally sound, but would comment on three (purposes) and take issue with one of the five 'justification notes'. Check the unrestricted sprawl of settlements:</p> <ul style="list-style-type: none"> <li>• We agree that approximately half of the site boundary adjoins the existing Settlement Framework boundary/built-up area. However, we would point out and believe it is very significant to note in your assessment that the other two boundaries are formed by urban highways – the A611 and Balls Lane.</li> <li>• Given the above, we cannot agree that 'Development of the site would not round off the existing settlement. We strongly believe that it would and that the two urban highways mentioned represent both a logical and defensible 'edge of settlement' 'stop' to further development as well as a more logical and defensible long term Green Belt boundary. Visually, the site is very well contained and the potentially developable area does not extend over topographical features.</li> <li>• Whilst it is true to say that the western and northern boundaries fall steeply away towards part of the existing urban area and to Balls Lane, these heavily treed embankments should be seen as a positive attribute of the site, ensuring that any development upon the majority of the site, which is level, would be 'well contained'. Moreover, whilst it is true to say that dwellings can be viewed along Derby</li> </ul>	
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<p>Road, this is from the centre of the site, not just the 'very southern' part, and were development to be permitted on the site, it would read as a logical continuation of existing development on Derby Road. The heavily wooded embankment to Balls Lane would ensure that the development was visually contained and would form a very effective and logical 'permanent' edge to development in this locality.</p> <p><i>In the light of all of the above, we would ask the Council to consider revising the 'score' downwards from 2 to 1.</i></p> <p>(ii) Agree with assessment of 'Preventing neighbouring settlements from merging'.</p> <p>(iii) Generally agree with assessment of 'Assist in safeguarding countryside from encroachment' but suggest further clarification. The statement regarding the bungalow is agreed. However, the comments regarding derelict outbuildings give the impression that they are of lesser significance than the bungalow, whereas they not only cover a much larger area, but are visually the most dominant feature on and indeed of the site. Moreover, the 'section of sparsely vegetated land with evidence of hardstanding beneath' comprises approx ¼ of the total site area and we believe it is important to record that this series of hardstandings are the remnants of former depot usage confirming not only the land's status as 'brownfield' but also the need for remedial action in order to bring the site into beneficial use.</p>	
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<p>Spatially, the former depot area and the bungalow and garden constitute over half the total site area and are unquestionably 'brownfield'. Moreover, we believe that the derelict and semi-derelict buildings should be classed as brownfield in their own right, their last use having been storage. Irrespective, arguably the entire site is brownfield by virtue of being all within the same curtilage, since unquestionably over half the site area is brownfield.</p> <p>Overall we believe the site includes a large amount of inappropriate developments and whilst by virtue of the site's good enclosure on the northern boundary, this does not intrude into open countryside beyond, it does intrude into and detract from the appearance of the urban area in this important, prominent edge of settlement location. The A611 is a busy transport route and the appearance of the site detracts significantly from, and gives a poor impression of, the locality.</p> <p>In the light of the above, we would ask you to consider revising the score downwards from 2 to 1.</p> <p>(iv) Preserve the setting and special character of historic Settlements. This is really not applicable and we agree with the justification notes and scoring.</p> <p>(v) Assist in urban regeneration We are perplexed by and cannot agree with the</p>	
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<p>sweeping generalisation that all Green Belt sites are the same regarding their ability to assist in Urban Regeneration. We believe the issue is more complex when considering whether or not to remove an existing site from the Green Belt. Some land within Green Belt may itself be a candidate for Urban Regeneration. In this Local Plan area, KA03 Site 5, the former Beacon Farm, may well be unique in this respect. Irrespective, whilst it may well be an anomaly, the matter cannot and must not be overlooked. The site immediately adjoins the settlement framework boundary, is dominated by dilapidated buildings and hardstandings, is wholly brownfield or largely brownfield and is in a sustainable location. In short, it is a prime candidate for development to assist urban regeneration.</p> <p>42. Disagree with assessment of other Green Belt sites in KA03 – Site 1, Site 2, Site 3 and Site 4. The Council should review the assessment of these sites.</p> <p>43. Overall we object to the Green Belt Review/Local Plan considerations in so far as they relate to KAO3 Site 5 on the grounds that there is no evidence to confirm that proper consideration has been given to NPPF guidance paragraph 85 which requires LPA's:</p> <ul style="list-style-type: none"> <li>• “not to include land (within the Green Belt) which it is unnecessary to keep permanently open”.</li> <li>• “satisfy themselves that the Green Belt boundary will</li> </ul>	
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<p><u>not</u> need to be altered at the end of the development plan period”.</p>	
<p><b>Fackley Road, Teversal (SHLAA site ref S74)</b></p> <ul style="list-style-type: none"> <li>• We have been having ongoing discussions with the Council with regard to identifying the need for bungalows in Ashfield.</li> <li>• Ashfield Homes was tasked with identifying what the need is in Ashfield with the support of BDWH (developer).</li> <li>• At all our meetings all involved agreed the need and fully supported our objectives.</li> <li>• We have identified this site (Fackley Road, Teversal) for the delivery of bungalows for the following reasons:             <ol style="list-style-type: none"> <li>1. There is a proven need for bungalows in the area;</li> <li>2. It would be a 100% bungalow scheme at a low density, not more than 50 units;</li> <li>3. A local Councillor was approached for comment. The Councillor spoke to local residents living on Crompton Street. Their concern was the difficulty of turning their cars around and if there was a suitable turning head or small roundabout, would be something that would be very helpful for them.</li> <li>4. We also spoke to Highways regarding both Crompton Street and Coppywood Close being connected and the conclusion was it was feasible and achievable but required joint discussions on a suitable design and would easily accommodate this scheme.</li> </ol> </li> </ul>	<p>Objection and Comments noted. The Council does not consider the site to be suitable for development. Evidence indicates that development would have an adverse impact on the landscape. It would have a significant impact on the green gap between Teversal and Stanton Hill, which would impact on the rural character of the settlement. Roads adjoining the site are also very narrow and a section of the adjoining road is in private ownership. It is unclear if access constraints can be mitigated. This has been a secondary consideration in determining the suitability of the site. The Site selection document will be amended to clarify the reasoned justification for the unsuitability of the site.</p> <p>No amendment proposed.</p>

<p>5. The low density of this scheme would mean that a large amount of the site would be open- space, enhancing the lives of those we intend to help. We hope the Council agree and we can move forward together to achieve this.</p>	
<p><b>Mill Lane, Huthwaite (SHLAA site ref S314)</b></p> <ul style="list-style-type: none"> <li>• We have been having ongoing discussions with the Council with regard to identifying the need for bungalows in Ashfield. Ashfield Homes was tasked with identifying what the need is in Ashfield with the support of BDWH (developer). At all our meetings all involved agreed the need and fully supported our objectives.</li> <li>• Council's site assessment: "Development of the site may be appropriate as it would form a logical infill within the urban area" and "An alternative access route would be required" both comments we agree fully with and propose the following solution for your consideration.</li> <li>• We have spoken with the Highway Authority regarding our proposal for bungalows and potential for accessing the site from Maycroft Gardens (the road was developed to access the recycling plant and landfill site). Highways explained that when this access was put in for the two purposes mentioned above it had to go through the same procedures as any development and therefore satisfied Highway requirements. Being realistic we are not proposing the large number in your report but feel a quantity of 50 units is acceptable and deliverable. I would conclude in asking you to consider this access point on the basis of what we are proposing and for the amount of development we are suggesting,</li> </ul>	<p>Comments noted.</p> <p>Given the severe access constraints, the Council does not intend to allocate the site for housing because there is uncertainty that development will be delivered within the Plan period.</p> <p>However, the site is located within the main urban area where there is a presumption in favour of sustainable development. Furthermore, the Council is seeking to withdraw the current Open Area designation from the site. Consequently, if the access constraints can be overcome, any future planning application would be determined on its own merits in this respect.</p> <p>No amendments proposed.</p>

<p>if agreeable we could look at the site in more detail. This site is by its nature inexpensive; therefore it lends itself well for this social project that we are proposing. A large proportion of the land would be open space with sensitive planting, creating a pleasurable place for the proposed occupants of the bungalows as well as the wider public.</p>	
<p><b>MARR Route Land</b> Why not use the MARR route land for housing and when business has an upturn look for other land for industrial use? There are water problems on the proposed site allocations.</p>	<p>The Council can only consider land that has been put forward for consideration by a landowner i.e. available land. The Council is proposing to allocate a site on the MARR, land off Cauldwell Lane, Mansfield.</p> <p>There are also other sites which have been submitted for consideration adjacent to the MARR which are not suitable for allocation because they do not adjoin a settlement and have very poor access to services and facilities (see SM45, SM46, S66 below for more details).</p> <p>No amendments proposed.</p>
<p><b>SHLAA Sites SM45, SM46, S66</b> Sites suggested as an alternative to Mowlands, Beck Lane, Lowmoor Road, and Newark Road. Suggestion that the sites offer a more sustainable option which would result in less congestion and which would not have an impact on local services.</p>	<p>The sites in question were not subject to detailed assessment as they failed to meet the SHLAA assessment methodology for additional assessment. The sites are unsuitable because they are located quite a distance from a settlement. Consequently, they have very poor access to services and facilities. Allocation of the sites would result in unsustainable development which is contrary to national planning policy and local planning policy.</p>
<p><b>Penny Emma Way, Kirkby in Ashfield (SHLAA site ref K26)</b> The conclusions of the Council's site assessment are noted (site has poor access to a primary school, GP and has a negative impact on air quality and the landscape. The site is no further away from the services than the sites chosen to be</p>	<p>Objection noted. Kirkby Hardwick is a very small collection of cottages. The site would not form a logical urban extension because it would need to be accessed via Penny Emma Way and is slightly separate from Kirkby Hardwick. It is a very narrow plot of land which faces an industrial estate of very large</p>

<p>allocated on Lowmoor Road and Newark Road and it would not have a greater impact on the landscape than the sites proposed for allocation.</p> <p>We would disagree with the findings regarding the site being within an industrial area. There are industrial buildings opposite the site but not adjacent to it. This is a predominantly residential area adjacent to Kirkby Hardwick. Multi storey flats were built some years ago adjacent to industrial buildings on Lowmoor Road.</p>	<p>industrial buildings. Development would be incongruous in this setting. The Site selection document will be amended to clarify the reasoned justification for not allocating the site.</p> <p>No amendments proposed.</p>
<p><b>Land rear of The Snipe Public House, Alfreton Road, Sutton in Ashfield (SHLAA site ref S142)</b></p> <p>Disagree with the Council regarding the site being undeliverable. The ownership problems have now been resolved. With regard to access, the owner of the property adjoining the site has indicated via his agent that he is now prepared to consider a joint development with the owner of Pasture Farm so that a planning application can be submitted. We would be grateful if you would include the site within the Local Plan.</p>	<p>Objection noted. The Council is not satisfied that the site is deliverable due to the ongoing landownership and access constraints. In addition to this, the site adjoins the A38 and a lorry park and large industrial building which is very likely to cause noise and disturbance to any future residents. It is unclear if any impact can be appropriately overcome. Whilst the Council does not intend to allocate the site for housing, the land is within the main urban area where there is a presumption in favour of sustainable development. As such, if landownership constraints can be overcome, any future planning application would be determined on its own merits.</p> <p>No amendments proposed.</p>
<p><b>Stoneyford Road, Sutton in Ashfield (extension to Vere Avenue)</b></p> <p>Objection to the omission of the land as a housing allocation in the Local Plan. Appendix 1 'Housing Site Selection Paper' confirms that the site is not suitable due to there being two designated Local Wildlife Sites on the site. An ecology assessment has now been undertaken which identifies a smaller area of the site which has a lower ecological</p>	<p>Objection noted. The Nottinghamshire Biological and Geological Records Centre (NBGRC) is responsible for the assessment and ongoing review of designated Local Wildlife Sites. Unless NBGRC proposes to amend the boundary, the Council maintains the view that the site is not suitable.</p> <p>No amendments proposed.</p>

interest/quality. The Council is asked to revisit the merits of including this smaller area within the existing allocation. Policy SKA3v anticipates that the site will deliver 230 dwellings. However, given the topography, it is likely to only deliver 180 dwellings. Therefore the inclusion of the additional land would be a logical extension to the site.

The suitability of the already consented access off Stoneyford Road to serve up to 150 dwellings has already been considered in detail by way of the aforementioned Secretary of State's decision.

Inclusion of the additional land would not therefore be to the detriment/require the deletion of any of the other sites proposed for allocation by the Council in the current draft document.

It would simply provide the opportunity of delivering the yield currently anticipated for SKA3v (by *draft* Policy SKA3) by making best and most effective use of available land in the urban area.

In summary, the landowners object to the omission of part of their land (SHLAA site ref. S384) as a housing allocation in the consultation draft.

Their current objection can be remedied by revisiting Site S384 on the amended basis and including it in the next draft as part of a larger housing allocation comprising SKA3v, or alternatively its own allocation - if the fact that SKA3v relates to the consented site clouds/confuses the matter.

The latest SHLAA for Site S384 concluded that development would be considered unsuitable on this site until such a time as satisfactory mitigation can be demonstrated.

It is respectfully considered that the Preliminary Ecological

<p>Assessment carried out to inform the RMA provides the necessary confirmation that satisfactory mitigation is either not warranted or can be secured. The landowners are willing to invest further in providing additional justification/demonstration of mitigation if required over and above that which has already been undertaken (preliminary Ecology Assessment).</p>	
<p><b>Land east of Lowmoor Road, Sutton in Ashfield (SHLAA site ref S67)</b>  Support allocation of SKA3ah Land east of Lowmoor Road and SKA3e Land south of Newark Road. Both sites represent highly sustainable development opportunities that can make an important contribution to future housing requirements over the plan period.  Object to the omission of land east of Lowmoor Road. The whole site has been continuously promoted at relevant stages of the Local Plan process. Discussions have been held with officers and members looking at the benefits of a more comprehensive scheme which could deliver between 1000 and 1400 homes in three phases. It is considered that this represents the most sustainable urban extension to the east of Lowmoor Road and the Council should seriously consider the whole site for allocation.  Hallam Land Management will be producing reports setting out in more detail the flood risk and surface water management solutions for development in this location.</p>	<p>The Council welcomes support for housing allocations SKA3ah and SKA3e.</p> <p>Objection to omission of land to the east of Lowmoor Road is acknowledged. The Council maintains the view that the site is unsuitable (central elements of S67) due to the adverse impact development would have on the landscape in this area. Furthermore, based on delivery rates of current urban extensions, the Council has significant concerns that the site will not be capable of delivering enough development to meet the objectively assessed housing needs of the District. The Council considers that the strategy of two smaller urban extensions with dispersed development is more deliverable, particularly taking into consideration past delivery rates, and the outcome of the report published by the HBF in August 2015 'Responding to demand; Understanding private housing supply' which indicates that a greater number of smaller sites enables development to be delivered more quickly. The allocation of a larger site would bring into question the soundness of the Local Plan due to the uncertainty regarding delivering development on the whole site within the Plan period.</p> <p>To allocate and rely on the additional land would put at risk the soundness of the Local Plan. As set out in paragraph 182 of the</p>

	<p>National Planning Policy Framework, local authorities should submit a plan for examination which it considers is “sound” – namely that is positively prepared (based on a strategy which seeks to meet the OAHN), justified (the most appropriate strategy when considered against reasonable alternatives), effective (it should be deliverable) and consistent with national policy.</p> <p>No amendments proposed.</p>
<p><b>Land west of Beck Lane</b></p> <p>Representations received in support of land to the north of Beck Lane proposed Housing Allocation SKA3h which was submitted to the Strategic Housing Land Availability process in October 2015. This representation seeks to allocate the adjoining site to the north of SKA3h.</p> <p>The Council needs to consider all sites submitted through the Local Plan process due to the withdrawal of the Local Plan in July 2014. A sustainable appraisal has to be undertaken to identify social, environmental and economic effects of the Local Plan in order to achieve sustainable development. This should result in informed decision making, enabling people who have not been involved in the plan making process to understand what information was considered and why certain decisions were made. Beck Lane (Policy ref. SKA3h) has been identified as a sustainable location for growth and consequently site ref SKA3h has been allocated. It is identified as meeting the objectives of the Local Plan in the Site Selection Technical Paper. New development along the MARR would support recognised growth aspirations of both Ashfield</p>	<p>Comments and objection noted. The Council has considered for allocation the submitted site to the north of Beck Lane site allocation SKA3h. The site is not considered to offer a better alternative than the sites proposed for allocation in the Local Plan Preferred Approach. It is located quite a distance from services and facilities in Skegby. The sites taken forward for allocation have better access to services and facilities.</p> <p>Whilst the MARR is recognised for its regeneration benefits, there are a number of sites already proposed for allocation in Mansfield and Sutton in Ashfield along the MARR route. It is not considered necessary to allocate this site as the Council is satisfied that the housing requirement can be met with the proposed allocations.</p> <p>The Council disagrees that the Policy Map is misleading. It accurately reflects designated Countryside. The ribbon development to the north of the site is within designated Countryside.</p> <p>The Council is satisfied that the Strategic Housing Market Area</p>



<p>and Mansfield District Councils.</p> <p>To maximise the growth benefits of SKA3h the quantum of development should be increased. The site submitted to the Council in October 2015 (adjacent to SKA3h) should be included in the Local Plan as an allocation to increase growth along the MARR.</p> <p>The Local Plan Preferred Approach proposals map is misleading as it indicates that development ends to the south of SKA3h. The submitted plan shows development to the north of Beck Lane. Consequently the proposed site can be considered an infill to the existing development along Beck Lane.</p> <p>Given that the OAHN has yet to be tested at public examination and the concerns raised over economic growth, market signals and affordable housing on the OAHN, the proposed site on Beck Lane would provide additional housing land in an area already identified as sustainable and meet the strategic objectives of the Local Plan whilst utilising the benefits of regeneration on the MARR. It could potentially be allocated as 'safeguarded land'. This would allow the market to develop the site in the medium term.</p> <p>Benefits:</p> <ol style="list-style-type: none"> <li>1. Good access from Beck Lane.</li> <li>2. New facilities could be delivered as part of the larger adjoining scheme;</li> <li>3. Within 30 minutes travel time by public transport of existing services and facilities. Public right of way – good connections to Skegby and Teversal Trails.</li> <li>4. Allocated site SKA3h has been confirmed as a sustainable location;</li> </ol>	<p>Assessment is a robust evidence document which identifies the objectively assessed housing needs of the District and the Nottingham Outer Housing Market Area.</p> <p>The Council is not proposing to allocate 'safeguarded land'. The Local Plan will be monitored on a regular basis and if necessary the Council will undertake an early review of the Plan to ensure that housing requirements and other development needs are being met.</p> <p>With regard to the suggested 'benefits' of the site, the Council does not consider that the site offers a better alternative than the sites taken forward. It is located further away than SKA3h from services and facilities in Skegby. It would not be within walking distance of existing services and facilities.</p> <p>No amendments proposed.</p>
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<p>5. A public right of way runs through the site and it has access to a bus service on Skegby Lane;</p> <p>6. The development would not significantly impact on the landscape and the adjoining site was deemed suitable. It would close the gap between existing development.</p> <p>7. The site is in floodzone 1 and drainage is not a constraint;</p> <p>8. Ecology – there are no designated sites and boundary treatments can be improved to create habitats for wildlife;</p> <p>9. The site appears to be Grade 3 agricultural land and is not required for agricultural use. Therefore development would not compromise any agricultural operations.</p> <p>10. There are no physical constraints.</p> <p>11. The site could accommodate approximately 160 dwellings at a density of 30 dwellings per hectare.</p> <p>12. The site is in a sustainable location and would contribute to the creation of sustainable mixed communities. It is within the catchment of a range of services and facilities located in Skegby.</p> <p>13. It would form a logical extension to the proposed allocation SKA3h.</p> <p>14. It is greenfield land with no current recreational value (existing nursery business is on site).</p> <p>15. The site would contribute towards meeting the housing requirement.</p> <p>16. The site is available and development is achievable to commence within 5 years.</p>	
<p><b>Land off Stoneyford Road, Sutton in Ashfield (SHLAA site ref S95)</b></p> <p>Questions raised with regard to the reasons why Site allocation SKA3j has been taken forward but not SHLAA ref.</p>	<p>Comments noted.</p> <p>Whilst the assessment of the site (SHLAA reference S95) has similar conclusions to the adjoining site which has been taken</p>

<p>S95 which is adjacent to the site. The SHLAA assessment of both sites is very similar in terms of there being no access to the public highway, both are designated countryside, the flood risk at each site is the same, and the impact on nearby culverts is the same.</p> <p>Planning application V/2014/0108 showed that a culvert upgrade would not be required.</p> <p>Access constraints on the site can be overcome by taking the access from the adjoining site (SKA3j). Therefore the site is capable of delivering development. Based on the whole plan viability evidence, development is achievable.</p> <p>Part of the site is a local wildlife site and would remain as such.</p> <p>The site is not greenfield (as stated in the SHLAA report) it is derelict land.</p> <p>A flood risk assessment has been undertaken and included in planning application V/2014/0108.</p> <p>Topography – assessment indicates ‘steeply sloping’. Only part of the site is sloping. Land to the south east is almost level ground.</p> <p>Contamination – the assessment states ‘Contamination suspected 25% historic landfill. Quarry with lime kilns, further 20% sewage works’. Land to the south east is land contaminated from cement silos and buried hard core continued over a number of years. The statement concerning 20% sewage relates to land adjoining the site which is not in our ownership.</p> <p>The Council has concluded in the Site Selection Technical Paper that the site is not considered to be suitable for allocation as it would impact on the gap between Sutton in</p>	<p>forward for allocation (SKA3j), the fundamental difference is that the development of the proposed site (S95) would have an adverse impact on the open break between Sutton in Ashfield and Stanton Hill. It is much more prominent in the landscape than SKA3j, being located directly adjacent to the main road between Sutton in Ashfield and Stanton Hill. Site SK3j is set much further back from Stoneyford Road and is obscured from view by existing development.</p> <p>The Council considers that it is important that each settlement retains its individual character. As such, the Council does not consider it appropriate to include S95 as a housing allocation in the Local Plan.</p> <p>No amendments proposed.</p>
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<p>Ashfield and Stanton Hill. The Council considers that it is important to maintain this gap to ensure that the characteristics of each settlement are maintained. This stance has been supported by a planning inspector through an appeal APP/W3005/A/14/2221907 (6).</p> <p>Suggestion: These two statements must also apply to the site taken forward for allocation (SKA3j). The same amount of green space would be left between the two villages by the proposed development of SKA3j and the inclusion of SHLAA site S95.</p>	
<p><b>Land off Stoneyford Road, Sutton in Ashfield (SHLAA site ref S100)</b></p> <p>a) The representation applies to land at the former Miners' Welfare Sports Ground, Stanton Hill. The site is shown to lie outside of the Main Sutton Urban Area (under proposed Policy S3) and is allocated in whole as countryside (under proposed Policy EV2) and in part as a Site of Importance to Nature Conservation (under proposed Policy EV4n).</p> <p>b) The NPPF indicates that Local Planning Authorities should use their evidence base to ensure that their objectively assessed housing needs are met in full. It also specifies that they should identify and update annually a supply of specific sites sufficient to provide five years supply of housing sites plus a buffer of 5% to ensure choice and competition in the market.</p> <p>c) The Council can only demonstrate 5.02 or 5.12 years land supply (depending on whether the Liverpool or Sedgfield method of calculation is used).</p> <p>It is noted at Table 1 of the Preferred Approach document that the Council has assessed there to be an over provision of 227</p>	<p>a) Comments noted.</p> <p>b) Comments noted.</p> <p>c) Disagree. The NPPF indicates that the 5% buffer forms part of the 15 year land supply (it is not in addition to it); it is simply moved forward from later in the plan period. The Council is satisfied that the OAHN can be met by the proposed allocations.</p>

<p> dwellings between 2015 and 2032 in comparison to the requirement. This is based on sites that exist with planning permission, the capacity of proposed housing allocations and demolitions and other losses.</p> <p> This oversupply equates to only 2.8% of the overall requirement and it is considered pertinent that the Council consider allocating further sites to ensure at least a 5% oversupply can be demonstrated in-line with the NPPF's requirement to provide a 5% buffer when assessing housing land supply. Furthermore, the importance of extending the oversupply is mirrored by proposed Policy S2 of the Preferred Approach Local Plan, which sets out the overall strategy for growth and confirms that "at least 8,268 dwellings will be delivered within the period 2015 to 2032" (our emphasis).</p> <p> Support for allocation of sites in Sutton and Kirkby to meet 65% of overall OAHN (higher than previous Plan which set the rate at 58%). Concern raised that anticipated yield (5370 dwellings) does not meet the OAHN for the Sutton and Kirkby areas (5374). Whilst it is acknowledged that there will be some windfall sites, others will also fall aside due to lapsed planning permissions. It is acknowledged in the Preferred Approach document at Paragraph 4.11 that "analysis indicates that a potential windfall rate based upon past delivery would slightly outweigh lapsed permissions when based on historic rates".</p> <p> Therefore, casting aside both windfalls and lapsed permissions, the supply of housing for Sutton and Kirkby over the Plan period does not appear to meet the assessed need.</p> <p> d) It is understood that each site submitted for consideration has been assessed against a number of criteria set out in a sustainability appraisal. It has come to our attention that there</p>	<p> d) &amp; e) Disagree with the comments regarding the SA. The Council has used a consistent approach to the assessment of all sites. The SA does not suggest that the site is less</p>
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are a number of discrepancies within the sustainability appraisals and that a fair assessment has not been made. We have undertaken a comparison of a small number of sites taken forward for allocation against the former Miner's Welfare Ground site.

Details of the sites assessed is as follows:

- SKA3ao (SHLAA site ref: K325) – Walesby Road, Kirkby
- SKA3g (SHLAA site ref: S112 / S316) – Rookery Farm, Alfreton Road, Sutton
- SKA3d (SHLAA site ref; S51 / S61 / S108 / S350) – Clegg Hill Drive, Huthwaite
- SHLAA ref: S100 – former Miners' Welfare Sports Ground, Stanton Hill.

e) Whilst the Council's assessment appears to suggest that the Miners' Welfare Ground site is less suitable and therefore less sustainable than the proposed allocated sites, it is our view that the Council has failed to take into consideration a number of issues, which are set out below.

In terms of biodiversity and green infrastructure, the Miners' Welfare site scores poorly in the Council's sustainability appraisal. However, the site is situated in a similar situation (i.e. subject to a Local Wildlife Site designation) as site ref: S112 / S316. Whilst it is acknowledged that site ref: S112 / S316 has been given the same score as the Miners' Welfare site, the comprehensive ecology report submitted with previous representations in relation to the Miners' Welfare site (attached at Appendix 1 of this representation for completeness) shows that it has little value and the areas that do can be preserved and/or enhanced

sustainable than the other sites taken forward. A large part of the site is less suitable because it's designated as a Local Wildlife Site. Nottinghamshire Biological and Geological Records Centre is aware of the ecology report submitted and they have indicated that they do not intend to change the designation of the site. However, land to the north of the site has fewer constraints and would be suitable if access constraints can be overcome.

<p>through careful mitigation measures.</p> <p>Natural resources</p> <p>Again, the Miners' Welfare site did score poorly in terms of natural resources, as did site ref: S51 / S61 / S108 / S350. It should be noted that all four sites are greenfield and indeed the Miners' Welfare site has the added benefit of containing an area of previously developed land to the north.</p> <p>f) Access issues</p> <p>The Access Considerations report (attached at Appendix 2 of this report), prepared by Westgate Consulting, submitted with previous representations in relation to the former Miners' Welfare Ground site considers three possible alternative means of access that could serve the development for housing. The report shows that each option would be consistent with current local and national design guidance and that traffic that would be generated could be safely and satisfactorily accommodated on the local highway network. There is therefore no highways reasons why the former Miners' Welfare Ground site should not be allocated for residential use.</p> <p>g) It should also be noted that proposed allocations SKA3d, SKA3g and SKA3ao all have major access difficulties. A planning application on part of the proposed SKA3d allocation was refused recently on highways grounds; SKA3g has no independent access and is wholly reliant on access through another proposed allocation (SKA3ac); and SKA3ao has major access difficulties.</p> <p>h) Added benefits of former Miners Welfare site:</p> <ol style="list-style-type: none"> <li>1. It has a higher health score than many other sites</li> </ol>	<p>f) Access from adjoining roads would not be supported by the Council but there are opportunities for access via the adjoining site off Gilcroft Street. The Council wrote to the landowner suggesting this as a potential access route but was informed that this would not be viable. Consequently, the site was not taken forward due to access constraints.</p> <p>It is acknowledged that potential access points have since been submitted as part of the response to this consultation, however, the Council is satisfied that there are enough sites to meet the objectively assessed housing needs so the site is not required.</p> <p>g) Following discussions with the Highway Authority, the Council is satisfied that highway constraints can be overcome on the sites taken forward for allocation.</p> <p>h) The Council acknowledges that the site has potential benefits but is satisfied that the sites selected are still the most appropriate.</p>
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<p>(within 500 metres of natural open space and 800 metres of a GP surgery);</p> <ol style="list-style-type: none"> <li>2. It has no previous surface water flooding issues unlike other sites (e.g. S112, S316 and K325).</li> <li>3. The site scores well against the criteria of the Sustainability Appraisal and is equal if not better in most instances.</li> </ol> <p>i) In conclusion, the Council has failed to identify sufficient sites to meet the housing needs of the District. The site put forward has been shown to be suitable and appropriate for allocation for housing. It scores well when assessed against other nearby sites taken forward as allocations. It is therefore requested that the site is allocated for housing in the Local Plan under Policy SKA3.</p>	<p>i) The Council disagrees with this statement, the evidence clearly demonstrates that there are enough sites to meet the housing needs of the District within the Plan period.</p> <p>No proposed amendments.</p>
<p><b>Land to the South of the MARR (SHLAA site ref SM45 &amp; SM46)</b></p> <p>a) Identifies that their client controls land to the north (in Mansfield) and south of the MARR and this facilitates a strategic approach being taken to the development of the landholdings identified in the submission.</p> <p>b) The site put forward comprises approximately 74 ha bounded by MARR to the north, Stonehills Plantation to the east, Derby Road to the south east, and Coxmoor Golf Course / agricultural land to the west. It is presently farmed and is bisected by Cauldwell Road.</p> <p>c) The response sets out the following reason why the site should be allocated for housing:</p>	<p>a) Comments noted.</p> <p>b) Comments noted.</p>

<ul style="list-style-type: none"> <li>• The Ashfield Local Plan Preferred Approach is underpinned by a spatial strategy to support the Sherwood Growth Zone which aims to provide well-designed developments for jobs, houses and services in the right location.</li> <li>• The response references the objectively assessed housing need, how the housing target will be delivered across the different market areas in Ashfield, Spatially Policy S2 with its focused on the main urban areas and the Area Policy SKA3 which sets out the large scale housing sites contributing to meeting the housing target in SP2. It identified that Policy SKA3 sets out a number of sites which will meet the housing need in Sutton-in-Ashfield and Kirby-in-Ashfield within the first 10 years of the Local Plan period. Beyond this, there is the need to ensure there is a supply of sites which can deliver the housing need identified for Ashfield.</li> <li>• The Centre for Local Economic Strategies (CLES) Study 2010 suggests that as people progress in their career, they tend to move out of Ashfield and Mansfield to areas which are considered to offer a higher quality of life. Given this evidence which suggests that housing does not meet the needs of the knowledge workers. There is a need to ensure the right type of housing is provided in the right locations to support economic growth.</li> <li>• This site is located adjacent to MARR and Employment Land Allocation PJ2Sd. This would provide alignment of housing and jobs, in an important location for growth. The</li> </ul>	<p>c) The statement which reads 'It is identified that Policy SKA3 sets out a number of sites which will meet the housing need in Sutton-in-Ashfield and Kirkby-in-Ashfield within the first 10 years of the Local Plan period' is incorrect. The Council has identified enough land for just over the 15 year plan period. With regard to meeting the housing needs of the District, the Council is satisfied that the sites selected for allocation can deliver the type and mix of homes required to support economic growth.</p> <p>The sites adjoining the MARR (SHLAA refs. SM45 and SM46) are considered to be unsuitable for allocation as they are located quite a distance from a settlement boundary and have been excluded from the Strategic Housing Land Availability Assessment as a result of this. This approach accords with the adopted Joint Nottingham Outer SHLAA Methodology (2008).</p> <p>Furthermore, Mansfield District Council Policy NE5c recognizes the adjoining area to SM46 as an important green wedge and buffer between industrial development and housing. Mansfield DC is seeking to designate the area adjacent to SM46 as an important open area which is proposed to be designated as strategic green infrastructure in their emerging Local Plan.</p> <p>The land is predominately rural in character and undulating in form. It is considered that the rural character of this land should be retained and protected accordingly.</p> <p>No proposed amendments.</p>
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<p>site's location to the south of the strategic employment land allocation would provide the opportunity to deliver a mix of type and tenure of homes which could be attractive to a wider range of households who potentially otherwise may leave the District to meet their long term housing needs and aspirations.</p> <ul style="list-style-type: none"> <li>• This site would enable the creation of a new housing market area which has the characteristics to provide a range of types and sizes. The site would, in the longer term also help to deliver the identified housing need for Ashfield.</li> </ul>	
<p><b>Land adjacent to Carnarvon Cottage, Silverhill Lane, Sutton in Ashfield (SHLAA ref. S380)</b></p> <p>a) Representations submitted on behalf of the landowner. The landowner wishes to object to the Council's latest consultation draft in relation to the Council's approach to the distribution of new housing. In particular to the re-designation of Fackley (from being a 'named settlement' with a settlement boundary in the current adopted local plan) as countryside.</p> <p>b) The Council is aware that the site has been promoted by the landowner at previous consultation stages of the Local Plan. The previous draft Plan (withdrawn following criticisms from the Inspector due to preside over the Examination) carried forward the existing boundary around Fackley as a 'named settlement' comprising part of Sutton in Ashfield for settlement hierarchy purposes.</p> <p>c) The site comprises a logical extension to the settlement boundary in this part of Fackley and meets the thresholds for site allocation purposes and can contribute towards meeting</p>	<p>a) Objection noted.</p> <p>b) Comments noted. Yes, the Council is aware that the site has been promoted in previous applications.</p> <p>c) Comments noted.</p> <p>d) Comments noted.</p> <p>e) Comments noted.</p> <p>f) The Greater Nottingham and Ashfield Accessible Settlements Study indicates that Teversal and Fackley are the least sustainable settlements because they do not have good access to services and facilities (they are not within walking distance of a school, a health centre, a post office etc.). Selston has services and facilities within the village (e.g. secondary school, primary schools, leisure centre, Health Centre, Post Office, supermarket etc.) which will benefit from an increase in the population to support these services.</p> <p>g) Whilst it is acknowledged that Fackley is not in the Green Belt, it has poor access to services and facilities and it would not promote sustainable development.</p>

<p>the housing needs of the District.</p> <p>d) Despite originally being concluded as a 'potentially suitable housing site subject to policy change (countryside)' in the SHLAA, the Council identified an alternative site in Fackley as its preferred housing site during the previous iteration of the draft Local Plan. However, the landowner has indicated that it was the view of the community that this site was preferred as the village's housing site rather than the site previously selected as an allocation.</p> <p>e) The Council's approach has now changed and neither site is being allocated. The designation of 'named settlement' has also been removed and it has been re-designated as a village within countryside. It is unsuitable for housing growth other than limited infilling.</p> <p>f) In contrast, the Council clearly recognises the importance and value of its other rural communities as evident in their approach to directing reduced levels of housing growth to help support the 'Rurals' despite these being in far less sustainable locations and tightly constrained by Green Belt.</p> <p>g) Fackley is neither constrained by Green Belt nor unsustainable. Whilst maintaining its own identity it forms part of the wider Sutton Main Urban Area.</p> <p>h) The Council has included other outlying villages within the definition of Sutton in Ashfield or Kirkby in Ashfield for allocation purposes. The landowner sees no reason why an alternative approach should be adopted in respect of Fackley which has its own settlement boundary.</p> <p>i) Given that there is clearly insufficient land within existing built up areas to meet future housing and other needs of the District it seems perverse to remove existing built up areas and</p>	<p>h) The Settlement Hierarchy promotes sustainable patterns of development in locations which contain services and facilities to meet the day to day needs of the community e.g. schools, health centres, shops etc. Fackley is rural in nature and it has poor access to services and facilities.</p> <p>i) Disagree. Fackley is in designated Countryside. No changes are proposed to this designation.</p> <p>j) The Council disagrees with this statement. The reasons for the unsuitability of the site are:</p> <ul style="list-style-type: none"> <li>• the site has poor access to services and facilities; and</li> <li>• a development of this scale would have an adverse impact on the rural character of the area.</li> </ul> <p>The Landscape character assessment for the site also indicates that development of the whole site would have a high impact on the landscape. It is acknowledged that the landscape assessment indicates that small scale development along Silverhill Lane, to mirror existing development, would be appropriate. However, the continuation of ribbon development is not considered to be the best option when compared against the sites taken forward as housing allocations. The site selection document will be updated for further clarity.</p> <p>Amendment proposed to Site Selection document to clarify reasoned justification for not allocating the site.</p>
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<p>re-allocate as countryside.</p> <p>j) The Housing Site Selection Technical Paper confirms that the site is well contained by landscape features and scores relatively well in terms of capacity to accommodate development, including affordable housing provision. It also has a minor positive impact on Sutton town centre. In terms of negative impacts, the site is recorded as being farmland and a greenfield site. However, the agricultural land classification is 4 (poor) and the Council is clearly relying on the release of greenfield sites to meet its housing need. The sites location on the approach to Teversal Village and Conservation Area is cited as the principal reason for not allocating the site. However, the same document confirms that the site does not directly affect the immediate setting of the conservation area. The conclusion that development of the site has the potential to encroach on the wider setting of Teversal is tenuous at best and could clearly be applied to many identified housing allocations in the absence of a development brief/detailed scheme. There is absolutely no reason to discount this site on the basis of this principle alone.</p>	
<p><b>Land to the East A60 Nottingham Road, Sutton in Ashfield (SHLAA ref. SM358)</b></p> <p>The Lindhurst Group proposes that 3.34 hectares of land shown on the attached plan, which lies to the east of the A60 north of Harlow Wood should be designated as amenity land in connection with the Berry Hill Mansfield Sustainable Urban Extension. The latter is in Mansfield District and has outline planning permission for mixed-use development.</p> <p>The Lindhurst Group further proposes that parts of the land</p>	<p>The Council does not have a policy for 'amenity land' and it does not consider that the justification for such a use has been demonstrated. The land is designated as Countryside (Policy EV2) where appropriate development comprises outdoor sport and recreation. As such, the suggested use could be appropriately dealt with through the development management process.</p> <p>Given that the Council does not intend to amend the Countryside designation, it is considered more appropriate to</p>

<p>should be permitted to be used to facilitate road access from the A60 into the Berry Hill Mansfield Sustainable Urban Extension, provided that such road access complies with highway regulations and standards.</p> <p>The land is currently farmland, but will no longer be farmable once the Berry Hill Mansfield Sustainable Urban Extension is developed.</p>	<p>address the requirement for an access route through the planning application process.</p> <p>It should also be noted that the Local Plan must consider the potential effects of development/activity relating to a change of use on European sites of importance for nature conservation. The site is directly adjacent to Sherwood Forest possible potential Special Protection Area. In order to “future-proof” the Ashfield Local Plan, it has been decided that, on a precautionary basis, the Sherwood Forest ppSPA will be treated as if it was a pSPA, thus affording it the equivalent to the highest level of protection during appraisal that it would have at any stage in its potential route to classification. A change of use to ‘amenity land’ and the development of an access road has the potential to have an adverse effect on protected species and habitats. Should the landowners decide to go down the development management route, the Council, as the competent Authority, would need to undertake an assessment of the effects of any future proposal in consultation with Natural England. This would be taken into consideration in determining the outcome of the planning application.</p>
<p><b>Comment</b></p>	
<p><b>Land off Thoresby Avenue, Kirkby-in-Ashfield</b> - A new housing allocation should be located to the south of the site EV5/144 to the south east of the A611 bounded by the urban area to the north west to replace the housing allocation lost at site SKA3al by protecting part of this site for a by-pass.</p>	<p>Comment noted. The site off Thoresby Avenue is in Green Belt and the Council does not consider there are exceptional circumstances for Green Belt release in Kirkby in Ashfield.</p>

## Proposed Amendments

Issue/Policy	Amendment
Safeguarded land	Add to the Housing Options Spatial Approach paper for clarification: "The Council does not consider it necessary to allocate safeguarded land because there are other areas which may be potentially suitable and available in the future e.g. designated countryside or brownfield sites in the urban area. The Council will continue to monitor and review land availability through the Strategic Land Availability Assessment process".
SHLAA Site S74 reasoned justification for not allocating the site.	Add to the site selection technical paper conclusion for S74 "A development of the size proposed would have a significant impact on the gap between Teversal and Stanton Hill and the rural character of the settlement. There are also severe highway constraints and it is unclear if these can be mitigated".
SHLAA site K26 Penny Emma Way	K26 Penny Emma Way – add to the Site Selection Technical Paper conclusion "The site would not form a logical urban extension because it would need to be accessed via Penny Emma Way and it is slightly separate from Kirkby Hardwick. It is a very narrow plot of land which faces an industrial estate with very large industrial buildings. Development would be incongruous in this setting.
SHLAA Site S100 Stoneyford Road, Stanton Hill	Include part of the site as a housing allocation with access via the adjoining land to the east.
SHLAA site S380 Silverhill Lane, Fackley	Update the Site Selection document to clarify that development of the whole site would have a high impact on the landscape.

**Ashfield District Council - Statement of Consultation**

<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Lewis	3058			√	Nathaniel Litchfield & Partners	5473	√		
IBA Planning on behalf of CISWO	1975	√			N. Carnall	5490	√		
Mr J Collins on behalf of Mrs Parker	3034	√	√	√	IBA Planning on behalf of Messers Webster, Millward, Shaw	5495	√		
Barton Willmore on behalf of Taylor Wimpey	6215	√			Pegasus Planning on behalf of Hallam Land Management	6036	√	√	
K. Taylor	2510	√			DLP Planning on behalf of Mr M Brouwer & Miss A. J. Brouwer	6505	√		
L. Hemstock	3398	√			S. Deakin	6579	√		
R. Cameron	3463	√		√	Airedon Planning on behalf of Mr J. Harrison	6806	√		
M. Green	3591			√	Mr N. Baseley, IBA Planning on behalf of Ms. E. Smith	5487	√		
N. Carnall	5471	√			Nottinghamshire County Council	2803	√		

**Policy SKA4: Sutton-in-Ashfield and Kirkby-in-Ashfield Gypsy and Travellers Site Allocation**

**Ashfield District Council - Statement of Consultation**

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to Policy</b>	
<b>Support</b>	
-	-
<b>Object</b>	
-	-
<b>Comment</b>	
-	-
<b>Responses received relating to Policy supporting text</b>	
-	-

**Proposed Amendments**

<b>Issue/Policy</b>	<b>Amendment</b>
-	-

<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
None									

## Policy SKA5: Green Infrastructure In and Around Sutton in Ashfield and Kirkby-in-Ashfield

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
Support	
Support for all the Green Infrastructure corridors set out in the Policy	Support acknowledged.
A further corridor link proposed to be established between the junction of GI network route 16,9 & 2, which should extend westward, through Annesley plantation, Little Oak Plantation and the Annesley Miners Welfare sports field (open/green space), ADC Forest Road Nature Area (now called Oak wood Meadows/Fields, the disused allotments and Forest Road Grassland (LWS) and connecting towards Bentinck Void and GI link 8.	The proposed new corridor link has been forwarded to the Council's Locality officers for considerations in relation to the background evidence for the Plan.
We support the notion that development should provide new or improved Green infrastructure and would commend KA03 Site 5 in this regard which, in stark contrast to most other potential development sites under consideration, has good, well-established areas of woodland to act as a tangible springboard for improved green infrastructure in association with development.	Support acknowledged.
The commitment of Policy SKA5 to promoting new and improved Green Infrastructure corridors is supported. National Trust would be pleased to discuss with the Council opportunities to improve linkages between the strategic Green Infrastructure network (e.g. links GI19: Pleasley to Tibshelf, and GI 20: Pleasley to Kings Mill Reservoir) and Hardwick	Support acknowledged.



Estate. Through the ongoing <i>People's Hardwick</i> project National Trust will be seeking to enhance the footpath network at Hardwick.	
Policy SKA5 which identifies opportunities for development to contribute to the Strategic GI corridors in the Kirkby and Sutton areas. It is important development is supported by the necessary infrastructure including investment in the green infrastructure network.	Support acknowledged.
Policies HA4, SKA5 and RA3, relating to GI, are welcomed and supported, along with the identification of strategic GI corridors; however, it should be noted that there are no maps within the Ashfield Green Infrastructure and Biodiversity Strategy showing the location of these corridors (or at least, not in the version available on the ADC website). It is also queried whether work will be undertaken to update these corridors in light of the Ashfield Biodiversity Opportunity Mapping project which is currently taking place.	Support acknowledged.  The Council's website sets out the Ashfield Green Infrastructure and Biodiversity Strategy including the associated maps.  The intention is for the GI corridors to take into account the Ashfield Biodiversity Opportunity Mapping project.
ACCESS in general supports all the green infrastructure corridor shown and seeks the Council to identify new. The identification of the new corridor has already been covered within this letter under item 8.8. We have already stressed our concerns about the existing corridor GI6 which runs along Forest road, the main thoroughfare through Annesley Woodhouse.	Supports Acknowledge. Information on the proposed new corridor passed to the Council's Locality Team for consideration as part of the revised Green Infrastructure and Biodiversity Technical Paper.
<b>Object</b>	
-	-
<b>Comment</b>	
Development should not seek to provide new or improved	This reflect the Policy Title, it is clear from paragraph 6.82 that

<p>green infrastructure in and around Sutton all Kirkby -- development should seek to recognise and enhance existing green infrastructure corridors.</p> <p>NWT support the green infrastructure corridors (figure 8.12 from the Green Infrastructure Study Report) would like to see better connectivity between the proposed routes especially where these interconnect with LWS the network formed would be more robust as it would allow greater movement of wildlife between a greater number of sites.</p> <p>NWT would also support the comments made by Peter Olko (NWT M&amp;A local Group chairman) concerning moving part of the existing corridor 6 --“as a large portion of its route along Forest road which is a heavily trafficked road. While some acknowledging the torturous route through the allotments, Anne’s Field (now a LWS), oak wood fields/Meadows and along the high bank between Prolog and TS TL, a far better route exists between the intersection of Route 16/9/2 -- through Annesley Forest, little oak plantation, Oak Wood Meadows, and through and down to Cuttail Brook. Subsidiary GI’s link into K-1 and 8, as shown on the map, which we recommend for adoption, since it comprises of ancient woodland, grass land LWS, former nature area for ADC, open fields and hedge row corridors, opening into Notts wildlife trust property, Bentinck void and Davis's bottom”.</p> <p>“In addition we would suggest that a strong GI corridor route exists between the junctions of GI corridor 16, 9, 2 as defined in the attached map. This feeds into Bentinck void via Bogs</p>	<p>the natural environment should be protected and enhanced for future generations.</p> <p>The intention is for the GI corridors to take into account the Ashfield Biodiversity Opportunity Mapping project.</p> <p>Comments will be considered by the Council.</p>
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**Ashfield District Council - Statement of Consultation**

Farm Quarry and Annesley Woodhouse Quarry both Nottinghamshire Wildlife Trust reserves".	
<b>Responses received relating to Policy supporting text</b>	
-	-

**Proposed Amendments**

<b>Issue/Policy</b>	<b>Amendment</b>
No changes proposed from the consultation.	

<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Johnson	1886		√		Natural England	3185		√	
Lathall	1917		√		ACCESS - Annesley Community Committed to Ensuring Sustainable Settlements	5359		√	
Collier	1918		√		Ward	5807		√	
Lathall	2631		√		Bolger	5817		√	
Nottinghamshire County Council	2803		√		Lathall	5819		√	
Cooper	2811		√		Manders	6640		√	
National Trust	2828		√		Lewis	6729		√	
Nottinghamshire Wildlife Trust	2832			√	Eyre	6897		√	
Collins	3034		√		Elkington	6977		√	

## Area Policy: The Rurals

### Policy RA1: The Rurals Economy and Jobs

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
The Plan recognises the role of the countryside and agriculture within the local economy.	Support acknowledged.
<b>Object</b>	
-	-
<b>Comment</b>	
-	-
<b>Responses received relating to Policy supporting text</b>	
-	-

### Proposed Amendments

Issue/Policy	Amendment
No changes proposed from the consultation.	

<u>List of Respondents</u>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Natural England	3185		√						

## Policy RA2: The Rural Housing Allocations – Non site specific responses

Please note that comments received in response to specific housing sites in Hucknall are set out separately under individual headers following this section.

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
Support	
Support for the all the sites allocated under the policy	Support acknowledged.
<p>Environment Agency support the Policy. All proposed allocations for Selston, Underwood, Bagthorpe and Underwood are located within flood zone 1 with no other constraints and are supported by the Environment Agency.</p> <p>The upper reaches of the River Erewash are located in these areas. It is failing WFD at Poor status for fish, invertebrates, macrophytes and phosphate. It is therefore a key waterbody which would benefit hugely from the actions set out in the River Basin Management Plan. It is therefore important to have robust policies within the Plan that can influence delivery of WFD objectives.</p>	<p>Support acknowledged.</p> <p>The water quality issues identified in The Rural are considered against Policy CC2 on Water Resources Management.</p>

Housing allocations within Jacksdale have been focused on infill development within the settlement and will not lead to the coalescence of settlements across the boundary into Derbyshire. This is important in maintaining the character of the coalfield landscape where a nucleated settlement pattern is a key characteristic that would help to retain the individual identity of each village. This approach is supported and welcomed.	Support acknowledged.
With regard to your current consultation for the emerging Local Plan for the district of Ashfield, the JUST Group, preparing the Neighbourhood Plan for Selston Parish, are pleased that the proposed sites within our parish are in conformity with the results of the extensive consultations that we have undertaken over the past two years.	The Council welcomes these comments and hopes to continue to work proactively with the JUST Group.
I wish to strongly support the decision not to take forward site V388 Wagstaff Lane/Palmerston Street for housing. The building of 191 houses on this site would radically alter the character of the villages of Westwood and Jacksdale, extending well beyond the boundaries of existing building groups and impinging greatly on the rural landscape.	The Council acknowledges these comments
ACCESS supports these figures, as it does all housing numbers throughout the District, and those that contained within policy RA2.	Support acknowledged.
<b>Object</b>	
<u>Natural Environment</u>	

<p>Greenfield sites should only be used as means of last resort not as the primary (cost effective) easy option for developers.</p>	<p>The Council has allocated a number of brownfield sites within Preferred Approach Local Plan, which can accommodate approximately 1268 dwellings. A very small number of brownfield sites have been rejected due to severe constraints e.g. the majority are located in high flood risk areas (flood zones 2 or 3). Unfortunately the supply of brownfield sites has reduced, due to the successful redevelopment sites in the recent past and the need to provide land for business / jobs growth. In order to help meet the future housing needs of the District, the Council has had to make the difficult decision to propose the allocation of greenfield land for development. In doing so the Council has selected sites deemed deliverable and sustainable, as required by national planning policy.</p> <p>No changes proposed.</p>
<p><u>Infrastructure</u></p>	
<p>There would need to be substantial increases to the surrounding infrastructure which is currently struggling to meet existing demands.</p>	<p>In developing the Local Plan the Council has worked closely with Education Department at the County Council, the Clinical Commissioning Groups and other infrastructure providers to understand and plan for the infrastructure needed to support the development proposed in the Plan. This will lead to an update of the Infrastructure Delivery Plan to support the Local Plan. This information will be used to help negotiate s106 agreements with future developers to help secure funds to deliver the infrastructure needed. In some cases this may lead to the delivery of new infrastructure as part of the development.</p> <p>No changes proposed.</p>
<p><u>Other Objection</u></p>	

<p>Objection to any building in Selston.</p>	<p>Paragraph 47 of the National Planning Policy Framework (NPPF) states that, 'to boost significantly the supply of housing, Local Authorities should use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing'. Therefore, the Council has no option but to plan for the future housing needs of the District. National planning policy specifies that, Local Plans should be drawn up over an appropriate timescale, preferably a 15 year time horizon.</p> <p>The 2015 Strategic Housing Market Area Assessment (SHMA) identifies that the Council needs to deliver 480 dwellings per annum between 2013 and 2033. This also includes housing within the 'Rurals'. Taking into consideration development that has been delivered since 2013, the Council has been required to identify sites for over 8000 dwellings over the Local Plan period (2017 to 2032).</p> <p>The distribution of housing sites across Ashfield is considered to be appropriate. Strategic Objective S08 sets out that new housing will be situated in the most appropriate locations within and adjoining the towns of Hucknall, Sutton and Kirkby and the villages of Selston, Jacksdale and Underwood. Policy S2 further sets out that development will be primarily directed towards the 3 towns (and areas in the District adjacent to Mansfield).</p> <p>For the above reason it is considered that 65% of housing sites allocated towards a combined area of Sutton and Kirkby is broadly equivalent to the 30% allocated to Hucknall, thereby</p>
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	<p>attributing a comparable level of growth across the 3 main towns. The remaining 5% has been allocated to the 'Rurals' area (Selston, Underwood, Jacksdale area) to support rural infrastructure and sustainable growth.</p> <p>No changes proposed.</p>
<b>Comment</b>	
All new development should be small scale to prevent areas being overwhelmed.	<p>The Council needs to allocate land for over 8000 dwellings in order to deliver the objectively assessed housing needs of the District over the next 15 years. The Council consider that the range of sites included in the Local Plan Preferred Approach is both appropriate and deliverable.</p> <p>The Plan includes 74 housing allocations which range in size from a yield of 10 to 495 dwellings. In addition, it includes 2 more strategically sized sites (SKA3al – Mowlands and HA3t, Rolls Royce) which offer the opportunity to provide a greater range of on-site benefits whilst being able to fulfil the needs of the District later in the Plan period.</p> <p>The Local Plan does not allocate sites below 10 dwellings, however, an additional supply of approximately 400 dwellings can be sourced from these smaller sites and are counted towards the overall supply for the District (ALPPA Table 1).</p> <p>No changes proposed.</p>
The proposed large allocations at Selston are highly questionable.	<p>These sites have been assessed as developable and deliverable and have the support of the Neighbourhood Forum.</p>

### Proposed Amendments

Issue/Policy	Amendment
<b>Officer Amendments</b>	
RA2 supporting paragraphs 7.16 to 7.21 as necessary.	Add text to cross refer to site briefs where relevant to individual site allocations.
Policy SKA3 - site list and supporting paragraphs.	Update as necessary with regard to site specific/alternative site responses and any new sites which have secured planning approval since April 2015.

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Environment Agency	1870		√		M. Redfern	6580	√		
Lathall	1917		√		Parker	6602	√		
Collier	1918		√		Manders	6640		√	
Lathall	2631		√		JUSt Neighbourhood Group	6693		√	
Debyshire County Council	2637		√		Bacon S	6695	√		
Cooper	2811		√		G Thorpe	6712		√	
ACCESS - Annesley Community Committed to Ensuring Sustainable Settlements	5359		√		Lewis	6729		√	
Ward	5807		√		Eggeleshaw	6734	√		
Lathall	5819		√		Elkington	6977		√	

## Policy RA2: The Rurals Housing Allocations – Site specific responses

### Policy RA2a: Site: Church Lane, Underwood

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Support	
N/A	-
Object	
I object to plans for housing on this site as it will destroy the habitat for many wildlife animals that live in this area.	The Council recognises that future development may have an impact on existing habitats on the site. Unfortunately this impact has to be balanced against the need to provide new housing, sites for which in Underwood are very limited due to the surrounding Green Belt. As such, the Council has had to allocate what deliverable sites there are in the existing settlement. If developments take place, it is hoped that private gardens will help to offset elements of habitat lost to some extent.
It will intrude on my privacy and create additional noise, I purchased my property for the privacy and because of the peace and quiet that surrounds us.	Any future development on the site would need to align with the Council's minimum privacy distances to ensure impact on the privacy of existing residents is minimised.
Looking at the plans I think the access to these properties would also be dangerous on Church Lane.	The Council has worked closely with the County Council Highways Department to ensure acceptable vehicular access

	can be achieved on all the sites proposed.
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### Proposed Amendments

Issue/Policy	Amendment
<b>Proposed Officer Amendments</b>	
There is an ancient orchard on the site, which may have the potential to contain protected species. Additional text is required to reflect this aspect.	<b>7.16 Site RA2a: Church Lane, Underwood.</b> This is an amalgamation of 3 parcels of land submitted for assessment in the SHLAA (Ref. V15, V16, V17) and is located within the settlement of Underwood. The <b>site is understood to have formed an orchard of long standing and contains mature trees. A tree survey and an ecology assessment</b> would be required at a later stage in the planning process. It has been assessed as suitable and deliverable within 5 years.

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
F Cherry	6576	√							

## Policy RA2c: Site: Westdale Road, Jacksdale

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Support	
N/A	
Object	
Building houses overlooking our gardens is an invasion of privacy. Building bungalows for the elderly or disabled would be better.	Any future development on the site would need to align with the Council's minimum privacy distances to ensure impact on the privacy of existing residents is minimised. The Council is not dictating the style/type homes development on the site. If a future developer wishes to development bungalows and they're appropriate to the character of the area, the Council may support them.
Houses bring screaming children	The Council has no control over who the occupants of homes are. Allocations within the local plan will need to provide homes for a range of people with different needs.

### Proposed Amendments

Issue/Policy	Amendment
N/A	-

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
D Bacon	5568	√							

## Policy RA2d: Site: Park Lane, Selston

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Site Allocation</b>	
<b>Support</b>	
The proposed allocation of land at Park Lane, Selston (RA2d) is strongly supported. The site is bounded by the M1 to its east and existing (mostly modern) housing to its west. It is therefore well defined and a sensible extension to the village. The M1 provides a robust, defensible and long term Green Belt boundary. Development in this location would clearly not affect the key purposes of Green Belt. The site also provides ready access to services and facilities and it is available and deliverable to help meet the immediate need for housing in the District.	Comments noted.
<b>Object</b>	
<u>Pollution / Air Quality</u> <ul style="list-style-type: none"> <li>i) This area is likely to be subject to unacceptable levels of pollution. Heavy traffic will produce high levels of harmful gases, all of which are harmful to health. There is also greatly increased level of particulates matter, which some research has indicated can impact on the lung capacity of children.</li> <li>j) Homes built next to a motorway will be subject to continual levels of noise pollution. The site will also lie</li> </ul>	<u>Pollution / Air Quality</u> <ul style="list-style-type: none"> <li>a. The Council's Environmental Health Department have been consulted on all the sites proposed within the Preferred Approach Local Plan and they have not raised any objections related to air pollution. Vehicles using the M1 will obviously omit polluting gases and particulates, but this area of the route does not suffer from high levels of congestion, nor is it identified as an Air Quality Management Area. The Council will continue to monitor</li> </ul>

<p>close to the HS2 route, which will also create noise.</p> <p>k) These sites have been identified as suitable for social housing. Where is the social justice in housing people that may well already be facing inequalities, adjacent to the M1.</p>	<p><b>air quality across the District as required.</b></p> <p>b. The Council acknowledge that the M1 does generate noise. However, it does not view the noise levels to be such, to prevent development on the site. The site contains an existing landscaped buffer, which the Council will seek to retain. At the detailed application stage, the developer may choice to install acoustic fencing or this maybe requested by the Council's Environmental Health Department.</p> <p>c. The proposed allocation is for market housing. As part of any future development, the developer will need to provide an element of affordable housing, but this will not be the dominant form of housing.</p>
<p><u>Natural Environment / Green Belt</u></p> <p>The sites are within the Green Belt and feel that the Green Belt should be the very last viable option when looking for sites to develop</p>	<p><u>Natural Environment / Green Belt</u></p> <p>The Rural's area is enclosed by Green Belt. The Council has proposed to allocate the sites available within the existing settlements, but these have not been sufficient to meet the Rural's housing needs. As such, the Council has unfortunately had to propose the release of Green Belt sites adjacent to the area's largest settlement of Selston. The sites proposed have scored low by the Green Belt Review undertaken, integrate well with the existing settlement, have good access points and are considered to be deliverable. The soundness of these judgements will be assessed by the appointed Planning Inspector during the Local Plan's examination.</p>
<p><u>Infrastructure</u></p> <p>a) The village of Selston does not have all the infrastructure and services required to support the increase in new</p>	<p><u>Infrastructure</u></p> <p>a) As the largest settlement, Selston contains a range of local infrastructure and services to support housing</p>

<p>homes. Where will the money come from when local government's budgets are being tighter and tighter through austerity measures forced by the government?</p> <p>b) Some of the proposed new homes will be built incredibly close to a very large mobile mast. Will adequate and appropriate safeguards be implemented and processes and procedures followed in order to mitigate the cumulative exposure from the mast to ensure that it does not exceed or contravene the International Commission on Non Ionising Radiation Protection guidelines?</p>	<p>growth. This includes supermarket, primary and secondary schools, library, doctors and leisure centre. Any future development will be subject to s106 negotiations, which will seek to secure funds from the developer to provide infrastructure needed to support the development proposed. The Council is working the County Council Education Department and the Clinical Commissioning Groups to understand what some of the key infrastructure needs of the proposed sites will be.</p> <p>b) The Council acknowledges that there is a communications mast currently on part of the site. Any future development will need to ensure appropriate consideration is given to this and advice will be taken from the Mobile Operators Association and the Council's Environmental Health Department. This level of detail will be undertaken at the planning application stage and could result in the mast being relocated or this area of land and an appropriate buffer not being redeveloped.</p>
<p><u>Highways / Access</u></p> <p>a) The benefits of the espoused national and local rail links and local tram links, for some, inaccessible, and for others incredibly difficult to access by public transport and are only accessible if a car is owned.</p> <p>b) It may well be the case that "the County Council has identified that 99% of residents in Ashfield are less than a ten minute walk from a bus stop with an hourly service", but residents of Selston are isolated after the early hours of the evening as services are drastically reduced.</p>	<p><u>Highways / Access</u></p> <p>a. The Council acknowledges that there is no train or tram services within Selston. The Council is supporting the opening of the freight line at the Pinxton / Selston boundary to passengers services, linked to the potential HS2 station at Toton. If successful, this may provide a local station for Selston &amp; Pinxton.</p> <p>b. The Trent Barton Ninety services links Selston with Sutton, Kirkby and Ripley, on an hourly service until 10:51pm during weekdays. The Rainbow One service links Selston with Nottingham &amp; Alfreton until</p>



	approximately 6 & 10 pm. Whilst the area is not as well serviced by public transport as the District's larger towns, these services do enable residents to access the wider area via public transport.
<b>Comment</b>	
e) I do not support this proposal as both sites do not fall within the "Parish" of Selston and therefore their identification and inclusion within the Selston Neighbourhood Plan is duplicitous.	d. The Council acknowledges that the sites do not fall within the Parish of Selston. However, the Preferred Approach Local Plan related to the whole of Ashfield.
f) I note that a small element of the site I have put forward for development, has not been included within the proposed allocation. A revised site plan has been submitted with the comments.	e. The Council acknowledges this comment and will assess the suitability of including this additional area within the proposed site allocation.
This proposed allocation is on the perimeter of the urban area of Selston, therefore any proposals should take into account the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone NCA 03 Selston and Eastwood Urban Fringe Woodland.	Comments acknowledged.

### Proposed Amendments

Issue/Policy	Amendment
A development brief will be created for the site providing broad principles and site specific considerations that will need to be taken into account by future development.	As a result of comments received, the Council proposes to ensure the development brief for Park Lane will include information related to:

	<p><u>Access</u> – primary vehicular access must be taken from Park Lane. Safe pedestrian links should be created with the existing residential area.</p> <p><u>Telecommunications mast</u> – a telecommunications mast is located on the northern edge of the site adjacent to Park Lane. In consultation with the mast operators, development proposals must ensure appropriate easements are applied to this area of the site.</p> <p><u>Landscaped buffer / acoustic fencing</u> – development proposals must retain, and where appropriate, enhance the existing landscape buffer adjacent to the M1. In consultation with the Council's Environmental Health Department, the need for additional acoustic barriers should also be assessed.</p>
A small area of additional land proposed to be included in the site allocated for development	Amend the site area to incorporate the small additional area of land put forward as part of the housing allocation.

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
J Anstock	1909	√			Nottinghamshire County Council	2803			√
Oxalis Planning	2235		√		M Briggs	5391			√
A Loydall	2697	√		√					

## Policy RA2e: Site: Bull & Butcher, Selston

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Site Allocation	
Support	
My client welcomes and supports the inclusion of their land as a housing allocation. The land is considered to comprise an extremely logical extension to the existing settlement boundary. It has good access to services and facilities and will deliver a significant amount of new housing to contribute towards the local housing needs identified for the area and help sustain the rural communities.	The Council welcomes the support from the landowners in seeking to provide housing development on the Bull & Butcher site.
My clients are consequently aware that the aspirations of the Neighbourhood Plan go beyond simply addressing local housing needs. It is known there is also a desire to enhance and increase the retail/local employment offer within the settlement to create a truly sustainable rural community and help to improve connectivity to local services and facilities. As such, my client remains willing to allow part of the site to be promoted as a small local retail/employment hub.	The Council fully supports the work undertaken by the Neighbourhood Group in developing a Neighbourhood Plan for the area. If there is a demonstrated demand for additional retail uses within Selston, that is appropriate to the scale of the settlement, the Council may support this as part of future development on the Bull & Butcher site.
The landowner has submitted an Access Appraisal which supports the inclusion of the site as a housing allocation.	The Council welcomes additional information which supports the deliverability of development. The Access Appraisal identifies potential access points from Alfreton Road and Nottingham Road, which is the main road running through Selston. To enable better integration into the existing

	settlement, it would also be beneficial to have an access route into the adjoining housing estate. The Council will be producing a Site Development Brief to guide future development.
<b>Object</b>	
Objects to any building in Selston. Development will blight the village	The Council's evidence based identifies the Objectively Assessed Housing Need for the District in the Strategic Housing Market Assessment. This also includes housing with The Rurals.
Concerns expressed regarding the condition of the roads and the amount of traffic.	The Council acknowledges that new development may generate more traffic. As such the Council has commissioned a Transport Study to model potential increase in congestion and movement and suggest potential mitigation to this.
Concern expressed regarding climate change and flooding.	Any future developments will need to comply with Building Regulations related to the energy efficiency of the building.  Any future development will need to appropriately manage surface water on site through a sustainable urban drainage system, reducing the potential for surface water flooding.
Concern expressed regarding more feral children roaming the streets.	Comments acknowledged.
The loss of Green Belt land to concrete.	Comments acknowledged.
<b>Comment</b>	
This proposed allocation is on the perimeter of the urban area of Selston, therefore any proposals should take into account	Comments acknowledged.

the Landscape actions included in the Greater Nottingham Landscape Character Assessment for Policy Zone NCA 03 Selston and Eastwood Urban Fringe Woodland.

### Proposed Amendments

Issue/Policy	Amendment
N/A	-

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Nottinghamshire County Council	2803			√	Eggleshaw	6734	√		
Star Pubs & Bars Ltd	6696		√						

## Policy RA2: Alternative Housing Sites Proposed in The Rurals

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Object</b>	
<p><b>Land adjacent to 282 Main Street, Westwood (SHLAA ref V14)</b></p> <p>Objection to the omission of their site having been identified for release from the Green Belt and allocated for housing. The land has been promoted during every stage of the Council's previous consultation process for the development of a small number of houses to meet the needs of the local community.</p> <p>The 'Housing Site Selection Technical Paper' confirms that only those sites capable of accommodating ten or more dwellings have been considered suitable for allocation purposes. This site falls below the threshold for allocation but it would comprise a logical rounding off of the settlement boundary in this part of Westwood.</p> <p>The site would need to be released from Green Belt for allocation purposes. The need to provide housing across the District provides justification for a review of the Green Belt. Having regard to the NPPF, the Local Plan Preferred Approach is proposing to allocate Green Belt land for housing. Releasing the site would not conflict with the Local Plan Strategy for locating development adjacent to larger settlements in the Rurals. The site relates to the existing built up area rather than the countryside and the Green Belt designation. The release of the site would not prejudice the wider objectives of including</p>	<p>Disagree with the suggestion of allocating sites for less than 10 dwellings. The sites selected provide opportunities to bring wider benefits to the area. They can deliver a mix of housing required whilst also contributing towards the necessary improvements associated with new development.</p> <p>There are no exceptional circumstances for further Green Belt release and the site is in floodzone 3. As such, it is not suitable for allocation.</p> <p>No amendments proposed.</p>

land in the Green Belt. On this basis it is not considered necessary to keep the land permanently open by retaining its Green Belt designation.

As a small site, its inclusion would not materially prejudice the overall housing strategy for the District, but could make a meaningful contribution in providing a small number of dwellings (which by their size would be inherently affordable) to meet the housing needs of this particular settlement. In this connection, my client is mindful that the majority of the housing needs for the '*Rurals*' are proposed to be met on a small number of larger sites, thereby placing heavy reliance on the performance of these to deliver the housing numbers as envisaged in the current draft document and at the appropriate time.

The Council is therefore asked to re-visit the merits of this site for release from the Green Belt and allocation for a small number of houses to meet local needs.

There should be a lower threshold in the Rurals in recognition of the valuable contribution smaller sites can make.

Even if it isn't allocated for housing, the Council should consider amending the boundary to remove it from its Green Belt designation or include it as safeguarded land.

Other than the Green Belt designation, the SHLAA purports the risk of flooding to be a further constraint to development.

However, the Council is aware the landowners have previously commissioned a Flood Risk Assessment confirming that the part of the site closest to the public highway is not at risk of flooding and could be developed for up to four dwellings subject to careful siting and design.

A copy of an appropriate layout (and *illustrative* streetscene)

<p>previously submitted to the Council to accompany earlier representations) is again enclosed for ease of reference. This was formulated in close liaison with the landowner's flood risk consultant in order to be able to demonstrate that (and how) the site could be satisfactorily developed.</p>	
<p>Land adjacent 149 Stoney Lane, Selston (SHLAA Ref. V86)</p> <p>a) The landowner objects to the omission of the site from the Local Plan.</p> <p>b) Appendix 1 of the Site Selection Technical Paper confirms that the site was simply discounted from further consideration as it fell below the threshold for allocation (10 dwellings). In other respects the site was considered suitable subject to a change in Green Belt policy.</p> <p>c) The SHLAA conclusions indicate that a Green Belt Review was being undertaken and there was a need to establish whether there are any exceptional circumstances for release of the land from the Green Belt.</p> <p>d) The Strategic Green Belt Review indicates that the site falls within Site 9 within the Selston Green Belt Area. The landowner wishes to make two points in this respect:</p> <p>1. First, Site 9 (as opposed to my clients' site in isolation) is considered of sufficient size to meet the minimum threshold for allocation purposes and it is not clear within the consultation draft whether the Council has considered the amalgamation of site V86 and the residual adjoining land comprising Site 9 jointly for allocation purposes - which would have resolved the</p>	<p>a) Objection noted.</p> <p>b) Comment noted.</p> <p>c) Comment noted.</p> <p>d) 1. The Council has not considered the amalgamation of the two sites because the other site has not been submitted to the Council for consideration. The Council can only take forward sites which are deliverable as defined by the NPPF. 2. The two sites taken forward are more suitable because, given their size, they can make a much bigger contribution towards meeting the housing needs of the area and they can bring wider benefits in terms of supporting local services and delivering environmental improvement and affordable housing.</p>



<p>now purported threshold deficiencies.</p> <p>2. The Strategic Green Belt Review confirms that Site 9 scored just as well as those other sites identified in the consultation draft for release from the Green Belt and subsequent allocations for housing (RA2d and RA2e).</p> <p>As such the site should be considered equally suitable for release from the Green Belt than those other sites identified in the consultation draft for allocation purposes.</p> <p>However, the fact that this site (and adjoining land comprising Site 9) already contains buildings is not reflected in the overall scores casts doubt on the robustness of the Council's scoring system. For example, both proposed housing allocations RA2d and RA2e are greenfield and contain no buildings – and yet are afforded the same score in terms of assisting in safeguarding the countryside from encroachment as Site 9 which, as evident below, is already extensively developed.</p> <p>e) Notwithstanding the fact that the buildings are agricultural in nature, they must clearly, by definition, already have a greater impact on the <i>openness</i> of the Green Belt (and in terms of encroachment into the countryside) than sites that are currently undeveloped.</p> <p>f) The site would assist in providing an element of natural flexibility if the Green Belt boundary was revised to specifically exclude it from the wider Green Belt designation.</p> <p>Its inclusion would not materially prejudice the overall housing strategy for the District, but could make a meaningful contribution in providing a small number of dwellings (which by their size would be inherently affordable) to meet the housing</p>	<p>e) The site assessment accords with the methodology which asks about inappropriate development. The site does not contain any inappropriate development.</p> <p>f, g, h, i, j) There are no exceptional circumstances for further Green Belt release.</p> <p>No amendments proposed.</p>
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<p>needs of this particular settlement. It would also help to provide a mix and choice of housing sites.</p> <p>g) The Council should allocate smaller sites (under 10 dwellings) in the Rural area to meet housing need. Smaller sites can make a valuable contribution in this part of the District. This approach would also have less of an impact on the Green Belt.</p> <p>h) Even if the Council is not prepared to lower the allocation threshold in advance of the next consultation stage (which my clients strongly advocate they should), then the site should still be considered for release from the Green Belt, or included as '<i>safeguarded land</i>' to allow development on the site to come forward if and as required to meet local housing needs.</p> <p>i) Its contribution to fulfilling the purposes of the Green Belt is negligible (as recognised in the Council's scoring assessment). Given that it is already extensively developed (and therefore not open), there is no need to include this land within the Green Belt in accordance with the advice in paragraph 85 of the NPPF. Recommend a minor Green Belt boundary review.</p> <p>j) The Council is asked to reconsider the merits of allocating site V86 in combination with adjoining land (favourably) considered collectively as Site 9 in the 'Selston Green Belt Areas [Overall Scores]' document.</p>	
<p>Winter Closes/Cordy Lane</p> <p>a) Representations have previously been submitted (by an agent) to the Council regarding the allocation of Winter Closes/Cordy Lane for the development of a mixed use site. We have been working with the Parish Council with regard to the Neighbourhood Plan and, following public consultation, it is</p>	<p>a) Comments noted. The Council does not support the proposal off Winter Closes. The proposed housing allocations will provide for the housing needs of the community and support existing local services, including schools, leisure centre, library, convenience stores, and the golf course. The</p>

<p>clear that the Parish Council and local community support this proposal.</p> <p>The Local Plan proposes to allocate land for 358 dwellings on 3 sites. No additional facilities are proposed on the site. The Local Plan Preferred Approach states “Appropriate levels of housing growth are proposed in the Rurals, helping to sustain facilities and services within these communities and improve the population age mix, which currently has the highest percentage of residents over 65 and the lowest below 15 years. Housing development within these communities will also help deliver affordable homes, which may also help retain young people within the community”. Question raised: How can this level of development achieve the aim of creating a sustainable environment?</p> <p>b) Point 7 of Policy S2 states that existing local facilities will be supported and links to them will be improved. Where necessary new facilities should be provided in line with the scale of development proposed. The proposed development sites do not achieve the aims of this policy as they only propose housing.</p> <p>c) The proposal for Winter Gardens/Cordy Lane brings forward a range of facilities including employment growth.</p> <p>d) The community has an expectation for a much improved environment to their villages, as set out in previous proposals. These proposals have gone through a lengthy Neighbourhood Plan consultation exercise by the Parish Council. We will be</p>	<p>Council does not consider there are exceptional circumstances for further Green Belt release in the Rurals.</p> <p>b) A Retail and Leisure Study is currently being undertaken which will identify any future requirements for the District. The Council are also updating the Infrastructure Delivery Plan which will identify any future requirements for the Rurals in relation to the sites taken forward for allocation.</p> <p>c) Comments noted. The Council is satisfied that the employment allocations taken forward will meet the needs of the District.</p> <p>d) The Council understands that Selston Parish Council does not support the proposal off Winter Closes. The site will remain Green Belt land.</p>
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<p>presenting an amended proposal to the Parish Council on 29<sup>th</sup> March 2016.</p> <p>e) This site is the only site in the Rurals which provides benefits and added value for the future lives of all age groups in the community. An improved educational, recreational, community environment for all residents. The above should be taken into consideration.</p>	<p>e) The Council is satisfied that the sites taken forward will meet the development needs of the community in the Rural area.</p> <p>No amendments proposed.</p>
<p>Land off Stoney Lane, Selston (SHLAA ref. V366)</p> <p>a) We have been informed that the main reason the site is not being taken forward for allocation is due to possibility that shallow mine shafts are located within the land. The land has been farmed for over 60 years and the landowner has not experienced any settlement of the land's surface. If past mining has been carried out it may be brought to light as part of a full intrusive ground investigation. This could be addressed as part of the development of the site and it is not considered a valid reason to preclude the land for development.</p> <p>b) It is understood that there is a shortfall in provision for residential development within Ashfield District. The land proposed extends to some 7.4 hectares which could provide circa 200 residential units. The land provides excellent connectivity to Selston village through established rights of way which link the primary school, secondary school and leisure centre. We would urge the Council to reconsider the exclusion of this land from the Local Plan.</p>	<p>a) This is incorrect. The site is not being taken forward as a housing allocation because it is Green Belt land and there are no exceptional circumstances for Green Belt release. The sites taken forward for housing are considered to be more suitable and they can deliver development which meet the needs of the community.</p> <p>b) This is incorrect. There is no shortfall in housing provision. The housing allocations taken forward can deliver enough homes to meet the objectively assessed housing needs of the District over the 15 year Plan period.</p> <p>No amendments proposed.</p>
<p>Land between 106 and 132 Main Road, Underwood</p> <p>a) Representations submitted on behalf of the landowners. The</p>	<p>a) Comments noted. Whilst the land may be described as</p>

site covers approximately 0.52 hectares and comprises underused land. It sits between existing development and is currently identified as Green Belt land in the Ashfield Local Preferred Approach.

**b) Chapter 7 – Area Policy The Rurals**

The settlement of Underwood is recognised as a named settlement under proposed Policy S3 – Settlement and Town Centre Hierarchy. This Policy states that it would expect Named Settlements to accommodate smaller scale growth. It is proposed that the Rural areas will provide approximately 5% of the overall housing needed for Ashfield.

Key element 4 of the draft Spatial Strategy states:

‘Appropriate levels of housing growth are proposed in the Rurals, helping to sustain facilities and services within these communities and improve the population age mix, which currently has the highest percentage of residents over 65 and the lowest below 15 years. Housing development within these communities will also help deliver affordable homes, which may also help retain young people within the community’.

It is therefore important that the new Local Plan provides for adequate housing in the rural areas to ensure they remain vibrant.

**c) Strategic Green Belt Review**

The Strategic Green Belt Review was undertaken in December 2015. The proposed alternative site lies on the southern edge of area U03, subsite 2 which achieved an overall Green Belt score of 16 for the larger area and a Green Belt score of 18 for the sub site area. The higher the score, the more important the

‘underused’, it could potentially be used for agriculture or other uses appropriate to the Green Belt.

b) Comments noted. The Council is satisfied that the Local Plan provides for the development needs of the area.

c) Part 9, Paragraph 85 of the NPPF indicates that “when defining boundaries, local planning authorities should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. With regard to the whole sub site, the northern boundary of the site contains the only physical feature which could clearly act as a defensible

<p>Green Belt is considered to be.</p> <p>One of the main issues raised in the scoring for sub site 2 was the following:</p> <p>“Topography of land means that development is likely to have an adverse impact on the setting of Bagthorpe Conservation Area, especially longer views from within the valley to the north. Encroachment of development will erode the rural setting of Lower Bagthorpe Conservation Area.”</p> <p>This analysis is misleading, the sub areas are too big and combine different sites. So whilst the fields closer to Lower Bagthorpe may have this effect on the Conservation Area, the submitted site has a completely different topography and is related to Underwood not Lower Bagthorpe. When undertaking a Green Belt assessment, smaller sites should be assessed – individual sites as opposed to groups of sites because different sites will have different impacts on the Green Belt.</p> <p>The submitted site has very little relationship to the other land within sub site 2. This is shown by the plan submitted with these representations. This is accepted by the Green Belt Review which states “With the exception of the most southerly part of the site (the submitted site), the land slopes fairly steeply down away from the existing settlement of Underwood, towards Bagthorpe in the north.”</p> <p>d) We would suggest that the submitted site has more of a relationship with area U04 sub site 13 which scores 7 points. This would be a fairer and more realistic score.</p> <p>e) Suggested score for each Green Belt purpose:</p> <p>1. Check unrestricted sprawl of settlements – Score 1</p>	<p>Green Belt boundary. As such the Council does not propose to change the subsite boundary.</p> <p>With regard to the score, the Council has reviewed the assessment in relation to impact on the setting of Lower Bagthorpe Conservation Area and has reduced the score to 1. The higher score related to the whole area (U03) and it has been transferred to subsite 2 in error. This has reduced the overall score to 13 out of 20. The proposed amendment to the Strategic Green Belt Review is detailed below.</p> <p>The site has now been taken through the site assessment process and has been assessed as unsuitable for allocation. Given that the two sites taken forward for allocation score much lower in the Green Belt assessment and can contribute towards meeting the housing requirement, there are no exceptional circumstances for further Green Belt release. Consequently, the site is considered to be unsuitable for allocation.</p> <p>d) The Council does not agree with this statement. Site U04, Subsite 13 does not extend beyond the settlement boundary, so would not result in reducing the gap between Underwood and Brinsley. It contains a residential garden so would not have the same effect on the encroachment of the countryside. It would not have any effect on the setting of Lower Bagthorpe</p>
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<ul style="list-style-type: none"> <li>• Site adjoins settlement boundary</li> <li>• Located between existing development</li> <li>• It is well related to Main Road and not to Lower Bagthorpe</li> <li>• Development would not east into countryside and further than existing development to the east and west.</li> </ul> <p>2. Prevent neighbouring settlements from merging into one another – Score 1</p> <ul style="list-style-type: none"> <li>• Development of the site would not protrude any further into the countryside than existing development to the east and west.</li> </ul> <p>3. Assist in safeguarding countryside from encroachment – Score 2</p> <ul style="list-style-type: none"> <li>• The site is on the edge of Underwood</li> <li>• Development would not encroach any more than existing development to the east and west</li> </ul> <p>4. Preserve the setting and special character of historic settlements – Score 1</p> <ul style="list-style-type: none"> <li>• The site has no historic merits, it is located over 600 metres from Bagthorpe Conservation Area</li> <li>• Its topography ensures that there is no impact on Lower Bagthorpe Conservation Area</li> </ul> <p>TOTAL SCORE 5</p> <p>This assessment demonstrates that by using the NPPF guidelines for the release of Green Belt, the submitted site is suitable for release as it has very little purpose in Green Belt terms. It should therefore be excluded from the Green Belt and allocated for housing to meet the housing need in the named</p>	<p>Conservation Area.</p> <p>e) The Council has taken on board the concerns raised and has reviewed the assessment. The only amendment proposed is in relation to the impact on the setting of Lower Bagthorpe CA, as set out previously.</p>
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settlements.

f) It is noted that the two sites taken forward as housing allocations in Selston are whole sites in the Green Belt Review (2015). Each SHLAA site should be looked at individually and assessed against the 5 purposes of the Green Belt.

g) We strongly object to the methodology that has been used for the Strategic Green Belt Review. Sites should be assessed individually not collectively. This approach has resulted in the site on Main Road being incorrectly assessed.

h) SHLAA and Housing Site Technical Selection Paper  
The site on Main Road was submitted to the Strategic Housing Land Availability Assessment (SHLAA) under reference V21. The conclusion of the SHLAA was that the site may be suitable if policy changes/mitigation. However, when the Council published it's Housing Technical Paper it discounted Site V21 on the following grounds:

f) The sites taken forward have defensible boundaries, which is a requirement of the NPPF. The site on Main Road, Underwood does not have a defensible boundary. As highlighted previously, Part 9, Paragraph 85 of the NPPF indicates that "when defining boundaries, local planning authorities should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. With regard to the northern boundary, there are no physical features on the ground which can be used to define the Green Belt boundary. The site and adjoining land are only separated by a roped boundary marker/fence. The suggested approach would not accord with the NPPF.

g) Objection noted. The Council has worked with Nottingham City Council, Gedling Borough Council and Broxtowe Borough Council to develop and agree the Green Belt Assessment Framework. The methodology utilises a logical and consistent method of assessment which accords with the NPPF. This has been subject to a six week period of consultation in August/September 2014.

h) Objection noted. The assessment of the site has now been reviewed and amended, as identified in section c above.



“Green Belt – The site scores the highest points for preserving the historic settlement (Lower Bagthorpe). Consequently it has been discounted from the site selection process”.

To discount the site solely on the grounds of the impact it would have on the historic settlement of Lower Bagthorpe is incorrect and is not supported by any evidence on heritage assets. We strongly object to this analysis. We have assessed the background studies that have informed the Local Plan Preferred Approach and only one relates to historic environment – Criteria for Local Heritage Asset Designation. The document does recognise the importance of Lower Bagthorpe Conservation Area, however we can find no analysis of the site on Main Road in respect of the historic aspect of Lower Bagthorpe.

Paragraphs 133 – 134 of the NPPF considers the impact of development on heritage assets, it effectively gives three scenarios:

1. Substantial harm
2. Less than substantial harm
3. No harm.

We strongly object to our client’s site being discounted solely on heritage grounds when a heritage assessment of the site based on the guidance in the NPPF has not been undertaken. We have assessed the NPPF guidance and conclude that the development of this small site would give rise to no harm on the heritage asset for the following reasons:

- It is over 600 metres from the CA and its topography ensures that it won’t have an impact;
- It relates to Underwood, not Bagthorpe;
- It would bring more public benefits - market and

<p>affordable housing in a sustainable location, housing for the elderly, infrastructure contributions etc.</p> <ul style="list-style-type: none"> <li>• The only heritage assessment that has been undertaken is through the Green Belt Review. The decision to discount the site based on heritage impact is based on insufficient evidence.</li> </ul> <p><u>i) Analysis of Housing Benefits</u></p> <p>Proposed Policy RA2 sets out the proposed housing allocations for the Named Settlements, this allocates 358 dwellings on 6 sites with only 2 being in Underwood (RA2a Church Lane for 21 units and RA2f Brick and Tile public house for 15 units). The 15 units at the Brick and Tile are already under construction so will therefore meet the current need. However the Plan should be accommodating housing for the next 15 years. The proposed allocation at Church Lane does have physical constraints in that it is covered by mature trees, therefore this decreases its deliverability.</p> <p>The remainder of the proposed rural sites are: RA2b Westdale Road, Jacksdale (15 units); RA2c Westdale Road (60 units). Both sites were allocated in the 2002 existing Local Plan and have not come forward in the past 14 years. There is no certainty that they will come forward over the new plan period. Site RA2c is not expected to come forward until years 5 to 10. As such it won't meet current housing needs.</p> <p>RA2d Park Lane, Selston – 110 units. Currently Green Belt, the anticipated delivery is over 5 years meaning it will not meet current demand. There are noise concerns on the site with 50% being a buffer zone to the M1. It is debatable whether this site is deliverable or viable. The strategy for the Rurals is for small</p>	<p>i) The Council is satisfied that the sites taken forward as housing allocations are deliverable within the Plan period. Landowners and agents of sites taken forward have indicated that development will be delivered within the 15 year plan period. The Housing Trajectory reflects that development will be delivered within the 15 year Plan period and the Council is confident that the sites taken forward in the District will ensure that a 5 year housing land supply is maintained.</p>
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scale growth to meet the housing need. 110 units is not small scale growth.

RA2e Rear of Bull and Butcher, Selston – 137 units. Currently Green Belt, the anticipated delivery is over 5 years. The strategy for the Rurals is for small scale growth to meet the housing need. 137 units is not small scale growth.

On this basis in the 0 to 5 year tranche it is likely that only 15 dwellings will come forward. The other sites in the 5 to 10 year tranche have infrastructure constraints which will hinder delivery. It is therefore questionable whether these sites will come forward.

j) The rural areas are in need of smaller sites which can meet local housing need and that do not have infrastructure constraints, and which can deliver housing in the next 0 to 5 years. The site is in a sustainable location and is well connected to the existing settlement of Underwood. It provides an opportunity to deliver smaller scale housing development around 15 to 20 dwellings in the rural area.

The site is:

Suitable – The methodology of the Green Belt Review is flawed. The site will have no impact on Lower Bagthorpe. It is in a sustainable location and it sits between residential development. It has no physical constraints, unlike some of the sites taken forward.

Available – there are no land ownership constraints

Achievable – there are no constraints that will affect achievability.

Accordingly the site should be excluded from the Green Belt and allocated for housing to meet the housing needs in

j) The Green Belt Review methodology is not flawed. The Council has produced a joint Green Belt assessment framework with Nottingham City, Broxtowe Borough and Gedling Borough Councils. It has been subject to a six week public consultation. It provides a robust method of assessment which complies with the NPPF.

In addition to this, the four Councils (Ashfield, Nottingham City, Broxtowe and Gedling) have liaised closely on the assessment of sites and have cross checked a sample of the Green Belt site assessments.

As stated previously, the Green Belt assessment is based on the whole of the subsite. In accordance with the NPPF, sites must have defensible boundaries. SHLAA site V21 does not have a defensible boundary.

Proposed amendments are detailed below.

Underwood.	
<b>Comments</b>	
<p>Land north of Larch Close, Underwood</p> <p>a) This site is being promoted by an agent on behalf of the landowners. The landowners are aware that the site is designated Green Belt land but that the Green Belt boundaries will be reviewed within the Rural Areas.</p> <p>b) Paragraph 83 of the NPPF confirms that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Local Authorities should consider Green Belt boundaries having regard to their permanence in the long term so that they should be capable of enduring beyond that period.</p> <p>NPPF Paragraph 85 advises that local authorities should:</p> <ul style="list-style-type: none"> <li>• not include land which it is unnecessary to keep permanently open; and</li> <li>• where necessary, identify in their plans areas of safeguarded land between the urban area and the Green Belt in order to meet longer term development needs stretching well beyond the Plan period;</li> <li>• satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period, and</li> <li>• define boundaries clearly using physical features that are readily recognizable and likely to be permanent.</li> </ul> <p>c) Part of the land has already been developed (comprising menage) with established equestrian use on the balance. The</p>	<p>a) Comments noted.</p> <p>b) Comments noted. The Council's approach to the Green Belt Review and site selection process accords with the NPPF.</p> <p>c) Comments regarding the current land use are noted. The site, which forms part of U02 subsite 1, scores 11 out of 20 in</p>

site is considered to be a logical extension of the built up area of Underwood. Nottingham Road (B600) and Mansfield Road (A608) already define the existing Green Belt boundary to the west and east. The release of the site, particularly if brought forward in combination with adjacent land to the east, would be similarly effectively defined.

The new boundary to the north would follow a logical and physical tree/hedgerow boundary (feature) which would be readily recognisable and likely to be permanent.

The site appears equally logical on the ground, being very well contained both in landscape and visual amenity/prominence in Green Belt terms) by existing hedgerow/tree boundaries and areas of mature tree planting all of which would be retained as part of any future housing scheme.

d) The site is considered equally suitable on its own if the adjoining site is not required. It would be logical to allocate the adjoining site as 'safeguarded land'. The Council will be allocating land within Underwood, Jacksdale and Selston to meet the District's identified housing needs within the Rural Areas and therefore the review of the Green Belt boundaries in this area would be consistent with the Local Plan Strategy for meeting identified requirements for sustainable development as required by the NPPF.

e) The site is free from physical/technical constraints that would otherwise prevent or delay delivery. It should be considered imminently available for development.

the Green Belt Review (2015). The sites in Selston which are being taken forward as housing allocations score much lower in the Green Belt Review, RA2 e Land to the rear of the Bull and Butcher scores 8 out of 20, and RA2d off Park Lane scores 7 out of 20. The sites also have better access to more facilities and services in Selston, which is larger than Underwood. Both sites are considered to be more suitable than the proposed site north of Larch Close in Underwood.

d) The Council is satisfied that the sites taken forward will deliver the housing needs of the area within the Plan period. As such, there is no requirement to identify additional sites.

e) Comments noted. Please see d above.

f) It is hoped that this information is of assistance at this early stage in the Local Plan review. The Neighbourhood Steering Group has been copied in to this response.	f) Comments noted. The Council has taken into consideration the information submitted and has concluded that the proposed allocations remain the most suitable sites to meet the housing needs of the community.
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### Proposed Amendments

Issue/Policy	Amendment/Development Brief Requirement
RA2c Westdale Road, Jacksdale. Nottinghamshire County Council has confirmed their intention to bring the site forward within the first five years of the Plan.	Amend delivery timescale to commence in year 3.
Strategic Green Belt Review U03 – land north of Underwood, between Main Road and Church Lane. Subsite 2 was awarded 5 out of 5 for 'Preserve the setting and special character of historic settlement'. The score of 5 relates to the whole of U03 rather than to subsite 2, this was an error. It has been reassessed by the Council and will be amended to score 1 out of 5.	Strategic Green Belt Review U03, subsite 2 - Preserve the setting and special character of historic settlement delete 5 and replace with 1. Amend supporting text to: <del>Topography of land means that development is likely to have an adverse impact on the setting of Bagthorpe Conservation Area especially longer views from within the valley to the north. Encroachment of development will erode the rural setting of the Lower Bagthorpe Conservation Area.</del> The site is not in the Bagthorpe Conservation area and does not contain any designated heritage assets. No local heritage assets have been identified at this time. The topography of the land to the south of the conservation area means that the ability to see this site from the Bagthorpe conservation area is very limited and is unlikely to have an adverse or harmful impact on the setting of Bagthorpe Conservation Area.

Site Selection Technical Paper – include SHLAA site V21 within the ‘unsuitable sites’ section.	Site selection conclusion: The Council considers that this site should not be taken forward as an allocation within the Preferred Approach Local Plan. The site’s primary constraint is its Green Belt designation. In response to paragraph 83 of the NPPF, the Council has undertaken a Green Belt Review to understand the contribution sites adjacent to the urban area make to the 5 purposes of Green Belt. The site scores 14 out of 20. Because there are sites which score lower in Green Belt terms, (sufficient to fulfil the District’s housing requirements) which are considered to be more suitable; the Council does not believe it has the grounds to demonstrate ‘ <i>exceptional circumstances</i> ’.
There was no Sustainability Appraisal of SHLAA site V21 Main Road, Underwood for the Preferred Approach because it was originally discounted on Green Belt grounds.	Sustainability Appraisal of SHLAA site V21.

<u>List of Respondents</u>					<u>List of Respondents</u>				
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Phoenix Planning on behalf of John Booth	6039	√			IBA Planning on behalf of Mr and Mrs Smith	2833	√		
C. B. Land on behalf of Mr. S. Smith	6567	√			IBA Planning on behalf of Mr. & Mrs. Gilbert	5098	√		
Mr. P. Stone, Signet Planning on behalf of Mr & Mrs Bacon	6631	√			Mr. N. Baseley, IBA Planning on behalf of Mr & Mrs Juniper	6694	√		

## Policy RA3: Green Infrastructure in The Rurals

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Support for all the Green Infrastructure corridors set out in the Policy.	Support acknowledged.
Policy RA3 identifies opportunities to enhance the GI Strategic network, in line with the GI and Biodiversity Strategy.	Support acknowledged.
Policies HA4, SKA5 and RA3, relating to GI, are welcomed and supported, along with the identification of strategic GI corridors; however, it should be noted that there are no maps within the Ashfield Green Infrastructure and Biodiversity Strategy showing the location of these corridors (or at least, not in the version available on the ADC website). It is also queried whether work will be undertaken to update these corridors in light of the Ashfield Biodiversity Opportunity Mapping project which is currently taking place.	Support acknowledged.  The Council's website sets out the Ashfield Green Infrastructure and Biodiversity Strategy including the associated maps.  The intention is for the GI corridors to take into account the Ashfield Biodiversity Opportunity Mapping project.
<b>Object</b>	
-	-
<b>Comment</b>	
-	-
<b>Responses received relating to Policy supporting text</b>	
-	-



### Proposed Amendments

Issue/Policy	Amendment
No changes proposed from the consultation.	-

<u>List of Respondents</u>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Lathall	1917		√		Ward	5807		√	
Collier	1918		√		Bolger	5817		√	
Johnson	1886		√		Lathall	5819		√	
Lathall	2631		√		Manders	6640		√	
Nottinghamshire County Council	2803		√		Lewis	6729		√	
Cooper	2811		√		Eyre	6897		√	
Natural England	3185		√		Elkington	6977		√	

## Adapting to Climate Change

### Policy CC1: Zero and Low Carbon Developments and Decentralised Renewable and Low Carbon Energy Generation

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
The County Council welcomes the various references throughout the Plan to waste; particularly the reference in part 3b) of Policy CC1 to the minimisation of waste.	Comments acknowledged.
This policy is generally supported	Comments acknowledged.
Natural England welcomes development that incorporates sustainable design and construction and shows both adaptation to and reduction in the contribution to climate change, therefore we welcome Policy CC1 which encourages the inclusion of climate change adaptation and future climate proofing of development.	Comments acknowledged.
Policies should seek to maximise renewable and low carbon energy development while ensuring that adverse environmental impacts are addressed satisfactorily, including cumulative biodiversity, landscape and visual impacts therefore we welcome Policy CC1 which adopts this approach.	Comments acknowledged.
<b>Object</b>	
It is noted that several references are included in the Plan to achieving zero carbon development, as follows: <ul style="list-style-type: none"> <li>Paragraph 5 of the Local Plan Vision;</li> </ul>	The Council acknowledges these comments and the resulting outcomes of the Deregulation Act 2015.

<ul style="list-style-type: none"> <li>• Paragraph 4.35;</li> <li>• Policy CC1 - Title and sub-heading;</li> <li>• Paragraph 8.1 - Heading; and</li> <li>• Paragraphs 8.2, 8.3 and 8.4.</li> </ul> <p>The Written Ministerial Statement dated 25<sup>th</sup> March 2015 which explains that, from the date the Deregulation Act 2015 is given Royal Assent (26<sup>th</sup> March 2015), local planning authorities should not set in their emerging Local Plans any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.</p> <p>Consequently, it is consider that Policy CC1 is unsound and reference made to zero carbon standards within the Plan should be deleted, as the Council does not have the power to require residential developments to exceed the energy performance requirements of the Building Regulations.</p>	<p>The Council recognises that it cannot set any additional local standards related to low and zero carbon development beyond those within Building Regulations. However, the Council wishes to highlight its support for developments that seek to exceed building regulations of their own accord. It will revise Policy CC1 appropriately.</p> <p>Proposed amendments to the CC1 are detailed below.</p>
<p>The Act removed the power of authorities to required residential developments to exceed the energy performance requirements of Building Regulations. The policy as currently draft is contrary national policy and needs to be reviewed.</p>	
<p><b>Comment</b></p>	
<p>The Local Plan should include a policy regarding the development of land for renewable energy use.</p> <p>Allowing development for renewable energy will remove land</p>	<p>Policy CC1 within the Preferred Approach Local Plan relates to the promotion of local carbon development and decentralised, renewable and low carbon energy generation.</p>

<p>from being available for at least 25 years and may restrict the choices available to the council in periods beyond this planning period. It is therefore important to consider where solar farms and wind turbine may be appropriately placed and where they may not due to prioritisation of land resources.</p> <p>A renewable developments policy should also consider other factors such as the impacts on people, landscape and wildlife.</p>	<p>In assessing any future planning applications for renewable energy generation, such as wind turbines or solar panels the Council will consider a range of factors, such as noise; landscape and heritage impact; residential amenity; highway, aviation, defence, radar and powerline safety; and potential impact on protected species.</p> <p>As detailed within the draft CC1, the Publication Local Plan will contain areas within the District that may be suitable for wind development, as requested by national planning practise guidance.</p>
<p>Chapter 8 – Adapting to Climate Change NCC have recently provided advice for NSDC on submitted planning applications for wind turbines. The Wind Energy SPD (Adopted March 2014) &amp; Supporting Landscape Capacity Study proved particularly useful in developing consistent arguments for and against turbines in the NSDC area. Have ADC considered producing a similar document?</p>	<p>The Council may consider producing additional guidance to aid the development of low carbon, renewable and decentralised energy in the future.</p>
<p>We request a minor change to part 4 to replace the word 'harm' with adverse effect. This is because the terminology of 'harm' is sometimes taken to mean that there are 'significant adverse effects'. Consequently, 'significant harm' may imply 'very significant' adverse effects, which would not be supported. We also request a reference to the settings of heritage assets in part 4.d), as follows:</p> <p><i>And/or significant <del>harm</del> adverse effects to:</i> d) <i>The surrounding landscape, townscape and, heritage assets and their settings</i></p>	<p>The Council acknowledges this comment and will apply the proposed amendments</p>
<p>In part 7 we request that 'stakeholder organisations' are</p>	<p>The Council acknowledges this comment and will apply the</p>

included alongside 'local communities' (reflecting the supporting text at paragraph 8.9):  <i>7. Proposals for wind turbines should undertake pre-application consultation with local communities <u>and stakeholder organisations potentially affected...</u></i>	proposed amendments
Within part 9.c) of the policy we request additional text is inserted to reflect the terminology of 'significance' when dealing with heritage assets:  c)...large scale renewable energy infrastructure will not be permitted unless it can be demonstrated that the objectives of the designation <u>and key aspects of significance</u> are not compromised...	The Council acknowledges this comment and will apply the proposed amendments
You may find the recent Natural England publication Climate Change Adaptation Manual - Evidence to support nature conservation in a changing climate (NE546) useful in considering climate pressures on local habitats and wildlife sites. We also recommend reference to the TCPA publication Climate change adaptation by design.	Comments acknowledged.
Policy CC1 4. item e) -- ACCESS have already commented about the exclusion of LWS habitats within certain paragraphs. We ask that this paragraph should be amended to read "nature conservation areas or biodiversity/ecological areas where the designation is National or local including LWS sites"	Designated nature conservation or biodiversity considerations include national and local designated sites as is set out in Policy EV4. No changes proposed.
<b>Responses received relating to Policy supporting text</b>	
Para 8.3 - this paragraph should also carry a counter statement "the Council will not support development schemes which lie within the shadow effect of natural structures, such	No changes proposed to the paragraph as these aspects should be reflected in the design of the scheme.

as woods, which will limit the amount of daylight especially during the winter, and would lead to increased fuel requirements with corresponding increase in emissions and the introduction or worsening of SAD syndrome”.	
Para 8.8, a) – add “low-frequency noise propagation” - this is more problematic and has a further impact radius.	Amend paragraph.
Para 8.14 -- the Council should give an indicative date when this mapping exercise might be completed. ACCESS ask to be informed when complete so they can be part of the consultation process.	No changes proposed.

### Proposed Amendments

Issue/Policy	Amendment
Proposed amendment to Policy CC1 - 1, 2 & 3 resulting from objections received.	<p><b>Zero and Low Carbon Development</b></p> <ol style="list-style-type: none"> <li>1. The Council will <del>expect</del> <b>seek to support</b> all new residential developments <del>proposals that to achieve the highest level of energy efficiency and carbon reduction measures,</del> exceeding National Housing Standards in relation to energy efficiency and carbon <b>reduction</b> <del>, where appropriate and viable.</del></li> <li>2. <b>The Council will seek to support</b> <del>Proposed</del> non-residential developments <del>should</del> that incorporate sustainable construction design, materials and methods to achieve BREEAM standard ‘good’, where viable and feasible.</li> </ol>

	<p><b>3. Development, including refurbishment where it requires planning permission, will be expected to demonstrate the following <del>The Council encourages designers to consider the following when creating their proposals:</del></b></p> <ul style="list-style-type: none"> <li>a) how it is located and designed to promote the efficient use of energy;</li> <li>b) how it makes effective use of sustainably sourced resources and materials, minimises waste and CO<sub>2</sub> emissions;</li> <li>c) how it is located, landscaped, laid out, sited and designed to effectively mitigate and adaptable to the effects of climate change, particularly the effect of rising temperatures; and</li> <li>d) how the building form and its construction permits further viable subsequent reduction in the building's carbon footprint.</li> </ul> <p><del>Where proposals do not demonstrate compliance with this policy, prospective developers will be expected to justify robustly why such compliance with policy requirements is not viable.</del></p>
<p>Proposed amendments to Policy CC1 (4.)</p>	<p><b>4. there are no significant adverse effects on:</b></p> <ul style="list-style-type: none"> <li>a) Residential amenity (including noise, fumes, odour, shadow flicker, reflected light, traffic and broadcast interference)</li> <li>b) Highway, Aviation, Defence, radar or power line</li> </ul>

	<p><b>safety</b></p> <p>c) Existing building in relation to fall over distance of wind turbines</p> <p>and/or significant harm to:</p> <p>d) The surrounding landscape, townscape, and heritage assets <b>and their settings</b></p> <p>e) Designated nature conservation or biodiversity considerations</p> <p>f) Species protected under national and international law, including those that occur outside protected areas.</p>
Proposed amendments to Policy CC1 (7.)	<p>7. Proposals for wind turbines should undertake pre-application consultation with local communities <b>and stakeholder organisations</b> potentially affected by the proposal, to help identify potential planning issues that need to be addressed.</p>
Paragraph 8.8	<p>Add a) Residential amenity (including, noise, <b>low-frequency noise</b>....</p>
Officer amendment – refinement of supporting text	<p>8.1 It is widely acknowledged that climate change is occurring across the planet, and one of the primary causes of this relates to the amount of carbon dioxide being released into the atmosphere. As a result the Government has committed to reducing the country's carbon dioxide emissions by 80% on 1990 levels by 2050, as set out in the Climate Change Act 2008. In order to help achieve this target the Government has implemented a number of initiatives and regulations aimed at the development industry and property owners to enhance the</p>



	energy efficiency / carbon emissions of new and existing properties. A key component of the Governments initiatives are the National Housing Standards, which have merged a number of previous standards and requirements to create one set of national standards that are to be applied via Building Regulations.
<b>Proposed Officer Amendments</b>	
Officer amendment – refinement of supporting text linked to revision of CC1 (1-3) detailed above	8.2 Creating low and zero carbon developments will play a key role in helping to achieve these carbon reduction commitments and the Council is committed to ensuring all new developments are as low carbon as possible. The Council acknowledges that Building Regulations should be the primary means of introducing and enforcing carbon reductions, but believes developments should enhance <b>consider applying</b> their carbon <b>and energy</b> reduction measures beyond the Building Regulations, where it is viable to do so. Creating the most low carbon developments viable, will not only have environmental benefits but will lead longer term financial savings for the owners / occupants via lower energy requirements.
Officer amendment to Policy CC1 (6) following reassessment of the evidence base.	<b>6. Wind turbine proposals will only be considered and assessed against Policy CC1 (6.) in areas identified as suitable for wind energy development on the Policies Map. Proposal that lie out of these areas cannot be approved by the Council. (mapping exercise proposed to be commissioned in early 2016) , as outlined in Appendix 3</b>
Officer amendment to CC1 supporting text, linked to the amended Policy CC1 (6)	8.12 The results of the study indicate that Ashfield has considerable potential for microgeneration; in particular, heat pumps, solar thermal and solar photo voltaics and these uses are particularly encouraged. The study also highlighted that, whilst Ashfield District has good average wind speeds, the

	<p>potential for commercial scale wind energy developments is limited by constraints relating to the presence of existing infrastructure, properties and bird sensitivity issues. <del>These constraints should be addressed as part of any future proposal.</del></p> <p>8.14 <del>In response to this national requirement, the Council will undertake appropriate mapping exercise to identify areas suitable for wind energy development.</del> The Low Carbon Energy Opportunities and Heat Mapping Study has mapped the wind potential within the District for small, medium and large scale wind turbines, as illustrated in Appendix 3</p> <p>Whilst this exercise has considered a number of constraints, such as physical features and aviation constraints this does not remove the requirement for any future applications to re-assess these constraints, coupled with more detailed site specific assessments and consultation with the relevant bodies and stakeholders.</p> <p>8.15 Prior to an application being submitted to the Council for consideration, it is recommended that the applicant undertakes appropriate consultation with local communities that may be affected by their wind energy proposal and submit appropriate information with their application to demonstrate how the planning impacts highlight at the consultation have been fully addressed by the proposal. <del>This information should also successfully address the requirements of Policy CC1(5).</del> Applicants are recommended to consult with the Council prior to undertaking such consultation.</p>
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**Ashfield District Council - Statement of Consultation**

<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Barton Willmore OBO Taylor Wimpey UK Ltd	2495/ 6644	√			ACCESS - Annesley Community Committed to Ensuring Sustainable Settlements	5359			√
D Shaw	2707			√	Pegasus Group OBO Hallam Land	6036	√		
Nottinghamshire County Council	2803			√	HBF	6151	√		
National Trust	2828		√	√	Bidwells on behalf of David Wilson Homes (East Midlands)	6705	√		
Natural England	3185	√							

## **Policy CC2: Water Resource Management**

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Environment Agency supports the policy as it creates a positive approach to addressing the risk of climate change and the link with future development. In particular the opportunity to reduce flood risk where possible through new development is encouraged.	Support acknowledged.

<p>In addition the position to not permit development which poses a significant risk to the quality of groundwater in principal aquifers or in groundwater protection zones is supported, alongside the strong presumption against development that is likely to have an adverse effect on the water environment.</p> <p>With regard to point 5 of CC2, the term 'appropriate' is subjective. Under the Water Resources act and Land Drainage Byelaws, Environment Agency consent is needed for development within 8 metres of a 'main river'. We recommend that 8m is a suitable distance from the top of bank of a watercourse. Point 5 should make clear that buffer strips should be free from any development including formal gardens, lighting, foot paths, etc.</p> <p>Identify that it would be useful to make a reference to link both CC2 and CC3 when considering opportunities to improve water quality and WFD, as there may also be synergies with flood risk benefits. This thinking can also be extended to include EV4 and EV5, and to find opportunities for delivering multiple benefit schemes.</p> <p>Much of Ashfield District is located on principal aquifer where groundwater is sensitive to pollution. All previous uses of the site must be investigated to determine whether there is the potential to cause contamination to ground water. Principal aquifers are geological strata that exhibit high permeability and usually provide a high level of water storage. These aquifers have strategic significance for water resources, often supporting large abstractions for the public water supply. They</p>	<p>Noted. However, for ordinary water courses a fixed distance of 8 metres may not be appropriate. Amend policy to give clarification and add a paragraph of explanation.</p> <p>Noted and additional paragraph proposed for inclusion in the Plan.</p> <p>Noted and additional paragraph proposed for inclusion in the Plan. Issues regarding surface water run off will be addressed as part of any planning application. For sites of one hectare or more a site specific flood risk assessment will be required, which will include considering the risks from surface water flooding.</p> <p>Change to the Policy to incorporat management of contaminated water</p>
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<p>are also of major importance, supporting river base flow. During and post construction it is possible that contamination could be mobilised and find its way into the aquifer. Ashfield DC should be satisfied that any risk has been properly assessed and viable remediation is in place.</p> <p>Whilst it is accepted that pollution prevention measures can be dealt with at development management stage, we recommend that the plan demonstrate a commitment to ensuring that surface water which may be contaminated pre and post construction is prevented from leaving site untreated, either by overland flow or via highway drainage and public surface water sewer systems and discharge to watercourses.</p>	
<p>Support for Policy from the National Trust.</p>	<p>Support acknowledged.</p>
<p>We welcome Policy CC2 which promotes a healthy water environment. Protection of water resources and water quality in the watercourses and underlying aquifer is critical to maintain the districts natural environment and the ecosystem services it provides.</p> <p>We support the requirement for development adjacent to watercourses to provide a green buffer and maximise any opportunities for biodiversity enhancement which could involve either improvements to the riparian habitat or naturalisation of the water course. The policy also addresses the requirement for development to include measures either during construction or operation to prevent contamination of the water environment from run-off and discharges which could otherwise adversely affect water dependent habitats and species.</p>	<p>Support acknowledged.</p>

<b>Object</b>	
<p>Policy CC2 Bullet Point (8) requires that residential development will implement water efficiency measures to achieve a requirement of 110 litres per person per day which the Council justifies in para 8.27. The Written Ministerial Statement (WMS) dated 25th March 2015 confirmed that “the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”. As set out in the NPPG (ID 56-015) the need for and viability of opting for a water consumption standard higher than that required by Building Regulations should be fully justified. The Greater Nottingham &amp; Ashfield Water Cycle Strategy 2010 is now somewhat dated. If the Council intends to rely upon this evidence the report should be up dated.</p>	<p>The evidence from the Council’s Watercycle Study is that it is important to reduce the use of water resources in the District and therefore water saving measures should be implemented. The Department of Communities and Local Government “Cost of building to the Code for Sustainable Homes. Updated cost review” August 2011 identified that to achieve Code Level Three/Four for water would cost £150 for a terraced property and £200 for a four bedroom semi detached house. Therefore, given the importance of saving water together with the limited impact in terms of viability no change is recommended to the Policy.</p>
<b>Comment</b>	
<p>Severn Trent Water Due to the size and location of some of the sites it is expected that localised capacity upgrades will be required, and once developers indicated connection points and flow rates we will undertake more detailed modelling.</p> <p>As with all new development it is paramount that surface water is managed sustainably and connections to the public surface water system should only be made as a last resort. However, provided surface water is managed sustainably they don't envisage any sewerage issues.</p>	<p>Noted.</p> <p>It is anticipated under the Policy SuDs should be utilised where ever possible.</p>

<p>Emphasis on the importance of work collaboratively with Local Planning Authorities.</p> <p>Water quality - Good quality river water and groundwater is vital for provision of good quality drinking water. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.</p> <p>Water Supply – It is not anticipate that there will be capacity problems within the urban areas of our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.</p> <p>Water Efficiency - Recommend that the local plan consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. Recommend that in all cases you consider:</p> <ul style="list-style-type: none"> <li>• Single flush siphon toilet cistern and those with a flush volume of 4 litres.</li> <li>• Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.</li> <li>• Hand wash basin taps with low flow rates of 4 litres or less.</li> <li>• Water butts for external use in properties with gardens.</li> </ul>	<p>Noted.</p> <p>The Policy stresses the requirement to meet the element and overall class status set out in the Humber Basin Management Plan.</p> <p>The rural sites are anticipated to come forward under the Local Plan Trajectory substantially in years 6 to 10. Therefore, there is the opportunity to undertake reinforcement work.</p> <p>It is not considered that the Policy can require that specific fittings are installed. National Planning Guidance permits a lower capacity that set out in the Building Regulations provided there is a local need. Policy CC2 sets out a requirement of 110 litres per day per person and it is anticipated that these fittings will help to meet this requirement.</p>
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Policy CC2, item 4 – there might be instances when an adverse effect on an existing water area might be beneficial. For example the creation of a wetland area within a water course element. Can the Council please consider wording this as appropriate if they believe that this point has been missed or needs classification. This would help to conserve habitats and species that depend directly on water a point raised in Para 8.17.	This aspect of the policy covers the scenario anticipated in the comment.
<b>Responses received relating to Policy supporting text</b>	
Para 8.27 -- the last sentence seems to imply that it is a requirement from residential properties to use 110 L/person/day. Change this to read "consequently, the policy includes water efficiency measures which for residential developments are a maximum requirement of 110 L/person/day"	Amend paragraph.

### Proposed Amendments

Issue/Policy	Amendment
Policy CC2 - 5.	<p>CC2 5.  <b>Development <span style="color: red;">should</span> will be permitted where it is set back by an appropriate distance, <span style="color: red;">to be agreed by the Local Flood Authority and/or Environment Agency</span>, from <span style="color: red;">a</span> watercourse to allow access <span style="color: red;">for riparian owners to</span> maintenance <span style="color: red;">the watercourse</span> and to enhancement habitat and ecological benefits.</b></p> <p><span style="color: red;">CC2 .8 Mangement of construction sites should ensure that contaminated surface water is prevented from leaving a site</span></p>



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	untreated either by overland flow, highway drainage and public surface water sewer systems so as to discharge to watercourses.
Introductory paragraphs add additional paragraph to highlight the synergy between specific policies.	There is a synergy between water quality, (Policy CC2) flood risk (Policy CC3) and to an extent Policy EV4: Green Infrastructure, Biodiversity and Geology and Policy EV5: Protection of Green Space and Recreational Facilities. Development proposals should look to integrate and facilitate the benefits achievable under these policies.
Water Resource Management – additional paragraph	<p>It is important that access is available for maintenance* to the riparian owners of the watercourse and to facilitate ecology. An appropriate distance from a watercourse should be maintained which is free of fences, post, pylon, wall, formal gardens or any other building or structure. Under the Environment Agency's Midlands Land Drainage Bylaws for 'main rivers' this buffer area is 8 metres measured horizontally from the foot of any bank of the river on the landward side or, where there is no such bank, within 8 metres measured horizontally from the top edge of the batter enclosing the river. For ordinary water course any buffer distance will need to be agreed with the Lead Local Flood Authority."</p> <p>* The Environment Agency has permissive powers (but not a duty) to carry out flood management work on main rivers and local councils have powers to carry out work on other watercourses</p>
Water Quality amended wording to paragraphs to reflect comments received.	<p><b>Para 8.21</b> Much of Ashfield District is located on principal aquifer. <del>Parts of Ashfield are important with respect to groundwater resources, as Ashfield is located on principal aquifers</del> namely the Lower Magnesian Limestone and Triassic Sherwood Sandstone <b>where groundwater is sensitive to</b></p>

	<p><del>pollution. Groundwater resources are an essential source of water for public supply, industry and agriculture and also help to sustain the base flows of rivers and will be protected.</del> All previous uses of a development site should be investigated to determine whether there is the potential to cause contamination to ground water. Principal aquifers are geological strata that exhibit high permeability and usually provide a high level of water storage. These aquifers have strategic significance for water resources, often supporting large abstractions for the public water supply. They are also of major importance, supporting river base flow.</p> <p>Para 8.22 It is important that standards of design, materials specification and of on-site construction practices respect the vulnerability of these aquifers as well as all watercourses, and environmentally sensitive areas. <del>During and post construction it is possible that this contamination could be mobilised and find its way into the aquifer. The Council will need to be satisfied that any risk has been properly assessed and viable remediation is in place.</del> Once groundwater is polluted the resource may be lost for many years and the protection of these resources from potentially polluting development will be strictly enforced.</p>
Development Briefs	<p><del>On the rural sites set out that Severn Trent Water has identified that reinforcement to the water supply may be necessary.</del></p>
Para 8.27	<p>Para 8.27 – The National Planning Policy Framework requires local planning authorities to adopt proactive strategies to adapt to climate change that take full account of water supply and demand considerations. National Planning identifies that where there is</p>

	a clear local need Local Plan policies can requiring new dwellings to meet the tighter Building Regulations optional requirement of a maximum of 110 litres/person/day.
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<b>List of Respondents</b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Environment Agency	1870		√		Annesley Community Committed to Ensuring Sustainable Settlements (ACCESS)	5359			√
National Trust	2828		√		Severn Trent Water	6047			√
Natural England	3185		√		Home Builders Federation	6151	√		

### Policy CC3: Flood Risk and Sustainable Drainage Systems (SuDS)

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
Support	
Environment Agency support the policy as it comprehensively creates a positive approach to addressing the risk of climate change and the link with future development. In particular the opportunity to consider reducing flood risk where possible	Support and additional comments noted.

<p>through new development is encouraged.</p> <p>They identify that with respect to climate change the flood risk information will continue to be improved as the catchment changes and the impacts of climate change begin to materialise. As a result of this Flood Mapping will continue to change for the duration of the Local Plan. National Planning advice may also alter to accommodate improved understanding of climate change and its future impact. This will require some flexibility within the Local Plan to accommodate the effects of climate change.</p> <p>Ashfield DC covers an area which impacts upon the headwaters of several major watercourses, as well as the River Leen. As such the impact upon these catchments can be similar to that of the River Leen and we'd welcome the same approach given across all watercourses, as that supporting the approach in the Leen 3d.</p> <p>With respect to surface water flooding and Sustainable Drainage schemes (SUDS) we request that you approach Nottinghamshire County Council as the Lead Local Flood Authority (LLFA), to ascertain their views with respect to the relevant Policies.</p> <p>Identify that it would be useful to make a reference to link both CC2 and CC3 when considering opportunities to improve water quality and WFD, as there may also be synergies with flood risk benefits. This thinking can also be extended to include EV4 and EV5, and to find opportunities for delivering</p>	<p>A planning application will be expected to take into account the latest and upto date information regarding all forms of flooding.</p> <p>Amend Policy to reflect this element.</p> <p>Nottinghamshire County Council was consulted in its capacity of the Lead Local Flood Authority.</p> <p>Noted and additional paragraph proposed for inclusion in the Plan.</p>
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multiple benefit schemes.	
<p>This policy is generally supported. However, it would benefit from a reference in support of those projects undertaken with the express purpose of improving the water environment. For example, within the section on Sustainable Drainage Systems:</p> <p><i>The Council will support development proposals comprising appropriate engineering/soft landscaping where the main purpose of the development is to reduce flood risk and/or improve water quality.</i></p>	<p>It is acknowledged that the Policy does not cover the circumstances described. Consequently it is proposed to amend the Policy to incorporate the proposed amendment.</p>
<p>Sustainable Drainage Systems (SUDS), which deal with surface water, are designed to mimic natural drainage as closely as possible. They provide an example of green infrastructure and an illustration of opportunities to achieve multiple benefits from the management of land. Well-designed systems can increase habitats for biodiversity and provide amenity areas for communities to enjoy, as well as increasing the resilience of built areas to a changing environment. We are pleased Policy CC3 encourages SuDS within development to manage water on-site and recognises the potential additional benefits of SUDS.</p>	<p>Support acknowledged.</p>
<p>The plan clearly states that “the aim of the Sequential test is to steer new development to areas with the lowest probability of flooding”. Moreover that “development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.” We strongly support this, but object to the fact that it has not been applied in practice to the housing site selection, particularly proposed allocation sites SKA3ah and SKA3ai.</p>	<p>Support for Policy CC3 noted. Neither site SKA3ah and SKA3ai are within Flood Zones 2 or 3 in relation to watercourses. As with many sites surface water flooding can be identified by it is anticipated that this can be mitigated as part of the development scheme.</p>
<b>Object</b>	

Concerns raised regarding the River Maun by Mowlands Close. The response identifies that since the developments off Kirkby Folly Road and Midland Road the respondent's garden has near constant ground water due to the high level of the water table. The banks of the stream are being eroded by the flow of water when the holding tanks release the water, which causes the level of the stream to rise dramatically to within inches of the top of the banks. Concerns that further development in the area will result in gardens being flooded and houses damaged.	<p>While identified as a response to Policy CC3 it related to the proposed development in the area of Sutton Junction. Therefore, it was been identified as an objection to the housing allocations proposed off Newark Road and Lowmoor Road.</p> <p>The comments is noted and it is a matter which will be raised as part of the Development Brief for sites off Lowmoor Road and Newark Road.</p>
<b>Comment</b>	
Surface water flooding should be a separate component from flooding issues (zone 2 etc) which are related to river flooding.	A site Specific Flood Risk Assessment will be required on all sites of 1 ha or more. It will need to take account and address any issue arising from all forms of potential flooding.
Concern regarding the flooding of the field to the rear of Western Close at Sutton Junction. From past experience areas of the estate have flooded. Any increase in housing would create more runoff and increase the risk of flooding on the estate. As the water will go into the River Maun it will also could potentially effect the Mowland Close Estates which regularly flooded as open land 60 years ago.	The comments is noted and it is a matter which will be raised as part of the Development Brief for sites off Lowmoor Road and Newark Road.
There has been a Strategic Flood Risk Assessment, why is there flooding all around Rolls Royce site where work is taking place, Farleys Brook, Bulwell Hall and other sites?	Policy CC3 is intended to minimise the risk of flooding in the District from new development. The Council's Strategic Flood Risk Assessment is only one sources of information and any planning application will need to take account of all the information on flooding in a site specific flood risk requirement, where required. Policy CC3 requires that sustainable drainage systems will be utilised on developments (SuDS) unless it is not feasible or viable, this includes the Rolls Royce site. SuDS is

	<p>utilised to prevent surface water flooding and to store surface water on site to prevent flood elsewhere and its use is emphasised by the provisions of the Flood and Water Management Act 2010.</p>
<p>Proposed that a section is added to the Policy regarding the prevention &amp;/or mitigation of downstream flooding by suitable soft landscaping methods around sources/headwaters within the District. By certain conditions on planning applications, Pickering in North Yorks have made a huge impact on the volume of surface water flowing into their local waterways thereby reducing the threat &amp;/or actuality of flooding greatly with, for example, increased tree planting. Also, is ADC adding to the Flood Risk Strategy at Notts County Council at all?</p>	<p>"Slowing the Flow at Pickering" is exploring a new approach to flood management. It is about working with nature to try and store more water in the landscape and slow its passage downstream. Whilst this will not prevent all flooding, it is expected to reduce the frequency of future floods in Pickering, It was a pilot projects funded by Defra. It included plant 50 ha of riparian woodland within the Pickering Beck catchment and 30 ha of floodplain woodland in the neighbouring catchment of the River Seven at appropriate sites to delay and reduce flood flows. Planning was not identified as a key factor but key aspects related to:</p> <ul style="list-style-type: none"> <li>• Modelling work which identified that land management measures can reduce downstream flood risk, underpinning the concept of a whole catchment approach to flood management.</li> <li>• Land ownership with around half of the land was either in public ownership (by the Forestry Commission and the North York Moors National Park Authority) or owned by the Duchy of Lancaster Estates.</li> </ul> <p>While recognising the merits of schemes that rebuild absorbent uplands through tree regeneration, it is not anticipated that a project of this scale would be applicable in Ashfield. However, the Ryedale Plan - Local Plan Strategy in Policy SP17 provides for flood risk to be managed through SuDS.</p>

	<p>Nottinghamshire County Council is under a legal duty to develop, maintain, apply and monitor a Local Flood Risk Management Strategy. The strategy will cover: flood risk management functions that Risk Management Authorities may exercise, objectives for managing flood risk, measures proposed to meet the objectives, how and when measures will be implemented, costs, benefits and funding of measure and assessment of local flood risk for the purpose of the strategy. Once the Strategy has been completed it will form part of the evidence base which informs the Local Plan.</p>
<p>Surface water and sewer flooding – Seern Trent Water have stressed that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. Developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.</p>	<p>Policy CC2 on Water Quality stresses the importance of not overloading the sewerage system. It is anticipated that SuDs should be utilised in Policy CC3 to minimise the risk of flooding. Put surface water into sewers is anticipated to be a last resort.</p>
<p>NWT supports the idea that where necessary new developments proposed within 500 m of any area which has a potential for flooding, one in thirty-year occasion, that a flood risk assessment will be conducted but also it should be made clear that new development should look in to creating Sustainable Urban Drainage (SUDS) on site. NWT reads many of these documents that promote SUDS but find few incorporated as they often need to be designed to fit the development so can be costly, there are issues with long-term management especially finding someone to take them on in perpetuity, so NWT feels that councils need to be more</p>	<p>The Local Plan has to be consistent with the NPPF. The comments do not reflect what is within the NPPF or national planning practice guidance consequently it is not considered they could be taken forward the Policy in the Local Plan.</p> <p>Ashfield has required SuDS on major schemes in Ashfield and can identify numerous sites where SuDS have been constructed or alternatively underground water holding tanks to reduce flood risk have been utilise.</p>



<p>forceful in requiring developers to at least look into creating these features if the councils Climate Change targets are to be met.</p> <p>SUDS can be planted with marginal and aquatic plants to encourage wildlife, to dissipate water flow and to create a feature which housing can face on to making them more desirable, so higher purchase price.</p>	
<p>Policy CC3 item d) -- Surface Water Flood Risk -- while accepting that run off rates on Greenfield sites should not be exceeded we believe that serious consideration should be given to the current surface water flooding risk prior to allowing consent for development. Consider adding the following: “Potential development sites shall be evaluated for surface water flood risk against the EA surface water flood risk maps. If the potential development site lies within either a high or medium surface flood risk area the developer should submit proposals on how this may additionally be managed as well as the green field site run off rate, within their SUDS proposals”</p>	<p>Limited changes proposed to Policy CC3 d. Surface water is taken into account utilising the EA surface water maps. Where permitted by national planning guidance a site specific flood risk assessment will need to take into account surface water flooding.</p>
<p><b>Responses received relating to Policy supporting text</b></p>	
<p>-</p>	

### Proposed Amendments

Issue/Policy	Amendment
<p>Policy CC3 3. d Amend to reflect comments received.</p>	<p>d .....For all other areas of the District run off rates for development on previously developed land should be reduced from the current rate of surface water runoff <b>with the objective, where feasible, of achieving green field runoff rates.</b> Surface</p>

	water runoff should be managed at source wherever possible, avoiding disposal to combined sewers.
Policy CC3 5. Amend to reflect comments received.	<p>Amend the Policy to read as follows: The Council will:</p> <ul style="list-style-type: none"> <li>a) Seek opportunities to remove problems from drainage networks and increase the capacity of the floodplain, wherever this can be safely achieved, in connection with new development;</li> <li>b) Support development proposals comprising appropriate engineering/soft landscaping where the main purpose of the development is to reduce flood risk and/or improve water quality.</li> </ul>
Flood Risk and SUDS – additional paragraph	While the Local Plan should be read as a whole with proposals being considered against all relevant policies there is a synergy between water quality, (Policy CC2) flood risk (Policy CC3) and to any extent Policy EV4 Green Infrastructure, Biodiversity and Geology and EV5 Protection of Green Space and Recreation Facilities. Development proposals should look to integrate and facilitate the benefits achievable under these policies.
Development Brief – Sutton Junction area.	The Brief needs to note and address the concerns of additional water into the River Maun in terms of potential impact downstream.

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<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Environment Agency	1870		√		Allen	4952			√
Johnson	1886			√	ACCESS - Annesley Community Committed to Ensuring Sustainable Settlements	5359			√
Lathall	1917			√	Ward	5807			√
Collier	1918			√	Lathall	5819			√
Evans	2123			√	Severn Trent Water	6047			√
Lathall	2631			√	Manders	6640			√
Cooper	2811			√	Lewis	6729			√
National Trust	2828		√		Wyatt	6740	√		
Nottinghamshire Wildlife Trust	2832			√	Madden	6805	√		
Collins	3034		√		Eyre	6897			√
Natural England	3185		√		Elkington	6977			√

## Protecting and Enhancing the Environment

### Policy EV1: Green Belt

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
Support	
This policy is generally supported. The wording is close to that within the NPPF and care should therefore be taken to ensure consistency.	Support acknowledged. The Policy was drafted to be consistent with the NPPF.
Object	
<p>The Green Belt boundaries are too tightly drawn around the existing urban boundaries. There is inadequate "slack" to accommodate additional housing/employment land within the current plan period.</p> <p>It isn't clear that a future plan would be able to provide sufficient land to meet its needs without yet further revision to the Green Belt Boundary.</p> <p>Having regard to the desire for permanent Green Belt boundaries we would expect a full and clear review would identify as Green Belt only those areas of land genuinely serving Green Belt Purposes, removing all but those areas from the Green Belt, and using alternate planning strategies, for example Safeguarding Policies where land is not to be developed unless or until circumstances warrant it.</p>	<p>The Green Belt is given a high policy importance by national planning policy (NPPF paragraph 79 to 92 and the footnote to paragraph 14). It identifies that once established Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of a Local Plan.</p> <p>The Strategic Green Belt Review 2015 does not determine whether or not land should remain or be excluded from the Green Belt. It undertakes an assessment of the relative value of areas within the Green Belt against the five purposes of including land in Green Belts, as set out in NPPF paragraph 80. The Review does not identify that any of the Green Belt in Ashfield fails to meet any of the five purposes of including land in Green Belts set out in NPPF.</p> <p>It is the role of the Council's emerging Local Plan to formally</p>

<p>Government guidance is clear that the Green Belt should not include which it is unnecessary to keep permanently open and that Council's should be satisfied that Green Belt boundaries will not need to be altered at the end of the Plan period.</p>	<p>revise Green Belt boundaries and to allocate land for development, having taken into account all relevant planning considerations. This includes whether there are, in the first instance, exceptional circumstances for altering existing boundaries.</p> <p>The Local Plan reflects the requirements of the NPPF by meeting anticipated needs over the Plan period. Employment land allocation incorporate a degree of flexibility against the scenarios identified in the Employment land Forecasting Study. Housing requirements are based on the evidence from the Strategic Housing Market Assessment. Future housing needs would need to be examined in relation to the evidence at the time of any review. Not all of Ashfield is located in the Green Belt but this has to be balanced against sustainable development in relation to factors such as infrastructure and housing market areas. Future developments in the Green Belt would have to be considered with neighbouring authorities under the Duty to Cooperate and in accordance with the provisions of the NPPF and Planning Practice Guidance.</p> <p><b>No proposed amendments.</b></p>
<p><b>Comment</b></p> <p>Farm and rural diversification should be a valid development within the Green Belt. Propose an addition element to the Policy so a new 2(b) with every other bullet point moving down.</p>	<p>Policy EV1 should be consistent with the National Planning Policy Framework and the Policy reflects paragraph 89. Paragraph 89 is exclusively concerned with the construction of new buildings. It does not apply and is not expressed to apply to any other form of development. Therefore, it is not considered that the change requested can be made to the Policy.</p>

	<b>No proposed amendments.</b>
<b>Responses received relating to Policy supporting text</b>	
-	-
<b><u>Changes to Green Belt Boundaries</u></b>	
<b>Support</b>	
Support for site AN1O - Forest Road, Annesley Woodhouse to be restored to Green Belt designation as it was before the Ashfield Local Plan Review 2002. The community has been requesting this to be reversed for over 10 years because of its wildlife/habitat implications. Its return to the Green Belt and its value to the community, is reflected in a 1000+ petition handed to Ashfield District Council on Monday, 28 March 2011 by Gloria De Piero (MP for Ashfield). This site also: a) acts as an invaluable buffer between Forest Road Sherwood Business Park/ Industrial site, b) provides an invaluable technological and biological role in that a substantive portion is designated a local wildlife site (LWS), "Forest Road Grassland — EV4nhm"	Support acknowledged.
Annesley & Felley Parish Council support the proposals on the Green Belt Boundaries - Land off Willow Drive and also Forest Road, Annesley Woodhouse.	Support acknowledged.
Supports the return of Forest Road grassland LWS No 5/3432 in to the Green Belt but would also like to see the 1.72 hectare woodland at Little Oak Plantation also included as this is categorised as Planted Ancient Woodland (PAWs).	Support acknowledged. Little Oak Plantation is within the Green Belt.
Para 9.1 - Support that "The main purpose of the Nottingham-Derby Green Belt is to contain the outward growth of Nottingham City and Derby City and to prevent the coalescence of these and other settlements within it by	Support acknowledged.

<p>keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence". However, object to the Council's failure to apply to the site.</p>	
<p><b>Object</b></p>	
<p>Request to amend the Green Belt boundary to exclude Chaworth Farm, Salmon Lane, Annesley Woodhouse.</p>	<p>Objection does not relate specifically to the wording of Policy EV1. Under the National Planning Policy Framework, paragraph 83 established Green Belt should only be altered in exceptional circumstances, through the preparation of the Local Plan. The Council has undertaken a review of the Green Belt boundaries and proposed changes are set out in the Green Belt Boundary Review Technical Paper 2015. The Technical Paper did not consider that any amendments should be made to the Green Belt boundary at Chaworth Farm.</p> <p><b>No proposed amendments.</b></p>
<p>Site KA03 Site 5 (the former Beacon Farm), Derby Road, Kirkby – Considers that the site should be released from the Green Belt.</p> <p>Sets out that there is support for the Policy, except elements: d) Replacement of an existing building. There may be occasions where the use of the building to be replaced is inappropriate or no longer appropriate in the Green Belt. Hence would recommend "..... the same use as the building it is replacing, or a more appropriate use in that location, and is ....."</p> <p>And f) which attempts to deal with previously developed (brownfield) sites in the Green Belt by in theory, allowing what</p>	<p>Policy EV1 has to be consistent with the provisions of NPPF paragraph 89, consequently there are no proposals to change the wording of the Policy.</p> <p>Comments regarding Site KA03 (former Beacon Farm) are set out in the relevant section on alternative sites.</p> <p>There are no exceptional circumstances for further Green Belt release due to the availability of more suitable sites in other parts of the District.</p> <p><b>No proposed amendments.</b></p>

<p>is described as the limited infilling or partial or complete redevelopment of those sites. However, given the very limited options for the type of development which other aspects of Green Belt policy allow, coupled with the requirement that the proposed development must not have a greater impact on the openness of the Green Belt, we see no prospect of any viable development.</p> <p>KA03 Site 5 should be removed from the Green Belt, if it were to be retained, then Policy EV1 would effectively continue to preclude any viable action to address the brownfield and semi-derelict problems evident on the site.</p>	
<p>Land to the east of Thoresby Avenue, Kirkby-in-Ashfield. The respondent sets out that as underlined by the Council's own Green Belt Review and our own independent Green Belt Review, it is considered that the Site makes a limited contribution to the purposes of the Green Belt as a whole. Due to this and the proximity of existing residential properties and the permanent boundary that these and the A611 form, we consider that the Site is suitable for release from the Green Belt in relation to residential development and can make a positive contribution to the supply of land for new homes.</p>	<p>As is emphasised in the Strategic Green Belt Review 2015 "this review itself does not determine whether or not land should remain or be excluded from the Green Belt." It is the role of the Council's emerging Local Plan to formally revise Green Belt boundaries and to allocate land for development, having taken into account all relevant planning considerations. This includes whether there are exceptional circumstances for altering existing boundaries (NPPF para 83). It is not considered that there are the exceptional circumstances for further Green Belt release due to the availability of more suitable sites in other parts of the District.</p> <p><b>No proposed amendments.</b></p>
<p>The Council should consider the release of land off Stoney Lane, Selston (SHLAA Ref. V86) from the Green Belt irrespective of the allocation process having regard to national</p>	<p>Under the National Planning Policy Framework, paragraph 83 established Green Belt should only be altered in exceptional circumstances, through the preparation of the Local Plan. The</p>



Green Belt policy which advises that, when defining boundaries, local planning authorities should not include land which it is unnecessary to keep permanently open. The above is particularly relevant given the relatively recent introduction of extended Permitted Development Rights in the form of Class Q development which enables the re-use and conversion of existing (or former) traditional (or non-traditional) agricultural buildings to create up to 3 dwellings despite being within the Green Belt.

The above provisions, together with the fact that the site is already extensively developed (and therefore not ‘open’) and scores equally favourably within the Strategic Green Belt Review, all point to the new Green Belt boundary being drawn around my client’s site so as to exclude it from the Green Belt moving forward.

Paragraph 85 advises local authorities, when defining Green Belt boundaries, to use physical features that are readily recognisable and likely to be permanent. Stoney Lane and the site’s north-western boundary (an established and mature tree and hedgerow) provide the physical and permanent features referred to above. The above approach also complements that advocated in the Strategic Green Belt Review 2015 which states in paragraph 3.6 that,

*“While the amount of land required to satisfy existing identified housing, employment and associated development requirements are the driving force behind the need to review Green Belt boundaries, in order to ensure any new boundaries can maintain a degree of permanence, they should ideally not*

Council has undertaken a strategic review of the Green Belt and it is not considered that there are the exceptional circumstances for further Green Belt release due to the availability of more suitable sites in other parts of the District.

Further comments regarding Stoney Lane (SHLAA Ref. V86) are set out in the relevant section on alternative sites.

**No proposed amendments.**

<p><i>be drawn excessively tight around existing built-up areas”.</i> Selston and the other villages comprising the ‘<i>Rurals</i>’ have always been tightly constrained by the Green Belt boundary. The proposed amendments to the Green Belt boundary shown in this latest consultation draft remain excessively tight around what will be the existing built-up areas and this necessarily prevents any flexibility being built into the Plan for this part of the District, contrary to the advice of paragraph 3.6 of the Strategic Green Belt Review 2015 above and the NPPF.</p>	
<p>Wren Hall Nursing Home, Nottingham Road, Selston The representations set out the following “These representations seek to be in the context of the plan read as a whole as it should be. At the same time it is necessary to work within a format of objecting policy by policy. This para forms part of them all. Please read the representations together to save repetition. The core issue for our clients is to provide reasonably for the land use needs of the highly successful Wren Hall Nursing Home complex to expand in situ (including owned land adjacent). This is to help provide for identified older persons care needs now and over the plan period. Many policies could impact on that. Our client objects to any policy – or reading of policy – which holds back this reasonable need”. To summarise the extensive representations they include:</p> <ul style="list-style-type: none"> <li>• Raising issues with various policies and supporting paragraphs in the context of Wren Hall.</li> <li>• An emphasis that The Rural area has a higher proportion of over 65.</li> </ul>	<p>The Green Belt boundaries in Ashfield have been established over a long period of time. This includes the boundary being identified to an extensive number of rear boundaries to properties around various settlements. It is widely accepted that these form defensible boundaries in accordance with NPPF para 85. Paragraph 83 of the NPPF identifies that once established, Green Belt boundaries should only be altered in exceptional circumstances. The proposal set out substantial changes to the Green Belt boundaries close to Wren Hall and the wider area. However, while being critical of various aspects of the Local Plan, identifying an older population in Selston and additional jobs the representations do not outline what are the ‘exceptional circumstances’ to justify the substantial changes to the Green Belt. Under these circumstances, the Council does not consider it has a justification of exceptional circumstances for amending the Green Belt as proposed by the representations.</p> <p>Other aspect in relation to specific comments on policies and paragraphs have been addressed where appropriate under the policies in question.</p>

<ul style="list-style-type: none"><li>• Wren Hall Nursing Home has a long waiting list with unmet need.</li><li>• Wren Hall Nursing Home is one of the largest employers in the area and wishes to expand those jobs (25 -30 jobs), which are appropriate for a range of people including those with comparatively limited skills.</li><li>• There are limited number of brownfield sites for new residential development in the settlements.</li><li>• The employment policies (PJ1 and PJ2) are unclear and could be interpreted as allowing development in the Green Belt.</li><li>• The paragraph at 4.16 et seq conflicts with Policy S3.</li><li>• Green Belt boundaries are illogical as it is along the back of properties.</li><li>• The area in question is a long way from Nottingham and development in and at the edge of settlements would have no material impact on the expansion of Nottingham or it joining up with any other settlement.</li><li>• Proposed changes to the Green Belt boundary to exclude the garden of Wren Hall Nursing Hall are supported. However, they should go further. Present plans for Wren</li></ul>	<p><b>No proposed amendments.</b></p>
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<p>Hall include individual apartment style accommodation which individuals own/rent/lease; and extending Wren Hall to be a 60 bedded home. Proposes that:</p> <ul style="list-style-type: none"> <li>➤ The Green Belt is amended to the rear of 224 Nottingham Road as identified on the plan (It is assumed that this is the paddocks to the north west of Wren Hall)</li> <li>➤ However, based on the Council's Green belt analysis the most appropriate Green belt line in the area is the firm landscape feature of the public footpath running from Nottingham Road to Alma Terrace. (See plan attached to submission).</li> </ul>	
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### Proposed Amendments

Issue/Policy	Amendment
-	-
<b>Proposed Officer Amendments</b>	
Amend Policy EV1 to align with NPPF.	<p><b>2. <del>Unless very special circumstances can be clearly demonstrated,</del> The Council will regard the construction of new buildings as inappropriate in the Green Belt, <del>other than:</del> However, subject to other Local Plan policies, exceptions to this are as follows:</b></p> <p><i><del>Other forms of development</del></i></p> <p><del>g) Any other form of development as listed under</del></p>

	<p><b>paragraph 90 of the NPPF.</b></p> <p><b>3. Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purpose of including land in Green Belt. These are:</b></p> <ul style="list-style-type: none"> <li><b>a) mineral extraction;</b></li> <li><b>b) engineering operations;</b></li> <li><b>c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;</b></li> <li><b>d) the re-use of buildings provided that the buildings are of permanent and substantial construction; and</b></li> <li><b>e) development brought forward under a Community Right to Build Order.</b></li> </ul>
New supporting text to be added after paragraph 9.3 to clarify that applications have to be considered against other policies within the Local Plan, as well as national policy.	<p>New paragraph after 9.3 to read:</p> <p>The implication of national policy on the Green Belt is that the Council, in considering a planning application for development in the Green Belt, must give “substantial weight” to “any harm to the Green Belt”. However, establishing the status of a proposed development – inappropriate or appropriate – remains only the first step. Thereafter, the application has to be considered against other policies in the Local Plan, in particular Policy EV11: ‘Protection and Enhancement of Landscape Character’, as well as national planning policy.</p>
Amend paragraph 9.8 to clarify the factors that will be taken into account when determining applications.	<p>Amend 4<sup>th</sup> sentence of paragraph 9.8 and add new sentence: In determining applications the Council will <b>also</b> take into</p>

	<p>account factors such as the size of the original building, the <b>scale, form, bulk, height, mass</b> and prominence of the extension or alteration, and the impact of the proposal on the openness of the Green Belt. <b>Proposals must not result in a large, bulky or intrusive buildings which would adversely impact on the openness of the Green Belt.</b></p>
<p>New supporting text to be added after paragraph 9.8 to clarify criteria c) of Policy EV1.</p>	<p>New paragraph after 9.8 to read:</p> <p><b>Regard will be given to previous extensions on the site, either allowed through Permitted Development Rights or through planning approvals. The original character of a building can be lost if the property is extended in an unsympathetic way through the addition of numerous extensions. The Council will take into account the original proportions of the building, prior to extensions being added. In some circumstances, it may be more appropriate to provide one new extension as a replacement for several existing extensions, especially where these are in poor condition or do not reflect the original character of the building. All applications will need to consider the impact of the cumulative extensions on the original building.</b></p> <p><b>The design of any development should be sympathetic to the existing building, the plot size upon which the building is sited, the area adjacent to the site and its wider setting. Proposed changes, either individually or cumulatively should not over dominate the existing building. Advice on appropriate design principles for residential extensions is contained in the Ashfield Design Supplementary Planning Document.</b></p>
<p>Amend 1<sup>st</sup> sentence of paragraph 9.9</p>	<p>Amend paragraph 9.9 to read:</p> <p><b>In the case of extensions to a dwelling, For the purpose of</b></p>

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	<b>Policy EV1</b> “original” means the dwelling as existing on 1st July 1948 even if the original dwelling has since been replaced.
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<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Johnson	1886		√		Ward	5807		√	
National Farmers' Union	1929			√	Bolger	5817		√	
Lathall	1917		√		Lathall	5819		√	
Collier	1918		√		England Lyle Good & Dr Bell	6630	√		
Chalkley	1966		√		Manders	6640		√	
Sport England	2016		√		Bacon	6695	√		
Annesley & Felley Parish Council	2019		√		Lewis	6729		√	
Barton Willmore	2495	√			Shillito	6738	√		
Lathall	2631		√		Madden	6805		√	
Cooper	2811		√		Eyre	6897		√	
National Trust	2828		√		Morton	6898		√	
Nottinghamshire Wildlife Trust	2832		√		Morton	6899		√	
Collins	3034				Elkington	6977		√	

## Policy EV2: Countryside

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Support for Policy EV2 1(a), (b) and (c) on rural uses, business uses and new buildings.	Support acknowledged.
Support for the Policy	Support acknowledged.
<b>Object</b>	
Policy EV2 to be amended so as to read that any development in the Countryside should not affect the character of the surrounding area in addition to the countryside itself. In the case on Teversal, Stanton Hill and Skegby, the character of the Area is defined by the amount of countryside and green space both fringing and within the settlements. Any development in the Countryside is likely to impact on the Area's character overall whether countryside or not.	<p>The Policy permits development in appropriate circumstances identified in the Policy. The amendment proposed would effectively negate any development and therefore would not accord with the provisions of the NPPF. However, the Local Plan and its policies must be read as a whole. Consequently, any development in the Countryside would also have to be considered against Policy EV11: Protection and Enhancement of Landscape Character. The Council proposes to clarify this in the supporting text to Policy EV2.</p> <p><b>Proposed amendment detailed below.</b></p>
<p><b>Land to the East A60, Nottingham Road, Sutton in Ashfield</b></p> <p>The Lindhurst Group proposes that 3.34 hectares of land shown on the attached plan, which lies to the east of the A60 north of Harlow Wood should be designated as amenity land in connection with the Berry Hill Mansfield Sustainable Urban Extension. The latter is in Mansfield District and has outline planning permission for mixed-use development.</p>	Disagree. The Council does not have a policy for 'amenity land' and it does not consider that the justification for such a use has been demonstrated. The land is designated as Countryside (Policy EV2) where appropriate development comprises outdoor sport and recreation. As such, the suggested use could be appropriately dealt with through the development management process.



<p>The Lindhurst Group further proposes that parts of the land should be permitted to be used to facilitate road access from the A60 into the Berry Hill Mansfield Sustainable Urban Extension, provided that such road access complies with highway regulations and standards.</p> <p>The land is currently farmland, but will no longer be farmable once the Berry Hill Mansfield Sustainable Urban Extension is developed.</p>	<p>Given that the Council does not intend to amend the Countryside designation, it is considered more appropriate to address the requirement for an access route through the planning application process.</p> <p>It should also be noted that the Local Plan must consider the potential effects of development/activity relating to a change of use on European sites of importance for nature conservation. The site is directly adjacent to Sherwood Forest possible potential Special Protection Area. In order to “future-proof” the Ashfield Local Plan, it has been decided that, on a precautionary basis, the Sherwood Forest ppSPA will be treated as if it was a pSPA, thus affording it the equivalent to the highest level of protection during appraisal that it would have at any stage in its potential route to classification. A change of use to ‘amenity land’ and the development of an access road has the potential to have an adverse effect on protected species and habitats. Should the landowners decide to go down the development management route, the Council, as the competent Authority, would need to undertake an assessment of the effects of any future proposal in consultation with Natural England. This would be taken into consideration in determining the outcome of the planning application.</p>
<p><b>Comment</b></p>	
<p>Proposed that within the last sentence of the introduction to part 1 we suggest that the concept of ‘appropriate development’ is qualified, to reflect the fact that the uses listed will not in all circumstances be appropriate:</p>	<p>It is not considered necessary to qualify ‘appropriate development’ as effectively this is achieved by the first sentence of the Policy. Appropriate development has to be seen in the context of “In the Countryside, as defined on the Policies Map, permission will only be given for appropriate development that is</p>

<p><i>1. The following list sets out the uses and development types which may be Appropriate uses in the countryside:</i> In part 1.a) of the policy (rural uses) we request that the term 'engineering operation' is reconsidered/refined as this term is very broad and could involve many different types of development.</p> <p>Within part 1.f) of the policy (replacement of existing buildings) we suggest that a reference to appropriate design is inserted: <i>f) Replacement of existing buildings provided that the new building is in the same or an appropriate rural use, is of a design appropriate to the context...</i></p> <p>Within part g) we suggest that a reference to openness is included: <i>g) Limited infill development which does not have an adverse effect on the scale, and character and openness of the area.</i></p>	<p>located and designed so as not to affect adversely the character of the countryside."</p> <p>Engineering operations are an exception to inappropriate development in the Green Belt by the NPPF and in this context are considered to be appropriate for the countryside. It is not practical or appropriate to defined all engineering operation. However, any engineering operation would have to be considered against the harm to the countryside and other policies within the NPPF and Local Plan.</p> <p>The Local Plan policies should not be seen in isolation. Consequently appropriate design would be reflected in Policy SP1.</p> <p>Openness is a term that is essentially related to the Green Belt. It is considered appropriate that the Policy considers applications against the character of the countryside.</p>
<p>Natural England generally welcomed Policy EV2 but suggested that the protection of soils should be specifically mentioned. Soil is a finite resource, and fulfils many roles that are beneficial to society. As a component of the natural environment, it is important soils are protected and used sustainably. The plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through</p>	<p>It is acknowledged that NPPF, paragraph 109 identifies that the planning system should protect and enhance valued soils. However, it is not considered that this aspect should be covered by Policy EV2. It is therefore proposed to amend Policy SD8: Environmental Protection, to address this issue.</p> <p><b>Proposed amendment is detailed under Policy EV8.</b></p>

careful soil management during the construction process. We advise that the Plan policies refer to the Defra Code of practice for the sustainable use of soils on construction sites.	
<p>Parts of the district have an excellent network of country parks, wildlife areas, footpath, trails and cycle ways. It is important that the council protects these areas to maintain their value to the health and well-being of its residents, protecting the unique nature of Ashfield being small towns within and adjacent to the countryside. Development on these areas would clearly have a negative impact; however, they also need to be protected from adjacent development.</p> <p>The value of the sites for nature and also for the enjoyment and benefit of people is vastly diminished by development which abuts these natural environments and footpaths. For example a public footpath through open countryside has a much higher value to the population of Ashfield than where the 'footpath' is partly or wholly enclosed by roads and buildings. Equally a hedgerow has greater value to nature when surrounded by fields rather than having development on one or both sides.</p> <p>There are a number right of way impacted by proposed developments and I would propose that the council seeks to have these directly replaced where reasonable or otherwise additional open area rights of way be provided on at least a like for like basis locally.</p>	<p>The Council has looked to protect country parks, wildlife areas, footpath, trails and cycle ways. However, there is no option given the housing requirements but to allocate sites on greenfield land. The Council has to balance the social and environmental aspects of sustainable development.</p> <p>As far as possible the Council is looking to negate the impact of these development by appropriate design and layout of the proposed development.</p> <p>In terms of rights of way the Council cannot impose a right of way on a landowner. Any rights of way forming part of a development site would form part of the considerations in relation to the layout of the site. The Council would also look to negotiate where ever possible, access to the wider Green Infrastructure network identified in the evidence supporting the Local Plan.</p>
<b>Responses received relating to Policy supporting text</b>	
<b>Para 9.38</b> -- consider adding to the financial test "the Council will also require knowledge why electronic and modern	These aspect would form part of any consideration of the need for an agricultural units on any agricultural holding.

communications equipment cannot alleviate the need for agricultural workers to be resident at the place of work to be able to respond promptly and expediently”	<b>No proposed amendments.</b>
<p><b>Para 9.39</b> – Objection to the wording of the paragraph as it suggests blanket support for infrastructure such as overhead power lines, new roads and railways in the countryside, which may have major adverse impacts. We suggest that this is amended to reflect the need for a balancing exercise:</p> <p><i>9.39. EV2: 2d) Utility installations and local transport infrastructure, such as electricity transmission lines or railway installations which can demonstrate a requirement for a rural location may will generally be supported by the Council, subject to their benefits and impacts.</i></p>	<p>The NPPF places an emphasis on a positive approach to electronic forms of communications and the provision of other forms of infrastructure. The Policy, its supporting paragraph together with other policies in the Local are consider to reflect the requirements of the NPPF while providing necessary safeguards in relation to the landscape and neighbouring properties.</p> <p><b>No proposed amendments.</b></p>

### Proposed Amendments

Issue/Policy	Amendment
<p><b>New supporting text</b></p> <p>Add new supporting text after paragraph 9.24 to clarify that applications have to be considered against other policies within the Local Plan, as well as national policy.</p>	<p>New paragraph after 9.24 to read:</p> <p><b>The Council will ensure that the character of the Countryside is protected and, where possible, enhanced. Any proposed development will need to be considered against other policies in the Local plan, in particular Policy EV11: ‘Protection and Enhancement of Landscape Character’, as well as national planning policy.</b></p>
<b>Proposed Officer Amendments</b>	
<p><b>Policy EV2 1.g) - Limited infill development.</b></p> <p>Clarification required regarding sustainable locations - to comply with paragraph 55 of the NPPF.</p>	<p>Amend Policy EV2 1.g) to read:</p> <p>Limited infill development which <b>is sustainably located and</b> does not have an adverse effect on the scale and character of the area.</p> <p>Amend paragraph 9.51 to read:</p>

	<p>Not all small gaps are appropriate for infilling, for example where it would result in new development in an unsustainable location. Any proposal for infill development will need to have particular regard to Policy S1: Sustainable Development Principles and Policy SD1: Good Design Considerations for Development. <del>consolidate groups of buildings which are isolated from the main body of the village, or if it would consolidate a ribbon of development extending into the open countryside.</del></p>
<p>New supporting text to be added after paragraph 9.40 to clarify criteria e) of Policy EV2.</p>	<p>New paragraphs after 9.40 to read:</p> <p>In determining applications the Council will also take into account factors such as the size of the original building, the scale, form, bulk and prominence of an extension or alteration, and the impact of the proposal on the character of the Countryside. Proposals must not result in a large, bulky or intrusive buildings which would adversely impact on the character of the Countryside.</p> <p>Regard will be given to previous extensions on the site, either allowed through Permitted Development Rights or through planning approvals. The original character of a building can be lost if the property is extended in an unsympathetic way through the addition of numerous extensions. The Council will take into account the original proportions of the building, prior to extensions being added. In some circumstances, it may be more appropriate to provide one new extension as a replacement for several existing extensions, especially where these are in poor condition or do not reflect the original character of the building. All applications will need to consider the impact of the cumulative extensions on the original building.</p>

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	The design of any development should be sympathetic to the existing building, the plot size upon which the building is sited, the area adjacent to the site and its wider setting. Proposed changes, either individually or cumulatively should not over dominate the existing building. Advice on appropriate design principles for residential extensions is contained in the Ashfield Design Supplementary Planning Document.
Amend 1 <sup>st</sup> sentence of paragraph 9.41	Amend paragraph 9.41 to read: <del>In the case of extensions to a dwelling, For the purpose of Policy EV1</del> “original” means the dwelling as existing on 1st July 1948 even if the original dwelling has since been replaced.

<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
National Farmers' Union	1929		√		Annesley Community Committed to Ensuring Sustainable Settlements (ACCESS)	5359			√
Shaw	2707			√	Sport England	5554		√	
National Trust	2828			√	Vardy	5933	√		
Natural England	3185			√					

## Policy EV3: Re-Use of Buildings in the Green Belt and Countryside

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
<b>Support</b>	
Support for EV3 paragraph 3 that buildings in the Green Belt and Countryside can be converted for residential use.	Support welcomed.
<b>Object</b>	
None	-
<b>Comment</b>	
None	-
<b>Responses received relating to Policy supporting text</b>	
<b>Para 9.59</b> -- change "10 years" to 15 years"	No changed proposed as the period identified reflects permitted development rights for agricultural buildings.

### Proposed Amendments

Issue/Policy	Amendment
None	None proposed

<b>List of Respondents</b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
National Farmers' Union	1929		√						
Annesley Community Committed to Ensuring Sustainable Settlements (ACCESS)	5359			√					

## Policy EV4: Green Infrastructure, Biodiversity and Geological Conservation

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
<p>Environment Agency welcomes and support that GI and biodiversity has its own policy and this is a positive step or the protection of the environment within the local plan.</p> <p>As the Plan progresses it should reference the Ashfield BOM (Biodiversity Opportunity Mapping) which will provide further support for the Policy. It will also help to inform future developers of the opportunities within the county.</p>	Support acknowledged.
<p>Natural England identifies that the NPPF requires that local planning authorities set out a strategic approach in their Local Plans, planning positively for the protection and enhancement of the natural environment including creating networks of biodiversity and green infrastructure (Paragraph 114), improving landscape character (Paragraph 115) and increasing access to nature. Therefore, we welcome Policy EV4 which seeks to establish a coherent network of green spaces by identifying the Strategic GI network and encouraging provision of multi-functional GI and enhancement of the overall network. We recommend the policy seeks commitment to the future management of the GI.</p>	Support acknowledged.



<p>The Plan should aim to contribute towards the Government's target to halt the decline in biodiversity (NPPF, Para 109), by seeking to secure opportunities to enhance biodiversity and deliver a net gain for nature. Development Management policies should promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations and identify suitable indicators for monitoring biodiversity in the plan.</p> <p>To minimise impacts on biodiversity and geodiversity, planning policies should: identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation. (NPPF, Para 117). Policies should set out a strategic approach for the creation, protection, enhancement and management of these networks. We advise that any development proposals should aim to avoid damage to existing biodiversity features, particularly statutorily designated sites, by following the mitigation hierarchy and to create opportunities for enhancing biodiversity through the delivery of Local Biodiversity Action Plan (LBAP) targets. Therefore we are pleased the mitigation hierarchy is embedded within Policy EV4.</p>	
<p>We support the aims of this Policy and would point out that KA03 Site 5 has the potential to make a small but locally important contribution in association with its development for housing.</p>	<p>Support acknowledged.</p>

<b>Object</b>	
<p>EV4ndm should be designated as a Local Wildlife Site and not allocated for housing as well. The site supports a wealth of wildlife and forms a wildlife corridor.</p>	<p>Local Plan Policy EV4 seeks to protect Green Infrastructure and minimise the fragmentation of habitats. The text in Policy HA3a acknowledges the designated Local Wildlife Sites on the site and seeks to protect the nature conservation interests on the site. Any future planning application will be required to demonstrate that it is compliant with Policy EV4 in this respect.</p> <p><b>No proposed amendments.</b></p>
<p>This policy should be amended to recognise that in reality and in the absence of statutory designation many locally identified sites may cease to be recognised as Local Wildlife Sites. Active beneficial management is unlikely to be secured through a policy of excluding development on such sites rather that may only be ensured as part of a scheme of mitigation and enhancement secured through the release or partial release of such sites for development.</p> <p>EV4 should not purport to also apply to sites subsequently identified as LWS sites. This point has been previously addressed by a Plan Inspector's who determined "In my view, only material that has been included in the draft Local Plan and has been the subject to public participation can form part of the adopted Development Plan. If the SINC list is amended after the adoption of the Local Plan, those amendments cannot, by definition, form part of the adopted Local Plan. ...</p> <p>The land at Common Lane Hucknall at EV4 ngm should be</p>	<p>In accordance with national planning policy, the Local Plan aims to protect and enhance the natural and local environment.</p> <p>A local wildlife site will be protected provided that it is identified as having the supporting ecology to justify designation.</p> <p>The respondent does not identify the source or date of the Inspector's comments. The Local Plan identifies a Policy which protects Local Wildlife Sites and in this context it is consider that the Policy will be applicable to both existing and any future designated of Local Wildlife Sites.</p> <p><b>No proposed amendments.</b></p>

removed from the list at Appendix 3. This area should be part of a site allocated for residential development where consideration is then to be given to appropriate establishment of management and enhancement/mitigation works.	
<b>Comment</b>	
The Policy should be related to the landscape character of the District in order to demonstrate how the biodiversity contributes and relates to the underlying character of the landscape. Biodiversity is one component of Green Infrastructure (GI) and is a component of the overall landscape character of an area. Landscape character is dealt with under Policy EV11 when in reality it forms the overarching framework for all the preceding environmental policies in the Plan. In view of this, it should be referenced earlier. Nevertheless, the policy wording is robust and covers many attributes of landscape character such as settlement gaps, the setting of settlements, and visually sensitive skylines.	Comments noted. All policies contained in the Local Plan should be read together and not in isolation. For clarification a proposed change is proposed to the introduction to the Local Plan.
The Forum has commissioned studies on green infrastructure, a townscape character assessment and on design criteria for future development. Local Plan policies EV4, EV5 and SD1 have certain parallels and the Forum may wish to comment further down the line once it has the results of the studies.	Comments acknowledged
Parts of the district have an excellent network of country parks, wildlife areas, footpath, trails and cycle ways. It is important that the council protects these areas to maintain their value to the health and well-being of its residents, protecting the unique nature of Ashfield being small towns within and adjacent to the countryside. Development on these areas would clearly have a negative impact; however, they also need to be protected from	<p>The Council has looked to protect country parks, wildlife areas, footpath, trails and cycle ways. However, there is no option given the housing requirements but to allocate sites on greenfield land. The Council has to balance the social and environmental aspects of sustainable development.</p> <p>As far as possible the Council is looking to negate the impact of</p>

adjacent development.

The value of the sites for nature and also for the enjoyment and benefit of people is vastly diminished by development which abuts these natural environments and footpaths. There are a number right of way impacted by proposed developments and I would propose that the council seeks to have these directly replaced where reasonable or otherwise additional open area rights of way be provided on at least a like for like basis locally.

All local wildlife sites and nature reserves should be protected and not developed on. A buffer should be provided around these areas which limits degradation by proposed developments, a 10m space between the developed land and the open spaces would provide some protection from the negative impacts.

Green Infrastructure corridors are not easily understood as there is no mapping or full description of all the Green Infrastructure corridors in the district.

The network of parks and trails to the north of Sutton should be expanded and enhanced particularly to link up to new developments to the west along the A38 corridor e.g. Mowlands and Rookery Farm. Money from these developments should be used to provide a new/enhanced Green Infrastructure corridor and multi user trail from south of the A38 in the Kirkby/Pinxton area to the west of Huthwaite to connect up to the Five Pits/Silverhill trail. This should also link

these development by appropriate design and layout of the proposed development.

In terms of rights of way the Council cannot impose a right of way on a landowner. Any rights of way forming part of a development site would form part of the considerations in relation to the layout of the site. The Council would also look to negotiate where ever possible, access to the wider Green Infrastructure network identified in the evidence supporting the Local Plan.

The Council put a high priority on protecting green spaces and recreational facilities.

As far as possible local wildlife sites and all nature reserves are protected under the Plan. However, it is acknowledged that in a small number of cases the development of a site for housing will have a direct impact on local wildlife sites. However, in these limited number of cases there will be a requirement to mitigate the impact on these local wildlife sites.

The green infrastructure routes form part of the evidence base to the Local Plan in the Green Infrastructure and Biodiversity Technical Paper. Information on sites and routes is available on the Council website in a series of maps at:

<http://www.ashfield-dc.gov.uk/residents/planning,-property-and-housing/forward-planning/ashfield-emerging-local-plan/green-infrastructure-and-biodiversity-technical-paper.aspx>

<p>into Rookery Park.</p> <p>Consideration should be given to the creation/enhancement of green space on land north of the A38 incorporating the EV4ngu Huthwaite Disused Railways, EV4nct New Hucknall Sidings Grasslands and agricultural land to the south. This would enhance the network of parks and trails and provide more local resources for the new housing developments in the area.</p> <p>The development of HS2 on adjacent land in this area of Ashfield provides an opportunity to work with the major infrastructure project to provide enhancements for local people as part of the land purchase, restoration and screening of the line.</p>	<p>It is anticipated that if Mowlands is development the pedestrian footbridge over the A38 will be an important component of linking Mowlands to the Ashfields estate. It is not anticipate that there will be direct access between Mowlands and Rookery Farm off Alfreton Road.</p> <p>The Green Infrastructure and Biodiversity Technical Paper identifies the key routes from the Council's perspective.</p> <p>If HS2 is given the go ahead it is anticipated that screening where appropriate will be part of the scheme.</p> <p><b>No proposed amendments.</b></p>
<p>The National Trust set out that the direction of this policy is generally supported although they have a number of concerns and requested changes.</p> <p>In relation to part 1.a) of the policy, it would be useful for National Trust to explore with the Council whether there is an opportunity to synchronise the delivery of footpath improvements at Hardwick (as part of <i>People's Hardwick</i>) with enhanced connectivity between Hardwick and identified strategic Green Infrastructure links.</p> <p>At part 2 we request that 'where appropriate' is replaced with 'wherever possible' to ensure that the policy is aspirational in relation to biodiversity.</p>	<p>The Council's Locality officers responsible for the evidence base supporting green infrastructure will be requested to liaise with the National Trust to determine whether there is scope to improve connectivity with Hardwick Hall.</p> <p>Based on NPPF para 114 which identifies that 'local planning authorities should set out a strategic approach in their plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure' it is proposed to change the working of the Policy to include 'where possible'.</p> <p>It is proposed to amend Part 3a of the Policy to reflect the NPPF para 118.</p>

<p>At part 3.a) we have significant concerns that the wording in relation to Sites of Scientific Interest would allow harm to these designated sites. Within the National Planning Policy Framework, paragraph 118 bullet point 2 contains a clear presumption against development that would have adverse impacts on an SSSI. Currently this policy is not in conformity with paragraph 118. The NPPF policy also includes stronger wording in relation to exceptions and Policy EV4 should be revised to reflect this.</p> <p>At part 3.b) which relates to local wildlife sites, we suggest that wording is included to ensure that development is only allowed in these locations when the development has specific locational requirements that necessitate use of that particular site.</p> <p>The reference to geodiversity in part 4 is not adequate. We suggest that a separate section is included within Policy EV4 to deal with sites of geological interest, including designated Regionally Important Geological Sites.</p>	<p>The Council has to weigh balance the requirements of social economic and environmental aspects of the local plan. Therefore, some wildlife sites will be impacted by housing allocations in the Local Plan and mitigation measures will be required. This forms part of the Local Plan considerations. The Policy should protect local wildlife sites and therefore changes to the wording will be taken forward to reflect that it not anticipate that these site will be normally developed.</p> <p>Part 3 of the policy applies to geological conservation interest including Regionally Important Geological Sites. However, it is proposed to amend the supporting paragraph to define what is meant by geodiversity.</p> <p><b>Proposed amendments are detailed below.</b></p>
<p>Policy EV5 2. "Development proposals should protect and, where appropriate enhance the diversity and value of land and buildings, .... Nottinghamshire Wildlife Trust supports this statement, but raises how or who will make the judgement that a development has "maximised opportunities for preservation.....",?</p> <p>Policy EV4 3 a) earlier in this report a heading states, "<i>It is important to protect existing assets and seek to put in place</i></p>	<p>It is agreed that the use of the word 'maximise' may be inappropriate and it is proposed to replace with 'facilitate'.</p> <p>In relation to EV 3 a) changes are proposed to the Policy to reflect the NPPF. However, the NPPF makes it clear that in</p>

<p><i>active management to enable access to green space, the countryside and other green infrastructure assets” but in section 3: a) Development proposals on, or affecting, Sites of Special Scientific Interest as shown on the Policies Map will only be permitted where the justification for the development clearly outweighs the nature conservation value of the site;</i></p> <p>NWT object strongly to this paragraph as there are no justification for allowing a development on a SSSI, there are no possible ‘mitigation measures’ that can repair, replace or justify the loss of a site designated as a SSSI. In addition, any proposed development close to a SSSI needs to be scrutinised to fully assess the proposal to ensure that it will not impact negatively on the nearby SSSI, that it will not cause the short or long-term degradation of the site, leading to the site being so degraded so that it loses the features for its original designation.</p> <p>NWT would request that the wording be changed to reflect the following paragraph included in this document concerning the Historic Environment: Page 50, 4.43 Suggested wording of 3a) <i>the ecology and habitats of the district can be fragile, once gone it cannot be replaced. Careful management is necessary to ensure its importance is recognised, protected so that it can contribute to the success and growth of the District. No development proposals will be allowed on Sites of Special Scientific Interest (SSSI), proposed developments close to SSSI, as shown on the Policies Map, will only be permitted where they are judged to have no detrimental impact upon the nature conservation value of the site, if this is not clearly demonstrated by the applicant then the planning application will be refused:</i></p>	<p>exceptional circumstances SSSI can be developed when the benefits of the development clearly outweigh the impacts on the SSSI and the wider network of SSSI. Consequently, the Local Plan policy cannot have an absolute bar on development. The Council considers that paragraph 9.72 emphasises the importance of species and habitats and consequently it is not necessary to specify the section requested from page 50 paragraph 4.43 with Policy EV3 a).</p> <p>Forward Planning’s evidence base and policies and development management decisions are considered in relation to planning legislation, national planning policies and duty on the Council, for example as set out under the Natural Environment and Rural Communities Act 2006 “to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.”</p>
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While acknowledging that councils are under pressure from central government not to 'stand in the way of new developments' wildlife, and habitats are protected under British and European law, Councils are obliged to protect and enhance the environment of the district and have a duty to protect and enhance habitat and species under the NERC Act and their Biodiversity Duty.

Ashfield District Council reports annually to Nottinghamshire County Council on the condition of LWS and their management of LWS in council ownership, this must to be made clear in this section as at present the wording is unclear and appears biased towards development at the cost of the environment. For example "where there is a reason to suspect the presence of protected wildlife or geodiversity" the council should not wait until there is a "reason to suspect" there is potential wildlife on a site, ADC planners should expect that developers consultants undertake the work required, a simple desk top study, before submitting planning applications. Ashfield District Council officers have undertaken an enormous amount of work looking in to the districts ecology, producing its Green Infrastructure Strategy and Green Infrastructure & Biodiversity Technical Paper in 2013, Nottinghamshire County Council with partners are producing a Biodiversity Opportunity Map (BOM) funded by ADC so all relevant wildlife sites and potential improvements to connectivity is mapped. NWT comment – a paragraph needs to be incorporated in to this section as ADC planners need to ensure that developers use these reference documents as they are intended, during the early stages of drawing up planning applications, to inform,

Local Wildlife Sites and other designated wildlife sites are mapped on the Local Plan Policies Map and also on the Council's internal constraints map. Both of which are used to identify areas/sites of importance for wildlife. This is the starting point for any planning application and to assess if any ecological surveys are required.

Changes to the Plan are proposed to specifically refer to the need to consider the Green Infrastructure & Biodiversity Technical Paper, and Biodiversity Opportunity Maps as part of any planning application.

**Proposed amendments are detailed below.**



<p>allowing developers to submit intelligent designs for any future developments, the statement should be based upon Page 138: 9.77. "All development proposals should consider protection and enhancement of biodiversity and geological diversity from the outset" stating this now will cut the time wasted later in the application process in the redrawing and re-submission of planning applications preventing the potential impact on Ashfield District Councils Green Infrastructure.</p>	
<p>Overall, Policy EV4 looks appropriate; however, in subsection 2, reference to enhancing the diversity and value of land and <i>buildings</i> is queried.</p> <p>It is also queried whether the requirements of NPPF paragraph 114 (to plan positively for biodiversity across LPA boundaries) is met by this policy; it is queried whether reference to the emerging Ashfield Biodiversity Opportunity Map would be appropriate in this respect.</p>	<p>Changes to the Plan are proposed to reflect a more positive approach in relation to the provisions of the NPPF.</p> <p>The emerging Ashfield Biodiversity Opportunity Mapping will form part of the evidence base for the Plan and will be reflected in the Policies of the final Local Plan submitted for examination.</p> <p><b>Proposed amendments are detailed below.</b></p>
<p>Policy EV4 item 1 -- add "Green stepping stones" to this sentence to read "a network of green corridors, green stepping stones and assets"</p> <p>Policy EV4 1. c) - modify this sentence to state "linkages between green infrastructure assets will be preserved and enhanced or created to improve public access, and biodiversity value, where the public access has no detrimental value to the green infrastructure being preserved"</p> <p>Policy EV4 3. c) -- modify to: "Development proposals on or affecting, nationally and locally designated sites, including LWS, shall be supported....." Local Wildlife Sites are an</p>	<p>No changes proposed to the policy as considered to be included within Green Infrastructure. Amend paragraph 9.64 include a reference to green stepping stones.</p> <p>No changes proposed to the Policy. The possible conflict between access and diversity is identified in paragraph 9.66.</p> <p>Substitute 'shall' for 'should'. Local Wildlife Sites are within locally designated sites.</p>

<p>important asset and the substitution of “shall” rather than “should” removes any ambiguity about providing an ecological assessment.</p>	<p><b>Proposed amendments detailed below.</b></p>
<p><b>Responses received relating to Policy supporting text</b></p>	
<p>Paragraph 9.66: – Ashfield Green Infrastructure network is extensive, sites highlighted require management plans in which cost of maintenance together with any potential site improvements should be clearly listed, this will enable developers and council planning officers easy access to ideas on how to deliver the above. NWT is pleased that the requirement of some sites to be uni-functional is acknowledged as there are always pressures to make any greenspace multi-functional, with the whole site open to the public.</p> <p>Paragraph 9.68: - “looking at whether the assets are surplus” this comment is misleading as conclusions of Ashfield District Council’s Green Infrastructure documents found only a few sites which they considered as ‘surplus to requirements’ there shouldn’t be any movement or play within this statement or document to create additional ‘surplus’ sites or designate other sites as surplus.</p> <p>The impact of a development on “major assets or corridor”, this statement is of concern as if a site is designated as a ‘major asset’ it should be protected, allowing a part to suffer an ‘impact’ from a new development could mean that the rest of the site suffers so its usefulness degraded. Also the reason for the area being designated as a ‘major asset’ may be the size</p>	<p>The Council would agree that ideally management plans would be beneficial. However, the Council has no powers to require a management plan for a third parties land unless it forms part of a planning application.</p> <p>It is not considered that this sentence is misleading. Each planning application has to be based on evidence and considered on its merits.</p> <p>The Council is required to reach a decision which balance the economic, social and environmental roles of sustainable development. This may in certain circumstances impact on a wildlife site or green infrastructure. In these circumstances, the Policy clearly identifies that the application should considered how the development may enhance these aspect</p>

<p>of the site alone, so loss of part may mean the rest of the area loses its usefulness.</p> <p>Paragraph 9.77: - rewording of statement to read “roosting or nesting sites” (spots – removed).</p> <p>Stating that Ashfield District Councils aim is to “consider protection” of features such as hedgerows and ponds does not go far enough, there needs to be wording that ensure these features are protected and long-term management will be secured through the planning process so ensuring their future.</p> <p>Planting and landscape designs, where possible, should predominately consist of native plants, grown from seeds of local provenance. There are always exceptions to this rule where screening is required quickly, high impact meadows to cover disturbed, nutrient rich ground or where soils are unsuitable for example on some restored brownfield sites, but even here the majority of the planting can be native with some additional non-native flora for colour, nectar etc.</p> <p>A target should be fixed for the number of house or industrial developments that incorporate bat, swift or bird nest bricks in to their design.</p>	<p>and if necessary undertake mitigation works.</p> <p>Sentence amended to delete ‘spots’ and replace with ‘sites’.</p> <p>Additional wording included in the paragraph to reflect long term management.</p> <p>Additional wording to be included in the paragraph to reflect native planting.</p> <p>It is not considered that a target could be imposed by the Council on these aspects. However, additional text is included in the paragraph on this aspect.</p> <p><b>Proposed amendments, where appropriate, detailed below.</b></p>
<p>Natural England sets out in relation to 9.71 that in addition to the species mentioned we think the Plan should acknowledge the presence of significant populations of breeding nightjar and</p>	<p>The Policy and supporting text has been amended to reflect these concerns.</p>

<p>woodlark present in the woodlands and aim to protect these species and their habitats from the effects of development. Natural England's Advice Note outlines a risk based approach that Local Planning Authorities may wish to adopt in order to assess and minimise as far as possible the potential impacts of development on breeding nightjar and woodlark populations. We consider that policy EV4 which encourages the protection and enhancement of priority species and habitats and seeks to improve the connectivity of habitats across the wider landscape should help to establish a coherent, defragmented landscape that benefits nightjar and woodlark and other key species and we welcome the sources of information for priority habitats and species listed at 9.78.</p>	<p><b>Proposed amendments detailed below.</b></p>
<p>Para 9.66 -- ACCESS support and applaud the statement about damage "by recreational disturbance" and believe that this should be a criteria to be considered were any green infrastructure is threatened by potential development.</p> <p>Para 9.72 - ACCESS is aware that Nottinghamshire has lost approximately 97% of its wildflower meadows. It would be an advantage to insert within this paragraph statistics relating to this loss.</p> <p>Para 9.78 -- ACCESS recommend that "with 100m" is added last sentence so that the effect of "recreational disturbance" as mentioned in Para 9.66 is accounted for –"Proposals within 100m of the development site that could affect the site of value for biodiversity or geological conservation...."</p> <p>Para 9.79 -- add after Nottinghamshire Wildlife Trust "and any</p>	<p>Comments acknowledged.</p> <p>No proposed amendment, as the source of the figure could not be identified.</p> <p>There is no specifically identified buffer for development and the 100 metres is not supported by an evidence base. No changes proposed.</p> <p>Amend to include additional text.</p>

local nature groups". NWT normally only have detailed information on their sites rather than other locations.	<b>Proposed amendments detailed below.</b>
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### Proposed Amendments

Issue/Policy	Amendment
Introduction	Proposed change to the introduction of the Local Plan to clarify that the Plan has to be read as a whole, rather than as a series of individual policies, in order to understand all the policies and guidance which will apply to any proposal.
<p>Policy EV4</p> <p>2. Delete 'where appropriate' and replace it with 'wherever possible and'. Replace 'maximise' with 'facilitate'. Make reference to the Council's Biodiversity Opportunity Maps.</p> <p>3. a) Additional wording required to reflect the provisions of the NPPF in relation to SSSIs</p> <p>3. b) Change to the wording to make clear that the loss of a local site will not normally be permitted.</p>	<p>Amend Policy EV4.</p> <p><b>2. Development proposals should protect and, where appropriate <del>where possible and</del> appropriate, enhance the diversity and value of land and buildings, and minimise fragmentation of habitats. Development They should facilitate maximise opportunities for preservation, creation, restoration, enhancement and connection of priority habitats, particularly for habitats identified in the District's Biodiversity Opportunity Maps and for the recovery of priority species.</b></p> <p><b>3. a) Development proposals likely to have an adverse effect on or affecting, Sites of Special Scientific Interest, as shown on the Policies Map, will only be permitted will not normally be permitted. An exception will only be made where the justification benefits of for the development clearly outweighs the nature conservation value of the site and the broader impact on the national network of Sites of Special Scientific Interest.</b></p>

<p>Additional aspect in relation to the possible Potential Special Protection Area for the Sherwood Forest Region.</p>	<p>3. b) Development proposals on, or affecting, <del>locally designated sites</del> <b>Local Wildlife Sites and Local Nature Reserves</b> <del>as shown on the Policies Map</del>, sites supporting priority habitats, or sites supporting protected or priority species, <b>will not normally be permitted. Development may</b> <del>will only be permitted where it is</del> <b>can be clearly</b> demonstrated that the need for the development outweighs the <b>adverse impact on the</b> <del>need to safeguard the nature conservation value of the site; and</del></p> <p>3. c) -- modify to: "Development proposals on or affecting, nationally and locally designated sites and notable species <b>should shall</b> be supported....."</p> <p><b>Add new criteria after criteria 3:</b>  <b>A risk based approach, as set out in Natural England's Advice Note to Local Planning Authorities will be adopted to all planning applications in relation to the possible potential Special Protection Area for the Sherwood Forest Region.</b></p>
<p>New paragraph setting out that planning applications should consider the evidence based to the Local Plan on biodiversity and green infrastructure.</p>	<p>New paragraph to be added after policy EV4:  <b>Planning applications should take into account, at an early stage, the evidence base set out for the Local Plan for green infrastructure and biodiversity mapping as well as other relevant maps available on these opportunities including those provided by the Environment Agency and Natural England.</b></p>
<p>Paragraph 9.64</p>	<p>Amend paragraph 9.64:  Green Infrastructure comprises networks of multi-functional green space, <b>including green stepping stones</b>, which sit within</p>

	and contribute to, the type of high quality natural and built environment required to deliver sustainable communities. <b>In the context of the Policy</b> it includes what is sometimes referred to as blue infrastructure; that is, the river and water environment.
New paragraph on the possible Potential Special Protection Area for the Sherwood Forest Region.	New paragraph to be added after para 9.72: <b>The UK government is required to identify how it can contribute to the conservation of particular bird species across their natural range in Europe through the protection of suitable sites. In doing this exercise it has identified that the populations of nightjar and woodlark in Sherwood may warrant such protection. A final decision has not been made and it remains under consideration as part of a UK-wide SPA Review Programme being led by the Joint Nature Conservation Committee. The Council will utilise the "Advice Note to Local Planning Authorities regarding the consideration of likely effects on the breeding population of nightjar and woodlark in the Sherwood Forest region as the basis of its approach to planning applications potentially impact on the possible potential Special Protection Area (ppSPA).</b>
Supporting Paragraphs to include what is meant by geodiversity	Para 9.76 add: <b>Geodiversity is the variety of rocks, minerals, fossils, landforms, sediments and soils, together with the natural processes which form and alter them.</b> Regionally Important Geological Sites (RIGS) are part of a national system to raise the profile and offer some protection to sites that contain important examples of the local geology. Ashfield has twelve of the 133 recognised RIGS in Nottinghamshire, which are currently designated as LWSs.
Amend paragraph 9.77 <ul style="list-style-type: none"> <li>Delete 'spots' and replace with 'sites'.</li> <li>Additional sentence relating to future management.</li> </ul>	Para 9.77, add: All development proposals should consider protection and enhancement of biodiversity and geological diversity from the

<ul style="list-style-type: none"> <li>• Additional sentence relating to native plants.</li> <li>• Additional sentence on bat, swift or bird nest bricks</li> </ul>	<p>outset and seek to protect features such as trees, hedgerows, ponds and woodland. <b>Planning applications should identify how these features will be managed in the long term.</b></p> <p>Buildings should be designed to include roosting or nesting <b>sites spots</b>, where appropriate, and include landscaping within sites and along boundaries which can provide feeding and nesting opportunities as well as acting as habitat corridors aiding the passage of wildlife between sites. <b>Developments can enhance biodiversity by incorporate bat, swift or bird nest bricks in to their design. These are cheap, easy to maintain and effective way of encouraging wildlife to use new buildings.</b> Good design for biodiversity can help bring wildlife into urban areas and be of benefit for quality of life, health and wellbeing as well as contribute to achieving Biodiversity Action Plan (BAP) targets. <b>Planting and landscape designs, where possible, should predominately consist of native plants, grown from seeds of local provenance.</b></p>
<p>Para 9.79 – Additional text.</p>	<p>Para 9.79, add:</p> <p>It should be noted that knowledge of valuable sites and their condition is constantly changing and decisions will be based on the most up to date information available. The Nottinghamshire Biological and Geological Records Centre can provide general data for development sites, where appropriate, and further information may also be available from the Nottinghamshire Wildlife Trust <b>and any local nature groups.</b></p>

<u>List of Respondents</u>									



**Ashfield District Council - Statement of Consultation**

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Environment Agency	1870		√		Collins	3034		√	
Shaw	2707			√	Natural England	3185		√	
Nottinghamshire County Council	2803			√	Annesley Community Committed to Ensuring Sustainable Settlements (ACCESS)	5359			√
National Trust	2828			√	Teversal, Stanton Hill & Skegby Neighbourhood Forum	6647			√
Nottinghamshire Wildlife Trust	2832			√	Bacon	6695	√		
Historic England	2836			√	Robinson	6733	√		
Derbyshire County Council	2637			√					

**Policy EV5: Protection of Green Spaces and Recreational Facilities**

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Support for the designation of RA5/99 Annesley Miners Welfare as a protected Green Space. Examination of the Ashfield DC Playing Pitch Strategy 2013 shows that the immediate Annesley area has a deficit of open space for recreation. Proposed that it could add greatly to the green infrastructure corridor link proposed by the respondent and would provide useful sports facilities as it has in the past.	Support acknowledged.

General support for the Policy.	Support acknowledged.
Natural England sets out that they are pleased Policy EV5 seeks to protect green space and that consideration is given to the function of any underused greenfield site and its contribution to the overall strategic GI network. We recommend any measures that could be implemented to improve the value of the site should be considered before the land is allocated for development. However we are concerned the policy does not encourage improved access to green space and nature for recreation and leisure in order to promote health and wellbeing.	The Policies in the Local Plan taken as a whole including Policy EV4 and Policy HS3 facilitate access to green space and nature which will help to promote health and wellbeing.
<b>Object</b>	
None received	
<b>Comment</b>	
The Forum has commissioned studies on green infrastructure, a townscape character assessment and on design criteria for future development. Local Plan policies EV4, EV5 and SD1 have certain parallels and the Forum may wish to comment further down the line once it has the results of the studies.	Comments acknowledged.
This could be strengthened in the plan particularly around the provision for those that are disabled.	No indication was provided by the response on what changes to the Policy are required to strengthen the Plan.
Parts of the district have an excellent network of country parks, wildlife areas, footpath, trails and cycle ways. It is important that the council protects these areas to maintain their value to the health and well-being of its residents, protecting the unique nature of Ashfield being small towns within and adjacent to the countryside. Development on these areas would clearly have a negative impact; however, they also need to be protected from	<p>The Council put a high priority on protecting green spaces and recreational facilities.</p> <p>As far as possible local wildlife sites and all nature reserves are protected under the Plan. However, it is acknowledged that in a small number of cases the development of a site for housing will have a direct impact on local wildlife sites. However, in these</p>

<p>adjacent development.</p> <p>All local wildlife sites and nature reserves should be protected and not developed on. Furthermore, a buffer should be provided around these areas which limits degradation by proposed developments, a 10m space between the developed land and the open spaces would provide some protection from the negative impacts e.g. dumping from gardens and loss of countryside feeling.</p>	<p>limited number of cases there will be a requirement to mitigate the impact on these local wildlife sites.</p> <p>No changes proposed.</p>
<p>Para 9.82 -- given the ever increasing power of computer systems we would recommend that all sites of 1 ha and above are included on the policies map and additionally listed in appendix 4.</p>	<p>Sites less than 1 hectare are currently shown on the Policies Map, therefore it is proposed to remove the reference to '2 hectares' from paragraph 9.82.</p> <p><b>Proposed amendment detailed below.</b></p>
<p>Para 9.90 -- there appears to be within this document 2 words which are used which may have the same, similar or differing meanings. These are "locality" and "catchment". Can the Council please provide a definition for each and ensure that their use within this document is consistent?</p>	<p>The term 'locality' in Policy EV5 is referred to in relation to the Standards set out in the Public Open Space Strategy. Propose to remove the term 'catchment' for the policy.</p> <p><b>Proposed amendment detailed below.</b></p>
<p><b>Responses received relating to Policy supporting text</b></p>	
<p>Natural England identifies in relation to Paragraph 9.80 that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local areas. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.</p>	<p>Comments acknowledged. Work is underway to examine these aspect to supplement the existing evidence base for the Local Plan.</p>

## Proposed Amendments

Issue/Policy	Amendment
Policy EV5 2 – Changes proposed to reflect emerging Public Open Space Strategy.	<p>Policy EV5 2. amend:</p> <p>2. Development that would lead to the loss or partial loss of a green space or recreation facility will only be permitted where:</p> <ul style="list-style-type: none"> <li>a) It is ancillary to the recreation use, or it would assist in the retention and enhancement of the recreational use of the site;</li> <li>b) <del>The Ashfield Green Space Strategy has identified a surplus in the catchment area to meet both current and future needs, and full consideration has been given to all functions that open space can perform;</del></li> <li>c) Adequate replacement provision of new green space is provided in the locality;</li> <li>d) It is proposed to make significant improvements to the overall quality of the recreation provision in the locality; or</li> <li>e) In the case of school playing fields the development is essential for educational purposes.</li> </ul>
Policy EV5 3. e)	<p>Policy EV5 3 e) amend:</p> <p>3. e) Form the only accessible green space (<del>as identified within the Green Space</del> <b>Public Open Space</b> <del>Strategy catchment areas</del>) for some residents.</p>
Paragraph 9.82	<p>Second sentence, amend:</p> <p><del>Sites greater than 2 hectares</del> are shown on the Policies Map and listed in Appendix 4.</p>
<b>Proposed Officer Amendments</b>	

Paragraph 9.84, 9.88 and 9.91 (plus any other references): Amend to reflect the evidence from the Public Open Space Strategy 2016 and delete reference to Green Space Strategy 2008.	<p>Delete all references to <del>Green Space Strategy</del> and replace with <b>Public Open Space Strategy</b>.</p> <p>Delete paragraph 9.83, which refers to the 2008 Green Space Strategy:</p> <p><del>The success and value of a green space network is dependent on three principal factors: the quantity, quality and accessibility of green spaces. The Council's Public Open Space Strategy looked at these three principal factors and found that quality was the overriding factor that affects the public's satisfaction with the green space network in Ashfield followed by distance and the ability to access green spaces.</del></p>
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<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Johnson	1886		√		Ward	5807		√	
Lathall	1917		√		Bolger	5817		√	
Collier	1918		√		Lathall	5819		√	
Lathall	2631		√		Terversal, Stanton Hill & Skegby Neighbourhood Forum	6647			√
Shaw	2707			√	Manders	6640		√	
Nottingham County Council	2803			√	Lewis	6729		√	
Cooper	2811		√		Eyre	6897		√	
National Trust	2828		√		Morton	6998		√	

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Natural England	3185		√		Morton	6899		√	
Annesley Community Committed to Ensuring Sustainable Settlements (ACCESS)	5359			√	Elkington	6977		√	
Sports England	5554		√		Elkington	6977		√	

## **Policy EV6: Trees, Woodland and Hedgerows**

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Support for the protection given to ancient woodland in para A of Policy EV6 but we would prefer to see absolute protection of such an important habitat rather than having the caveats in the bullet points at the end of para C. If there must be a caveat we would prefer something along the lines of "except in wholly exceptional circumstances" to describe the only possible circumstances in which development affecting ancient woodland might be permitted.	The Council recognises the importance of ancient woodlands. However, the proposed wording in the comment is considered to go beyond National Policy Guidance in paragraph 118 of the National Planning Policy Framework.  No changes proposed.
We support the aims of this Policy and would point out that the wooded embankments associated with KA03 Site 5 have the potential to provide increasingly important wildlife habitats in addition to their recreational and visual values. These wildlife habitats will be important in their own right, but also for the joy that living alongside can bring to residents. They will also	Support for the Policy acknowledged.

absorb CO2 emissions, helping to provide a healthy local micro-climate for residents and contributing to the Council's stated aim for development sites to mitigate against climate change. Last but not least, they will add to and enhance the character and appearance of the local environment and offer informal recreation and keep fit opportunities, supporting the health and well-being of residents in the locality generally and helping to realise the visionary aims of the Plan.	
General support for the Policy.	Support acknowledged.
Support for Policy EV6 and recommend that any replacement planting should use native species that are appropriate to the landscape character area.	Support and recommendation acknowledged. Propose to include a reference to to use of native species in Policy EV6. <b>Proposed amendment detailed below.</b>
<b>Object</b>	
-	-
<b>Comment</b>	
Policy EV6 item 2a), consider adding "Planted Ancient Woodland (PAWS)" and "Ancient Hedgerow" to the descriptive narrative within the sentence.	The supporting paragraphs to the Policy have been amended to stress that ancient woodlands within Planning Practice Guidance includes both Ancient Semi-Natural Woodland (ASNW) as well as Plantations on Ancient Woodland Sites (PAWS).  <b>Proposed amendment detailed below.</b>  Hedgerows are already covered within Policy 2. B).  No changes proposed.
There seems to be an assumption in the Policy that all trees within conservation areas are positive, which is not necessarily the case. It would be better to see a provision that important	As a generalisation trees form an important part of the landscape and street scene both in urban and rural areas. However, it is acknowledged that a tree may be located where

amenity trees will be identified as part of the review of conservation area appraisals or the proviso “where trees contribute to the character or appearance of the conservation area”.	there may be associate issues, particularly in relation to buildings and shrinkable clay soils.  No changes proposed.
<b>Responses received relating to Policy supporting text</b>	
Proposed additional paragraph 9.107, which sets out a list of ancient hedgerows in Ashfield to support paragraph 9.106.	The Council does not hold data on all ancient hedgerows in the District.  No changes proposed.
<p>Para 9.100:– the paragraph is correct as a definition of ancient woodland but a statement could be added explaining Planted Ancient Woodland (PAW'S) which is a similar classification as it is a target for felling of non-natives and replanting with native broad-leafed trees, there are examples of this habitat within Ashfield including some of the Forestry Commission woodland.</p> <p>Para 9.104: &amp; 9.106: - These two paragraphs underline the importance of hedgerows but it needs to explain what surveys etc Ashfield District Council expects of a developer before applying for planning permission. Many of the hedgerows within the district will be of importance as boundaries of Parish Council or Manor House Estates, these historic boundaries may be in need of protection from development or loss through lack of suitable management, NWT suggests that ADC undertake a mapping exercise to map these sites before they are lost.</p>	<p>Amend paragraph to include additional wording on PAW'S.</p> <p><b>Proposed amendment detailed below.</b></p> <p>It is considered that a survey of hedgerows, if necessary, forms part of the potential requirements in the planning application list and is not a requirement of the Local Plan. With exceptions, the removal of hedgerows is covered by the Hedgrow Regulations 1997. The Council does not have the resources to undertake a survey of hedgerows in the District.</p> <p>No changes proposed.</p>
Para 9.99 -- consider adding words to the effect “before the removal of any trees on the development site the Council will be contacted to determine whether it wishes to seek a Tree Preservation Order”. Removes the ambiguity of developers	The paragraph is considered to be consisited with the process for designated TPOs. The Council does not have evidence to justify the removal of land ownmers rights to manage their land, and the wording is inpractical as when does land become



<p>stating they did not know a Tree Preservation Order was in place on the development site, and also gives advance information to the Council and improves its ability to undertake/place such a Tree Preservation Order to safeguard such trees.</p> <p>Para 9.100 -- it is ACCESS's understanding that Ancient Woodland and Replanted Ancient Woodland both enjoy the same status. Please insert a reference to Replanted Ancient Woodland (PAWS).</p>	<p>defined as a development site?</p> <p>No changes proposed.</p> <p>Amendment included in relation to PAWS. Hedgrows address in paragraphs 9.104 to 9.106.</p>
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### Proposed Amendments

Issue/Policy	Amendment
Policy EV6 3. Emphasis on native species.	Add at the end of criteria 3: <b>Replacement planting should use native species and complement the landscape character of the area.</b>
Paragraph 9.100. Amend to include information on PAWS	Paragraph 9.100 to read: Ancient woodlands in particular are exceptionally rich in wildlife, and often contain important archaeological and heritage features relating to their past management. <b>Planning Practice Guidance identifies that both Ancient Semi-Natural Woodland (ASNW) as well as Plantations on Ancient Woodland Sites (PAWS) are ancient woodland. Both types should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework.</b> Eleven Ancient Woodland sites have been identified by Natural England within Ashfield (see Appendix 5).
<b>Officer Proposed Amendments</b>	
Paragraph 9.95. Amend to include information on when an	Development proposals will be expected to avoid harm to

<p>exception to the protection of trees, woodlands and hedgerows would apply. It is also suggested to split the paragraph and add a reference to Policy SD1, as this policy provides information on the provision of new planting within development sites.</p>	<p>existing trees, woodlands and hedgerows, and incorporate them within a landscape scheme, <b>except where their long-term survival would be compromised by their age or physical condition or there are exceptional and overriding benefits in accepting their loss.</b></p> <p>The retention of existing trees, woodlands and hedgerows can assist in integrating new development into the local environment by providing some mature, established elements within landscaping schemes. Mitigation, replacement or compensatory measures will be required when this cannot be achieved, to ensure that there is no net loss of environmental value as a result of development; these should be secured by condition or through S106 Agreement. <b>Policy SD1: Good Design Considerations for Development, provides details on the provision of new planting within development sites.</b></p>
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<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Woodland Trust	1878		√		Natural England	3185		√	
National Trust	2828		√		Annesley Community Committed to Ensuring Sustainable Settlements (ACCESS)	5359			√
Nottinghamshire Wildlife Trust	2832			√	Kirkby and District Archaeological Group	5643			√
Collins	3034		√						

## Policy EV7: Provision and Protection of Allotments

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
I support this part of the document. The objectives must be accompanied by the Council developing and maintaining an active strategy to promote allotments and to ensuring they are well used.	Support noted. The Council's Forward Planning Team has recently undertaken a review of the allotments sites within the district as part of the evidence base for the Local Plan. This information will feed into the Council's Allotment Strategy which is currently being updated.
<b>Object</b>	
Objection to Lime Tree Road Allotments (EV7 HA) being protected as allotments, considered the allotments should be allocated for housing.	The recent review of allotments within the district shows this site is currently well used (47 out of 51 plots currently used) which indicate a need for the site within this locality. Allotments are an important component of green space provision. The National Planning Policy Framework stresses the important contribution that open space makes towards the health and well being of local communities. It identifies that open space should not be built on except in specific circumstances. This is reflected in the Policy EV7. Consequently, no changes are proposed.
<b>Comment</b>	
Policy EV7 - opening paragraph - can the Council please define what is meant by "locally identified demand" to avoid ambiguity.	'Locally identified demand' is set out in the Council's Allotment Survey Technical Paper (2016) and will also be included in the Council's emerging Allotment Strategy. Both documents will be

	regularly updated throughout the Plan period. It is proposed to include a reference to both documents in the supporting paragraphs.
<b>Responses received relating to Policy supporting text</b>	
<p>Para 9.110: - developers will have to show that there is no longer a demand in the locality - this must be against cultivated allotments - not allotments covered with trees and briars and extremely poor access.</p> <p>Para 9.112: - this is headed private allotments - the council should make quite clear that when it is talking about allotments in paragraphs above which comments are directed to Council allotments and which are directed to private allotments. Should these private allotments be included within any surveys etc?</p>	<p>Paragraph 9.112 clarifies that 'The approach of non-maintenance and running down of allotments will not provide evidence of a lack of demand for allotments in the locality.</p> <p>Policy EV7 and its supporting text covers both public and private allotments. Paragraph 9.112 highlights an issue regarding only private allotments.</p>
Para 9.112 -- ACCESS applaud and confirm the inclusion of the last sentence within this paragraph, being aware of the owners stance on Forest Road allotments during 10 years of planning applications and threats of Appeals.	Supported acknowledged.

### Proposed Amendments

Issue/Policy	Amendment
Paragraph 9.109 Amend paragraph to identify sources of information on demand for allotments.	Paragraph 9.109, amend first sentence to read: The requirements for allotments as part of any major residential development proposals will be assessed in relation to local provision and the potential demand created by the residential development. <b>Information on demand is set out in the Council's</b>

	Allotment Survey Technical Paper and Allotment Strategy.
<b>Proposed Officer Amendments</b>	
Polict EV7 – In order to provide clarification it is proposed to strengthen the wording in the policy.	<b>Policy EV7</b>  <b>The Council will support the provision of new allotments in order to meet a locally identified demand. Where residential development results in an additional demand for allotments in a locality, new provision allotments may could form part of the on-site green space requirement, or a planning contribution may be required towards either improving existing allotments or providing new allotments elsewhere, as set out under Policy HG3.</b>

<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Nottinghamshire Wildlife Trust	2832			√	Annesley Community Committed to Ensuring Sustainable Settlements (ACCESS)	5359			√
Norris	2426		√		Hucknall & District Smallholders & Allotment Society	6737	√		

## Policy EV8 – Equestrian and other rural land based activities

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
-	-
<b>Object</b>	
-	-
<b>Comment</b>	
-	-
<b>Responses received relating to Policy supporting text</b>	
Paragraph 9.114 - Equestrian and land based activities should be allowed in the Green Belt or the countryside and the related policies should make it clear that buildings for equestrian and land based purposes will be supported in the Green Belt and Countryside.	The Policy has to be seen against the requirements of the Local Plan as a whole including Policy EV1 Green Belt and Policy EV2 Countryside. Any application must be considered against the impact on either the Green Belt or the Countryside. This is reflected in paragraph 9.114 and it is not proposed to make any amendments to the paragraph.
Page 149, paragraph 9.120. - Query on the sentence of "the Environment Agency identify that one of the four issues is diffuse pollution from agriculture. Also, if it is a low percentage then what is the problem, so it does need to be qualified?"	Amend the paragraph to reflect comments that it is necessary to qualify the issue.

### Proposed Amendments

Issue/Policy	Amendment
Amend Page 149, paragraph 9.120 to delete the reference to agricultural pollution.	Delete "In the Midlands the Environment Agency identifies that one of the four issues is diffuse pollution from agriculture."

<b>List of Respondents</b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
National Farmers' Union	1929			√					

## Policy EV9: Agricultural Land Quality

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
General support for the Policy.	Support acknowledged.
<b>Object</b>	
-	-
<b>Comment</b>	
<p>The Plan recognises that development has an irreversible adverse (cumulative) impact on the finite national and local stock of Best and Most Versatile (BMV) land. Retaining BMV land enhances future options for sustainable food production and helps secure other important ecosystem services.</p> <p>Local planning authorities should take into account the economic and other benefits of Best and Most Versatile agricultural Land (BMV - Grades 1, 2 and 3a in the Agricultural</p>	<p>Comments noted. The Local Plan identifies that the presence of Best and Most Versatile land should be taken into account but it has to be considered along side other sustainability considerations in making decisions about development.</p>

<p>Land Classification) and the plan should safeguard its long term capability. Paragraph 112 of the National Planning Policy Framework (NPPF) should be referenced when considering the protection of best and most versatile (BMV) agricultural land. Policy EV9 is consistent with this approach.</p> <p>The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. Further information is provided on Natural England's website.</p>	
<b>Responses received relating to Policy supporting text</b>	
-	-

N.B. A number of objections were received relate to specific housing allocations on land regarded as fallings within the best and most versatile land. However, they did not specifically comment on Policy EV9.

### Proposed Amendments

Issue/Policy	Amendment
No changes proposed from the consultation	-

<b>List of Respondents</b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
National Trust	2828		√		Natural England	3185		√	



## Policy EV10: The Historic Environment

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
This policy is generally supported.	Support is noted.
<b>Object</b>	
There needs to be more protection for locally listed buildings/areas/objects.	The Council supports the protection of local heritage assets and has created a policy, in line with national planning policy, to try and protect these assets against inappropriate development.
<b>Comment</b>	
<p><u>Historic England's comments:</u> There are a number of difficulties in trying to draw up policies which are all encompassing, related to the 'historic environment' and not specific to conservation areas, listed buildings, etc. It is essential that the Heritage Policy is strategic in line with the NPPF. If not strategic, any Neighbourhood Plans could then include policies which would outweigh those within the Local Plan.</p> <p><u>Policy Paragraph 1</u> The final sentence refers to: "including designated and locally designated heritage assets and their setting". Historic England identifies that this does not allow for non-designated heritage assets, such as those identified on the HER, those encountered during the process of considering a planning application or during the development of a local plan, which</p>	<p>The Council acknowledges this overarching comment.</p> <p><u>Policy Paragraph 1</u> The Council acknowledges the comment made and will amend the draft policy accordingly.</p> <p><b>Proposed amendment detailed below.</b></p>

are covered by NPPG Paragraph: 041 Reference ID: 18a-041-20140306. Suggest this is re-worded slightly to state “designated and non-designated heritage assets”.

Policy Paragraph 3

Item b) — We suggest this is amended slightly to state ‘Sites or Areas of Archaeological Interest’

Suggested that an additional clause is added “e) heritage assets identified during the course of the preparation of a local plan or development application”. This can occur on occasion, during the process of investigation of site allocation, or in the early stages of the preparation of a Heritage Statement or assessment by the LPA.

Policy Paragraph 4

The second sentence does not fulfil the balance requirements of the NPPF and is considered too restrictive by simply stating ‘Development will not be permitted’. The tests set out in paragraphs 133 and 134 could be undermined by the narrowness of this policy. This was mentioned in our previous comments in 2012 when we said: “Furthermore, there will need to be recognition that harm can be justified by (outweighing) public benefits to be consistent with the NPPF.”

Suggest keeping the first sentence and re-wording the second sentence to address the balance requirements, being careful to avoid the use of the word ‘substantial’ in order to ensure that all harm is considered.

Policy Paragraph 3

Criteria b) The Council acknowledge and accepts the proposed revisions to the draft policy.

Policy EV10 already identifies that ‘Any new sites identified after the Local Plan is adopted will be protected under this policy’. However, for clarification it is proposed to include additional wording in the supporting text.

**Proposed amendments detailed below.**

Policy Paragraph 4

The Council acknowledges the comments made and agrees that paragraph 4 of the policy requires amendments to align with the NPPF.

**Proposed amendment detailed below.**

Policy Paragraph 5

This wraps up two points, a general comment about support of the long-term future of the historic environment and Heritage at Risk and the policy could be a more positive strategy for the conservation enjoyment of the historic environment, including heritage assets most at risk of neglect, decay and other threats. If you refer to significance in Para. 4, then this becomes unnecessary duplication here.  
It would be simpler to restrict this policy to making a positive and strategic point about Heritage at Risk, for example:

*“In considering the impact of proposals that affect the historic environment, the Council will give great weight to the conservation of heritage assets, including those that are most at risk through neglect, decay, or other threats.”*

and/or

*“The Council will support the sensitive adaptation and re-use of under-utilised or redundant heritage assets consistent with their conservation, whilst also recognising that managed change may sometimes be necessary to ensure long term viability.”*

and

*“The Council will record and monitor heritage assets that are at risk and take action where necessary, including the use of statutory powers,”*

and

*“The Council will work proactively with owners and the County Council and Historic England to secure the future of heritage assets, identified in the Nottinghamshire County Council Buildings at Risk Register and the Historic England Heritage At*

Policy Paragraph 5

The Council acknowledges the comments related to policy paragraph 5.

The Council proposes to amend criteria 5 of the draft policy to focus on Heritage at Risk and include additional wording in the supporting text.

**Proposed amendment detailed below.**

*Risk Register, to seek long- term solutions to unlock the optimum viable use.”*

Policy Paragraph 6

This is the main policy related to setting and it is better to emphasise that the specific contribution made by setting to significance should be assessed in the first instance. The first sentence lists “character, architectural integrity and setting”, which could be seen as an exclusive list related primarily to buildings. We would be inclined not to catalogue these too narrowly, and to instead say:

“Whilst the original use of a building is often the most appropriate, support will be given for the re-use of heritage assets for new purposes where these sustain their significance and support their conservation”. It may be worth having a separate sentence related just to setting.

The second sentence appears to have merged provisions within paras. 133 and 134 of the NPPF and is in our view too open-ended. The provisions within the NPPF are much more stringent than this policy embodies, dependent upon the level of harm and the level of significance. For these it is not just ‘optimum viable use’ that needs to be demonstrated, but assuming that a change of use could lead to substantial harm, there are four additional provisions. If these are not followed, it leaves the policy wide open to being purely based on the economic circumstances of the owner, current market conditions rather than the level of harm and level of significance. We therefore recommend that the second

Policy Paragraph 6

The Council acknowledges the comments related to policy paragraph 6.

As suggested, the Council proposes to amend this paragraph of the draft policy in line with the comments made.

**Proposed amendment detailed below.**

sentence be removed.	
<b>Responses received relating to Policy supporting text</b>	
Conservation Areas - Amend paragraph 9.133, page 153 to include after the words - particular character "including walls".	The Council recognises that walls contribute to the historic character of a conservation area. Such assets will be highlighted within the Conservation Area Appraisal, referred to within paragraph 9.133, together with a number of other assets that collectively create the historic character the conservation areas designation seeks to protect and enhance. However, the Council does not feel it is necessary to highlight walls specifically within this paragraph given its overarching context.
<p>Amend the text to set out the proposed Kirkby Hardwick Local Character Area - The criteria for Local Heritage Assets designation document as described in 7.4 local character areas should include Kirkby Hardwick as a local character area. The response set out a description of the character area including the archaeological remains of Kirkby Hardwick Manor, the hamlet of Kirkby Hardwick and the adjacent fields, the 19th century bridge to the Pinxton &amp; Mansfield Railway, course of the River Maun.</p> <p>(related to submitted plan), sub areas 1-6 contain non-designated heritage assets and designated heritage assets in area 2.</p> <p>We ask that the Kirkby Hardwick site (as submitted) be included as a local character area and described under policy EV10 with a new paragraph that heritage asset areas of this</p>	<p>The Council does not support the proposal to allocate Heritage and Non-Heritage Asset Areas. Historic assets of significance are protected as Designated Heritage Assets and Non-Designated Assets.</p> <p>Kirkby Hardwick is already identified as a Local Heritage Asset and is included on the Council's Local Heritage List – Reference no. 199. The site was added to the local list in 2014.</p> <p>The remaining assets identified will be assessed against the Council Criteria for Local Heritage Asset Designation (Feb. 2013) to identify if they meet the criteria. Sites can be nominated for inclusion on the local list at any time.</p> <p>The Council does not feel additional designations are required.</p>

<p>type be named and described as Heritage and Non-Heritage asset areas and indicated on the proposals map.</p>	
<p><u>National Trust commented:</u> Paragraph 9.132 lists five Conservation Areas in Ashfield. The majority of Hardwick Hall, Park and associated properties are located within Hardwick and Rowthorne Conservation Area – designated by Bolsover District. Because of the location of the district boundary between Ashfield and Bolsover, there is a section of the southeast Park, as well as Hardwick Farm and Norwood Lodge, which is are excluded from the designated Conservation Area. National Trust therefore requests that the Council considers designating a sixth Conservation Area within Ashfield through this Local Plan review process. This could include National Trust land within Ashfield District, thereby completing the Conservation Area coverage. National Trust would be pleased to discuss with Bolsover and Ashfield Councils the scope for a Conservation Area Character Appraisal covering Hardwick and Rowthorne. This could be a great example of cooperation between districts on strategic planning for heritage.</p>	<p>The Council acknowledge the request to allocate an additional Conservation Area within the District covering elements of the Hardwick Hall estate.</p> <p>The Council’s Conservation Officer has been informed of the request and has approach the National Trust to discuss the proposal further.</p> <p>It is proposed to refer specifically to the setting of Hardwick Hall and its associated Registered Park and Garden within Policy EV10.</p> <p><b>Proposed amendment detailed below.</b></p>
<p><u>Historic England comment’s:</u></p> <p><u>Paragraph 9.129</u> The list of terms used in the last sentence (“rarity, representativeness, association, aesthetic appeal, and integrity”) appear to relate to criteria for Local Heritage Listing, not for a national measurement of importance. We would avoid listing this narrow set of criteria, as they exclude or overlook</p>	<p><u>Paragraph 9.129</u> The Council acknowledges the point raised, but also feels it is important to provider the reader with an indication of how significance is assessed.</p> <p>The Council agrees that the current description may be</p>

certain aspects of significance such as ‘evidential value,’ which is particularly applicable to archaeological sites, and ‘communal value’.

#### Conservation Areas

There is no mention of Management Plans, to accompany conservation area appraisals. Under para. 9.133 it may be useful to include reference to the existing management plans, to demonstrate the ‘positive strategy’ for the historic environment.

#### Designated Listed Buildings

##### Paragraph 9.139

The first sentence is worded a little oddly and seems to contain a presumption that alterations will be agreed, whereas the main emphasis of this paragraph is about the process of listing and recognition of value — it seems a little muddled. Listing is designed to protect buildings, to recognise their value, and includes both the inside and outside. It may be simpler to state that listing is a process of recognition of architectural and historic interest, which includes both the exterior and interior, rather than mix up the listing process with consideration of applications.

##### Paragraph 9.140

It may be difficult to actually enforce the final sentence. It would be more appropriate to say that: “The Council will seek demonstrable proof that every possible effort has been made to secure an alternative use for a building before considering any proposals to demolish — for example, this would normally

perceived as narrow, as such it will revised the text to include ‘such as’ and ‘not restricted to’. The proposed amendment is detailed below.

#### Conservation Areas

The Council acknowledges the comment. Draft Management Plans are included with the Conservation Area Appraisal.

The supporting text will be amended to include a reference to the draft Management Plans. Details given below.

#### Designated Listed Buildings

##### Paragraph 9.139

The Council acknowledges this comment and will amend the paragraph accordingly.

**Proposed amendment detailed below.**

##### Paragraph 9.140

The Council acknowledges this comment and will amend the paragraph accordingly.

**Proposed amendment detailed below.**

include evidence of the offer of the unrestricted freehold of the building on the open market at a realistic price and for a reasonable period (this could be as much as five years in some circumstances, dependent upon local market conditions), proof of relevant and recent exploration of charitable use and grants with a range of heritage bodies and local organisations.”

Paragraph 9.142

Please refer to Historic England policy guidance, rather than English Heritage.

Local Heritage Assets

Paragraph 9.146

This should ideally be qualified in line with the NPPF as it is currently carrying the same weight as listed buildings and should be proportionate to importance — “In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.” (NPPF para. 135)

We recommend that the statement allows some flexibility to have a provision such as, ‘unless this is decisively outweighed by genuine public benefit.’

Scheduled Monuments and Areas of Archaeological Interest

This is a very useful summary but it might be helpful to draw

Paragraph 9.142

The Council acknowledges this comment. However the statement related to a document / guidance produced by Historic England prior to its name change. As such, the Council believes the reference should remain as the document itself has not been amended.

Local Heritage Assets

Paragraph 9.146

The Council acknowledges this comment, however, it is considered that the wording as suggested is not appropriate. It is proposed to amend the supporting text to the policy to distinguish the different weights to be applied to designated and non-designated heritage assets.

**Proposed amendment detailed below.**

Scheduled Monuments and Areas of Archaeological Interest

The Council acknowledges comments regarding paragraphs





“not have an adverse impact” is too narrow, not in accordance with the NPPF and in our view unsound. The final sentence of the paragraph seems to make an assumption that all trees are positive, but they may not be (e.g. later introductions, self-seeded trees or those that affect strategic views or avenues, just as an example).

Policy EV6 — see comments earlier.

#### Historic Landscape Features

##### Paragraphs 9.155 to 9.157

It is very welcome to see elements of the historic landscape included within the local plan. We recommend an additional paragraph that: “a qualitative judgment about the landscape affected should be informed by either a Landscape and Visual Appraisal or a Landscape and Visual Impact Assessment, as appropriate, in accordance with the most up to date guidance, taking into account the specific contribution that heritage and the setting of heritage assets makes to landscape character”.

#### Shopfronts

This section seems a little detached but the Policy SH4 is very welcome.

#### Statements of Heritage Significance and Archaeological Evaluations

Archaeological evaluations (common terminology) are different from desk-based assessments (they are often a second stage). See earlier comments - this is potentially a little muddled. It then seems clearer in 9.160. The final sentence in the first paragraph repeats the NPPF. We consider that it

#### Historic Landscape Features

##### Paragraphs 9.155 to 9.157

The Council welcomes this comment and will amend the paragraph accordingly.

**Proposed amendment detailed below.**

#### Shopfronts

Comment is noted.

#### Statements of Heritage Significance and Archaeological Evaluations

The Council acknowledges the comments. The Council will amend paragraph 9.159 to distinguish between evaluations and desk-based assessments.

The Council will propose to amend paragraph 9.160 in line with



constitutes “using local selection criteria”?	and is available on the Council’s website.
<p>Para 9.144 -- can this paragraph be expanded to state that there are more local heritage assets within the database set, which are checked against proposed development proposals, than is contained within the appendices of this document. Additionally, can the list of "local heritage assets" be included on the Council website.</p> <p>Para 9.157 - will the Council please consider introducing the words “quarries and lime burning” as examples quoted.</p>	<p>Comments noted, however, it is not the Council’s intention to publish a separate ‘list’ of local heritage assets. The Council’s adopted ‘Criteria for Local Heritage Asset Designation’ is the recognised means by which assets are considered and identified.</p> <p>Local heritage assets can be identified at any time and by having a published ‘list’ it could imply that the absence of a buildings/site from the list, means it has no value, clearly this may not be the case.</p> <p>The Council is currently working towards mapping all the buildings/sites which are considered to comply with the Council’s adopted guidance, together with all the nominated sites (to be confirmed). Once completed this will be made publicly available via the Council’s online map service.</p> <p>The Council will amend paragraph 9.144 to clearly explain the Council’s approach to local heritage assets.</p> <p><b>Proposed amendments detailed below.</b></p> <p>The features identified in the paragraph are examples. The paragraph does not provided an exhaustive list of features. No changes proposed.</p>
EV10cd - it is Annesley VILLAGE not "New" Annesley!	The Conservation area was designated as “New Annesley “ Conservation Area and advertised in the London Gazette accordingly. No change proposed

### Proposed Amendments

Issue/Policy	Amendment
EV10 Policy paragraph (1) – in line with Historic England comments	<p>1. <b>Proposed developments must have regard to its impact on the historic environment and will be expected to be in line with conservation area appraisals, characterisation studies and other relevant studies. <del>adopted by the Council.</del> ....., including designated and <b>non-designated</b> <del>locally designated</del> heritage assets and their setting.</b></p>
EV10 Policy paragraph (3) – in line with Historic England comments	<p>3. <b>Non-Designated Heritage Assets in Ashfield include:</b></p> <ul style="list-style-type: none"> <li>a) .....</li> <li>b) <b>Sites or</b> Areas of Archaeological Interest</li> <li>c) .....</li> <li>d) .....</li> </ul>
EV10 Policy paragraph (4) – in line with Historic England comments	<p>4. <b>Development proposals, including alteration and extensions should <del>preserve</del> <b>conserve</b> or enhance the significance of designated and non-designated heritage assets and their settings through high quality and sensitive design of appropriate scale, siting and materials. Development, <del>including demolition</del>, that would harm <b>or result in the loss of</b> the special architectural, historical or archaeological interest <b>significance</b> of a heritage asset, directly or in directly will not be permitted <b>without a clear and convincing justification.</b></b></p> <p><b>a) Justification for Designated Heritage Assets will include;</b></p> <ul style="list-style-type: none"> <li>• <b>a heritage statement that clearly describes the significance of the building and explains in detail</b></li> </ul>

	<p>how the proposals shall not adversely affect this significance, and</p> <ul style="list-style-type: none"> <li>• be in accordance with the most up to date legislation and national policy and guidance<sup>(4)</sup>.</li> </ul> <p><b>b) Justification for Non-Designated Heritage Assets will include:</b></p> <ul style="list-style-type: none"> <li>• a heritage statement that clearly describes the significance of the building and explains in detail how the proposals shall not adversely affect this significance, or;</li> <li>• an up to date structural report that clearly identifies that the building is incapable of viable repair, or</li> <li>• Demonstrate that the building has no viable use in the medium term through appropriate marketing and there would be a public benefit arising from its demolition.</li> </ul> <p>Add Footnote:</p> <p><sup>(4)</sup> This include the Planning (Listed Buildings and Conservation Areas) Act 1990; the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG).</p>
<p>EV10 Policy paragraph (5) – in line with Historic England comments</p>	<p><del><b>5. Support will be given to development proposals that protect, conserve and enhance the historic environment and secure its long-term future, especially the District's Heritage at Risk. Such proposals must recognise the significance of the heritage asset as a central part of the development.</b></del></p>

	<p><b>5. The Council will support the sensitive adaptation and re-use of redundant heritage assets, especially those identified as being ‘at risk<sup>(5)</sup>’, where the proposals are consistent with their conservation, whilst also recognising that managed change may sometimes be necessary to ensure long term viability.</b></p> <p>Add Footnote: (5) Heritage assets at risk in this case relates to buildings or structures identified on the National Heritage at Risk Register compiled by Historic England and Registers compiled by the County or District Council.</p> <p>Add new Paragraph after 9.142: The Council will record and monitor heritage assets that are at risk and work proactively with owners and stakeholders, or take action where necessary, including the use of statutory powers, to help secure their long-term viable use.</p>
<p>EV10 Policy paragraph (6) – in line with Historic England comments</p>	<p><del><b>6. Support will be given for the re-use of heritage assets for new purposes where they are compatible with their character, architectural integrity and setting. New uses that harm the fabric or setting of heritage assets shall not be supported unless it can be demonstrated that the harm is justified to realise the optimum viable use.</b></del></p> <p><b>6. In considering the impact a development proposal may have on the setting of a heritage asset, the Council will assess the contribution the setting makes to the overall significance of the asset and how the proposal may</b></p>

	<b>impact on this. Particular regard will be given to Hardwick Hall and Annesley Hall and their associated Registered Parks and Gardens.</b>
EV10 supporting text para 9.129 – in line with Historic England comments	<p>Heritage assets are buildings, monuments, sites, places, areas or landscapes of historic, archaeological, architectural or artistic interest, whether designated or not, that have a degree of significance. The term ‘significance’ (for heritage policy) can be defined as “the value of a heritage asset to this and future generations because of its heritage interest”<sup>6</sup>. <b>In measuring the significance of an asset a number of factors are assessed, including, but not restricted to, and is measured in terms of the an asset’s rarity, representativeness, association, integrity, evidential value, historical value, aesthetic value appeal, and, and communal value. Heritage assets identified after the Local Plan is adopted or during the course of a development application will be protected under Policy EV10”.</b></p> <p>Footnotes to be added to identify sources used to measure significance:</p> <ul style="list-style-type: none"> <li>• <i>Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment, Historic England, 2008</i></li> <li>• <i>Understanding Place Historic Area Assessments: Principles and Practice, Historic England, 2010</i></li> </ul>
EV10 supporting text para 9.133 (conservation areas) – in line with Historic England comments	For each Conservation Area, with the exception of New Annesley, the Council has prepared a Conservation Area Appraisal <b>(including Management Plans)</b> based on .....
EV10 supporting text para 9.139 (Designated Listed Buildings)	<del>Listing ensures that the architectural and historic interest of the</del>



<p>– in line with Historic England comments</p>	<p><del>building is carefully considered before any alterations, either outside or inside, are agreed.</del> Listing is a process of recognition of architectural and historic interest, which includes both the exterior and interior, including pre-1948 buildings within the curtilage. Listed buildings are graded to show their relative architectural or historic interest, as follows:</p>
<p>EV10 supporting text para 9.140 (Designated Listed Buildings) – in line with Historic England comments</p>	<p>Paragraph 9.140 Ashfield has a limited stock of statutorily listed buildings (<del>see Appendix 7</del>). They represent a finite asset and for that reason their loss <del>or substantial demolition</del> will not be permitted unless the Council is satisfied that every possible alternative approach for restoration, conversion or re-use has been thoroughly explored. The fact that a building has become derelict will not in itself be regarded as sufficient reason to permit its demolition. <del>The Council will ensure that every possible effort has been made to secure an alternative use for a building before considering any proposals to demolish.</del> In most cases, the Council will seek demonstrable proof that every possible effort has been made to secure an alternative use for a building before considering any proposals to demolish. This would normally include evidence of the offer of the unrestricted freehold of the building on the open market at a realistic price and for a reasonable period (this could be as much as five years in some circumstances, dependent upon local market conditions), proof of relevant and recent exploration of charitable use and grants with a range of heritage bodies and local organisations.</p>
<p>EV10 supporting text para 9.144</p>	<p>Paragraph 9.144 <del>A list of non-designated</del> Currently identified local heritage</p>

	<p>assets <del>is</del> <b>are mapped on the Council's website</b> <del>published in a separate document</del>, together with a criteria based document to enable the identification of future local heritage assets at any given time. The <del>list</del> <b>mapping system</b> will be maintained and kept under review by the Council. The absence of any particular <b>local</b> heritage asset on the <del>local list</del> <b>mapping system</b> should not be taken to imply that it has no heritage value, simply that it has yet to be identified or it does not currently meet the selection criteria.</p>
EV10 supporting text para 9.150 (Scheduled Monuments and Areas of Archaeological Interest) – in line with Historic England comments	<p>Paragraph 9.150            Early consideration should be given by developers to the question of whether archaeological remains exist on a site and the implications for a proposed development. <b>This process can involve different levels of staged assessments, specific to the site and its history. The initial stage should undertake a desk-based assessment of the site, but may also require (where necessary) a range of additional assessments including, but not limited to, geophysical survey, geo-archaeological modelling, field walking, test pitting, trial trenching and/or setting studies. This initial stage may need to be followed by a full archaeological evaluation of the site.</b> The County Archaeologist should be contacted for advice on locations where remains are known or thought to exist. Advice can be given on the best means to preserve and enhance remains that have been previously identified. <b>Archaeological Assessments should be undertaken by a suitably qualified person.</b></p> <p>Paragraph 9.151            Where sites are of known or potential archaeological</p>

	<p>significance developers may be required to submit the results of an archaeological evaluation with any planning application. Evaluations of this kind help to define the character and extent of the archaeological remains, and thus indicate the weight which ought to be attached to their preservation. The level of importance of the site can then be assessed against the need for the proposed development. <b>Such evaluations should be submitted to the Council at the earliest possible stage of the planning application process, to ensure an informed decision can be made. The Council will not support the postponing of appropriate evaluations via conditions or secondary detailed planning applications.</b> If archaeological remains are discovered during development, developers should contact the Local Authority immediately for advice.</p>
<p>EV10 supporting text para 9.154 (<u>Historic Parks and Gardens</u>) – in line with Historic England comments and to explain the importance of setting.</p>	<p>Paragraph 9.154  <b>The significance of parks and gardens may extend beyond the defined boundary with regards to views towards or away from the park and garden or in how the park and garden is experienced, for example on approach. Any development proposal within or affecting a designated historic park or garden, or any subsequent designations, will only be permitted if it would not have an adverse impact on its historic or special features. Development proposals that would result in the harm or loss of a designated historic park or garden or its setting, would only be permitted by the Council if it can be appropriately demonstrated that the harm or loss is outweighed by the substantial public benefit resulting from the development. Where this public benefit cannot be demonstrated, proposals must align with the requirements of national planning policy. Where appropriate, it Any development impacting on a</b></p>

	<p>designated historic park or garden should seek to support the long-term preservation of the park or garden and its setting through sensitive restoration, adaptation and/or re-use. In particular, care should be taken to avoid the loss of trees, or woodland or significant views, that contribute to the asset's significance. <del>and</del> Any proposed loss of trees or woodland will need to be assessed against Policy EV6. <del>which protects all trees worthy of retention.</del></p>
EV10 supporting text para 9.155 to 9.157 (Historic Landscape Features) – in line with Historic England comments	<p>9.156 .....            9.157 .....            9.158 A qualitative judgment about the landscape affected should be informed by either a Landscape and Visual Appraisal or a Landscape and Visual Impact Assessment, as appropriate, in accordance with the most up to date guidance, taking into account the specific contribution that heritage and the setting of heritage assets makes to landscape character.</p>
EV10 supporting text para 9.159 to 9.160 (Statements of Heritage Significance and Archaeological Evaluations) – in line with Historic England comments	<p>Paragraph 9.159            In cases where it is necessary for an applicant to submit a Statement of Heritage Significance (as required since 2010 and the NPPF) and/or archaeological evaluation (following a desk-based assessment), the scope and degree of detail necessary will vary according to the particular circumstances of each application. The level of detail required should be proportionate to the importance of the heritage asset, the size of the development and the level of its impact on the heritage asset. As a minimum, a Heritage Statement and/or archaeological evaluation should describe the significance of the heritage asset affected and consult the Nottinghamshire Historic Environment Records.</p>

	<p>Paragraph 9.160</p> <p><del>Where an application site includes, or is considered to have the potential to include, heritage assets with archaeological interest, the Council will require developers to submit an appropriate desk-based assessment and, where desk-based research is insufficient to assess the interest properly, a field evaluation.</del> All development proposals that would affect any heritage asset will need to be accompanied by a Statement of Heritage Significance which, as a minimum, should cover the following:</p> <ul style="list-style-type: none"> <li>• describe and assess the significance of the asset and/or its setting;</li> <li>• identify the impact of works on the special character of the asset; and</li> <li>• provide a clear justification for the works, especially if these would harm the asset or its setting, so that the harm can be weighed against public benefits.</li> </ul>
<b>Proposed Officer Amendments</b>	
Paragraph 9.131 – the number of Listed buildings has increased.	Paragraph 9.131 Delete 79 and replace with 82
Header above paragraph 9.138 – remove the word ‘Designated’ as it is unnecessary to say the Listed Buildings are Designated.	Header above paragraph 9.138 <del>Designated</del> Listed Buildings
Header above paragraph 9.143 – remove the word ‘Local’ and replace with ‘Non-Designated’ for consistency.	Header above paragraph 9.143 <del>Local</del> Non-Designated Heritage Assets
It is proposed to remove ‘Appendix 7 – List of Buildings of Special Architectural or Historic Interest’ and refer the National	Remove Appendix 7 and any references from the Local Plan (Policies and supporting text).

<p>Heritage List for England (NHLE). This is the only official and up-to-date database of all listed and designated heritage sites. The database provides the user with more comprehensive information to that currently provided in Appendix 7.</p>	<p>Policy EV10, last paragraph:  ‘Existing Conservation Areas are detailed below <b>and shown on the Policies Map</b>, Listed Buildings, <b>Scheduled Monuments and Registered Parks and Gardens</b> are listed in <del>Appendix 7</del> <b>the National Heritage List for England</b>, Scheduled Monuments are <b>also</b> listed in Appendix 8 <b>and shown on the Policies Map</b>. <del>and Registered and Unregistered Parks and Gardens are listed below and shown on the Policies Map. All sites are shown on the Policies Map.....</del>’</p> <p>Add at the end of paragraph 9.138:  <b>In England the statutory body responsible for maintaining ‘the list’ is Historic England. The National Heritage List for England (NHLE) is the only official and up-to-date database of all listed and designated heritage sites.</b></p> <p>Paragraph 9.140:  ‘Ashfield has a limited stock of statutory listed buildings <del>(see Appendix 7).</del>’</p>
<p>Add new paragraphs, after 9.141, to include further information on heritage at risk</p>	<p><b>Heritage at Risk</b></p> <p><b>Heritage at risk includes buildings or sites that are at risk of being lost as a result of neglect, decay or inappropriate development. Heritage at risk is monitored by Historic England, Nottinghamshire County Council and Ashfield District Council<sup>24</sup>. The Council will support the repair and re-use of heritage assets at risk especially where proposals will conserve them in a manner appropriate to their significance.</b></p>

	<p>Add footnote:</p> <p><sup>24</sup> The number of assets considered to be at risk is likely to change during the period of this Local Plan.</p>
<p>Policy EV10 and paragraph 9.145:</p> <p>The need for a clear and convincing justification for works to a heritage asset relates only to designate heritage assets in the NPPF – therefore it is proposed to remove this reference from paragraph 9.145.</p>	<p>Paragraph 9.145</p> <p>The loss of <del>non-designated heritage assets, including local heritage assets, buildings or assets identified on the 'local heritage list'</del> would be detrimental to the appearance, character, townscape quality or heritage of the District. Therefore, the Council will seek to encourage the retention, restoration and continued beneficial use of these <del>assets</del> buildings wherever possible. Proposals to alter them should, for example, be architecturally compatible with the style of the original <del>building</del> asset. Where planning permission is required (not prior notification for demolition), the Council will resist the loss of non-designated heritage assets, including local heritage assets, demolition of Buildings of Local Interest where there is no clear and convincing justification for their removal. This would normally include evidence that the asset is incapable of viable repair or evidence that the building/asset has no viable use in the medium term through appropriate marketing. Policy SD5: Assessing Viability, and its supporting text, provides details on the Demand test and/or the Viability Test.</p>
<p>EV10 supporting text para 9.146 (Local Heritage Assets) – for clarity.</p>	<p>The setting of <del>local heritage</del> assets <del>on the Council's Local Heritage List</del> may contribute to their intrinsic qualities, and the Council will seek to protect both the character and setting of such assets.</p>
<p>Add footnote stating where the HER can be accessed in paragraph 9.148 for clarification.</p>	<p>The HER can be accessed online at The Heritage Gateway <a href="http://www.heritagegateway.org.uk/gateway">http://www.heritagegateway.org.uk/gateway</a></p>

Add addition text to paragraph 9.149 to clarify that that works to Scheduled Monuments require Scheduled monument Consent.	Paragraph 9.149, add new sentence after 2 <sup>nd</sup> sentence: <b>Any work to a scheduled monument requires Scheduled Monument Consent, applications should be made to Historic England.</b>
Add additional text to paragraph 9.154 to explain the importance of setting.	Paragraph 9.154, add new first sentence:

<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
National Trust	28258		√	√	Historic England	2836			√
M Thorne	3888	√							

## Policy EV11: Protection and Enhancement of Landscape Character

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
Support	
Housing allocations within Jacksdale have been focused on infill development within the settlement and will not lead to the coalescence of settlements across the boundary into Derbyshire. This is important in maintaining the character of	Support acknowledged.



<p>the coalfield landscape where a nucleated settlement pattern is a key characteristic that would help to retain the individual identity of each village. This approach is supported and welcomed.</p>	
<p>Natural England wants to see the character of all landscapes conserved and enhanced, therefore we welcome Policy EV11.</p> <p>The Local Plan should consider defining “valued landscapes” (NPPF Para 109) (apart from those that are protected through designation) and include policies for the protection and enhancement of their intrinsic qualities such as; historic landscapes, natural beauty and amenity, wildlife and cultural heritage.</p> <p>It is not our role to define what locally valued landscapes are - this is for Local Planning Authorities and their communities. However, Natural England considers World Heritage Sites designated for their natural interest, local landscape designations and Inheritance Tax Exempt land to be locally valued. For more information see: PPG Historic Environment - World Heritage Sites.</p> <p>A landscape character approach, based on an up-to-date Landscape Character Assessment coupled with techniques such as Landscape and Visual Impact Assessment (LVIA) provides a robust basis for defining issues and responding to them and for assessing proposed development.</p>	<p>Supported acknowledged.</p> <p>Criteria 2. a) of Policy EV11 states that ‘.....development proposals should demonstrate that their location, scale, design and materials will protect, conserve and where possible, enhance the special qualities and local distinctiveness of the area (including its historical, geological, biological and cultural character). The Local Plan has to be read as a whole, rather than as a series of individual policies, to understand all the policies and guidance which will apply to any proposal. Policy EV10 – The Historic Environment seeks to protect Registered and Unregistered Parks and Gardens, landscape features as defined in the Landscape Character Assessment (2009)...’.</p> <p>Policy EV4 – Green Infrastructure, Biodiversity and Geodiversity seeks to conserve and enhance Green Infrastructure and protect important wildlife sites such as Sites of Special Scientific Interest and Local Nature Reserves. As such it is not considered necessary to specifically define ‘valued landscapes’.</p> <p>Comments noted.</p> <p>The Landscape Character Assessment for Ashfield covers all countryside areas which lies outside the Main Urban Area and Named Settlements and it provides a starting point to assess proposed development.</p>

<b>Object</b>	
-	-
<b>Comment</b>	
Policy EV11 forms the overarching framework for all the preceding environmental policies in the Plan. In view of this, it should be referenced earlier. Nevertheless, the policy wording is robust and covers many attributes of landscape character such as settlement gaps, the setting of settlements, and visually sensitive skylines.	As the policies in the plan are to be read as a whole it is considered that there is not a specific issue with the Policy numbering.
Policy EV11 seeks to protect historic landscape features including ponds , trees , ridge and furrow patterns, meadows and orchards, as these all add value to the character of the area and help to make Ashfield's landscape distinctive'. Policy EV11 – page 158 - no comments	Noted.
Policy EV11 2e) has the Council a register of "visually sensitive skylines, ridgelines, hillsides, valley sides and geological features". Could this register please be forwarded to ACCESS along with the definitions of the terms, and be considered to be placed on the Council website. If this register is not available can a deadline be established for the generation of the same?	The Council does not have a register. Landscape assessment have been undertaken by the Council's landscape architects of housing allocations. The Policy applied to planning applications where, in appropriate circumstances, landscape assessments will be required.
<b>Responses received relating to Policy supporting text</b>	
Paragraph 9.165 – Page 159 – Re write to read 'Each of these areas has been further sub-divided into component landscape character areas known as Policy Zones' rather than 'Draft Policy Zones'	The Greater Nottingham Landscape Character Assessment 2009 identifies in its text Draft Policy Zones (DPZ). Consequently the text in the exiting paragraph reflects the evidence base. No change proposed.

## Proposed Amendments

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<b>Issue/Policy</b>	<b>Amendment</b>
None	No proposed amendments

<b>List of Respondents</b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Derbyshire County Council	2637		√	√	Natural England	3185		√	
Nottinghamshire County Council	2803			√	Annesley Community Committed to Ensuring Sustainable Settlements (ACCESS)	5359			√
National Trust	2828		√						

## Providing Jobs

### Policy PJ1: Business and Economic Development

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
-	-
<b>Object</b>	

<p>When our client reads the more detailed policies and how they would apply to the land use needs of the Nursing Home and area, they are of the view that para 4.16 et seq conflict with Policy S3 which appears to says such a site has to be allocated.</p> <p>Para 4.58 needs to be more precise and include the ability for existing facilities to expand. For example, a decision might also need to take account of PJ1 and PJ2. These appear to say that proposals such as those intended at Wren Hall will be allowed in Green Belt if it is expansion in situ and even if not allocated. If that is the case then it is suggested that the last sentence to be explicit.</p> <p>Our client notes the important and rational para 13.25 on Care Homes and the value of outlook. Expansion of Care Homes must be encouraged in the policies in ways which allow them to be built with more generous use of land. A specific allocation seems the best way to ensure that and our client asks for this allocation of Wren Hall.</p> <p>Our client considers the PJ policies leave Plan users without a clear view as to what is intended and how applications will be judged. A rewrite and allocation are sought.</p>	<p>Paragraph 4.16 to 4.19 set out the Council's position on residential care homes. It identifies that the evidence indicates an over-provision in Ashfield and it sets out that it is anticipated that care homes could come forward on housing allocations. The Council does not see any conflict with para 4.58 under Policy S1.</p> <p>National planning policy gives a clear emphasis to the protection of the Green Belt. NPPF para 87 to 90 identifies that inappropriate development is, by definition, harmful to the Green Belt. The paragraphs identify exceptions to this. Consequently, this would be the Policy starting point for development in the Green Belt. Under these circumstances it is not considered that there is any conflict with the employment related policies in PHJ1 and PJ2.</p> <p>Paragraph 13.25 sets out what is anticipated from developments for care homes in relation to the amenity policy.</p> <p>The Council has no issue with Policy PJ1 and PJ2 and the supporting paragraphs.</p>
<b>Comment</b>	
-	
<b>Responses received relating to Policy supporting text</b>	
-	

### Proposed Amendments

Issue/Policy	Amendment
No changes proposed from the consultation.	-

<u>List of Respondents</u>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
England Lyle Good & Dr Bell	6630	√							

### Policy PJ2: Business and Employment Sites

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
Support	
-	-
Object	
When our client reads the more detailed policies and how they would apply to the land use needs of the Nursing Home and area, they are of the view that para 4.16 et seq conflict with Policy S3 which appears to says such a site has to be allocated.	Paragraph 4.16 to 4.19 set out the Council's position on residential care homes. It identifies that the evidence indicates an over-provision in Ashfield and it sets out that it is anticipated that care homes could come forward on housing allocations The Council does not see not see any conflict with para 4.58

<p>Para 4.58 needs to be more precise and include the ability for existing facilities to expand. For example, a decision might also need to take account of PJ1 and PJ2. These appear to say that proposals such as those intended at Wren Hall will be allowed in Green Belt if it is expansion in situ and even if not allocated. If that is the case then it is suggested that the last sentence to be explicit.</p> <p>Our client notes the important and rational para 13.25 on Care Homes and the value of outlook. Expansion of Care Homes must be encouraged in the policies in ways which allow them to be built with more generous use of land. A specific allocation seems the best way to ensure that and our client asks for this allocation of Wren Hall.</p> <p>Our client considers the PJ policies leave Plan users without a clear view as to what is intended and how applications will be judged. A rewrite and allocation are sought.</p>	<p>under Policy S1.</p> <p>National planning policy gives a clear emphasis to the protection of the Green Belt. NPPF para 87 to 90 identifies that inappropriate development is, by definition, harmful to the Green Belt. The paragraphs identify exceptions to this. Consequently, this would be the Policy starting point for development in the Green Belt. Under these circumstances it is not consider that there is any conflict with the employment related policies in PHJ1 and PJ2.</p> <p>Paragraph 13.25 sets out what is anticipated from developments for care homes in relation to the amenity policy.</p> <p>The Council has no issue with Policy PJ1 and PJ2 and the supporting paragraphs.</p>
<b>Comment</b>	
-	-
<b>Responses received relating to Policy supporting text</b>	
-	-

### Proposed Amendments

Issue/Policy	Amendment
No changes proposed from the consultation.	-
<b>Proposed Officer Amenments</b>	
Move Paragraphs 10.13 to 10.16 with minor amendments from	Moved to Policy SD5: Viability

Policy PJ3 to SD5. Additional paragraph to refer to Demand and Viability Tests under Policy SD5.	
Amend paragraph 10.12 to reflect that loss of employment sites Demand Test and Viability Test is linked to Policy SD5: Viability.	Paragraph 10.12 amend Where economic circumstances change, the policy allows for changes to other uses in specific circumstances which are usually reflected in a lack of demand for the site in question. In these circumstances, the Council will require the developer to satisfy one or more of the following tests <b>Demand Test and Viability Test, set out under Policy SD5: Viability</b> , dependent on the nature of the site.

<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
England Lyle Good & Dr Bell	6630	√							

### Policy PJ3: Rural Business Development

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
Support	
Support for Policy PJ3 recognising the need for tourism development to safeguard landscape and heritage assets. However, it is considered this should also include ecologically	Proposed to amend the Policy to include "ecologically sensitive areas."

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sensitive assets.	
<b>Object</b>	
-	-
<b>Comment</b>	
Support for the Policy if the second sentence of Section 1 reads, “.... the following business development <u>will</u> be acceptable”.	The Local Plan emphasises that all policies are interdependent and must be read together in relation to their combined effect upon development proposals. Under these circumstances it is considered appropriate to amend the Policy in accordance with the proposal.
<b>Responses received relating to Policy supporting text</b>	
Paragraph 10.36. Support for this paragraph in what it says about car travel and broadband improvement.	Support acknowledged.

**Proposed Amendments**

<b>Issue/Policy</b>	<b>Amendment</b>
Policy PJ3 1. Amend the Policy reflecting comment made.	Amend the Policy to “The Council will support measures which promote an integrated and flexible approach to sustainable business development within rural settlements. In principle, the following business development <del>may</del> <b>will</b> be acceptable:”
Policy PL3 2. Amend the Policy reflecting comment made.	Amend the Policy “ Safeguarding key landscape, <b>ecologically sensitive areas</b> and heritage assets;”

<b><u>List of Respondents</u></b>									
<b>Respondent</b>	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	<b>Respondent</b>	Database Number	Object to the Policy	Support the Policy	Comment on the Policy



National Farmers' Union	1929			√	Natural England	3185		√	
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## Policy PJ4: Agricultural, Forestry or Horticultural Development, and Farm Diversification

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
We are pleased Policy PJ4 requires development in the countryside to minimise any adverse effect on the local environment.	Comment noted.
<b>Object</b>	
-	
<b>Comment</b>	
<b>Responses received relating to Policy supporting text</b>	
Paragraph 10.49. Support for the Council's wording on farm shops.	Support acknowledged.
Page 173, paragraph 10.51 - Query on the sentence of "the Environment Agency identify that one of the four issues is diffuse pollution from agriculture. Also, if it is a low percentage then what is the problem, so it does need to be qualified?"	Amend the paragraph to reflect comments that it is necessary to qualify the issue.

### Proposed Amendments

Issue/Policy	Amendment
Paragraph 10.51 amend paragraph to reflect source of	The Water Framework Directive requires all water bodies to

information on agricultural pollution.	<p>achieve good ecological status by 2027. In the Midlands, the Environment Agency identifies that one of four issues of concern is diffuse pollution from agriculture. Diffuse pollution of water (DPW) arises from numerous pollution sources including agriculture. Agriculture produces four distinct types of pollution, fertilizer, pesticides, sediment and faecal bacteria. These four types of agricultural pollutants contribute 50-60% of nitrates, 20-30% of phosphates and 75% of sediment in England's waterways. They are also a source of faecal and other bacteria and pesticides. DPW from agriculture and rural land use is directly attributed to 28% of failures to meet Water Framework Directive standards<sup>3</sup>."</p> <p>Such pollution on a catchment scale can be significant in terms of the cumulative effect it has on the environment. Consequently, the storage and handling of livestock slurries and manures and other potential pollutants is important in relation to water quality.</p> <p>Source: Houses of Parliament Parliamentary Office of Science &amp; Technology Post note No 478 Oct 2014 Diffuse Pollution of Water by Agriculture.</p>
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<b>List of Respondents</b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy

<sup>3</sup> Source: Houses of Parliament Parliamentary Office of Science & Technology Post note No 478 Oct 2014 Diffuse Pollution of Water by Agriculture.

National Farmers' Union	1929			√	Natural England	3185		√	
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## Policy PJ5: Education, Skills and Training

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
-	-
<b>Object</b>	
-	-
<b>Comment</b>	
Identified that young people need to take personal responsibility for their discipline.	Comment acknowledged.
Primary- Nottinghamshire has seen an increase in birth rates across the county since 2007. This is reflected in the overall school population but is particularly well illustrated in the numbers of primary age children. There are areas in Ashfield e.g. Kirkby, Hucknall and Sutton that have already been identified as a potential 'hot spots' where demand for school places was predicted to exceed supply. Therefore as part of the basic need programme 1155 additional school places will have been provided in the Ashfield district by September 2016. A consequence of this is that many schools in the Ashfield district have been expanded to their site capacity and therefore cannot be expanded any further to accommodate children	Comments acknowledged. There are on-going discussions with the County Council as the Education Authority regarding the requirements of specific schools in relation to new development. However, all infrastructure requirements have to be seen in the context of viability. The NPPF in paragraph 173 identifies that 'the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal

<p>generated from future housing developments. It also assumes that for all of the proposed developments the County Council will be requesting and will receive 100% of section 106 contributions requested for education in order to carry out the necessary work to adapt and extend school buildings.</p> <p>Secondary - Working on the existing population forecasts secondary schools in Ashfield are at capacity from the 2020/21 academic year. We will therefore be seeking a secondary education contribution on housing sites that apply for planning permission during the current 10 year pupil projection period. We are currently embarking upon a round of meetings with all secondary Head Teachers and Heads of Academy Trusts in the county to find out what their plans are for the future.</p>	<p>cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.'</p>
<b>Responses received relating to Policy supporting text</b>	
-	-

### Proposed Amendments

Issue/Policy	Amendment
No changes proposed from the consultation.	-

<u>List of Respondents</u>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Nottinghamshire County Council	2803			√	Drew	6732			√

## Shopping

### Policy SH1: Retail, leisure and commercial and town centre uses

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Support for the general direction of the Local Plan but wish to make comment on a number of policies.	Support acknowledged.
Kirkby Town Centre Boundary – The inclusion of the Aldi Store within the town centre boundary is supported.	The Council welcomes support for the proposed town centre boundary for Kirkby in Ashfield.
Support for the Council's intention to update the Retail Study.	Support acknowledged.
Support for the Council's aspiration to direct future investment towards defined centres, in particular Sutton in Ashfield.	Support acknowledged.
Support for the locally set threshold figures for impact assessments.	Support acknowledged.
Support for the inclusion of the Sequential test which is considered to accord with the NPPF.	Support acknowledged.
Support for Policy SH1 in seeking to maintain a level of A1 retail floorspace within the Primary Shopping Area but assessing any loss through consideration of whether the change of use would harm or contribute towards the vitality and viability of the centre. This is a successful approach taken forward by many local authorities as it accords with the	The Council welcomes support for Policy SH1 and the approach taken to maintaining a level of A1 retail floorspace within the PSA.

requirements of national guidance.	
A relaxation of policy to allow more diverse uses is supported as this approach accords with the NPPF.	Support acknowledged.
<b>Object</b>	
A threshold of 500 sqm floorspace for retail impact assessments is too high. Strongly recommend that the Council undertake a robust assessment of where the current balance of unit sizes lies in each town centre and local centre. Suitable thresholds can then be set.	The Retail and Leisure Study will inform any changes with regard to thresholds.
<b>Comment</b>	
Aldi Stores is designed to serve a local catchment and offer many benefits in terms of choice and competition. Each Aldi store provides local job opportunities alongside expenditure which benefits existing retailers through linked trips.	Comments acknowledged.
Draft Policy SH1 looks to adopt thresholds for retail impact using the recommendations of the 2011 Ashfield Retail Study (500m for Sutton, and 300m for Kirkby and Hucknall). The justification for the thresholds is questioned because it is out of date (based on national policy which predates the NPPF). NPPF practice guidance is important because it provides guidance on how LPAs should generate a local threshold to assess retail impact.	The emerging 2016 Retail and Leisure Study will provide an update in relation to retail impact thresholds. The study, which accords with the NPPF and Planning Practice Guidance, will be used to inform the revision of Policy SH1 in relation to Retail Impact thresholds.
The wording of paragraph 11.11 of Draft Policy SH1 is noted. The paragraph enables the Council to request a retail impact assessment for any uplift in floorspace, below a justified retail impact threshold is considered necessary, as the principle of retail use has already been established. In many cases, extensions or an uplift in floorspace is to enable an existing	The Council considers that there may be some instances where it is necessary to consider both the existing and additional floorspace of retail units when extensions are proposed, particularly if the resultant development would be of a scale which has the potential to impact on town centres. Each case would be considered on its own merits.

<p>store to trade more efficiently.</p> <p>In light of the above, we encourage the Council to review the context and proposed levels of threshold set to ensure that sustainable development is achieved.</p>	<p>This approach accords with national guidance which seeks a flexible approach. As identified in paragraph 15 of planning practice guidance, the impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible.</p>
<p>Aldi wish to remain fully involved at every stage of the preparation of the Council's emerging Local Plan.</p>	<p>Comments noted. Notifications of future consultations on the Local Plan will be given in due course.</p>
<p>Response submitted on behalf of Ellandi LLP who manage the Idlewells Shopping Centre in Sutton in Ashfield. The response provides observations in connection with the Ashfield Local Plan.</p> <p>Ellandi's approach is to proactively transform the towns in which it invests by working with other stakeholders to ensure shopping centres perform successfully. The result has a positive effect on the vitality and viability of town centres.</p> <p>The Ellandi Community Shopping Centre Initiative is truly community orientated – it aims to put town centres at the heart of local communities by investing in centres (both intellectually and financially). It believes that shopping centres have a major role to play in regenerating town centres and recognises that the planning system has a fundamental role to play in supporting their objectives. As such, Ellandi welcomes the opportunity to engage with the preparation of the Local Plan.</p>	<p>Comments noted. The Council welcomes Ellandi's engagement with Local Plan preparation.</p>
<p>Any identified retail and leisure needs from the emerging Retail Study should be included in the Local Plan along with a strategy on the phased delivery on sustainable town centre sites.</p>	<p>Comments noted. Policies will be updated as necessary following the completion of the Retail and Leisure Study.</p>

Longer term capacity for retail floorspace should be treated with caution because it may be subject to change due to the innovative nature of the retail sector and associated consumer behaviour.	The Council will continue to monitor and review retail policy/requirements. Any necessary amendments will be undertaken through the Local Plan Review process.
Sites should be allocated in accordance with national policy, in particular the sequential approach and impact assessment, and should be subject to a phased delivery. Any out of centre sites allocated for retail should be identified as reserve sites that might deliver retail development towards the end of the plan period, subject to regular plan led updates of capacity forecasts. This would accord with the town centre first requirement of the NPPF.	Sites have been allocated in accordance with national policy. It is not considered necessary to allocate reserve sites in out of centre locations.
Effective policies are required for development management purposes. Policies should not be just cut and pasted from the NPPF e.g. the sequential approach and impact test; the Council should consider where and when need/capacity is likely to arise.	The Council has identified locations for retail growth and has set the threshold for retail impact assessments. This approach accords with national policy.
It would be beneficial to define what the Council considers to be the appropriate scale and form of development for each town centre. This will need to be informed by updated retail assessment work. New retailing should be generally phased in line with housing growth. This will enable figures to be set for each centre.	Town Centre hierarchy has been defined in Policy S3. The 2016 Retail and Leisure Study has been taken into account when making any necessary amendments to retail and leisure policies. Whilst the Local Plan provides policies which support the regeneration of each town centre, the town centre masterplans and associated strategies provide the framework for future growth.
Impact assessments should also be applicable to changes of use, section 73 applications and variations to s106 agreements which may seek amendments to existing permissions.	Each application would be considered on its own merits. Where an application has the potential to have an adverse effect on the viability of the town centre a retail impact assessment would be requested.
Wording in relation to the 'sequential test' should be amended	Agree. Include additional text in point 3 of Policy SH1 to read as



to state that the local authority 'requires' new retail, leisure and office development to be located in town centres first and only where no suitable and available sites exist will alternative locations be considered in accordance with the sequential approach.	follows: 'The Council requires main town centre uses, including retail, leisure and offices, to be located in town centres first and only where no suitable and available sites exist will alternative locations be considered'.
It would be helpful to emphasise that it will be for the applicant to demonstrate through robust evidence that there are no sequentially preferable suitable sites available.	Agree. Include in point 3 of Policy SH1 'the applicant would need to demonstrate through robust evidence that there are no sequentially preferable sites available'.
The applicant should need to demonstrate that a proposal accords with the phased delivery requirements of the Local Plan e.g. is there plan led capacity at the time proposed?	Disagree. The Council does not intend to adopt a phased approach to town centre development as it is not considered necessary.
Policy SH1 should specifically state that where an application is likely to have significant adverse impact on the vitality and viability of one of the District's town centres it will be refused.	Agree. Additional text will be included in Policy SH1 as follows: 'Where an application fails to demonstrate that the sequential test has been satisfied, or where it will have an adverse impact on a town centre or local centre, it will be refused.
Policy SH1 para 2,b) - please consider adding after local shopping centres following words "or out-of-town and local shopping parades since these provide vital services within the smaller communities and reduce the amount of congestion on the roads". Protects both town centre and out of town centre shopping complexes.	No changes are proposed. The Policy set out that an Impact Test will be required by any development for out of centre locations above a specified size of development which will also include local shopping parades.
<b>Responses received relating to Policy supporting text</b>	
-	-

## Proposed Amendments

Issue/Policy	Amendment
Retail Impact Assessment thresholds will need to be updated once the Ashfield Retail and Leisure Study is complete.	Policy SH1 will be updated as necessary.
<p>The Council needs to ensure that the policy clearly reflects the 'Town centre first' approach in national planning policy.</p> <p>Clarity is needed with regard to the outcome of a Sequential Test or Impact Assessment. The Policy should state the consequences of the failure to meet these requirements.</p>	<p>Include revised text in point 3 of Policy SH1 to read as follows:</p> <p><b>Sequential Test</b></p> <p><b><del>3. A sequential test should be undertaken for retail, leisure and office proposals not located within a designated Town Centre. The Council will give preference to development located within the Primary Shopping Areas. Edge of centre locations which are within easy walking distance of the Primary Shopping Area will be favoured where sites in Primary Shopping Areas are unavailable. Where development is proposed to be located in an edge of centre location, the Council will seek to ensure that it is of an appropriate scale and linkages between the Primary Shopping Area and the development are improved where necessary. Where suitable locations cannot be identified within Primary Shopping Areas or on the edge of centres, the Council will seek to ensure that sites are as close as possible to Primary Shopping Areas and are well served by public transport</del></b></p> <p><b>The Council requires main town centre uses, including retail, leisure and offices, to be located within a designated town centre. Only where no suitable and available sites exist, will alternative locations be considered, taking into account proximity and access to Primary Shopping Areas. In order to demonstrate no other suitable sites within, or close to, the</b></p>

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	town centre are available or suitable, all proposals for town centre uses falling outside a designated town centre must undertake a sequential test. Where an application fails to demonstrate that the sequential test has been satisfied, or where it will have an adverse impact on a town centre or local centre, it will be refused.
Paragraph 11.11 (now paragraph 10.11) indicates that the whole floorspace will be taken into account when determining if an impact assessment is required in relation to extensions to existing stores.	Include additional text in paragraph 10.11 to read as follows: <b>The scope of retail impact assessments should be discussed with the Council at an early stage.</b> Where proposals seek to extend existing premises, <b>where necessary</b> , the total gross floorspace of the proposed development (including extension) will be taken into account when determining whether an impact assessment is required. <b>This will depend on the nature and scale of the proposal.</b>
Update retail and leisure needs following completion of the Retail and Leisure Study.	Update Policies relating to retail and leisure need as necessary.

<b><u>List of Respondents</u></b>									
<b>Respondent</b>	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	<b>Respondent</b>	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Annesley Community Committed to Ensuring Sustainable Settlements (ACCESS)	5359			√	Savills on behalf of Ellandi LLP	6692	√	√	√
Planning Potential on behalf of Aldi Stores Ltd	5368		√	√					

## Policy SH2: Local Shopping Centres, Shopping Parades and Single Shops

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
<b>Support</b>	
None	-
<b>Object</b>	
None	-
<b>Comments</b>	
None	-
Responses received relating to Policy supporting text	
None	-

### Proposed Amendments

Issue/Policy	Amendment/Development Brief Requirement
None	-

<u>List of Respondents</u>					<u>List of Respondents</u>				
Respondent	Database Number	Object to the	Support the	Comment on the	Respondent	Database Number	Object to the	Support the	Comment on the

		Policy	Policy	Policy			Policy	Policy	Policy

### Policy SH3: Food Drink and the Evening Economy

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support and comment</b>	
<p>Being overweight or obese (excess weight) is a major public health concern for Nottinghamshire. The number of children who are overweight or obese is expected to increase by 5% between 2015-2019 and in adults by 4% over the same period. Morbid obesity in adults is expected to increase by 16% during this same period.</p> <p>Food environments relate to the availability of food choices in an area which can influence the type of food and energy intake an individual can access. Studies suggest that obesity is more prevalent in areas where access to healthy food sources is limited or considered expensive. Exposure to takeaway food outlets in home, work, and commuting environments combined was associated with marginally higher consumption of takeaway food, greater body mass index, and greater odds of obesity.</p> <p>The Council may wish to also consider planning approaches in relation to hot food takeaways:</p>	<p>The NPPF identifies that local planning authorities (LPAs) have a responsibility to promote healthy communities. It also provides clear advice that local planning authorities should work with public health leads and organisations to understand and take account of the health status and needs of the local population... including expected changes, and any information about relevant barriers to improving health and wellbeing". The National Planning Practice Guidance (NPPG)* refers to promoting access to healthier food.</p> <p>The Report "Obesity and the environment: regulating the growth of fast food outlets" 2014 identified that a number of authorities have had planning decisions challenged through the appeals process in relation to fast food outlet near schools. Some appeals have been allowed, but many have been dismissed.</p>

<ul style="list-style-type: none"> <li>• <b>Concentration and clustering/vitality and viability</b> – limiting the number of A5 units next to one another; ensuring the number does not exceed a defined percentage of units or floor space in a primary shopping area/frontage; permission is granted where it will not result in overconcentration to the detriment of the retail function and restrictions where granting would prejudice the vitality and, or viability of a retail area. From a health perspective this will reduce unhealthy options and poor nutritional choice available.</li> <li>• <b>Hours of operation</b> –planning conditions restrict the opening hours of the premises depending upon location and proximity to residential properties. This will also address crime and anti-social behaviour.</li> <li>• <b>Healthy eating options</b> – encouraging the provision of healthy food options and improve the nutritional value of the menu (promoting sign up to the Nottinghamshire Healthy Options Takeaway scheme).</li> </ul> <p>The ‘Tipping the scales’ document, published in January 2016, may be useful.</p>	<p>The Council recognises that overweight or obesity is a major health issue and this is reflected in the Policy SH3 with its limitation of hot food takeaways with 400m of schools. The Council proposes to amend the policy to further justify the approach taken.</p> <p>Policies HA1 and SKA1 identify Primary Shopping Areas and primary and secondary shopping frontages which is aimed at guiding the type of development which will be supported by the Council. This approach will assist in managing clustering of A5 units.</p> <p>With regard to the hours of operation, this would be dealt with through liaison with the Council’s Environmental Health officers as part of the development management process on a case by case basis.</p> <p>The Council’s Environmental Health team is working with and encouraging businesses to provide healthier food options on their menus and help customers manage their weight.</p> <p>The Council has introduced a Healthier Options Takeaway (HOT) Merit Award Scheme, where take-aways with a hygiene rating of three or above can apply for a Merit award.</p> <p>There are currently thirty businesses that hold the HOT award in the District.</p>
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Responses received relating to Policy supporting text	
None	-

### Proposed Amendments

Issue/Policy	Amendment/Development Brief Requirement
Policy SH3 Hot Food	<p>Amend text in point 4 of Policy SH3: Hot food Takeaways within 400m of a schools, college or youth facilities will not <b>be supported</b> <del>permitted where they are likely to contribute to diets harmful to health or the promotion of unhealthy lifestyles.</del></p> <p>Amend supporting text in paragraph 11.26 to read as follows: Hot food takeaway outlets enable residents to access a range of prepared convenience food for the enjoyment and consumption. However, a large proportion of the food available through these outlets are often high in fat, salt and/or sugar. It is becoming widely <b>recognised</b> <del>acknowledged</del> that regular consumption of such food can lead to long term health issues. <b>Annual health profiles for Ashfield, produced by the Department for Health, indicate that obesity rates for Year 6 children (aged 10 - 11) have increased from 18.8% in 2012-2013 to 20.1% in 2015.</b> Consequently, the Council believes it is important to restrict the presence of these outlets where young people and children gather. As such the Council will not support a development proposal of a hot food takeaway (Use Class A5) within 400 metres of the primary entrance to a school, college or youth centre.</p>

<u>List of Respondents</u>					<u>List of Respondents</u>				
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Nottinghamshire County Council	2803								

## Policy SH4: Shopfronts

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
Support	
-	-
Object	
-	-
Comment	
Historic England - Policy SH4 is very welcome. With regard to shop signage (para. 7), it would be much clearer to refer to the fascia, rather than the 'strip' as this could mean any part of the elevation underneath the first floor window, unless of course you wish to accept large signs that extend between the actual shopfront and the window cill above, which could be quite overbearing.	<p>The Council acknowledges this comment and will revise the policy accordingly.</p> <p>Proposed amendments to policy SH4 is detailed below.</p>



<p>Consider Policy SH4 needs amendment:</p> <p>Are points 6 (2<sup>nd</sup> sentence) &amp; 7 required? They overlap, repeat and partly contradict Policy SD11 &amp; supporting text. We consider these points should be deleted. Consequent amendments will be needed to paragraphs 11.39, 11.39 and 11.40-11.41. If some of the advice is retained, it should be moved to SD11 and cross referenced in SH4.</p> <p>If advice is moved or retained, the following needs attention: SH4(6) &amp; para 11.38 – reference to internally illuminated box <i>signs</i> (not ‘lights’) in SH4 (6) is not fully in accordance with para 11.38. The objection is to ‘bulky’ box signs, as in paragraph 11.38; and we consider that this word should also appear in SH4 (6). To make the point clear, we suggest after “...<i>projecting signs</i>’, be inserted “<i>crudely attached over an existing fascia</i>”</p> <p>Para 11.41 – may not be possible for an advertisement’s frame to fit flush to the shopfront, particularly where underlying structure lies cross the shopfront. This is often the case with modern buildings. We suggest that ‘<i>wherever possible</i>’ be inserted at the beginning of this sentence.</p>	<p>The Council acknowledges that there is an element of cross over between Policies SH4 and SD11.</p> <p>The Council wishes to ensure shop signage is considered from the outset of a shop front design, as such reference to key elements of it will be retained within SH4, with direct reference to policy SD11.</p> <p>Shop front lighting can be included within a signage system, but it can also form part of a shop front design separate from the signage. As such, the Council believes reference and guidance should also be retained in policy SH4.</p> <p>Proposed amendments to policy SH4 and SD11 are detailed below, taking into account the comments submitted.</p>
<p><b>Responses received relating to Policy supporting text</b></p>	
<p>-</p>	

### Proposed Amendments

Issue/Policy	Amendment
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<p>Amendments to Policy SH4, criteria 6 and 7, related to the comments detailed above regarding cross reference to policy SD11.</p>	<p><b>6. Illumination to shopfronts must be sited and designed so as not to <b>negatively impact on the street scene</b> or cause visual intrusion from light pollution into adjoining or nearby residential properties. Flashing internal or external lighting, and/or internally illuminated box <b>signs</b> lights will not normally be permitted.</b></p> <p><b>7. <del>Shop signage should generally be limited to the strip above the main shopfront and below the first floor, where it does not have an overbearing effect on the building or the street scene.</del> Shop signage should form an integral part of a shop front design, but it must not have an overbearing effect on the building or the surrounding street scene. Signage should generally be limited to appropriately designed and located fascia boards and/or projecting signs. Further guidance is detailed within policy SD11.</b></p>
<p>Paragraphs 11.38, 11.40 &amp; 11.41</p>	<p><b>Illumination</b></p> <p><b>11.38 As with any part of a shop front, lighting must be appropriate designed into a shop front and not considered as an afterthought.</b> A well-lit window display or simply lit fascia sign is an effective method of advertising and can make a positive contribution to the street at night, and aid security. However, <b>illumination that dominates a building and/or negatively impacts on the surrounding street scene, such as bulky illuminated box</b></p>

	<p>fascias or projecting signs, <del>will not be supported.</del> are likely to <del>over dominate a shop front, and therefore should be avoided.</del> In assessing possible negative impacts, the Council will consider the potential cumulative impacts that may arise as a result of the proposal.</p> <p><b>Signage</b></p> <p>11.40 Shop front signage plays an important role in advertising the business within a property and contributing to the street scene of its surroundings. In designing and locating shop front signage, proposals must successful balance these aspects. The Council acknowledges that businesses require signage, but this must not be to the detriment of the surrounding street scene or other uses. Further guidance on signage is detailed within Policy SD11. In the future, this may be supplemented by supplementary planning guidance. <del>Poorly sited or badly designed shop signs, including projecting signs and illumination, can have a detrimental effect on the character and appearance of areas and may raise issues of public safety.</del> <b>Text moved to SD11</b></p> <p><del>11.41 Signage should not dominate the street scene in terms of size, scale, lighting and positioning. The frame should fit flush with the shop front fascia, be positioned below the first floor and blend with the overall colour scheme. See also Policy SD10 –</del></p>
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	<del>Advertisements.</del> <b>Text moved to SD11</b>
<b>Officer Comments</b>	
Paragraph 11.31 – need to reference Policy EV10: The Historic Environment, to ensure that shopfronts of architectural or historical value are considered appropriately.	Add at the end of paragraph 11.31: <b>Where shopfronts are part of, or affect, a heritage asset, Policy EV10 is applicable.</b>

<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Historic England	2836			√	C Thomas Ltd	6521			√

## Policy HG1: Provision for Gypsies, Travellers and Travelling Showpeople

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Environment Agency support the policy and welcome the inclusion of flood risk at point (G).	Support noted.
<b>Object</b>	
None.	-

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<b>Comment</b>	
None.	-
<b>Responses received relating to Policy supporting text</b>	
None.	-

**Proposed Amendments**

<b>Issue/Policy</b>	<b>Amendment</b>
No changes proposed from the consultation.	-

**List of Respondents**

<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Environment Agency	1870		√						

**Policy HG2: Affordable Housing (including Starter Homes)**

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
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Responses received relating to the Policy	
<b>Support</b>	
We support the intent and content of Policy HG2 which imposes a realistic requirement for 10% affordable units on sites of 15 or more dwellings in the Kirkby area and would confirm the landowner's intent to comply with this in the event that KA03 Site 5 is allocated as requested.	Support noted.
<b>Object</b>	
Affordable housing needs to take into account the viability of new development. Proposed amendments to the Policy:  "2. Affordable housing should be provided to the appropriate proportion of total housing units in proposed new residential development as set out below, <b><i>unless it can be demonstrated that such provision undermines the viability and deliverability of the scheme.</i></b> "	The Local Plan should be read as a whole rather than as isolated policies. It is considered that viability issues are covered by Policy SD5: Assessing Viability and in this context no changes are required.  The Council has commissioned an update of the Whole Plan Viability Assessment. Any issues raised as a result will be addressed at the Publication Stage of the Local Plan.
The threshold triggering a requirement for the provision of affordable housing should be set at no less than 10 or more homes. This would be in line with the Government's intended policy.  As drafted the policy applies to very small developments of only 4 units. This is an unnecessary burden on the developers of such schemes and likely to severely impact on deliverability and viability	Planning Practice Guidance was amended in May 2016 following the order of the Court of Appeal. Contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should now not be sought from small scale and self-build development. Small scale is identified as developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000 sq m.  <b>Amend Policy HG2 to reflect national guidance in respect of site size threshold.</b>
<b>Comment</b>	

Why has the percentage of affordable housing in Kirkby been cut from the Steering Group agreed 30% down to 10%? First time buyers in our District cannot afford much. Has the average earnings of Ashfield gone up from the £21,000pa previously quoted?

Under national planning policy (NPPF para 173) sites identified in the Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

The Affordable housing policy as drafted reflects the viability evidence from the Three Dragons viability study (2009) which was supported by the Local Plan and CIL Viability assessment in December 2013. The key findings of this study suggested a wide variation in the market and hence viability of delivering affordable housing across the District. This policy approach is locally distinctive and acknowledges the disparity across the District. It is considered to be more appropriate than a general policy applied to the administrative area of Ashfield. Additional viability work is being undertaken to determine whether the policy can be taken forward in its present form.

The policy will however be amended to reflect the order of the Court of Appeal (dated 13 May 2016), which gives legal effect to

The Council need to consider the viability and costs in plan-making and ensure that the recommended provision of affordable housing in Kirkby will not detrimentally impact upon the deliverability of associated infrastructure contributions or requirements, but instead enhance deliverability over the Plan period. It needs to satisfy NPPF paras 173 and 174.

the policy set out in the Written Ministerial Statement of 28 November 2014 and should be taken into account. These circumstances are that;

- contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm
- in designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. No affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development. This applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty

Since no part of the District falls within the above definition, the proposed threshold of 4 dwellings and above in the 'Rurals' area (Selston Parish) will be amended to a threshold of 11 and above.

**Proposed amendment detailed below.**



<p>We would welcome additional text to underline the form of housing required, i.e, social rent, affordable rent, intermediate or mix of tenure and seek a breakdown in the percentage required.</p>	<p>Part 3 of proposed policy HG2 requires developers to engage with the Council in order to determine the type, size and tenure mix which would be appropriate on a site. The Council considers that this presents a more appropriate approach which has the ability to deliver units taking account of both need and existing tenure mix in a specific area. This is supported by paragraphs 12.19 and 12.20. The former paragraph will be amended to provide more clarity as set out in the section below.</p> <p><b>No proposed amendments</b></p>
<p>It is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. Therefore it is necessary for any proposed affordable housing policy to be as flexible as possible. It is recommended that the wording “<b>subject to viability</b>” is inserted into policy HG2.</p>	<p>With regard to viability on any specific site, this issue is addressed in paragraph 2.18. Whilst it is acknowledged that market conditions can sometimes be challenging, the policy applies to the longer term and should make clear the stance of the Council which is based on up to date assessments of viability and need.</p> <p>Planning proposals are judged on their own merits, and should these particular policy requirements prove to be financially prohibitive to the delivery of a site for housing, then this will be a material consideration in the determination. It is therefore considered unnecessary to amend the wording of policy itself.</p> <p><b>No proposed amendments</b></p>
<p>The viability report 2013 is now dated. It is recommended that the Council undertakes a new Whole Plan Viability Assessment including the implications of the recently announced reductions in social housing rents on affordable</p>	<p>Agreed. The Council has commissioned an update of the Whole Plan Viability Assessment. Any issues raised as a result will be addressed at the Publication Stage of the Local Plan.</p>

housing transfer values and developer profits together with a full assessment of the costs associated with implementing the optional higher housing standards proposed under numerous policies.	
It is possible that as a consequence of the Housing & Planning Bill, policy HG2 may change before publication of the draft and/or pre-submission Local Plan. If so, the HBF may wish to submit further comments on any changes proposed by the Council.	<p>The Housing &amp; Planning Bill became the Housing and Planning Act 2016 in May. The Council is awaiting the publication of new regulations to inform revisions to policy HG2 in respect of Starter Homes.</p> <p>It is anticipated that the required changes will be included in the Local Plan Publication document which is scheduled for a further round of consultation in Autumn 2016.</p>
<b>Responses received relating to Policy supporting text</b>	
None	

### Proposed Amendments

<b>Issue/Policy</b>	<b>Amendment</b>
HG2 (2), Figure 1: Affordable Housing Requirement in Ashfield.	Amend the proposed threshold of 4 dwellings and above in the 'Rurals' area (Selston Parish) to a threshold of 11 and above.
Paragraph 12.17	Update to reflect most recent Viability Assessment.
<b>Proposed Officer Amendments</b>	
Paragraph 12.16	Text refers to outdated evidence base. Delete paragraph " <del>at a more local level.....less populated areas</del> "

**Ashfield District Council - Statement of Consultation**

Paragraph 12.19	Reword to improve clarity and reflect policy wording as follows:  “ <b>HG2:3</b> The overall <del>proportion, mix and threshold</del> <b>type, size and tenure mix</b> for affordable housing....”
Paragraph 12.19	Delete third bullet point - duplicates previous paragraph 12.18.  “ <del>the ability to deliver.....level of affordable housing</del> ”
HG2 and supporting text	Revise as necessary to reflect new regulations in respect of Starter Homes.

<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Barton Wilmore	2495			√	Bacon	6695	√		
Collins J	3034		√		Bidwells on behalf of David Wilson Homes (East Midlands)	6705			√
Green for HBF	6151			√	Madden R	6805			√
Taylor Wimpey UK Ltd	6644	√							

## Policy HG3: Public Open Space in New Residential Developments

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
<b>Support</b>	
General support for the policy.	Support acknowledged.
<b>Object</b>	
None	N/A
<b>Comment</b>	
Provision for open space is based on the Green Space Strategy 2008, Ashfield Green Infrastructure and Biodiversity Technical Paper 2013 and the Ashfield Playing Pitch Strategy 2013. Provisions should be based on more up to date assessments.	<p>The Green Space strategy is currently being updated and will be re-named the Public Open Space Strategy.</p> <p>The Ashfield Green Infrastructure and Biodiversity Technical Paper and the Ashfield Playing Pitch Strategy are being updated to support the Publication Local Plan.</p> <p><b>Update references to evidence base documents in Policy HG3 and supporting text.</b></p>
Policy should encourage a point at 'c' for improved access to open space.	<p>Comment noted.</p> <p><b>Proposed amendment detailed below.</b></p>
Responses received relating to Policy supporting text	

With regard to paragraph 12.29 It is Sport England's understanding that NPPF and government advice does not support the use of standards. Standards would not be supported by CIL S122 test or NPPF para 204 this reads through to policy HG3.	<p>Comment noted. Reference to 'local' standards will be deleted.</p> <p><b>Remove the word 'Local' from second sentence of paragraph 12.29.</b></p>
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### Proposed Amendments

Issue/Policy	Amendment
Paragraph 12.29	Remove the word ' <b>Local</b> ' from second sentence.
HG3, paragraphs 12.28-12.29	Update references to reflect most up-to-date evidence base documents in HG3 and supporting text.
HG3(c), bullet point 1	Add text "Improvement of existing open space provision/ <i>improved access to existing open space</i> , or..."
<b>Proposed Officer Amendments</b>	
HG3(c) additional bullet point	<p>New bullet point</p> <ul style="list-style-type: none"> <li><i>habitat/biodiversity schemes identified in the Biodiversity Opportunity Mapping Technical Paper</i></li> </ul>
The emerging Public Open Space Strategy identifies that participants generally travelled to facilities using vehicular transport and catchment areas were therefore less important. As such, the Council are proposing that in the future, football pitches and other outdoor sports facilities will be concentrated on one or two sites within each area (Hucknall, Kirkby, Rurals and Sutton) in order to provide better quality facilities which	<p>Add new paragraph after 12.30:</p> <p><i>In the future football pitches and other outdoor sports facilities will be concentrated on one or two sites within each area (Hucknall, Kirkby, Rurals and Sutton) in order to provide better quality facilities which where possible meet the relevant national</i></p>

where possible meet the relevant national governing body standards.	governing body standards.
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<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Barton Wilmore for Taylor Wimpey	2495			✓	Natural England	3185		✓	✓
Collins J	3034		✓		Sport England – Beard	5554			✓

## Policy HG4: Housing Mix

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Supports self-build / custom build in principle.	Support noted.
<b>Object</b>	
Policy HG4 sets out a number of requirements for new residential developments including that all developments will contain adequate internal living space in accordance with the Nationally Described Space Standard and that developments	The Council do not consider that Policy HG4 is over-prescriptive, but has been drafted to deliver a wide choice of high quality homes in order to create sustainable, inclusive and mixed communities in accordance with NPPF paragraph 50.

<p>of 10 or more dwellings will be expected to provide 10% of dwellings that are accessible or easily adaptable for occupation by the elderly or people with disabilities. A further proposed requirement is that the inclusion of self-build and custom-build properties on sites will be encouraged. It is considered that the Policy is overly prescriptive. However, it is accepted that opportunities for accessible or easily adaptable dwellings and opportunities for self-build and custom build properties could be accommodated on large strategic sites of over 500 dwellings.</p>	<p>The Council has commissioned an update of the Whole Plan Viability Assessment, which includes the impact of Policy HG4. Any issues raised as a result will be addressed at the Publication Stage of the Local Plan.</p> <p><b>No proposed amendment (subject to updated evidence).</b></p>
<p><b>Policy HG4 Bullet Point (5)</b> the Council proposes that the inclusion of self-build and / or custom build plots on sites will be encouraged. The HBF supports self-build/custom build in principle for its potential additional contribution to the overall housing supply where this is based on a positive policy approach by the Council to increase the total amount of new housing development and meet an identified and quantified self-build / custom build housing need. However the HBF is not supportive of a restrictive policy requirement approach for the inclusion of such housing on sites of a specific size. This approach provides no additionality to land supply but merely changes production from one to another type of builder. It is suggested that when encouraging self-build / custom build the Council gives consideration to the practicalities of implementing any such policy. Such considerations should consider the health &amp; safety implications, working hours, length of build programmes, etc. The Council should refer to the East Devon Inspector's Final Report which expresses reservations about the implementation difficulties associated</p>	<p>There is no requirement to increase the total amount of new housing development over and above the Objectively assessed Need (OAN) in order to accommodate self/custom build. Available evidence indicates a relatively low demand for self-build/custom build plots in Ashfield District. It is therefore not intended to allocate sites specifically for this purpose at this time. Allocated sites are based on those which have the capacity to deliver 10 or more dwellings. This does not preclude self-build/custom build schemes coming forward in appropriate locations in accordance with other Local Plan policies, or as part of an allocated site.</p> <p>The policy places no restriction for the inclusion of self/custom build on sites of a specific size as suggested.</p> <p>With reference to the cited case, East Devon's submitted policy required 10% of plots to be made available for sale to small builders or for self-build. The inspector did not believe that the planning system could make developers sell land to potential</p>

<p>with this sort of policy. Furthermore it is suggested that any policy to encourage self-build / custom build is subject to viability considerations, specific site circumstances and it is based on evidence of an identified demand for such housing.</p>	<p>rivals. The policy was subsequently amended to <i>encourage</i>, rather than <i>require</i> them to do so. The amended policy contained in the adopted East Devon Local Plan is comparable with Ashfield's proposed policy in this respect.</p> <p><b>No changes proposed.</b></p>
<p><b>Policy HG4 Bullet Point (2)</b> requires that all new residential development will contain adequate internal living space in accordance with the nationally described space standard. With particular reference to the nationally described space standard the NPPG (ID: 56-020) confirms "<i>where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies</i>". If the Council wishes to adopt this standard it should be justified by meeting the criteria set out in the NPPG including need, viability and impact on affordability. At this time the Council has not provided sufficient evidence to justify adoption of the nationally described space standard.</p>	<p>The nationally described space standard replaces the existing local standards set out in the Residential Design Guide SPD. Paragraph 12.40 provides supporting text which states that new dwellings will be expected to meet the Government's standards unless there is clear evidence to demonstrate that this would not be viable or technically feasible and that a satisfactory standard of accommodation can still be achieved.</p> <p>The Council has commissioned an update of the Whole Plan Viability Assessment, which includes the impact of Policy HG4. Any issues raised as a result will be addressed at the Publication Stage of the Local Plan.</p> <p>An analysis of the size and type of dwellings currently being built in Ashfield is being undertaken to support this policy requirement.</p> <p><b>No proposed amendment</b> (subject to updated evidence).</p>
<p><b>Policy HG4 Bullet Point (3)</b> also requires developments of more than 10 dwellings to provide 10% accessible / adaptable dwellings. Again the Council has not provided evidence to justify this policy proposal.</p>	<p>Paragraphs 12.42-12.42 set out the supporting text to policy HG4 bullet point 3. This identifies that the justification for requiring 10% adaptable/accessible (category 2) dwellings is based on need, derived from the Nottingham Outer Strategic</p>



<p>As set out by the HBF in the preceding paragraphs there is no evidence justifying adoption of the housing standard as proposed by the Council. Indeed this is acknowledged by the Council in para 13.20 of the preferred option document <i>“Within the National Standards there is scope for some additional local standards related to access, water and space where there is considered a justified local need. <u>At present such need has not been established by the Council, but further evidence base work may present need and justification at the Publication stage</u>”</i> (our emphasis). The HBF is concerned that the Council appears to be proposing the aforementioned policy requirements with no supporting evidence for the inclusion of these policies in the preferred option consultation. Therefore there is a perception that subsequent evidence will be a retro fit to justify a pre-determined policy position rather than evidence which informed the initial formulation of any proposed policy.</p>	<p>Housing Market Assessment October 2015. The need for specialist housing amounts to 13% of overall need. The policy as drafted requires 10% of dwellings only on developments delivering 10 or more dwellings. Evidently this will fall short of meeting 13% of total delivery on all sites, however, it is anticipated that the balance of need will be met by alternative forms of specialist housing as set out in paragraph 12.43.</p> <p>It is acknowledged that the supporting text to Policy SD1 is currently misleading. Paragraph 13.20 should have in fact referred only to viability work in respect of accessibility/ adaptability since the need has already been established as set out above. This text will be amended for the Publication Local Plan document.</p> <p>As set out above, the Council has commissioned an update of the Whole Plan Viability Assessment, which includes the impact of Policy HG4. The evidence will not be retro-fitted as alleged, but will inform any amendments to policies at the next stage of the Local Plan required to ensure that it is deliverable and therefore ‘sound’.</p> <p><b>Update/amend SD1 supporting paragraph 13.20. No change proposed to policy HG4</b> (subject to updated evidence).</p>
<p>When our client reads the more detailed policies and how they would apply to the land use needs of the Nursing Home and area, they are of the view that para 4.16 et seq conflict with Policy S3 which appears to says such a site has to be allocated.</p>	<p>Paragraph 4.16 to 4.19 set out the Council’s position on residential care homes. It identifies that evidence indicates a current over-provision in Ashfield and it sets out that it is anticipated that care homes sufficient to meet the long-term requirement could come forward on housing allocations.</p>

<p>Para 4.58 needs to be more precise and include the ability for existing facilities to expand. For example, a decision might also need to take account of PJ1 and PJ2. These appear to say that proposals such as those intended at Wren Hall will be allowed in Green Belt if it is expansion in situ and even if not allocated. If that is the case then it is suggested that the last sentence to be explicit.</p> <p>Our client notes the important and rational para 13.25 on Care Homes and the value of outlook. Expansion of Care Homes must be encouraged in the policies in ways which allow them to be built with more generous use of land. A specific allocation seems the best way to ensure that and our client asks for this allocation of Wren Hall.</p> <p>Our client considers the PJ policies leave Plan users without a clear view as to what is intended and how applications will be judged. A rewrite and allocation are sought.</p>	<p>(supporting text to Policy HG4, paragraph 12.43 re-iterates this position). The Council does not see not see any conflict with para 4.58 under Policy S1.</p> <p>National planning policy gives a clear emphasis to the protection of the Green Belt. NPPF para 87 to 90 identifies that inappropriate development is, by definition, harmful to the Green Belt. The paragraphs identify exceptions to this. Consequently, this would be the Policy starting point for development in the Green Belt. Under these circumstances it is not consider that there is any conflict with the employment related policies in PHJ1 and PJ2.</p> <p>Paragraph 13.25 sets out what is anticipated from developments for care homes in relation to the amenity policy.</p> <p>The Council has no issue with Policy PJ1 and PJ2 and the supporting paragraphs.</p> <p><b>No proposed amendment.</b></p>
<p><b>Comment</b></p>	
<p>If more bungalows were insisted upon by ADC planning as a condition of granting planning permission then other types of houses would be free up for families. With life expectancy of 100 then more 65-85 etc will need bungalows not sheltered accommodation.</p>	<p>Policy HG4 requires that new residential developments should contribute to a mix of housing tenures, types and sizes in order to create mixed and balanced communities, as agreed with the Local Planning Authority. Developers are encouraged to discuss the appropriate mix with the Council at an early stage in the planning application process.</p>
<p>Has consideration been given to Whole Life houses?</p>	

	In addition, Policy HG4 as drafted requires 10% accessible or easily adaptable dwellings to be provided on sites of 10 dwellings or more. This is supported by paragraphs 12.41 to 12.43.
Affordable housing should also be healthy housing, so new housing developments should meet standards required to maintain warm and healthy housing.	Affordable housing standards are set by the Building Regulations. National planning policy requires that if higher standards are to be taken forward the evidence base should identify a need and that the Policy is viable in the context of the viability impact of the Plan.
<b>Responses received relating to Policy supporting text</b>	
None.	

### Proposed Amendments

Issue/Policy	Amendment
<b>Proposed Officer Amendments</b>	
SD1 supporting text Paragraph 13.20	Update/amend with reference to evidence base, including whole plan viability. Cross refer to other policies, e.g., HG4, where necessary for clarity.

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Nottinghamshire County Council	2803			√	Taylor Wimpey UK Ltd	6644	√		
HBF – Green S	6151	√	√		Bidwells on behalf of David Wilson Homes (East Midlands)	6705		√	

England Lyle Good & Dr Bell	6630	√			Wyatt	6740			√
					Madden	6805			√

## Policy HG5: Housing Density

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
<b>Support</b>	
Support for the intent and provisions of this policy.	Support noted.
Support the approach of HG5 which seeks to optimise density for the efficient use of land with due regard to the specific characteristics of the site and its surrounding area. This accords with NPPF paragraph 47. Support general density requirements for HG5a) and b) as this facilitates the assessment of the viability of a scheme from the outset and provides a benchmark for negotiation.	Support noted.
<b>Object</b>	
The Policy approach is overly prescriptive. The Policy must instead indicate a degree of flexibility in that determining housing density should be made on a site-by-site basis through the planning application process.	The Council considers that proposed policy HG5 allows for sufficient flexibility to determine density on a site-by-site basis, enabling lower densities where appropriate, but encouraging efficient use of land taking account of location, local character and local housing mix. The policy does not prescribe set densities, but a reasonable minimum overall density which will

	<p>apply to the majority of large sites.</p> <p>To include any further flexibility would render the policy meaningless.</p> <p>No changes proposed.</p>
<b>Comment</b>	
<p>We would like reference to be made in the policy to indicate that the flexibility of determining housing density can be made on a site by site basis through the development management process. This would provide developers or housebuilders with the opportunity to discuss and negotiate the optimum density appropriate for a particular site, therefore consideration can be made towards viability and the surrounding area.</p>	<p>The Council considers that the policy as drafted does provide developers/housebuilders with the opportunity to negotiate the optimum density appropriate for a particular site. It sets guidelines for the minimum density required on major sites only (10 or more dwellings) and outlines circumstances where lower densities may be appropriate. This includes having regard to the character of the surrounding area.</p> <p>Viability is taken into account across the whole plan. It would be inappropriate to be included with regard to a density policy due to the potential impact on design/layout or the efficient use of land, i.e., the aim of the policy is to achieve a scheme appropriate for a particular location.</p> <p>No changes proposed.</p>
<b>Responses received relating to Policy supporting text</b>	
None.	

### Proposed Amendments

Issue/Policy	Amendment
None.	

### List of Respondents

Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Barton Wilmore obo Taylor Wimpey	2495			√	Taylor Wimpey UK Ltd	6644	√		
Collins J	3034		√						

### Policy HG6: Conversion to Housing in Multiple Occupation, Flats and BedsitesHousing Mix

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
Support	
-	-
Object	
-	-
Comment	
-	-
Responses received relating to Policy supporting text	
-	-

### Proposed Amendments

Issue/Policy	Amendment
None	-

<u>List of Respondents</u>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
None									

## Contributing to Successful Development

### Policy SD1: Good Design Considerations for Development

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Whilst strongly supporting the intent of this Policy, we would like to see a greater emphasis on and expectation of enhancement through new development. All too often Developers get away with mediocrity.	Support acknowledged.
Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local	Support acknowledged. Policy EV4: Green Infrastructure, Biodiversity and Geodiversity, includes a requirement under Point 2 to protect and enhance the diversity and value of land and buildings and minimise the fragmentation of habitat. It is

materials, this is reflected in Policy SD1. Developments in the countryside may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance biodiversity, in accordance with Paragraph 118 of the NPPF.	also reflected in the supporting text under paragraph 9.77.
<b>Object</b>	
Whilst we acknowledge the importance of design and recognise it as a key aspect of sustainable development, we must underline paragraph 59 of the NPPF which states that design policies should avoid unnecessary prescription or detail.	It is considered that the Policy sets out key design principle and is not prescriptive or detailed.  No changes proposed.
<b>Comment</b>	
The Forum has commissioned studies on green infrastructure, a townscape character assessment and on design criteria for future development. Local Plan policies EV4, EV5 and SD1 have certain parallels and the Forum may wish to comment further down the line once it has the results of the studies.	Noted.
Need to be more explicit about how neighbourhoods will address components to Lifetime Neighbourhoods.	The Report Lifetime Neighbourhoods 2011 Communities and Local Government identifies that the key factors are: <ul style="list-style-type: none"> <li>• supporting residents to develop lifetime neighbourhoods – especially resident empowerment;</li> <li>• access;</li> <li>• services and amenities;</li> <li>• built and natural environments;</li> <li>• social networks/well-being;</li> </ul>



	<ul style="list-style-type: none"> <li>• housing.</li> </ul> <p>The Local Plan covers many of these aspects but cannot include all aspects. The Council would welcome further information on what changes to the Plan would be helpful in achieving lifetime neighbourhoods.</p>
<b>Responses received relating to Policy supporting text</b>	
Para 13.3 -- we would ask the following to be included at the end of this paragraph "or do not harmonise and blend in with existing development, except if the existing development is classed as substandard". ACCESS wish all developments were possible to blend in and harmonise with existing build	No changes proposed as this aspect is a fundamental part of the design process. (See Residential Design Guide Supplementary Planning Document, Section 3.0)

### Proposed Amendments

Issue/Policy	Amendment
No changes proposed from the consultation.	-
<b>Proposed Officer Amendments</b>	
Criteria 4. For clarification, add information on what to apply and consider when creating public realm strategies.	<p><b>Public Realm &amp; Open Space</b></p> <p><b>5. The public realm elements of a development proposal must complement the proposed building/s and seek to enhance its surroundings. Proposals must apply an appropriate balance of hard and soft landscape that contributes to the overall design of the scheme. When creating public realm strategies for a site, proposals should apply and consider the following:</b></p> <p><b>a. Locate public spaces on main lines of movement (pedestrian or vehicular);</b></p> <p><b>b. Spaces must present imaginative, high quality design</b></p>

	<p>and contributes to the District's wider green infrastructure framework;</p> <ul style="list-style-type: none"> <li>c. Spaces and routes must be overlooked from surrounding buildings, with active frontages onto spaces where appropriate;</li> <li>d. Creation of incidental and/or small areas of grass / open space with little function will not be accepted;</li> <li>e. Prioritise the retention of key natural features, such as mature trees, hedgerows and land forms;</li> <li>f. Provide new trees, including street trees, hedgerows and additional native species planting as part of the overall landscaping framework throughout a site;</li> <li>g. Strengthen and protect existing boundary hedgerows around the site;</li> <li>h. Provide appropriate landscaping and screening to aid residential amenity; and</li> <li>i. Potential impact of artificial lighting on wildlife.</li> </ul>
<p>Paragraphs 13.11 to 13.14. Amend the supporting text to reflect the changes to criteria 4. as set out above.</p>	<p><b>Movement, Public Realm &amp; Open Space</b></p> <p>Coupled with a well-designed building, public realm plays an important role in the urban and rural environment, creating spaces for public interaction, amenity and movement. Public realm comprises a range of streets, squares and spaces much of which we interactive with on a daily basis. <b>Attractive and well designed environments can help attract inward investment and users to a town centre; encourage sustainable forms of travel; promote health activity; and discourage antisocial behaviour and crime.</b> It is therefore important that such spaces are designed to function well, whilst complementing and enhancing</p>

	<p>their surroundings. They should be appropriately located and surveyed from surrounding properties / uses.</p> <p><del>A large proportion of our public realm is used for affective movement, via roads and pathways. However, it is important to ensure such environments do not become dominated by road movement, with schemes engineered rather than designed. Whilst effective road movement is important, these spaces should be designed from a pedestrian view point, with environments safe and functional for both users.</del></p> <p>In designing new streets, development proposals should apply standards and guidance from Manual for Streets.</p> <p>The quality of materials play an important role in the effectiveness of public realm, creating attractive spaces that invite safe use. The Council will therefore require new development to design its public realm with an appropriate palette of high quality materials that seek to enhance the environment. Proposals should apply a mix of hard and soft landscaping, appropriate to the setting. Wherever possible, and particularly in relation to large scale developments, a landscaping framework utilising native species should be provided, reflecting the objectives of the Public Open Space Strategy. Proposal should also effectively use and enhance existing landscape features such as mature trees, hedgerows and land forms to help add character to the development and increase opportunities for wildlife.</p> <p>Planting that blends with its surroundings, contributes positively</p>
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	<p>to the creation of a sustainable quality environment. It also mitigates against the impacts of climate change, facilitate health and wellbeing and enhance the character and appearance of the District. Design considerations for new planting should:</p> <ul style="list-style-type: none"> <li>• ensure the continuance of tree cover by incorporating a mix of existing trees and new planting in the design.</li> <li>• design for a hierarchy of different types of planting including avenue planting, trees in gardens, boundary planting and open space planting.</li> <li>• consider the size and species of trees to be planted. Often a mixture of sizes is best. Planting larger trees creates an instant effect but young trees and whips transplant better and will develop faster.</li> </ul> <p>Major development proposals should provide for the planting and maintenance of street trees of appropriate species at intervals appropriate to the site, except where the site's location requires a clearly building-dominated design approach that would be prejudiced by the inclusion of street trees.</p>
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<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Barton Willmore	2495	√			Natural England	3185		√	
Nottinghamshire County	2803			√	ACCESS - Annesley	5359			√

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Council					Community Committed to Ensuring Sustainable Settlements				
Collins	3034		√		Teversal, Stanton Hill & Skegby Neighbourhood Forum	6647			√

## **Policy SD2: Amenity**

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
We support the intent and provisions of this policy.	Support acknowledged.
<b>Object</b>	
-	-
<b>Comment</b>	
Policy SD2 a) consider adding to the end of the first sentence – “from both natural and built structures within and outside the development area”. ACCESS are concerned about overshadowing and frost pockets within potential developments created by the location and orientation of established woods adjoining such developments.	No changes proposed to the Policy. This would be a fundamental part of any design of a residential estate (See Residential Design Guidance Supplementary Planning Document, neighbourhood integration para 3.6 onwards).
<b>Responses received relating to Policy supporting text</b>	
Para 13.32 -- in some cases legislation may require buffer zones between developments and areas of high biological and	All Policies in the Local Plan should be considered as an integrated approach and buffer zones have been considered

technological habitat, please consider modifying this paragraph to take this requirement into account.	with the environmental policies. No changes proposed.
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### Proposed Amendments

Issue/Policy	Amendment
None.	-

<u>List of Respondents</u>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Collins	3034		√		ACCESS - Annesley Community Committed to Ensuring Sustainable Settlements	5359			√

### Policy SD3: Recycling and Refuse Provision in New Development

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
Support	
We support the intent and provisions of this policy and are pleased to see the Council has given thought to ensuring that in future proper provision is made to accommodate refuse and recycling facilities such that hopefully they will be both	Support acknowledged.

convenient to use and to collect and that both storage and collection doesn't cause environmental damage by being visually prominent and/or a nuisance factor, which it so often is with many established residential areas which were developed without or with too little regard for such facilities.	
<b>Object</b>	
-	
<b>Comment</b>	
Is Ashfield still expecting inert materials to be used on development sites where possible? No mention of this in this section. Contrary to SO12?	Policy SD3 relates to recycling and refuse provision in new development and not to the importing on materials onto a site. Significant importing of materials onto a site would be a County Council matter under the Waste Local Plan.
<b>Responses received relating to Policy supporting text</b>	
-	

### Proposed Amendments

Issue/Policy	Amendment
None.	-
<b>Proposed Officer Amendments</b>	
Paragraph 13.37	<p>Amend first sentence to read: To meet current recycling requirements a dwelling is provided with <del>at least two 240 litre bins</del> <b>one 180 litre bin for general waste, one 240 litre bins for dry recyclables</b> and one 44 litre box for recycling glass.</p> <p>Amend third sentence to read: Where residential developments are proposed with gardens,</p>

	including communal gardens in apartment developments, an additional area should be provided for either a garden waste bin or a composting area consideration should be given to the use of a composting facility.
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<b>List of Respondents</b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Collins	3034		√		Madden	6805			√

## Policy SD4: Infrastructure Provision and Developer Contributions

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to Policy</b>	
<b>Support</b>	
We support the intent and provisions of this Policy.	Support acknowledged.
Support for Policies SD4 with regards to sport when the actions are supported by evidence	Support acknowledged.
Green Infrastructure should be provided as an integral part of all new development, alongside other infrastructure such as utilities and transport networks, therefore we are pleased Policy SD4 includes provision for green infrastructure and is based on a whole life costs approach which should secure the long term maintenance and management requirements.	Support acknowledged.



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<b>Object</b>	
-	-
<b>Comment</b>	
<u>General</u>	
Raised issue over the design quality of new housing and the lack of infrastructure provision for hospital, schools, doctors, dentists, care services and recreational facilities.	As part of the integrated approach to the Local Plan the Council considers the infrastructure requirements for all forms of development. This will include collating information from infrastructure providers on physical assets such as roads, power lines and sewerage systems; community services such as health centres and schools; and environmental assets such as public open spaces. However, the NPPF paragraph 173 sets out that 'the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.' In Ashfield there is likely to be an issue in relation to viability and difficult decisions will need to be made in relation to affordable housing, and planning contributions to the wider infrastructure. It is likely to require infrastructure providers to look at wider sources of funding that just S106 planning contributions.
Infrastructure needs looking at prior to deciding sites. The Council needs to put this in place first and recoup capital expenditure through S106 money.	If sums are to be sought from housing developers through S106 agreement, dependent on the size of the development, the front loading of contributions can have a significant impact on viability

	of a scheme and its ability to meet planning contributions. For larger development, planning contributions will need to be phased over the life time of the scheme.
<p>The Policy sets out at length how infrastructure provision and developer contributions will be sought. We consider that the Council should carefully consider and remain flexible in terms of the delivery of infrastructure provision. As outlined in paragraph 173 of the NPPF, sustainable development requires attention to viability and costs in plan-making to ensure a Plan is deliverable. On this note, the Plan should ensure that the delivery of infrastructure will not detrimentally impact upon the deliverability of the required housing need by subjecting new development to inappropriate scale of obligations and policy burdens.</p> <p>As Policy SD4 and SD5 are inter-linked, we consider reference to Policy SD5, which refers to our concerns outlined above, should be referred to within Policy SD4, in particular in respect to 'Infrastructure Provision'.</p>	<p>The Council is undertaking an update on the Whole Plan Development Viability Study to understand the up-to-date position on viability and development in the District.</p> <p>The Local Plan emphasises that all policies are interdependent and must be read together in relation to their combined effect upon development proposals. Therefore Policy SD4 and SD5 are not independent of each other. However, a short paragraph will be added to the text to emphasise the links between Policy SD4 and SD5.</p>
Page 224 - item 4d) -- please qualify within the appendix what "green" and particularly "blue infrastructure" is.	The Appendix includes a definition of Green Infrastructure. The Appendix will be amended to include a definition of Blue Infrastructure.
<u>Education</u>	
Primary- Nottinghamshire has seen an increase in birth rates across the county since 2007. This is reflected in the overall school population but is particularly well illustrated in the numbers of primary age children. There are areas in Ashfield e.g. Kirkby, Hucknall and Sutton that have already been identified as a potential 'hot spots' where demand for school places was predicted to exceed supply. Therefore as part of	Comments are acknowledged and there are on-going discussions with the County Council as the Education Authority regarding the requirements of specific schools in relation to new development.

<p>the basic need programme 1155 additional school places will have been provided in the Ashfield district by September 2016. A consequence of this is that many schools in the Ashfield district have been expanded to their site capacity and therefore cannot be expanded any further to accommodate children generated from future housing developments. It also assumes that for all of the proposed developments the County Council will be requesting and will receive 100% of section 106 contributions requested for education in order to carry out the necessary work to adapt and extend school buildings.</p> <p>Secondary - Working on the existing population forecasts secondary schools in Ashfield are at capacity from the 2020/21 academic year. We will therefore be seeking a secondary education contribution on housing sites that apply for planning permission during the current 10 year pupil projection period. We are currently embarking upon a round of meetings with all secondary Head Teachers and Heads of Academy Trusts in the county to find out what their plans are for the future.</p>	
<p><u>Health</u></p>	
<p>The proposed housing development will have a significant impact on accessto health services locally. As the CCG will be looking for S106 planning contributions towards the provision of health services. The level of funding is anticipated to be in the region of £551.00 per dwelling (based on current calculations which may change over time) for larger developments of approximately 50 dwellings or more.</p>	<p>It is noted that CCG will be seeking S106 planning contributions for health services provision. However, whether this can be achieved will depend on the viability of any scheme in relation to affordable housing and planning contrbutions.</p>
<p>The Plan could be strengthened by undertaking modelling work to assess population growth assessment and healthcare service impact working in conjunction with CCG colleagues.</p>	<p>The Council is working with both CCGs that cover Ashfield regarding the impact of the proposed housing development on healthcare services.</p>

<u>Transport</u>	
Residents in Annesley Woodhouse expressed concern regarding the A611. It is one of Nottinghamshire's most congested and slowest roads in all a.m. and p.m. peak travel periods and that all junctions are already working to near capacity or over. The congestion has a further impact in that it detracts companies from locating at the vacant units of Sherwood Business Park.	The issues relating to traffic on Derby Road at Annesley are acknowledged and this reflects one of the area in Ashfield where there are pressures on the highway. The Council is undertaking an update of the Traffic Assessment for the District to understand the extent of the issue and what mitigation aspects could be considered.
Suggested that as a matter of urgency a box junction is required on the A611 with Midfield Road at Annesley Woodhouse.	
Concerned regarding the traffic build-up on Forest Road/Derby Road which is getting worse without the anticipated and expected additions due to the already approved and proposed development sites being taken into account. The ongoing congestion on Derby Road seriously affects our family business, situated on Forest Road because of the longer delays in travelling both in and out of Forest Road and along Derby Road. We agree that no further development should be placed along Derby Road/A611; that a cumulative assessment on the traffic impact taking already approved (but not yet developed) and proposed development sites takes place, and that longer term Ashfield District Council and the Highways Authority should look at either a dual carriage for the A611 or provide a bypass to Annesley.	
Road infrastructure already stretched to the limit.	The Traffic Assessment for the District to understand the extent of the issue and what mitigation aspects could be considered.
<u>Utilities</u>	

Concern raised that the utilities companies cannot facilitate the housing proposed.	Undertakers have been consulted and no issues have been identified other than additional works will be required to the Sewerage works at Huthwaite to take into account any additional development proposals in the area served by the works.
<u>S106 Negotiations</u>	
Council seems to be poor at negotiating planning contributions. Should insist on developers doing what is needed not giving in to what is best for the developers.	<p>The National Planning Policy Framework, paragraph 173, stresses that development should not be subject to a scale of obligations and policy burdens that the ability to develop viably is threatened. It also sets out that the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. Under National Planning Practice Guidance viability applies to both plan making and planning decision. Where the viability of a development is in question, local planning authorities should look to be flexible in applying policy requirements wherever possible.</p> <p>Consequently, S106 contributions and CIL must reflect viability issues. Where necessary, developers are required to submit site specific viability assessments. The Council will take external advice from viability experts on the information submitted in order to determine the viability of the development scheme. It is acknowledged that the Council will have to make difficult decisions in relation to infrastructure priorities and development.</p>
<b>Responses received relating to Policy supporting text</b>	

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### Proposed Amendments

Issue/Policy	Amendment
Policy SD4 addition provision on viability of development	<p>Policy SD4 amend to include point 7</p> <p>7. The requirement for infrastructure provision or contributions has to be considered against the viability of any development. Where viability is identified as an issue it should be considered against Policy SD5.</p>
<b>Proposed Officer Amendments</b>	
Policy SD4 Criteria 4.d) delete: 'EV5 and EV6. Both are protection policies not applicable to SD4.	<p><b>4. The Council will require on-site or off-site provision.....:</b></p> <p><b>d) Provision of appropriate sport and recreation facilities, new and improved open space, improving quality and access to green and blue infrastructure, the open space network; and public realm in accordance with Policies HG3 (Public Open Space in New Residential Developments), EV4 (Green Infrastructure, Biodiversity and Geodiversity) <del>EV5 (Green Space)</del>, <del>EV6 (Trees)</del> EV7 (Allotments) EV10 (Historic Environment) EV11 (Landscape Character);</b></p>

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<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Johnson	1886			√	Bolger	5817			√
Lathall	1917			√	Lathall	5819			√
Collier	1918			√	Nottingham North & East Clinical Commissioning Group	6509			√
Barton Willmore	2495			√	Manders	6640			√
Lathall	2631			√	Lewis	6729			√
Whetton	2753			√	Wyatt	6739			√
Nottinghamshire County Council	2803			√	Wyatt	6740			√
Cooper	2811			√	Smith	6875			√
Collins	3034		√		Smith	6876			√
Natural England	3185		√		Eyre	6897			√
ACCESS - Annesley Community Committed to Ensuring Sustainable Settlements	5359			√	Morton	6898			√
Sport England	5554		√		Morton	6899			√
Ward	5807			√	Elkington	6977			√

## Policy SD5: Assessing Viability

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
Support	
-	-
Object	
-	-
Comment	
-	-
Responses received relating to Policy supporting text	
No changes proposed from the consultation.	-

## Proposed Amendments

Issue/Policy	Amendment
None	
<b>Proposed Officer Amendments</b>	
Policy SD5 amendments suggested for clarification of the Policy	<p><b>Policy SD5</b></p> <p>Development <b>should</b> <del>will be expected to</del> comply with the policies set out in the <del>is</del> Plan (including those policies which refer to the provision and funding of infrastructure) unless it can be demonstrated that the policies will result in the development being unviable.</p>



	<p>Proposals that are unable to comply with the Plan's policies on viability grounds must be accompanied by a detailed viability assessment <b>for the development</b>. The viability assessment <b>should</b>, <del>including</del>, setting out and justifying the inputs and assumptions applied <b>in the assessment</b> <del>a development appraisal</del> <b>and</b>, given the sensitive to changes in inputs, <b>apply</b> sensitivity analysis and/or scenario analysis. Where a scheme requires phased delivery over the medium and longer term, changes in the value of development and changes in costs of delivery should be taken into account in <b>the</b> <del>any</del> assessment. The viability assessment will be independently reviewed by a viability specialist appointed by the Council at the applicant's expense.</p> <p>Where the viability assessment demonstrates the particular circumstances of the site or the proposed development will impact on the viability of the proposal, the Council will be flexible in relation to planning obligations <b>and/or affordable housing</b>, subject to the development being acceptable in planning terms in relation to need to achieve sustainable development.</p>
Add to Policy SD5 additional text to link to other policies within the Plan on lack of demand for a site or premises.	<p><b>Where other Policies in the Local Plan or national planning policy require the demonstration of no or a lack of demand for the building or site, the Council will require the applicant to demonstrate they have meet the Demand Test and/or the Viability Test.</b></p>

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Move Paragraph 10.13 to 10.16 with minor amendments from Policy PJ3 to SD5.	<b>Paragraphs moved with slight amendments.</b>

<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
None									

## **Policy SD6: Telecommunications**

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
-	-
<b>Object</b>	
-	-
<b>Comment</b>	
-	
<b>Responses received relating to Policy supporting text</b>	
-	-

### Proposed Amendments

Issue/Policy	Amendment
-	-

<u>List of Respondents</u>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
-									

### Policy SD7: Contaminated Land and Unstable Land

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
Responses received relating to the Policy	
Support	
-	-
Object	
-	-
Comment	
Environment Agency - Much of Ashfield District is located on principal aquifer where groundwater is sensitive to pollution. All previous uses of the site must be investigated to determine whether there is the potential to cause contamination to	The Policy identifies as one of the issues to be considered by developers is "avoiding the contamination of any watercourse, water body, groundwater or aquifer." (SD7 .2)

<p>ground water. Principal aquifers are geological strata that exhibit high permeability and usually provide a high level of water storage. These aquifers have strategic significance for water resources, often supporting large abstractions for the public water supply. They are also of major importance, supporting river base flow.</p> <p>During and post construction it is possible that this contamination could be mobilised and find its way into the aquifer. Ashfield DC should be satisfied that any risk has been properly assessed and viable remediation is in place.</p> <p>Whilst it is accepted that pollution prevention measures can be dealt with at development management stage, we recommend that the plan demonstrate a commitment to ensuring that surface water which may be contaminated pre and post construction is prevented from leaving site untreated, either by overland flow or via highway drainage and public surface water sewer systems and discharge to watercourses.</p>	<p>Amendments to paragraph 13.78 are proposed to reinforce the importance of taking into account the aquifers.</p>
<b>Responses received relating to Policy supporting text</b>	
-	

### Proposed Amendments

Issue/Policy	Amendment
Amend paragraph 13.78 to include the additional text emphasising the importance of taking into account aquifers.	Much of the District of Ashfield is located on principal aquifer where groundwater is sensitive to pollution. It is important that standards of design, materials specification and of on-site construction practices respect the vulnerability of these aquifers as well as all watercourses, and environmentally sensitive

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	<p>areas. During and post construction it is possible that this contamination could be mobilised and find its way into the aquifer. The Council will need to be satisfied that any risk has been properly assessed and viable remediation is in place. The Council will require the applicant to provide such information as is necessary to determine whether the proposed development can proceed. Investigations will need to consider the possibility that new pathways may be introduced as a result of development activities, such as piling, drain laying and trenches for services and that new receptors may be introduced by the development proposed. Substantial parts of the District are above groundwater aquifers, and therefore Development proposals should not create a pathway into the water supply.</p>
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<u>List of Respondents</u>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Environment Agency	1870			√					

## Policy SD8: Environmental Protection

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
We support the intent and provisions of this Policy.	Support acknowledged.
Support for Policy SD8 which considers the potential impacts from noise, lighting and air pollution on environmental receptors.	Support acknowledged
<b>Object</b>	
-	-
<b>Comment</b>	
Concerns expressed regarding the air quality at the Badger Box junction, Annesley Woodhouse in the context of increased traffic and assessment of SHLAA sites. This junction is an important school crossing point with the school playing fields being situated at the side of the A611 Derby Road.	<p>The Council's Environmental Health Department monitor air quality in the District in accordance with the The Environment Act 1995. No Air Quality Management Areas (AQMA) have been designated in Ashfield todote.</p> <p>For sites over 30 dwellings an air quality assessment will need to be submitted for consideration by the Environmental Health Department at the planning application stage.</p> <p>Part IV of the Environment Act 1995 makes it a statutory requirement for local authorities to continue to review and assess the current and future air quality in their areas against objectives set out for key air pollutants, under the provisions of the National Air Quality Regulations 2000 and the Air Quality (Amendment) Regulations 2002. The Council will continue to monitor air quality across the District.</p>

This Policy should include the situation where new houses are sited near to noisy or smelly farm buildings to try to prevent the closing down of existing noisy and smelly businesses by the serving of abatement notices.	The Policy identifies that development should be sites and designed to avoid adverse impacts on human health and well being including noise and smells. Consequently, these aspects should be taken into account under the Policy in determining any planning application. No changes proposed.
See the comments on soils raised by Natural England in Policy EV2.	Amendments to Policy SD8: Environmental Protection, are proposed to take into the account the comments and the requirements of the NPPF identified by Natural England.
<b>Responses received relating to Policy supporting text</b>	
-	

N.B. A number of response raise air quality in relation to responses on specific housing sites.

### Proposed Amendments

Issue/Policy	Amendment
Policy SD8: Environmental protection - Amend Policy and supporting paragraphs to include soils to reflect comments on the requirements of the NPPF and soils.	<p>Policy SD8 add:</p> <p>10. Development should take appropriate measures to maintain soil resources and functions to an extent that is considered relevant and proportionate to the scale of the development.</p> <p>Where requested, evidence of the adoption of best practice in the movement of, storage, management, reuse and reinstatement of soils must be submitted along with any planning application.</p> <p>Supporting paragraphs add:</p> <p>National planning policy identifies that the planning system</p>

	<p>should protect and enhance valued soils. Soil is an essential finite which has a wide ranging functions and it is important that soils are managed sustainably, in order that they can retain the capacity to carry out these vital functions.</p> <p>The Government's 'Safeguarding our soils: A strategy for England' sets out the current policy context on soils and a number of core objectives for policy and research.</p> <p>DEFRA has published a Code of Practice on the sustainable use of soils on construction sites. This provides guidance to assist anyone involved in the construction industry to protect the soil resources with which they work. Although the Code itself is not legislatively binding, by following it DEFRA identifies that:</p> <ul style="list-style-type: none"><li>• you will help protect and enhance the soil resources on site and achieve wider benefits for the environment;</li><li>• you may achieve cost savings for your business;</li><li>• it may help you to achieve your business sustainability targets; and</li><li>• it may help you to meet legal obligations regarding waste controls.</li></ul> <p>The Highways Agency and the Construction Industry Research and Information Association have produced a best practice guide on habitat translocation external site which also includes useful information on soil handling.</p>
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<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Johnson	1886			√	Ward	5807			√
Lathall	1917			√	Bolger	5817			√
Collier	1918			√	Lathall	5819			√
National Farmers' Union	1929			√	Manders	6640			√
Lathall	2631			√	Lewis	6729			√
Cooper	2811			√	Eyre	6897			√
Collins	3034		√		Elkington	6977			√
Natural England	3185		√						

**Policy SD9: Traffic Management and Highway Safety**

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Support for the Council update the Transport Study to take into account the cumulative effects of already committed development schemes (but not yet commenced) and proposed schemes being put forward within this LPPA.	Support acknowledged
Support for the Policy and paragraph 13.108 for the improve local connectivity by utilising the minerals line from Kirkby-in-Ashfield towards Somercotes for passengers.	Support acknowledged

We support the intent and provisions of this Policy.	Support acknowledged.
Support for the shift towards sustainable transport modes and acknowledge the importance attached to demonstrating how connectivity and accessibility will be improved where development occurs.	Support acknowledged.
Sets out that with their clients site proposed housing siite, east of Thoresby Avenue, Kirkby-in-Ashfield, there is ample opportunity to improve accessibility and connectivity along the A611 (Derby Road) to facilitate access to local shopping, education and health facilities. This is also reflected within the Nottingham Outer SHLAA 2015, whereby the Council recognise the Site has no highway access constraints.	
<b>Object</b>	
The level crossing at Sutton Junction interrupts the flow of traffic at regular intervals throughout the day. This issue will be enhanced if any future housing development in the Sutton Junction area are given planning permission.	While identified as an objection to Policy SD9 it relates the the Housing Allocation at Newark Road and Searby Road, Sutton in Ashfield.
<b>Comment</b>	
Bolsover District Council - Identified that Junction 28 of the M1 is a congestion hot spot in Bolsover, that future growth will impact in the Junction which should addressed at a national level. Bolsover DC is satisfied on the basis of paragrapgh 13.99 that Ashfield has undertaken the appropriate measures to ensure the implications of additional growth in Ashfield will be considered in relation to Junction 28 of the M1.	Comments acknowledged.
Issues with traffic related to the Sutton Junction Level Crossing. At least 4 times per hour the barriers are closed for an excessively long time. This already causes delays. The	Comments acknowledged. The Council will work with the Highway Authority to identify any necessary infrastructure requirements. This will be informed by the updated Transport

roads are used as an alternative route into Mansfield rather than the A38. Additional housing will make these problems worse.	Study.
<p>Policy and Paragraph 13.99 should be amended to identify the following:</p> <ul style="list-style-type: none"> <li>a transport corridor should be safeguarded through the housing site SKA3a1 for a prospective Kirkby North eastern by-pass from Penny Ema Way East to the A611 at Derby Road.</li> </ul> <p>A transport corridor to be safeguarded from the junction of Portland Street/ Community Hospital to Lowmoor Road at Kirkby-in-Ashfield and</p>	Comments acknowledged. See the response above.
<p>The A38 - The response identifies that the A38 provides an arterial route which connects Mansfield town centre to the M1 J28 and industrial areas and provides a by-pass to Sutton and Kirkby. The Draft Local Plan seeks to develop areas of land for both housing and employment purposes along the A38 corridor as well as along the A617 which is a major continuation of the A38. In addition a major development of land within Mansfield district along the A617 at Lindhurst will commence early in the plan period. "As a result there is certain to be a significant increase in traffic flows along the A38 connecting residential areas to employment areas, congestion will get worse and the benefit of the arterial route will soon become a scourge." The draft Local Plan should clearly set out the need to upgrade the A38 to dual carriageway along its length from Kingsmill to Calladine Business Park, without this then economic growth may not occur due to lack of confidence in the effectiveness of local transport systems.</p>	<p>Decision on upgrading roads are undertaken by the County Council in their role as the Highway Authority through the Local Transport Plans (LTPS). The LTP include:</p> <ul style="list-style-type: none"> <li>Policies - the strategy and the type of measures which contribute to that strategy and</li> <li>An implementation plan for those measures.</li> </ul> <p>Ultimately, decisions on the local strategic road network are undertaken by the Highway Authority. However, in developing the Local Plan the Council has worked closely with Highways Department at the County Council to understand and plan for the highways infrastructure needed to support the development proposed in the Plan. The Council has also commissioned an update to the Transport Study that will include an assessment of traffic impact resulting from the proposed sites and potential mitigation needed to help reduce that impact. It will inform the</p>

<p>A second arterial route should be developed which builds on the B6023 Alfreton Road to Mansfield Road corridor. A major upgrade to increase traffic flows and accessibility will have an economic benefit to Sutton town centre enabling free access and providing a realistic alternative route from the M1 and industrial areas for the northern parts of Sutton.</p> <p>In order to improve access and connectivity to Sutton town centre work should be undertaken to Kirkby Road, Station Road and Coxmoor Road/Eastfield Side. These roads connect the main by-pass with the through-route and improvements would encourage a sense of Sutton being a place to visit rather than to drive around.</p> <p>Development of Mowlands for housing includes for the provision of a relief road from the A38 to Kirkby Cross; the opportunity should not be missed to upscale this relief road to a 'Kirkby Relief Road' connecting the A611 at its junction with the B6021 through Bentinck Town and Mowlands to the A38. This could eventually link into a by-pass of Annesley down to the Sherwood Business Park. This Kirby Relief Road would provide connectivity across the northern part of Ashfield linking the only two A class roads running through the area, linking J27 and J28 of the M1, reducing traffic in Kirkby town centre, connecting Sherwood Business Park with Huthwaite and Mowlands and connecting A38 employment areas with Annesley and Hucknall. This would not be too expensive as using the Mowlands development relief road would account for about a third of the length of the more strategic Kirkby Relief</p>	<p>Local Transport Plan and it will also assist in identifying whether planning contributions will be required towards the highway infrastructure.</p> <p>Major planning applications which include substantial new road have the potential to improve the local strategic road network.</p>
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Road.	
<b>Responses received relating to Policy supporting text</b>	
Paragraph 13.99 should be amended to identify that a corridor should be safeguarded through the housing site SKA3a1 for a prospective Kirkby North eastern by-pass from Penny Ema Way East to the A611 at Derby Road.	Comments noted. The Council will work with the Highway Authority to identify any necessary infrastructure requirements. This will be informed by the updated Transport Study.
Para 13.103 -- last sentence, please consider adding the important category of schoolchildren within these examples.	No changes proposed the paragraph includes a number of users in general terms and pedestrians would include school children.

**Proposed Amendments**

<b>Issue/Policy</b>	<b>Amendment</b>
No changes proposed from the consultation.	-

<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Johnson	1886		√		Lewis	3058		√	
Lathall	1917		√		Allen	4952			√
Collier	1918		√		ACCESS - Annesley Community Committed to Ensuring Sustainable Settlements	5359			√
Bolsover District Council	1982			√	Ward	5807		√	
Evans	2123	√			Bolger	5817		√	
Barton Willmore	2495		√		Lathall	5819		√	

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Lathall	2631		√		Manders	6640		√	
Shaw	2707			√	Lewis	6729		√	
Cooper	2811		√		Eyre	6897		√	
Collins	3034		√		Elkington	6977		√	

## Policy SD10: Parking

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
We support the intent and provisions of this Policy.	Support acknowledged.
<b>Object</b>	
-	-
<b>Comment</b>	
-	-
<b>Responses received relating to Policy supporting text</b>	
-	-

## Proposed Amendments

<b>Issue/Policy</b>	<b>Amendment</b>
None.	-

<b><u>List of Respondents</u></b>									
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Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Collins	3034		√						

## Policy SD11: Advertisements

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Policy is considered to be sound	Support acknowledged.
<b>Object</b>	
-	-
<b>Comment</b>	
-	-
<b>Responses received relating to Policy supporting text</b>	
-	-

## Proposed Amendments

Issue/Policy	Amendment
C Thompson Ltd requested amendments to Policy SH4, which have led to amendments to Policy SD11.  Policy text	<b>Policy SD11: Advertisements</b>  Advertisements, including <b>shopfront signage</b> , boards and signs, will be supported where they:

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	.....
Supporting text amendment	<p>13.14 These design details should be considered as an integral part of the development. <b>Poorly sited or badly designed advertisements and signage, can have a detrimental effect on the character and appearance of areas and may raise issues of public safety. Advertisements and signage should not dominate the street scene in terms of size, scale, lighting and positioning. Shop front fascia signage should fit flush with the <del>shop front</del> fascia (unless it can be demonstrated that this is not possible), be positioned below the first floor and blend with the architectural style of the shop front and overall colour scheme.</b></p> <p><b>Addition from SH4</b></p>

<u>List of Respondents</u>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Chris Thompson Ltd	6521		√						



## Policy SD12: Provision and Protection of Health and Community Facilities

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to Policy</b>	
<b>Support</b>	
<p>The Theatres Trust supports proposed policy SP12 as it aims to safeguard community and cultural facilities, as required by para 70 of the NPPF.</p> <p>However, the plan refers to 'community facilities' in some areas and policies, and 'social infrastructure' in others. For clarity, the plan should use consistent terminology. We recommend the following definition is used which obviates the need for examples: <i>community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.</i></p>	<p>Support Acknowledged.</p> <p>Wording will be amended to reflect a consistent approach.</p>
Support for Policy SD12 with regards to sport when the actions are supported by evidence.	Support acknowledged.
<b>Object</b>	
<p>Our Client supports in parallel the change to the Green Belt line at Wren Hall but feels that it does not go far enough. This is said particularly having read back into the scoring system and the reports on Green Belt plus the justification for removing this area.</p> <p>For context, the present plans for extending the Wren Hall facility- based on identified need- include;</p>	<p>It is not clear what the representations are setting out in relation to Policy SD12. Therefore, no changes are proposed in relation to the Policy.</p>

<p>(a) individual apartment style accommodation which individuals own/rent/lease; and (b) extending Wren Hall to be a 60 bedded home.</p> <p>Our client submits that the boundary of the land removed should be wider. The most appropriate Green Belt line in the area is the firm landscape feature of the public footpath running from Nottingham Road to Alma Terrace. Having looked closely at the 6 different subzones for the Green Belt analysis and noted the low score for even the wider zone including the equestrian land and buildings behind 224 Nottingham Road the area outlined by our client for release fulfils no significant Green Belt purpose and could be/should be released. The boundary proposed fits as closely as possible with your criteria of property boundary and landscape feature (being a hedgerow). This is still not a better compromise than now. The Alma Terrace line is the truly appropriate and long term defensible one. Plan submitted which depicts the suggested amendment.</p>	
<p><b>Comment</b></p>	
<p>The proposed housing development will have a significant impact on access to health services locally. The Nottingham North and East Clinical Commissioning Group will be looking for S106 planning contributions towards the provision of health services. It is anticipated that this will relate to the larger developments of approximately 50 dwellings or more.</p>	<p>It is noted that CCG will be seeking S106 planning contributions for health services provision.</p>
<p>Nottingham Branch of CAMRA's proposes that the Policy should be amended and suggested it should be based on a "Model" Policy put forward by CAMRA.</p>	<p>Comments noted with proposed amendments to the Policy and supporting text.</p>

It is suggested contacting CCG colleagues who commission primary, community and secondary health care services to ascertain what needs there will be for shared community use and co-location of services.	The Council is working with both CCGs that cover Ashfield regarding the impact of the proposed housing development on healthcare services.
Page 249 - Reference is made to major development schemes may require a HIA completing – the Plan should define when a HIA needs to be complete and recommend a tool to be used. A HIA does not just assess health infrastructure requirements but the impact that the built and natural environment has on the wider determinants of health and a healthy lifestyle.	Consideration is being given to when a HIA will be required.

### Proposed Amendments

Issue/Policy	Amendment
Policy amend loss of community facilities.	<p><b>A development which result in the loss of building or site required for the provision of health and community facilities will not be permitted unless:</b></p> <ul style="list-style-type: none"> <li>a) There is no longer a requirement for the facility in that location; or</li> <li>b) <b>an alternative facility which meets similar local needs is already available; and</b></li> <li>c) <b>where appropriate on commercial community facilities it can be demonstrated through a viability assessment that the current use is no longer economically viable and there is no prospect of it becoming viable.</b></li> </ul>
Additional sentence to identify potential roles community facilities can provide. Definition of communities facilities in the	<b>Community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of</b>

glossary.	the community.
Amend supporting paragraphs to the Policy.	Delete all references 'social infrastructure' and replace with 'health and community facilities'.
Amend paragraph 13.20 to add additional text	<p>The application will need to be able to demonstrate that:</p> <ul style="list-style-type: none"> <li>• .....</li> <li>• For community facility it is no longer viable. Viability is anticipated to apply to community facilities that are run for business purposes to make a profit (although there may be exceptions).</li> </ul> <p><del>Where appropriate the</del> For a commercial community facility it is no longer viable. Viability is anticipated to apply to community facilities that are run for business purposes to make a profit (although there may be exceptions). In these circumstances, the Council will <del>utilise existing tools such as The Campaign for Real Ale "Public House Viability Test"</del> will utilise existing tools such as The Campaign for Real Ale "Public House Viability Test" <b>require evidence that the facility is not viable including:</b></p> <ul style="list-style-type: none"> <li>• the existing or recent business is not financially viable, as evidenced by trading accounts for the last three years in which the business was operating as a full-time business;</li> <li>• A range of measures were tried or explored to increase trade and diversify use;</li> <li>• The facility must have been adequately marketed. (See the supporting text on the Demand Test in Policy SD5)</li> </ul> <p>The Council will utilise existing tools such as The Campaign for Real Ale "Public House Viability Test" or other similar</p>

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	evaluation method to assess the viability of the business and to make an <del>fair, open and</del> informed judgement on the need for the facility in the locality.
<b>Proposed Officer Amendments</b>	
Policy SD12 - Policy wording needs amending for clarification.	<p>Policy amend Point 2</p> <p>1. A development which results in the loss of a building or site for the provision of health and/or community facilities will not be permitted unless:</p>

<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Nottinghamshire County Council	2803			√	Nottingham North & East Clinical Commissioning Group	6509			√
The Theatres Trust	5348		√		CAMRA	6556			√
Sport England	5554		√		England Lyle Good & Dr Bell	6630			√

## Policy SD13: Design Out Crime and Fear of Crime

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Responses received relating to the Policy</b>	
<b>Support</b>	
Whilst supporting the intent of this Policy, we urge some caution where, for example, convenient footpath links, especially linked to established housing areas, are frowned upon because they may be possible access/escape routes for burglars. A balance needs to be struck whereby the appearance, function and enjoyment of living in an area isn't unduly constrained by security concerns.	Comments noted. The Council liaises with the police and other agencies to reach a balance decision on these aspects.
<b>Object</b>	
-	-
<b>Comment</b>	
-	-
<b>Responses received relating to Policy supporting text</b>	
-	-

### Proposed Amendments

Issue/Policy	Amendment
-	-
<b>Proposed Policy Amendments</b>	
For clarification add to the Policy additional text regarding working with the Police, community partnerships and other agencies.	The Council will work with the police, community safety partnerships and other agencies to co-ordinate analysis and action.

<b>List of Respondents</b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Collins	3034		√						

## New Policies Proposed

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
Cemeteries – The Council should allocate land for new burial space which is proposed to be a Green Cemetery for various reasons identified in the response.	No proposals to amend the Policy as there is no evidence base to support this aspect.
Open Area – Land off Mill Lane, Huthwaite was protected under the Ashfield Local Plan Review 2002 Policy RC2 from development. The land off Mill Lane is now identified in the urban area and has no policy protection. This is the only area of traditional farmland with mature trees and hedges left on Huthwaite's southern flank. Further development would turn Huthwaite into a mere suburb with loss of wildlife and habitat.	Ashfield Local Plan Review, 2002, Policy RC2 is not reflected within the emerging Local Plan. This Policy previously sought to protect a number of open areas within the existing urban area. However, there have since been policy changes and planning permissions granted and it is considered that this policy is covered by other policies within the emerging local plan. In relation to Mill Lane, Huthwaite, part of the site has planning permission for housing, part of the site is a Local Wildlife Site and is protected by Policy EV4. Protection of the remainder of this area is potentially provided under Policy EV5, criteria 3 and supporting paragraph 9.88 subject to the land meeting the criteria in the Policy.

### Proposed Amendments

Issue/Policy	Amendment
-	-

<u>List of Respondents</u>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Lewis	3058			√	Morton	2182			√

### Appendices

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
The Local Authority Heritage List of non-designated heritage assets should appear as an appendix to the Local Plan.	It is not considered practical to take forward.
Historic England - Appendix 7— policy EV IO List of Buildings_P286-287 A useful checklist but the use of lists of LBs can become quickly out of date and is often advisable to address this with a caveat, i.e. 'accurate as at date.	Appendix 7 on listed buildings to be deleted. Reference is made under Policy EV10 made to the 'National Heritage List For England' website where the up to date record of listed building is maintained.
Page 224 - item 4d) -- please qualify within the appendix what "green" and particularly "blue infrastructure" is.	The Appendix includes a definition of Green Infrastructure. The Appendix amended to include a definition of Blue Infrastructure.

### Proposed Amendments

Issue/Policy	Amendment
Appendix to include a definition of Blue infrastructure.	Blue Infrastructure definition provided.



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<b>Proposed Officer Amendments</b>	
For clarity.	New Appendix - Include year land supply in Appendices

<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Historic England	2836				Kirkby and District Archaeological Group	5643			

## GLOSSARY

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
Listed Buildings — second sentence remove the word 'normally' after 'Consent is'.	Glossary to be amended to reflect comments.
The glossary contains a Mature Landscape Areas definition, these are not mentioned elsewhere in the document and have been superseded by the Greater Nottingham Landscape Character Assessment, therefore this reference should be deleted.	Deleted reference to Mature Landscape Areas.
Glossary -- please qualify within the appendix what "green" and particularly "blue infrastructure" is.	Glossary amended to reflect comment.
Appendix 1 (Glossary) -- has the Council an "aged or veteran tree register"? If it intends to produce one please give a date. If it does not intend to produce one please remove this term from	The Council does not have an an "aged or veteran tree register". The Glossary includes terms which are utilised in relation to planning and reflects the definition in the NPPF.

this appendix.	
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### Proposed Amendments

Issue/Policy	Amendment
To reflect comments.	Listed Buildings — second sentence remove the word ‘normally’ after ‘Consent is’.
To reflect the comments that Mature Landscape Areas are not set out as a Policy within the Local Plan, unlike the Ashfield Local Plan Review 2002.	Deleted reference to Mature Landscape Areas.
Blue Infrastructure (space) include definition to reflect comments.	Blue Infrastructure (space) encompasses all the water and wetland network (rivers, streams, canals, ponds, reservoirs wetlands, etc.)
<b>Proposed Officer Amendments</b>	
Add definition of community facilities to the glossary.	<b>Community facilities:</b> Community facilities are set out in the National Planning Policy Framework as including local shops, meeting places, sports venues, cultural buildings, public houses and places of worship and other local services to enhance the sustainability of communities and residential environments.
Include definition of Starter Homes to reflect the Housing and Planning brought into effect May 2016.	<b>Starter Homes:</b> Defined under the Housing and Planning Act 2016 as a new dwelling which is available for purchase by qualifying first-time buyers only (being at least 23 years old but has not yet reached the age of 40). They are sold at a discount of at least 20% of the market value with a price cap (2016) outside Greater London of £250,000. Any future sale or letting is subject any regulations made by the Secretary of State. There is a statutory duty on local planning authorities to require starter homes.

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<b><u>List of Respondents</u></b>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Historic England	2836			√	ACCESS - Annesley Community Committed to Ensuring Sustainable Settlements	5359			√

## Policies Maps

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Support</b>	
-	-
<b>Object</b>	
<p>Support for the removal of Wren Hall garden curtilage from Green Belt. The garden should never have been included in the Green Belt. The tendency around Selston to run along building lines or property boundaries does not accord with the long standing advice about permanent features.</p> <p>The removal is of assistance to the business but it won't provide enough space for a quality building over the Plan</p>	<p>Support acknowledged. The Green Belt boundaries have been established for a considerable period of time and it is not clear why the representatons considered that these boundaries do not meet the requirements of NPPF paragraph 85.</p> <p>The exceptional circumstances for excluding the substantial area to the north of the public footbath from Nottingham Road to</p>

period. This representation should therefore be read with the parallel representation about extending the Green Belt line on number 224 Nottingham Road (and without prejudice to the overall view that the appropriate Green Belt line in the area is the firm landscape feature of the public footpath running from Nottingham Road to Alma Terrace). (Objection in the context of the whole submission).	Alma Terrace is not set out in the representations.
<b>Comment</b>	
On the Policies Map – North Sheet, an extensive area of 'SINC' (LWS) is shown covering farmland within the bounds of the Teversal Trails, to the north of Skegby/Teversal. This appears to be a mapping error.	It is confirmed that there is an error on the map and this will be amended accordingly.

### Proposed Amendments

<b>Issue/Policy</b>	<b>Amendment</b>
Policies Map North sheet	Amend map to show correct area of LWS covering farmland within the bounds of the Teversal Trails, to the north of Skegby/Teversal. This appears to be a mapping error.
<b>Proposed Officer Amendments</b>	
<b>Boundary incorrect.</b>	<b>Main Urban Area boundary around PJ2sd, PJ2ha and SKA3p</b>
Planning Practice Guidance Paragraph: 005 Reference ID: 27-005-20140306 Safeguarding minerals? Whilst district councils are not mineral planning authorities, they have an important role in safeguarding minerals in three ways: <b>“District councils should show Mineral Safeguarding Areas on their policy maps”</b> .	Plans illustrating the Mineral Safeguarding Areas within the District will be appended within the Local Plan document. Given the potential conflict

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Minerals Local Plan Submission March 2016 “The Minerals Safeguarding and Consultation Area reflected in each Nottinghamshire District/Borough Adopted Local Plan Policies Maps” quote in Minerals LP Submission – Reflect in the Policies map?	
Boundary incorrect.	Housing allocation (SHLAA ref V87) Park Lane, Selston. Amend the boundary to exclude the bungalow. Amend the boundary to include the land south of the bungalow.
Boundary incorrect.	Housing allocated SKA3q 25 - Common Road incorrectly identified by Nottinghamshire County Council as part of the SHLAA site. Amend housing allocated SKA3q to remove 25 Common Road from the allocated site.
Boundary incorrect.	Housing allocation SKA3h Beck Lane. Amend site boundary. A small area of the site has been sold since the SHLAA site was submitted and now forms part of the garden to 17a Beck Lane.
Boundary incorrect.	Housing allocation SKA3ac Alferton Rd, Sutton – Policies Map boundary revision. Amend boundary to remove 249 Alferton Road and replace with access via 251 Alferton Road.
Revised boundary to include overgrown/unmanaged land. This should result in an improvement to the environment.	Amend site boundary as per submitted site plan to include 0.01 hectares of land to the west (land adjoining Spring Street).
Revised boundary.	Mowlands SKA3al - Amend boundary of the site allocation to follow ridgeline and removal of the Ancient Woodland from the allocation boundary.
Revised boundary.	Allocation SKA3l - Alferton Road. Amend boundary and area of site to reflect changes in land identified as part of the allocation.

<b><u>List of Respondents</u></b>									
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Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Nottinghamshire County Council	2803			√	England Lyle Good & Dr Bell	6630	√		

## Sustainability Appraisal

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<b>Support</b>	
Natural England considers that the Sustainability Appraisal has been carried out thoroughly and has covered our interests in the natural environment, taking on board our comments at the scoping stage. It has analysed the potential impacts of alternative site options and policies. We are therefore satisfied with the progress of the appraisal.	Support acknowledged.
The County Council welcomes the inclusion of SA Objective 11 on Waste and the decision making criteria associated with it.	Support acknowledged.
<b>Object</b>	
Object to the SA of the Land off Hamilton Road, Sutton in Ashfield (SELAA S6)  The response support that the sustainability appraisal recognises employment development on their site would have a positive effect on the economy and employment. However, there is a strongly object to the sustainability assessment of	While the results of the SA have informed the site selection process it is not the only factor taken into account when determining the Preferred Approach. There are often positive and negatives effects identified for sites and consequently it does not act as a ranking but is a source of information which highlights potential positives and negatives related to a site. The commentary adds information to the assessment on each

<p>their site where it suggests that the impact on natural resources would have a 'significant negative effect'.</p> <p>The response identifies that is considered that incorrect analysis has been undertaken of the agricultural classification. It is maintained that:</p> <ul style="list-style-type: none"> <li>• The better quality agricultural land is not significant referencing NPPF para 112. The response acknowledges that the NPPF does not define significant but states that 20ha of best and most versatile agricultural land is a trigger for consulting on proposals which are not in accordance with the provisions of a development plan (Schedule 4 of the Town and Country Planning Development Management Procedure Order April 2015). It quotes an appeal decision (ref no APP/Y1138/W/15/3155271) where planning permission was granted on an application which included the development of 11.8ha of Grade 1 agricultural land.</li> <li>• It identifies that Summit Park which has planning permission also includes better quality agricultural land.</li> </ul> <p>It is maintained that the analysis in the SA, SELAA are unsound and require amendment.</p> <p>The representation also make the following comments</p> <ul style="list-style-type: none"> <li>• Landscape - The impact on Hamilton Hill and Kingsmill Reservoir would be minimal as development would be viewed against existing and proposed employment development and the railway line and MARR (A617)</li> </ul>	<p>objective. It is not a planning application where a council or inspector is required to determining the application.</p> <p>The SA sets out 17 objectives, which sites have been assessed against. These objectives including how land allocation would be assessed were subject to consultation as part of the SA Scoping Report which includes comments from the Statutory Consultees. It included in relation to Object 8 Natural Resources, which identified that development that will result in the loss of best quality agricultural land (where known) will result in a minor negative. The approach adopted by the Council is considered to be consistent with sustainability appraisal and Strategic Environmental Assessment. The commentary on the site set out in the SA Appendix Three acknowledges that only a small part of the site is identified as better quality agricultural land. Consequently, the Council considers that the scoring in the SA is appropriate based on the Approach identified in the SA Scoping Report June 2015.</p> <p>Similarly it is not considered that the scoring of the landscape, air and noise pollution and travel is incorrect taken in relation to the scoring of other sites.</p> <p>In relation to the conclusion, the Council considers that it fairly reflects the keys aspects of the site including the semi-rural location. The Local Plan Preferred Approach does not propose to amend the urban boundary to the MARR as suggested in the response.</p> <p>N.B. In relation to the appeal decision no case could be found</p>
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<p>provide separation between the landscape features.</p> <ul style="list-style-type: none"> <li>• Air and Noise Pollution - The impact on air and noise pollution would, in our opinion, be minimal when judged against the surrounding employment activity and could readily be mitigated.</li> <li>• Travel and Accessibility - From a travel and accessibility perspective, it is accepted that the site does not currently benefit from easy access to bus stops, however, additional bus routes could be incentivised by new development and Travel Plans could be required</li> </ul> <p>The response suggests that the conclusion that the site is semi-rural, is extremely misleading as Summit Park, to the east, effectively represents the new boundary for the urban area – to all intents and purposes the site now lies within the urban area where development of employment or housing should be regarded as appropriate.</p>	<p>with the Case ID: 3155271.</p>
<p>Sustainability Appraisal - Para 4.95 page 102</p> <p>In commenting on this key issue, we are almost lost for words. Whether or not the land in question continues to fulfil the 5 criteria deemed necessary by National Guidance for inclusion in the Green Belt does not even get scant consideration. Clearly this is unacceptable. The Inspector's comments in 2015 to the subsequently withdrawn Plan made it clear to the Council that he was expecting land which no longer fulfils Green Belt purposes to be removed as part of this Local Plan Process.</p> <p>Whilst currently nominally Green Belt, the Council's Green Belt Review concludes that the site no longer fulfils the purposes of</p>	<p>Paragraph 4.95 states that Council does not feel it could justify the release of Green Belt land to the south of Kirkby. This remains the case. The Council does not consider that it has the evidence to justify a removal of land from the Green Belt in this area at this time.</p> <p>The NPPF paragraph 83 highlights that <i>Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of a Local Plan. At this time authorities should consider the Green Belt boundaries, having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</i></p>



<p>Green Belt. Moreover, given the very strong, more logical defensible boundaries that exist, its removal from the Green Belt would have no detrimental effect on the remaining Green Belt.</p> <p>Although, as demonstrated elsewhere, we consider this site to be eminently suitable for housing, the decision to remove the site from the Green Belt can and should be taken irrespective.</p> <p>We would ask the Council to look again specifically at KA03 Site 5 and resolve to allocate it for residential development. In particular, all countryside sites are more worthy of continued protection through the Local Plan than KA03 Site 5, which as well as being brownfield is urban/urban fringe in character and appearance.</p> <p>further we object to the following site in Hucknall which, unlike site KA03 Site 5, is legitimate Green Belt, worthy of continued protection:</p> <p>H9, H51, H52, H81, H99</p>	<p>Having regard to this national stance, the Council has undertaken a Green Belt Review to understand how the Green Belt functions around the District's settlements, utilising a scoring system shared with neighbouring authorities. Whilst this process has given the Council an understanding of how different sites perform in relation to the purposes of Green Belt, in itself the Council does not believe it demonstrates the exceptional circumstances for revising the Green Belt boundary.</p> <p>Within the south of the District, the Council believes it can justify the exceptional circumstance for limited Green Belt release. However, within the northern area around Kirkby and Sutton, there remains a supply of deliverable non-Green Belt land that could meet the development needs of the area during the plan period. Beyond these (proposed) allocated sites, there remains non-Green Belt land that in the long term (beyond the plan period), could continue to provide the northern area of the District with potential future development land, without the need for Green Belt release. Therefore, the Council does not believe at this time it has the exceptional circumstances to alter Green Belt boundaries, as required by NPPF paragraph 83. It also believes the current Green Belt boundary around Kirkby, has the potential to endure beyond the emerging Plan period.</p>
<p><b>Comment</b></p>	
<p><u>Potential indicators</u></p> <p>The indicators would have benefitted from being more tailored to the circumstances of the District and a more robust monitoring framework. Recording numbers of assets may be useful as part of the baseline data, but is not a particularly</p>	<p>The Council is reviewing the indicators to be taken forward in relation to the SA, Local Plan and naaula Monitoring.</p>

<p>informative way of monitoring impacts for the historic environment.</p> <p>The following may have been more useful indicators for monitoring purposes, and could form baseline data in the future:</p> <p><b>Conservation Areas</b> - Percentage of local authority area covered by designation, percentage of conservation areas at risk, and numbers of potential or new conservation areas considered for review or designation</p> <p><b>Historic Parks and Gardens</b> - levels of public resources, levels of increased access and number and% of registered parks and gardens 'at risk'</p> <p>Number and % of <b>Local Heritage Assets at Risk</b></p> <p>Number of historic buildings repaired and brought back into use</p> <p><b>Archaeology</b> - % of planning applications where archaeological investigations were required prior to approval</p> <p><b>Historic Environment</b> - number and extent of street / <b>public realm</b> audits.</p> <p><b>Listed buildings</b> - number of actions taken in response to breaches of listed building control</p> <p><u>Sustainability Issues and Problems</u> (page 33) — We highlight the need to ensure cross- boundary consultation with the neighbouring authority, regarding the registered Park and Garden that is Hardwick Hall, to address any potential issues of setting.</p>	
<p>This recognition of the role of minerals is reflected in the SA</p>	<p>Comments acknowledged.</p>

<p>and the Housing Site Selection Technical Paper.</p> <p>The County Council particularly welcomes the inclusion of the decision making criteria 'Will it impact on a mineral safeguarded area?' under Soil/Fauna/Flora/Material Assets in Table 2 of the SA and inclusion of the outcomes of this criteria in the individual site assessments in the Technical Paper.</p> <p>The County Council consider that the preparation of the Plan and its subsequent policies complement the approach set out in the Minerals Local Plan (Submission Draft, Feb 2016).</p>	
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### Proposed Amendments

Issue/Policy	Amendment
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<b>Proposed Officer Amendments</b>	
Amend incorrect wording.	<p>SA Appendix 2. Site H4 – Watnall Road, Hucknall</p> <p>7. Landscape – incorrectly states “No landscape assessment has been undertaken for the site, as it lies within the existing urban area.” The site is within Green Belt.</p> <p>Amend SA: Include details from the Landscape assessment. The site scores 9 out of a possible 16 overall and 2 out of 3 for capacity. Score remains as one negative - .</p> <p>Travel and accessibility: The text in the ‘mitigation’ section will be amended to reflect the fact that in the future there will be a school within walking distance. The conclusion will remain unchanged i.e. one positive +.</p>
Amend to reflect Mineral Safeguarding areas	Include reference to Mineral Safeguarding areas within SA

	evidence base.
Amend incorrect wording.	SA Appendix 1 – Housing Sites. H20 – Land south of Papplewick Lane. Objective 15 - Employment: refers to 'development on site is expected to include employment land...'. This is incorrect and should be deleted
Amend incorrect wording.	SA Appendix 1 - Site SHLAA H9, H51, H52, H81 H99 – Broomhill Farm Extension. Amend the SA site allocation - The landscape section is 'neutral' as it indicates that there is no landscape assessment for the site. This is incorrect. The Landscape Assessment is in the LCA folder and is entitled H9. Update the SA accordingly. The site scores 10 out of 16 overall and 2/3 for capacity to accommodate development which equals one negative - .
For clarification.	Appendix 2. SHLAA site S75 Pleasley Road, Teversal. Under SA: Remove 'unlikely to affect heritage assets' from the positive and add 'Development in this location would have an adverse impact on the rural character of the area, including the entrance route to Teversal Conservation Area' under 'Negative'.
For clarification.	Appendix 2. SHLAA site S380 Land adj to Carnavon Cottage, Silverhill Lane, Teversal. Add to SA negative and conclusion re landscape Capacity to Accommodate Development - Score 2 Medium: Medium capacity impact if development mirrored the row of cottages to the west of the site with new build set at the same distance from the road and extending the same length back in terms of rear gardens. Other development not in keeping with the existing housing would create a high impact. As such, development of the whole site would impact on the openness of the area.

**Ashfield District Council - Statement of Consultation**

<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Nottinghamshire County Council	2803		√	√	Natural England	3185		√	
Historic England	2836			√	J Collins Assoc	3034	√		
The Tyler-Parkes Partnership Ltd	2808	√							

## Strategic Housing Market Assessment

<b>Responses received in relation to the Local Plan Preferred Approach Consultation</b>	<b>Ashfield District Council's Response</b>
<p>The Spatial Strategy seeks to adopt the District's Objectively Assessed Housing Need of 480 dwellings a year as the District's housing target, as guided by the Nottingham 2015 Outer Strategic Housing Market Assessment (SHMA), published in October 2015. The SHMA has not yet been tested under examination by an independent Inspector. Furthermore, in assessing affordable housing needs, the SHMA tested a number of scenarios (25%, 30%, 35% and 40%) of household income spent on housing. The affordable housing need was calculated as 164 dwellings per annum based on the affordability threshold of 30%. This figure is a dramatic reduction from the 25% scenario of 280 affordable homes per annum. The 30% scenario therefore needs to be fully justified</p>	<p>The Council is satisfied that the Nottingham Outer SHMA provides a robust evidence document which identifies the objectively assessed housing need for the HMA and for each District. The approach taken is fully justified within the SHMA.</p> <p>No amendments proposed.</p>

<p>in order to ensure that affordable housing needs for the District have not been under-estimated.</p>	
<p>The Council's general approach to calculating the housing requirement is considered to be reasonably robust. However there are a number of factors which suggest that actual requirements might be higher than forecast indicating a need for added flexibility. These include the need to take full account of the effects of the recent recession on household formation rates and in this regard, it is considered that the rebalancing applied is likely to be insufficient.</p> <p>Concern is also raised at the lack of application of a non-delivery allowance. Whilst it is acknowledged that this is partly compensated for by a lack of windfall allowance, it is considered that because of the number, scale and distribution of allocated housing sites, there is an increased probability of the non-delivery of sites. As such a higher non-delivery allowance should be applied and additional land allocated for development.</p>	<p>The Council is satisfied that the Nottingham Outer SHMA provides a robust evidence document which identifies the objectively assessed housing need for the HMA and for each District. The approach taken is fully justified within the SHMA.</p> <p>The Council acknowledges the comment, but believe the number, scale and distribution of sites proposed within the Local Plan will aid delivery, rather than increase the probability of non-delivery of sites.</p> <p>The Council may review its Housing Land Monitoring Report to include a lapse rate discount and a windfall allowance.</p>
<p>The Spatial Strategy seeks to adopt the District's Objectively Assessed Housing Need of 480 dwellings a year as the District's housing target, as guided by the Nottingham 2015 Outer Strategic Housing Market Assessment (SHMA), published in October 2015. However, the SHMA has not yet been tested under examination by an independent Inspector. Furthermore, in assessing affordable housing needs, the SHMA tested a number of scenarios (25%, 30%, 35% and 40%) of household income spent on housing. The affordable housing need was calculated as 164 dwellings per annum based on the affordability threshold of 30%. This figure is a dramatic reduction from the 25% scenario of 280 affordable homes per annum. The 30% scenario therefore needs to be fully justified in order to ensure that affordable housing needs</p>	<p>Comments acknowledged. The SHMA is considered to set out the requirements for affordable housing together with why that approach has been adopted.</p>

for the District have not been under-estimated.

### Proposed Amendments

Issue/Policy	Amendment
-	-

<u>List of Respondents</u>									
Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy	Respondent	Database Number	Object to the Policy	Support the Policy	Comment on the Policy
Oxalis Planning	2235	√			Taylor Wimpey UK Ltd	6644	√		
Bidwells on behalf of David Wilson Homes (East Midlands)	6705			√					

### Other Documents forming the Supporting Evidence

Responses received in relation to the Local Plan Preferred Approach Consultation	Ashfield District Council's Response
<u>General</u>	
ACCESS notes that Ashfield District Council intends to drive its Local Plan by having a robust, objective and up-to-date evidence base (LPPA para 1.12) but acknowledge that some reports are currently outstanding but all will be revised to be integrated into the next stage of consultation (LPPA para 1.13 and Para 1.14).	Comments acknowledged.

<p>ACCESS in discussions with the Forward Planning Team are satisfied that sufficient investigations and discussions have taken place between neighbouring Authorities, Highways Agency, EA etc to derive sensible proposed housing site selections (page 4, 2nd para - Housing Site Selection Technical Paper). We are confident that the production of the Local Plan to its next stage with the completion of any outstanding reports within Para 1.14 before the next consultation stage will allow confirmation of the strategy currently undertaken by the Forward Planning Team.</p>	
<p><b>Green Belt Boundary Review Technical Paper 2015</b></p>	
<p>We support the recommendations within the above, in particular we recommend the acceptance of site AN10 - Forest Road, Annesley Woodhouse to Greenbelt (page 11 of 14). However we would point out that this is not a placement of an area into Greenbelt but a return to Greenbelt status of the site after its incorrect removal in 2002. The community has been requesting this to be reversed for over 10 years because of its wildlife/habitat implications. It's return to the Greenbelt and its value to the community, is witnessed by the 1000+ petition handed to Asheld District Council on Monday, 28 March 2011 by Gloria De Piero (MP for Ashfield) and the subsequent approval to return the area to Greenbelt within a later Council meeting.</p> <p>This site also:</p> <ul style="list-style-type: none"> <li>a) acts as an invaluable buer between Forest road, Sherwood business Park/Industrial site</li> <li>b) provides an invaluable technological and biological role in</li> </ul>	<p>The site in question was removed from the Green Belt as part of the Ashfield Local Plan Review 2002. It removal was undertaken as part of the review of the Local Plan and conformed to the requirements of national planning guidance at the time.</p> <p>The proposed changes reflect the current evidence set out in the Green Belt Boundary Review Technical Paper.</p>



that a substantive portion is designated a local wildlife site (LWS), "Forest Road Grassland – EV4nhm"	
<p>Support for the changes within this document and with particular comments regarding AN10 – Forest Road, Annesley Woodhouse. Support the comment that this area is “regarded as being open in character and therefore it serves a Green Belt function”, and that you are technically adding it to the Green Belt, a position which is echoed on your Policy map. However the response set out:</p> <ul style="list-style-type: none"> <li>• This site does not comprise of 3 fields + disused allotments but one field &amp; disused allotments which have carefully been managed to a blight condition. The field is sub-divided by temporary fencing to allow rotation of horse grazing and to ensure the enhancing of the area by careful management. This over 40 years, has allowed the site to be Classified as “Neutral Grassland” and is in fact a species rich and diverse wild flower meadow.</li> <li>• The site is not being “added” to Green Belt it is being “returned” to Green Belt and the response sets out the history and current nature of the site.</li> </ul>	<p>Comments noted. However, it is not proposed to make any amendments to the Strategy.</p> <p>It is acknowledged that the site has been identified as a Local Wildlife Site and this is reflected in the Local Plan Appendix 3 EV4nhm Forest Road Grasslands.</p>
<b>Green Infrastructure &amp; Biodiversity Technical Paper</b>	
Proposed Kirkby Hardwick Greenway – Extends from from Sutton Parkway Station through land to the rear of Kirkby Hardwick (EV158 & EV 159 to Sutton Middle Lane and onto the A38/B6018 Junction).	The Technical Paper is an evidence base which has already been produced. No changes to the Study are proposed.
ACCESS acknowledge that many of the Green Infrastructure	The comments made by ACCESS have been forwarded to the

<p>networks are marked as "Draft" and at the "Biodiversity Mapping" event which took place on 29th of February 2016, which ACCESS attended, at the conclusion it was stated that the "results would be fed into the Ashfield Green Infrastructure and Biodiversity Mapping for consideration of the Local Plan". In this context Access set out a number of comments relating to the Paper.</p> <p>The Council's Green Space Strategy 2008 needs to be updated</p> <p>ACCESS setout an additional Green Corridor, as detailed, in a map forwarded with the comments. It reflect the following:</p> <p>a) Existing Green corridor GI6 routes along a considerable portion of Forest Road. This road is a very busy commuter road and provides little natural vegetation (in the above we have shown this blanked out with white dots)</p> <p>b) ACCESS would suggest recognition of a new GI corridor which links from the junction of the GI 16,9,2 and routes through Annesley Forest, Little Oak Plantation, dis-used allotments, Forest Road grassland, ADC's Oak Wood Fields, through the buffer of remaining fields between Salmon Lane and Sherwood Business Park into the opening green spaces and connecting as shown to GI 8 and R5.</p>	<p>Council's Locality Team who are undertaking a review of the Green Infrastructure &amp; Biodiversity Technical Paper incorporating the Biodiversity Mapping.</p> <p>The Public Open Space Strategy is being review.</p> <p>The proposed in green infrastructure route ahs been forwarded to the Council's Locality Team.</p>
<p><b>Habitats Regulations Assessment (HRA)</b></p> <p>We note the refreshed Habitats Regulations Assessment (HRA) will be published with the submission document. HRA is an iterative process and therefore should be undertaken as the plan is developed to consider the potential effects of the Plan on European designated sites and to inform options. As the</p>	<p>The Local Plan Preferred Approach should be seen in the context that a Local Plan has been submitted and withdrawn. The Plan in question included a HRA assessment which has informed the Local Plan Preferred Approach.</p>

competent authority Ashfield District Council may need to carry out a screening assessment, and appropriate assessment where required, under the Conservation of Habitats & Species Regulations 2010 (as amended) to assess the impact of the Local Plan on the any European designated sites (Natura 2000 sites) that could potentially be affected.

A Screening Exercise should be undertaken to assess, on the basis of objective information, if there would be a significant effect resulting from the Local Plan. If the screening assessment shows that the effect may be significant or if the effect is not known, this would trigger the need for Appropriate Assessment. This is the detailed consideration of the impact on the integrity of European sites of the plan either alone or in combination with other projects or plans. This stage also includes the development of mitigation measures to avoid or reduce any possible impacts.

We are pleased the HRA has considered potential effects on those European designated sites; Birklands & Bilhaugh Special Area of Conservation (SAC) and The South Pennine Moors Special Area of Conservation and Special Protection Area, which are located outside of the district but have the potential to be indirectly affected by the Plan. In addition we are pleased the Plan acknowledges the presence of significant populations of breeding nightjar and woodlark in the Sherwood Forest area which could be classified as Special Protection Area (SPA) in the future and the authority has chosen to take a risk-based approach and undertaken a robust assessment of all sites in order to minimise impacts on those species and

The comments noted and will be reflected in the HRA.

future proof the Plan, in accordance with Natural England's Advice Note.	
<b>Health Impact Assessment.</b>	
We are pleased the Plan recognises the relationship between health and wellbeing and access to green space and the natural environment and this will be assessed in the Health Impact Assessment.	Comments acknowledged.
It is noted that an HRA has been carried out; the views of Natural England on the acceptability of the HRA should be sought, if they have not already been.	Comments acknowledged.
<b>Housing Site Selection Technical Paper</b>	
Considered that the Housing Site Selection Technical Paper provides a sound basis for the selection of preferred locations submitted and the respondents agree with those that have not been included or have been rejected.	Support acknowledged.
<p>This recognition of the role of minerals is reflected in the SA and the Housing Site Selection Technical Paper.</p> <p>The County Council particularly welcomes the inclusion of the decision making criteria 'Will it impact on a mineral safeguarded area?' under Soil/Fauna/Flora/Material Assets in Table 2 of the SA and inclusion of the outcomes of this criteria in the individual site assessments in the Technical Paper.</p> <p>The County Council consider that the preparation of the Plan and its subsequent policies complement the approach set out in the Minerals Local Plan (Submission Draft, Feb 2016).</p>	Comments acknowledged.

<p>Housing target – Para 4, Page 5 -- we note the following comment “<i>to enable appropriate flexibility within the supply of sites, the Council sought to locate a greater number of sites than required and applied what he considers to be a conservative yield/density to its site assessment</i>”. We applaud this statement and the confidence it should give to all, apart from developers who always want more, irrespective of the numbers given.</p> <p>Employment land -- Page 5 -- ACCESS notes there is sufficient capacity within the District for no new employment sites to have to be allocated over the plan period. ACCESS supports the release of employment land where appropriate based on 5 years reviews as this is more appropriate than the development of the greenfield or Green Belt being considered.</p> <p>7.3 Within this document -- Page 6 - reference is made to paragraph 47 of the NPPF in that a key element “<i>is to assess and make a judgement on whether a site is deliverable. To be considered deliverable, sites should be available for development now, offer a suitable location and be achievable</i>”. Whilst ACCESS agree with that statement they would refer the Council to Page 12 of the NPPF, Footnote 11. The Council's statement above clearly misses the key element that housing will be delivered on the site within five years.</p> <p>ACCESS would make specific comment about AN10 (which is being returned back to green belt) and the disused allotments. These were submitted in the 2002 Plan as site reference area K109. Taylor Wimpey have made approximately 5 planning</p>	<p>Support acknowledged.</p> <p>Comments acknowledged. It is anticipated that the Local Plan will be reviewed at least every five years. This will include a review of employment land requirements, sites and their suitability for alternative uses if they have not been developed. (NPPF para 22).</p> <p>The Council will review this element of the Paper in relation to the footnote and the five years element.</p> <p>Comments acknowledged.</p>
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<p>applications, have purchased Little Oak Plantation in an attempt to make an unjustifiable surface water solution to the proposed development on K109, with no avail. This demonstrably supports that this site is not deliverable and has been removed for development consideration, which the LWS status, the green belt boundary return also vindicates.</p> <p>ACCESS support the prudence principles adopted under para four, page 6 of this document, which further justify and give a margin of safety to the number of houses and housing sites selected within this LPPA</p> <p>Page 6, also lists known site constraints - ACCESS believe the Council should consider and implement several other constraints/restrictions which would be easy to take account of. These are:</p> <p>a) Impact risk zone/buffer zones which have to be implemented around such as Ancient Woodland, planted ancient woodland &amp; SSSI's. – Acknowledged the Council takes into account SSSI impact zones but not buffer zones around ancient woodlands.</p> <p>b) Potential for flooding from surface water - the EA have developed accurate maps to represent which areas may have a risk of flooding from surface water flooding -</p> <p>ACCESS supports the statement, Para 3, page 6 - "<i>Sites within.... and sites designated as local wildlife sites have all been assessed as unsuitable unless it has been determined that such constraints could be appropriately mitigated.</i>"</p>	<p>Comments acknowledged</p> <p>In relation to ancient woodlands it is acknowledged that the Government advice for Ancient Woodland and veteran trees identifies a 15m buffer (although the size of the buffer will vary). It is not considered that will prevent a site from coming forward but will impact on the potential number of dwellings that could be brought forward on the site.</p> <p>While acknowledging that development can be impact from flooding from all sources, the advice the Council has received is that surface water can be mitigated against as part of the development for example through SuDS.</p> <p>Comments acknowledged.</p>
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<p>However, ACCESS would state that all LWS sites should be considered unsuitable unless very exceptional circumstance deem otherwise.</p> <p>Sites Not Allocated Site K382 – Annesley Miners Welfare – ACCESS would make the following comments:</p> <ul style="list-style-type: none"> <li>i. the locality of Annesley in the immediate vicinity is deficient of both senior and junior football pitches.</li> <li>ii. Reference to the EA surface water flooding zone map would show that part of this site is potentially higher risk with a moderate amount within medium/low.</li> <li>iii. The site is known to suffer from foul sewage problems and overflow in periods of high rain.</li> <li>iv. There are major flooding problems along Derby Road and into the property which was previously the police house</li> <li>v. Development on this site would also require a 25m buffer zone adjacent to Little Oak Plantation (AW) which would severely restrict the number of houses which could be accommodated.</li> <li>vi. There are major highway constraint problems and traffic junction capacity along the A611 particularly in this area.</li> </ul> <p>ACCESS would support the Council stance that this site is not allocated and ask that the above observations are entered into the assessment sheet.</p>	<p>Comments are acknowledged. Please see comments above on surface water and buffer zones for ancient woodlands. The Council is currently undertaking an assessment of playing pitch requirements. Any site assessments will be revised if the evidence from studies and statutory consultees identifies or confirms there are specific issues.</p>
<p><b>Infrastructure Delivery Plan 2013</b></p>	
<p>ACCESS stresses that rather than small-scale developments, which overload the current system, that serious consideration</p>	<p>The finding of the Updated Transport Study will be integrated into the Infrastructure Delivery Plan.</p>

<p>should be given to larger scale developments, such as outlined within the site known as Mowlands, into which education and health facilities can be inserted. In many cases, this would assist adjacent existing developments to have the right level of service provision, rather than restricted services, which past developments have failed to address.</p> <p>We would reinforce our concerns about traffic impacts through Annesley Woodhouse/Annesley set out in the Ashfield Transport Study 2013. Since the production of this Study, the traffic situation through Annesley/Annesley Woodhouse has deteriorated further. ACCESS and the residents of Annesley Woodhouse and surrounding areas therefore welcome the restricted development along Derby Road.</p> <p>ACCESS would ask not only in the interests of ourselves but more the prosperity of Ashfield that serious consideration be given of a bypass to Annesley and upgrades of the road from Annesley until the A60 junction.</p>	<p>The Council is working with Nottinghamshire County Council regarding the Study and the wider implications of development for the transport infrastructure in Ashfield.</p>
<p><b>Strategic Housing Land Availability Assessment (SHLAA)</b></p> <p>SHLAA criteria:</p> <ul style="list-style-type: none"> <li>• Within the SHLAA notes, proposed development sites, which border SSSI sites have a note referencing a buffer regarding human interference. Similar buffers exist for Ancient Woodland (AW) and Replanted Ancient Woodland (PAWS). The minimum buffer distance being 25 m. This should be applied in considering the SHLAA sites.</li> </ul>	<ul style="list-style-type: none"> <li>• The Government suggests mitigation measures could include leaving an appropriate buffer of at least 15 metres. This will be taken into consideration in the Development Briefs for sites taken forward.</li> <li>• Disagree. The Council's Environmental Health Officers have been consulted and have not raised this as an issue.</li> <li>• Surface water flooding is reflected in the SHLAA</li> </ul>



<ul style="list-style-type: none"> <li>• The criteria be amended so that any potential development site has an indication of the pollution levels (air quality) within 50m of its proposed location.</li> <li>• Surface water flooding should be reflected in the SHLAA criteria.</li> <li>• Some proposed development sites may be affected by solar shading because of their orientation and location with respect to the sun and natural features. Sites which may be shaded in the winter throughout the majority of the day will suffer from increased heating bills and the residents may also suffer from SAD syndrome. We believe this is a vital component towards the health of Ashfield residence and that this should be included as a component on the SHLAA forms.</li> </ul>	<p>assessment.</p> <ul style="list-style-type: none"> <li>• Disagree. The orientation of dwellings would be considered as part of the planning application process.</li> </ul>
<p>ACCESS commends the joint approach by Ashfield District Council, Mansfield District Council and Newark &amp; Sherwood District Council to cooperate and plan for issues with cross boundary impacts (NPPF 181) and have duly prepared a Strategic Housing Market Assessment, which we find comprehensive.</p> <p>We find that it complies with the requirements of the NPPF and PPG to inform and support planning and housing. Overall, ACCESS is satisfied that current and future market trends and demands have been taken correctly into account along with</p>	<p>Comment are noted. In relation to overlooking, the Council Residential Design Guide Supplementary Planning Document, November 2014 sets out design principles which are taken into account on planning applications. This includes minimum distances between dwellings (para 3.48 to 3.51).</p>

<p>affordable housing, sheltered housing, and housing needs of particular groups etc, and in particular agree with this summary regarding housing contained within Para 11.16 . However ACCESS stresses various statement from the SHMA which identified a shortage of bungalows within various areas of the District. Bungalows provide the potential for older households to downsize and to release equity. However, there are overbearing effect of proposed 2 storey and 2 1/2 story dwellings being placed next to existing bungalows. ACCESS suggest that to reduce the demand gap for bungalows, and allow new developments to blend in with the existing, and ensure the character of the area is preserved, that new developments always incorporate bungalows at this interface if bungalows are present within the existing location.</p> <p>ACCESS congratulated not only the Councils involved in this Study but GL Hearn Ltd on the amount of statistical data analysed and reported upon and the clarity of conclusions.</p>	
<p><b>Strategic Green Belt Review December 2015</b></p>	
<p>1. ADC conducted a Strategic Green Belt Review dated December 2015. The methodology was to score parcels of existing Green Belt designated land against an assessment framework based on the purpose of Green Belt designation. The Review has not changed allocations but informs the draft Local Plan, which should consider such changes.</p> <p>2.The Green Belt Review has not scored other open countryside parcels of land and therefore has not gathered a comparison of relative values for other land to compare with</p>	<p>The Green Belt is a given a high policy importance by national planning policy (NPPF para 79 to 92 and the footnote to para 14). The Strategic Green Belt Review purpose is set out as part of the document. However, it has no role in looking to compare the relative value of the Countryside against the Green Belt in Ashfield.</p> <p>The Green Belt was initial established by the Green Belt Local Plan prepared by Nottinghamshire County Council and adopted in 1989. National planning guidance identifies that once</p>

<p>Green Belt land and has therefore been undertaken in isolation and is flawed.</p> <p>3.Green Belt designation was originally given to protect Nottingham/Derby and not to protect the Ashfield conurbations of Sutton/Kirkby against the same pressures of urban sprawl, settlement merging, loss of countryside etc. The move to Localism should mean that Green Belt land is assessed on a basis of purpose for the local area.</p> <p>4.In order to make the best decision for the local area, comparison needs to be made between important non Green Belt open countryside areas such as land proposed for urban extensions, infills and other proposed developments.</p> <p>5.The Spatial Strategy section of the Local Plan concludes that no Green Belt land should be released around Kirkby but there is little to justify this and no connection between this conclusion and the detailed assessment undertaken in the Green Belt Review. The Green Belt Review therefore appears to have been done to justify the existing position and not provide an open assessment of the best areas in which to undertake development.</p> <p>6.Some Green Belt areas and subsites in and around Kirkby and Annesley have relatively low scores (10 and below) in particular Ka03 scores only 6 overall; Ka01 scores 9 with some subsite below that level. These sites have had previous developer interest and may be developable. It appears these may have been rejected for reallocation due to previous</p>	<p>established Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of a Local Plan. This applies equally to the creation of new Green Belt as well as any exclusions of land from the Green Belt. All land in the Green Belt has to be considered against the five purposes of the Green Belt which includes the land to the south and east of Kirkby-in-Ashfield.</p> <p>The Inspector on the then submitted Local Plan with included Green Belt sites at Kirkby-in-Ashfield set out in his letter dated 26<sup>th</sup> March 2014 “it is clear that there must be a robust and compelling justification for allocating Green Belt land for housing in preference to sites which are not in the Green Belt. However, I am not persuaded that such ‘exceptional circumstances’ have been clearly set out in the evidence provided.” Taking these comments into consideration, the Council has reached a view that the evidence supporting the Local Plan does not justify taking land out of the Green Belt around Kirkby-in-Ashfield.</p> <p>The Council has undertaken landscape assessment where it is outside the main urban areas/settlements and various other assessments of land put forward for development. The assessments are brought together in the Housing Technical Paper which has informed the housing allocations proposed in the Local Plan Preferred Approach.</p>
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<p>criticism.</p> <p>7. Some proposed housing allocations with the Local Plan may have higher scores than some Green Belt designated sites when considered against the Green Belt framework and would therefore have greater local value if properly considered. For example it would appear to me on quick assessment that Mowlands may score around 10 and therefore rank above the low scoring Green Belt areas.</p> <p>8. ADC should properly consider the local value of all provisionally allocated housing allocations e.g. SkA3al, SKA3h and SKA3ah and score these against the Green Belt framework and reconsider their decision not to release any Green Belt areas around Kirkby and Annesley where score indicate this to be appropriate. These scores should be transparent and published.</p>	
<p>Support for the inter-authority co-operation and joint working (Duty to Co-operate), the various authorities agreed to adopt a common 'Assessment Framework' for assessing the purposes of Green Belt,</p> <p>The submission sets out various ground why a site at KA03 Site 5 (Beacon Farm) should be released from the Green Belt. This includes</p> <ul style="list-style-type: none"> <li>No evidence to suggest that any consideration whatsoever was given to the special characteristics of KA03 site 5, in particular its largely brownfield state and visual detriment.</li> </ul>	<p>Support acknowledged.</p> <p>The Green Belt is a given a high policy importance by national planning policy (NPPF paragraph 79 to 92 and the footnote to paragraph 14). It identifies that once established Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Given that the Green Belt has been allocated in this area under various Local Plan since 1989 it has been accepted over a considerable period that the area in question contributes towards the Green</p>

<ul style="list-style-type: none"> <li>• not characterised by openness. The site is dominated and characterised by buildings, most of which are dilapidated,</li> <li>• There is no evidence in published documentation to demonstrate that full and proper consideration has been given to the site.</li> <li>• The site promotes a sustainable pattern of development.</li> <li>• Located immediately adjacent to the built-up settlement framework and with good access to public transport, would represent sustainable development.</li> <li>• The site has defensible boundaries.</li> <li>• Sites no longer fulfil Green Belt purposes.</li> <li>• The Council should take it forward as a brownfield site.</li> <li>• Question whether the Score for the site is correct.</li> </ul> <p>Key purpose of the review was to identify land which no longer fulfilled the purposes of Green Belt and where it was not necessary to protect such land as 'open land' throughout and well beyond the current plan period</p> <p>The site has a low score in the Green Belt Review. Given the purposes and permanence of Green Belt and clear Government guidance in NPPF requiring LPA's to satisfy</p>	<p>Belt.</p> <p>It should be noted that the definition of brownfield land in the NPPF excludes land occupied for agricultural or forestry buildings.</p> <p>NPPF Paragraph 111 sets out that "Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land." However, this cannot be seen in isolation from the rest of the NPPF. The NPPF policies on the Green Belt do not set out that the fact that a site is brownfield means that it should be taken out of the Green Belt. Being a brownfield site in itself does not constitute exceptional circumstances for changing Green Belt boundaries. It should also be noted that the definition in the NPPF of previously developed land excludes from the definition permanent structures or fixed surface structures that have blended into the landscape in the process of time. The Government consultation on proposed changes to national planning policy December 2015 included that to meet the requirement for starter homes small brownfield sites within the Green Belt should be considered in the same way as other brown field land. However, this is proposed to be a change to NPPF paragraph 89 rather than a consideration of a local plan.</p> <p>As is emphasised in the Strategic Green Belt Review "this review itself does not determine whether or not land should</p>
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<p>themselves that it is necessary to retain such sites as Green Belt not just for this plan period but well beyond, it is incumbent on the LPA to openly consider the future of such sites as part of the Local Plan process. There is no evidence in public documentation demonstrating that to date the Council has done so.</p> <p>The Response queried the scoring of some of the elements of the Review and question whether some of the statements made were correct stressing that hard standing and the brownfield nature of the site.</p> <p>Stress that the question is more complex than looking at it simply as Green Belt and that the site would assist in urban regeneration and doing nothing means that there is a demonstrably detrimental effect.</p> <p>The representations state that the Inspector on the withdrawn Local Plan give a clear indication of an expectation that some areas of current Green Belt which no longer fulfil Green Belt criteria will be removed as part of this Local Plan process. Particular emphasis was put on the Inspector's statement</p> <p>"Why are areas identified as making a negligible or no contribution to Green Belt purposes being retained as Green Belt?"</p> <p>The site is the strongest candidate for the reasons stated and would be suitable for residential development contributing towards housing needs of Kirkby. There is firm developer</p>	<p>remain or be excluded from the Green Belt." It is the role of the Council's emerging Local Plan to formally revise Green Belt boundaries and to allocate land for development, having taken into account all relevant planning considerations. This includes whether there are, in the first instance, exceptional circumstances for altering existing boundaries. It is not the role of the Review to establish whether or not such exceptional circumstances exist, but if there is a need to alter Green Belt boundaries, the review is intended to inform how this might best be done. It undertake an assessment of the relative value of areas within the Green Belt against the five purposes of including land in Green Belts set out in NPPF paragraph 80.</p> <p>In terms of the Green Belt scoring the site has scored 6 out of 20 points indicates that it does meet the 5 purposes of the Green Belt, albeit to a lesser extent than some other sites. As such, there is no justification for removing the site from Green Belt. The Council is satisfied that the scoring is correct in the Green Belt Review. The public highway adjoining the site on Balls Lane and Derby Road does not form an 'urban' boundary as both roads adjoin open countryside in this location. With regard to the score for 'Assist in safeguarding countryside from encroachment' the Council is satisfied that the assessment is correct. The bungalow and poultry sheds accommodate approximately 20% of the site (not 50% as stated in the submitted response).</p> <p>The Inspector in his letter dated 26<sup>th</sup> March 2014 raised specific concerns regarding the Council's Strategic Green Belt Review' dated August 2013. The representation emphasising the</p>
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<p>interest in the site if taken out of the Green Belt.</p> <p>Comments were set out on the other parcels of land forming KA3 stressing that Site 5 (former Beacon Farm) has no physical or even visual connection with the remainder of KA03.</p> <p>The response also states that when seeking sites for development, the Council has failed to systematically identify and prioritise suitably located areas of PDL for development before looking to allocate areas of open countryside and/or Green Belt which, unlike KA03 Site 5 (Beacon Farm) have the potential to continue to fulfil the purposes of Green Belt. KA03 Site 5 has very strong logical long term defensible boundaries such that its removal from the Green Belt and indeed its allocation for development would have no detrimental effect on the open countryside/Green Belt beyond and, in our view, would represent a logical 'rounding off' of development in this locality. Moreover, importantly, development on the site would utilise Brownfield land and represent sustainable development in accordance with NPPF guidelines and would clearly assist in Urban Regeneration.</p>	<p>Inspector's statement reflects the Inspector's concerns. As a result of the Council has worked with neighbouring authorities to develop a joint approach to Green Belt assessment and undertake a revised assessment of the Green Belt seen in the Strategic Green Belt Review Dec 2015.</p> <p>The Inspector in his letter of 26<sup>th</sup> March 2014 sets out "....it is clear that there must be a robust and compelling justification for allocating Green Belt land for housing in preference to sites which are not in the Green Belt. However, I am not persuaded that such 'exceptional circumstances' have been clearly set out in the evidence provided. This is primarily due to the concerns I have expressed above about the assessment of sites which can be summarised as follows:</p> <ol style="list-style-type: none"> <li>1. From the evidence base provided, it is not possible for me to reach a clear understanding of how decisions have been arrived at to allocate some sites and not others. Nor is it clear how important factors relating to town centre regeneration and landscape/visual effects have been considered.</li> <li>2. I am not convinced that all reasonable site options outside the Green Belt have been evaluated, in particular smaller parcels of land within the potential SUEs.</li> </ol> <p>Consequently, I cannot be sure that all possible options for development outside the Green Belt have been exhausted or that the development of Green Belt land would represent a</p>
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	<p>significantly more sustainable option than development of land which is not in the Green Belt. For these reasons, the evidence does not clearly demonstrate that there are exceptional circumstances to justify altering the Green Belt boundary, particularly in relation to Kirkby.”</p> <p>The Council’s Sustainability Appraisal sets out the approach taken to housing and employment strategies and considers a series of options. These options including taking into account the impact of the Green Belt. It identifies that in relation to Kirkby-in-Ashfield, the Green Belt is located to the south and south east of the town. This means that land to the west and north of Kirkby-in-Ashfield is in the countryside, which does not have the same national policy emphasis. On this basis, it is not considered that the development of Green Belt land would represent a significantly more sustainable option than development of land which is not in the Green Belt. As such, the evidence would not clearly demonstrate that there are exceptional circumstances to justify altering the Green Belt boundary in relation to Kirkby-in-Ashfield.</p>
ACCESS identifies that under Para 1.4 we note that this is a technical exercise and does not determine whether or not land should remain or be excluded from the Greenbelt and that it is the role of the emerging Local Plan to form revised Green Belt boundaries.	<p>It is confirmed that the Review is a technical exercise and does not determine whether or not land should remain or be excluded from the Green Belt. It is the role of the District’s emerging Local Plan to formally revise Green Belt boundaries and to allocate land for development, where appropriate, having taken into account all relevant planning considerations. This includes whether there are, in the first instance, exceptional circumstances for altering existing boundaries. It is not the role of the Strategic Green Belt Review to establish whether exceptional circumstances exist, but should there be a need to</p>



<p>Specifically, examining site area KA11, Sub site 1 - we note that nowhere within this document does the historical significance of Little Oak Plantation as Ancient Woodland be mentioned. Ancient Woodland had significance importance in determining on how historical settlements emerged and we feel it is a failure to neglect this in assessing the merits of greenbelt portions</p> <p>KA11 – area Map, Assessment 1, Sub-site 1 – Sub-site 2</p> <ul style="list-style-type: none"> <li>• All references to “Annesley” should state “Annesley Woodhouse” to clearly differentiate between the main settlements of “New Annesley”, “Annesley” &amp; “Annesley Woodhouse” throughout all documentation</li> <li>• Sub-site 2 documentation clearly states “<i>currently mitigated by the wooded area and tree belts</i>”, consider changing to “<i>currently mitigated by the wooded area and tree belts, although a management plan is in place to replace currently planted pine that is approximately 20 years old with native species and meadow areas which will considerably diminish the visible screening between residents on Forest road and the sites on Sherwood Business park</i>”</li> </ul> <p>ACCESS would contend that the return to Green Belt and the LWS status of land identified as AN10, &amp; the disused allotments, should be included in this assessment. This would</p>	<p>alter Green Belt boundaries, for instance to accommodate an established need for new development, the Review is intended to inform how this might best be done.</p> <p>The key elements to determine Green Belt boundaries is set out in NPPF paragraph 85 including defining boundaries clearly, using physical features that are readily recognisable and likely to be permanent. The designation of Little Oak Planation as an Ancient Woodland does not relate to this aspect and therefore would not be included within the document.</p> <ul style="list-style-type: none"> <li>• Comments are acknowledged and the amendments will be made to the Strategic Green Belt Review to differentiate between ‘New Annesley’ ‘Annesley’ and ‘Annesley Woodhouse’.</li> <li>• Comments noted, however it is not considered appropriate to put the level of detailed suggested into the Strategic Green Belt Review document.</li> </ul> <p>The return of site AN10 – Forest Road, Annesley Woodhouse, is detailed in another evidence base document – ‘Green Belt Boundary Review Technical Paper 2015’. It is not considered</p>
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<p>enable the separation which has existed between Forest Road residences and the industrial users of Sherwood Business park for the last 20+ years to be maintained and improved and the word of “very narrow” possibly be changed to “narrow”.</p> <p>The inclusion of AN10 in this assessment would also bring together invaluable assets to provide a combined profile of a Neutral Grassland, Meadow Area (Forest Road Nature Area - now known as Oak Wood fields) and Ancient Woodland within a unique setting/area enabling a vast diversity of habitats, but still preserving the function of Greenbelt. We ask that these points are considered.</p>	<p>appropriate or necessary to include this dite within the Strategic Green Belt Review document.</p>
<p><b>Strategic Green Belt Review - U03 (Assessmnet 1)</b> Additional supporting text has been added to ‘Preserve the setting and special character of historic settlement’ for clarification.</p>	<p>Strategic Green Belt Review – U03 (Assessment 1) Amend supporting text for ‘Preserve the setting and special character of historic settlement’ to:</p> <ul style="list-style-type: none"> <li>• <del>Topography of the land means that development is likely to have an adverse impact on the setting of Bagthorpe Conservation Area especially longer views from within the valley to the north. Encroachment of development will erode the rural setting of the Lower Bagthorpe Conservation Area.</del></li> <li>• The majority of the area is not in the Bagthorpe Conservation area and does not contain any designated heritage assets. No local heritage assets have been identified at this time.</li> <li>• Due to the topography of the land to the south of the conservation area and the open character and low field boundaries, parts of the area are highly visible from the conservation area. Development would reduce the rural</li> </ul>

	<p>setting that is significant to the character of Bagthorpe resulting in an urban encroachment that would be harmful to the setting of the conservation area.</p>
<p><b>Strategic Green Belt Review - U03 / Site 1</b>            Site 1 was awarded 5 out of 5 for 'Preserve the setting and special character of historic settlement'. The score of 5 relates to the whole of U03 rather than to subsite 1, this was an error. The site has been reassessed by the Council and has been scored 2 out of 5.</p>	<p>Strategic Green Belt Review – U03 / Site 1            'Preserve the setting and special character of historic settlement' delete 5 and replace with 2.            Amend supporting text to:</p> <ul style="list-style-type: none"> <li>• <del>Topography of land means that development is likely to have an adverse impact on the setting of Bagthorpe Conservation Area especially longer views from within the valley to the north. Encroachment of development will erode the rural setting of the Lower Bagthorpe Conservation Area.</del></li> <li>• The site is not in the Bagthorpe Conservation area and does not contain any designated heritage assets. No local heritage assets have been identified at this time. The site is within the setting of the Bagthorpe Conservation Area and the wider setting of Grade II listed Remains of Wansley Hall, Grade II listed Barn 50m east of Wansley Hall and the Scheduled Monument of the Wansley Hall manorial site. There is potential for development to be visible from the conservation area and the designated heritage assets at Wansley Hall which could undermine the understanding of the medieval landscape.</li> </ul>
<p><b>Strategic Green Belt Review – U03 / Site 2</b>            Site 2 was awarded 5 out of 5 for 'Preserve the setting and special character of historic settlement'. The score of 5 relates to the whole of U03 rather than to subsite 2, this was an error. The site has been reassessed by the Council and has been scored 1 out of 5.</p>	<p>Strategic Green Belt Review – U03 / Site 2            'Preserve the setting and special character of historic settlement' delete 5 and replace with 1.            Amend supporting text to:</p> <ul style="list-style-type: none"> <li>• <del>Topography of land means that development is likely to</del></li> </ul>

	<p>have an adverse impact on the setting of Bagthorpe Conservation Area especially longer views from within the valley to the north. Encroachment of development will erode the rural setting of the Lower Bagthorpe Conservation Area.</p> <ul style="list-style-type: none"> <li>• The site is not in the Bagthorpe Conservation area and does not contain any designated heritage assets. No local heritage assets have been identified at this time. The topography of the land to the south of the conservation area means that the ability to see this site from the Bagthorpe conservation area is very limited and is unlikely to have an adverse or harmful impact on the setting of Bagthorpe Conservation Area.</li> </ul>
<p><b>Strategic Green Belt Review – U03 / Site 3</b>          Site 3 was awarded 5 out of 5 for ‘Preserve the setting and special character of historic settlement’. The score of 5 relates to the whole of U03 rather than to subsite 3, this was an error. The site has been reassessed by the Council and has been scored 2 out of 5.</p>	<p>Strategic Green Belt Review – U03 / Site 3          ‘Preserve the setting and special character of historic settlement’ delete 5 and replace with 2.          Amend supporting text to:</p> <ul style="list-style-type: none"> <li>• <del>Topography of land means that development is likely to have an adverse impact on the setting of Bagthorpe Conservation Area especially longer views from within the valley to the north. Encroachment of development will erode the rural setting of the Lower Bagthorpe Conservation Area.</del></li> <li>• The site is not in the Bagthorpe Conservation area and does not contain any designated heritage assets. No local heritage assets have been identified at this time. The topography of the land to the south of the conservation area means that there is greater potential for development here to be visible from the conservation area. Harm to the setting would most likely be less than substantial and</li> </ul>

<p><b>Strategic Green Belt Review – U03 / Site 4</b> Additional supporting text has been added to ‘Preserve the setting and special character of historic settlement’ for clarification.</p>	<p style="color: red;">through mitigation measures could be further reduced.</p> <p>Strategic Green Belt Review – U03 / Site 4 Amend supporting text for ‘Preserve the setting and special character of historic settlement’ to:</p> <ul style="list-style-type: none"> <li><del>Development of the site is unlikely to have an adverse impact on the setting of Bagthorpe Conservation Area. The site adjoins existing modern development to the east and does not extend beyond this modern development.</del></li> <li style="color: red;">The site is not in the Bagthorpe Conservation area and does not contain any designated heritage assets. No local heritage assets have been identified at this time. The topography of the land to the south of the conservation area means that there is greater potential for development here to be visible from the conservation area. Harm to the setting would most likely be less than substantial and through mitigation measures could be further reduced.</li> </ul>
<p><b>Strategic Green Belt Review – U03 / Site 5</b> Additional supporting text has been added to ‘Preserve the setting and special character of historic settlement’ for clarification.</p>	<p>Strategic Green Belt Review – U03 / Site 5 Amend supporting text for ‘Preserve the setting and special character of historic settlement’ to:</p> <ul style="list-style-type: none"> <li><del>Topography of land means that development is likely to have a significant adverse impact on the setting of Bagthorpe Conservation Area especially longer views from within the valley to the north. Encroachment of development will erode the rural setting of the Lower Bagthorpe Conservation Area.</del></li> <li style="color: red;">The site is not in the Bagthorpe Conservation area and does not contain any designated heritage assets. No local heritage assets have been identified at this time. Due to the topography of the land to the south of the conservation</li> </ul>

	<p>area and the open character and low field boundaries the site is highly visible from the conservation area.</p> <p>Development at this site would reduce the rural setting that is significant to the character of Bagthorpe resulting in an urban encroachment that would be harmful to the setting of the conservation area.</p>
<p><b>Strategic Green Belt Review – U03 /Site 6</b></p> <p>Site 6 was awarded 5 out of 5 for ‘Preserve the setting and special character of historic settlement’. The score of 5 relates to the whole of U03 rather than to subsite 6, this was an error. The site has been reassessed by the Council and has been scored 1 out of 5.</p>	<p>Strategic Green Belt Review – U03 / Site 6</p> <p>‘Preserve the setting and special character of historic settlement’ delete 5 and replace with 1.</p> <p>Amend supporting text to:</p> <ul style="list-style-type: none"> <li><del>Topography of land means that development is likely to have a significant adverse impact on the setting of Bagthorpe Conservation Area especially longer views from within the valley to the north. Encroachment of development will erode the rural setting of the Lower Bagthorpe Conservation Area.</del></li> <li>The site is not in the Bagthorpe Conservation area and does not contain any designated heritage assets. No local heritage assets have been identified at this time. The ability to see this site from the conservation area is minimal, development is not likely to be considered harmful to the setting of the conservation area.</li> </ul>
<p><b>Strategic Green Belt Review – U03 / Site 7</b></p> <p>Site 7 was awarded 5 out of 5 for ‘Preserve the setting and special character of historic settlement’. The score of 5 relates to the whole of U03 rather than to subsite 7, this was an error. The site has been reassessed by the Council and has been scored 3 out of 5.</p>	<p>Strategic Green Belt Review – U03 / Site 7</p> <p>‘Preserve the setting and special character of historic settlement’ delete 5 and replace with 3.</p> <p>Amend supporting text to:</p> <ul style="list-style-type: none"> <li><del>Topography of land means that development is likely to have a significant adverse impact on the setting of Bagthorpe Conservation Area especially longer views from</del></li> </ul>

	<p>within the valley to the north. Encroachment of development will erode the rural setting of the Lower Bagthorpe Conservation Area.</p> <ul style="list-style-type: none"> <li>The site is not in the Bagthorpe Conservation area and does not contain any designated heritage assets. No local heritage assets have been identified at this time. The site is screened in views from the conservation area but development would potentially be more visible and would result in some harm due to the setting due to a reduction of the rural setting that is important to the character of the Bagthorpe Conservation Area.</li> </ul>
<p><b>Strategic Green Belt Review – U03 / Site 8</b> Additional supporting text has been added to 'Preserve the setting and special character of historic settlement' for clarification.</p>	<p>Strategic Green Belt Review – U03 / Site 8 Amend supporting text for 'Preserve the setting and special character of historic settlement' to:</p> <ul style="list-style-type: none"> <li><del>Topography of land means that development is likely to have a significant adverse impact on the setting of Bagthorpe Conservation Area especially longer views from within the valley to the north. Encroachment of development will erode the rural setting of the Lower Bagthorpe Conservation Area.</del></li> <li>This site is partly within the Bagthorpe Conservation Area. Development at this site is likely to be harmful to the character and appearance of the conservation area.</li> </ul>
<p><b>Transport Study</b></p>	
<p>Noted that the transport study is out of date when compared to the proposals submitted under this LPPA. However, we welcome the initiative by the Council, that this document is being re-commissioned to take into account the cumulative</p>	<p>Support for updated Transport Study acknowledged.</p>

<p>effects of already committed development schemes (but not yet commenced) and proposed schemes being put forward within this LPPA.</p> <p>Concerns expressed over A611 in relation to Annesley Woodhouse which is one of Nottinghamshire's most congested and slowest roads in all a.m. and p.m. peak travel periods and that all junctions are already working to near capacity or over and therefore welcome this study. Set out that has a negative impact on firms locating to Sherwood Park and raised that a number of specified housing allocation/permission in Ashfield, Mansfield and Gedling will add to traffic.</p>	
<p>ACCESS is disappointed that the Ashfield Transport Study Update -- June 2013 is out of date compared with the locations chosen for this current Local Plan consultation. However, we welcome the initiative by the Council, to re-commissioned a Study to take into account the cumulative effects of the schemes in the Local Plan.</p> <p>Residents in Annesley Woodhouse are aware that the A611, is one of Nottinghamshire's most congested and slowest roads in all a.m. and p.m. peak travel periods and that all junctions are already working to near capacity or over. The congestion has a further impact in that it detracts companies from locating at the vacant units of Sherwood Business Park. We welcome that the Update Study takes into account various sites identified in the submission. It should also building in the high office vacancy rates at Sherwood Park.</p>	<p>The Council has commissioned a Transport Study which provides an assessment of the transport related implications of growth within the District to 2032. It includes various sites outside the District. However, it does not include the Newstead Eco Park identify in the representations submitted.</p>



Please note that comments relating to specific housing sites can be found under the site specific responses.

### Proposed Amendments

Issue/Policy	Amendment
Housing Site Selection Technical Paper - Page 6 (see comment)	Amend to reflect the footnote in NPPF para 47 footnote 11 and 12.
<b>Proposed Officer Amendments</b>	
Housing Site Selection Technical Paper - Introductory text, Landscape section for clarification.	Current text: 'Generally sites that have scored the highest with regard to the capacity to accommodate development have not been selected to be taken forward. However, the Council has decided to take forward Beck Lane in Skegby, which has scored the highest in terms of its capacity to accommodate development. This is due to the fact that many of the sites submitted to the Council have severe access constraints which creates a high risk that development would not be delivered within the 15 year Plan period. Beck Lane has fewer physical constraints and there is an extant planning permission for a football academy on the site. As such, the principle of some development on the site which will impact on the landscape has already been established. The site also lies adjacent to the MARR, which is a regeneration corridor supported by D2N2, which development on the site will help support.' Change to 'The impact of the building on the landscape and the associated movement of traffic has been taken into account in determining the suitability of this site for allocation.'
Housing Site Selection Technical Paper Page 65 and Page 69	Remove sites S363 and S394 from the 'Sites not taken forward' section. They have been taken forward as an allocation with S68, S71 and S337 (Beck Lane).
Housing Site Selection Technical Paper - Page 45	Amend title 'Housing Sites not taken forward' to 'Alternative housing sites (not allocated)'.

Housing Site Selection Technical Paper - Teversal sites	Set out reasons for the sites not being taken forward: 'Results from Accessible Settlements Study indicate that the settlement has poor access to services and facilities (lowest scoring settlement in the District).'
Housing Site Selection Technical Paper - Introductory text, Green Belt.	Amend text to reflects the Spatial Approach to Housing Options Paper in terms of the 'Exceptional circumstances' for Green Belt release.
Housing Site Selection Technical Paper	Allocation SKA3l - Alfreton Road. Amend boundary and area of site to reflect changes in land identified as part of the allocation.
Housing Site Selection Technical Paper	Add the Main Urban Area boundary around PJ2sd, PJ2ha and SKA3p
Housing Site Selection Technical Paper	Housing allocation (SHLAA ref V87) Park Lane, Selston. Amend the boundary to exclude the bungalow. Amend the boundary to include the land south of the bungalow.
Housing Site Selection Technical Paper	Housing allocated SKA3q 25 - Common Road incorrectly identified by Nottinghamshire County Council as part of the SHLAA site. Amend housing allocated SKA3q to remove 25 Common Road from the allocated site.
Housing Site Selection Technical Paper	Housing allocation SKA3h Beck Lane. Amend site boundary. A small area of the site has been sold since the SHLAA site was submitted and now forms part of the garden to 17a Beck Lane.
Housing Site Selection Technical Paper	Housing allocation SKA3ac Alfreton Rd, Sutton – Policies Map boundary revision. Amend boundary to remove 249 Alfreton Road and replace with access via 251 Alfreton Road.
Housing Site Selection Technical Paper	Amend site boundary as per submitted site plan to include 0.01 hectares of land to the west (land adjoining Spring Street).
Housing Site Selection Technical Paper	Mowlands SKA3al - Amend boundary of the site allocation to follow ridgeline and removal of the Ancient Woodland from the allocation boundary.

Housing Site Selection Technical Paper	Allocation SKA3I - Alfreton Road. Amend boundary and area of site to reflect changes in land identified as part of the allocation.
Housing Site Selection Technical Paper	<p>Site K79 Mowlands – Set out additional text identifying the impact on Conservation Area and other heritage assets i.e. <b>The delivery of housing will enable the Council to meet the objectively assessed housing need. This is considered to be a public benefit which outweighs the harm (assessed as ‘less than substantial harm’) that will be inflicted on the CA.</b></p> <p>Amend the conclusion:</p> <ul style="list-style-type: none"> <li>• To correct an error – ‘It has been determined that it could deliver a maximum of <del>1000</del> 880 dwellings (<del>1015</del>).</li> <li>• To demonstrate that heritage and wildlife have been taken into account add the following text:</li> </ul> <p><u>Heritage</u></p> <p>Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special attention to be paid to the desirability of preserving or enhancing the character or appearance the conservation area. The Council acknowledges that development has the potential to cause harm to the character and appearance of Kirkby Cross Conservation Area. Any planning application would require heritage statements that describe the significance of each aspect of the conservation area affected. New development in a conservation area can preserve or enhance its character and appearance subject to suitably acknowledging the heritage assets affected and avoiding harm or by applying suitable mitigation measures, especially in reducing risk to a heritage asset. The NPPF also has a presumption against harmful development unless public benefits of a scheme can be considered to outweigh the harm. Whilst recognising the harm that may be caused, it is also necessary to acknowledge that there are opportunities to enhance the character and appearance of the</p>

	<p>Conservation Area through a suitably designed scheme. Taking into consideration the ability of the site to deliver a significant proportion of the objectively assessed housing needs of the district, subject to an acceptable access solution, the Council considers that the public benefits of delivering housing, including affordable housing, and associated infrastructure, will outweigh any potential harm.</p> <p><u>Wildlife / Green Space / Agricultural Land</u></p> <p>The northern element of the site includes a Local Wildlife Site and an area of Protected Green Space some of which may be required to achieve access, only. In such a scenario, the Council believes the benefits resulting from a future development would outweigh the potential loss of part of the site for a means of access. As a result of any loss / impact, a future development would need to include appropriate mitigation to help offset this loss. Broad details will be included within the site's development brief which will help inform more detailed proposed at application stage.</p> <p>Any future development would need to protect public rights of way, and Ancient Woodland at its western boundary.</p> <p>As detailed within the introduction, due to the lack of deliverable housing sites and the need to balance other considerations, the Council has had to propose the allocation of sites that contain Grade 2 soils. Natural England have been consulted on the proposed plan and have not raised any objections related to this</p>
Housing Site Selection Technical Paper	<p>Beck Lane conclusion – amend:</p> <p>If it can be demonstrated that highway constraints can be mitigated' to 'Highway constraints can be mitigated.</p> <p>Also remove:</p> <p><del>The principle of development has also been established on the</del></p>

	<p>site through an extant permission for a football academy’ – replace with ‘There is also an extant planning permission for a football academy on the site (which includes an indoor football centre) and associated parking. The impact of the building on the landscape and the associated movement of traffic has been taken into account in determining the suitability of this site for allocation.</p>
Housing Site Selection Technical Paper - For clarification.	<p>SHLAA Site H4 Stubbing Wood Farm Add to the site selection document conclusion for SHLAA site H4 Stubbing Wood Farm: The site is not capable of accommodating the number of new homes required to meet the objectively assessed housing needs of the District (site capacity 200 dwellings). Broomhill Farm Extension can accommodate more than twice the amount of development (site capacity 480 dwellings).</p>
Housing Site Selection Technical Paper	<p>Some of the headers in the ‘conclusions’ section (<u>Conclusion</u>) are incorrect ‘(<u>Consultation</u>)’. Replace <u>Consultation</u> with <u>Conclusion</u> (see site V335).</p>
Housing Site Selection Technical Paper - For clarification.	<p>SHLAA site S74 Fackley Road, Teversal Amended wording: A development of the size proposed would have a significant impact on the gap between Teversal and Stanton Hill and the rural character of the settlement. There are also severe highway constraints and it is unclear if these can be mitigated.</p>
Housing Site Selection Technical Paper - For clarification.	<p>SHLAA K26 Penny Emma Way – add to the Site Selection Technical Paper conclusion: The site would not form a logical urban extension because it would need to be accessed via Penny Emma Way and it is slightly separate from Kirkby Hardwick. It is a very narrow plot of land which faces an industrial estate with very large industrial buildings. Development would be incongruous in this setting.</p>

Housing Site Selection Technical Paper - For clarification.	SHLAA site S75 Pleasley Road, Teversal. Under SA – Remove: <del>unlikely to affect heritage assets' from the positive</del> and add: Development in this location would have an adverse impact on the rural character of the area, including the entrance route to Teversal Conservation Area under 'Negative'.
Housing Site Selection Technical Paper - For clarification.	SHLAA site S380 Pleasley Road, Teversal. Add to SA negative and conclusion re landscape Capacity to Accommodate Development - Score 2 Medium:  Medium capacity impact if development mirrored the row of cottages to the west of the site with new build set at the same distance from the road and extending the same length back in terms of rear gardens. Other development not in keeping with the existing housing would create a high impact. As such, development of the whole site would impact on the openness of the area.
Strategic Housing Land Availability Assessment (SHLAA) – Reflects that additional information is available.	H20 – Land south of Papplewick Lane. Amend expected delivery of the site to 5 – 10 years
Strategic Housing Land Availability Assessment (SHLAA)	S75 & S380 - Amend conclusion and heritage section to read: Development has potential to encroach on the rural character of the wider setting of Teversal and thus the experience of how the village is approached. The NPPF defines setting and reminds us that experience forms part of understanding setting. Insensitive access points and substantial loss of tree screening would be harmful to the rural character of the setting of the conservation area but potentially could be mitigated against.
Strategic Housing Land Availability Assessment (SHLAA)	S60 Amend planning history to include – previous application refused (due to Countryside policy).

Strategic Housing Land Availability Assessment (SHLAA)	Allocation SKA3l - Alfreton Road. Amend boundary and area of site to reflect changes in land identified as part of the allocation.
Strategic Housing Land Availability Assessment (SHLAA)	Housing allocation (SHLAA ref V87) Park Lane, Selston. Amend the boundary to exclude the bungalow. Amend the boundary to include the land south of the bungalow.
Strategic Housing Land Availability Assessment (SHLAA)	Housing allocated SKA3q 25 - Common Road incorrectly identified by Nottinghamshire County Council as part of the SHLAA site. Amend housing allocated SKA3q to remove 25 Common Road from the allocated site.
Strategic Housing Land Availability Assessment (SHLAA)	Housing allocation SKA3h Beck Lane. Amend site boundary. A small area of the site has been sold since the SHLAA site was submitted and now forms part of the garden to 17a Beck Lane.
Strategic Housing Land Availability Assessment (SHLAA)	Housing allocation SKA3ac Alfreton Rd, Sutton – Policies Map boundary revision. Amend boundary to remove 249 Alfreton Road and replace with access via 251 Alfreton Road.
The inclusion of the land would result in an improvement to the environment due to the overgrown/unmanaged state of the land.	Amend site boundary as per submitted site plan to include 0.01 hectares of land to the west (land adjoining Spring Street).
Strategic Housing Land Availability Assessment (SHLAA)	Mowlands SKA3al - Amend boundary of the site allocation to follow ridgeline and removal of The Dumbles/Local Wildlife Site from the allocation boundary.
Strategic Housing Land Availability Assessment (SHLAA)	Allocation SKA3l - Alfreton Road. Amend boundary and area of site to reflect changes in land identified as part of the allocation.
Strategic Housing Land Availability Assessment (SHLAA)	Beck Lane conclusion – delete: If it can be demonstrated that highway constraints can be mitigated and add Highway constraints can be mitigated.  Also delete: The principle of development has also been established on the

**Ashfield District Council - Statement of Consultation**

	<p>site through an extant permission for a football academy' – replace with 'There is also an extant planning permission for a football academy on the site (which includes an indoor football centre) and associated parking. The impact of the building on the landscape and the associated movement of traffic has been taken into account in determining the suitability of this site for allocation.</p>
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<b><u>List of Respondents</u></b>									
<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>	<b>Respondent</b>	<b>Database Number</b>	<b>Object to the Policy</b>	<b>Support the Policy</b>	<b>Comment on the Policy</b>
Johnson	1886			√	Kirkby and District Archaeological Group	5643			√
Lathall	1917			√	Thompson	5812		√	
Collier	1918			√	Bolger	5817			√
Lathall	2631			√	Lathall	5819			√
Shaw	2707	√			Manders	6640			√
Nottinghamshire County Council	2803			√					
Cooper	2811			√	Banks	6700		√	
Collins	3034	√			Lewis	6729			√
Natural England	3185			√	Eyre	6897			√
ACCESS	5359				Elkington	6977			√
Ward	5807			√					





## **Appendix 1: Previous Consultations on Ashfield Local Plan & Local Development Framework**

### **Ashfield Local Plan 2010 - 2023 Preferred Approach (September 2012)**

- 4.2 The Ashfield Local Plan reflect the national planning guidance that ideally a local plan should be brought forward as a single plan rather than as a series of plans in the Local Development Framework. It integrated work arising from the previous consultations. The consultation was undertaken from 26<sup>th</sup> September to 9<sup>th</sup> November 2012. There were 1,300 representations from 635 respondents.
- 4.3 Responses could be made by letter, email or on-line via 'Wordpress'. The Council sent an email or letter to specific consultation bodies, Duty to Cooperate bodies and to all parties on the Local Plan Database including general consultation bodies. The consultation documents were available on the Council's website, at the Council offices and local libraries. Displays were undertaken at Sutton in Ashfield, Kirkby-in-Ashfield, Hucknall and Selston Libraries. Posters on the consultation were on display at community centres, leisure centres, Visitor Centres, some sub post offices and some doctors surgeries. Posters were also on display at Co-operative Store Selston, Asda, Sutton in Ashfield, The Idlewells Morrisson in Kirkby-in-Ashfield and Tesco's in Hucknall. Consultation Events were held with Developer, Landowner and Infrastructure Provider, Kirkby & Sutton Community Groups, Hucknall Community Groups and the Villages Community Groups. Letters and leaflets were sent to the secondary schools (follow up from previous consultation) at Holgate School, Ashfield School, Selston Arts College, Sutton Centre School, Hucknall National School. Post cards advertising the consultation were delivered to all primary schools in the District at the primary schools at Newstead and Bestwood Village (10,725 postcards were sent out). There were adverts in the Ashfield Chad, Hucknall Dispatch, Eastwood Advertiser, and the Ripley and Heanor News with news articles in the Ashfield Chad. Announcements on the consultation were made on Acacia Radio and Takeover Radio. Site notices were put on lamp posts or fences close or adjacent to proposed housing sites (Unless they had planning permission already).

### Key issues raised by representations

- 4.4 Most of the policies within the document received general support, including the creation of new homes and employment in the district. The vast majority of objections related to specific sites and were submitted by local residents that would be directly affected by the proposed development.

- 4.5 In particular, there was general opposition from local residents to proposed residential developments at:
- Nottingham Road, Hucknall
  - Rolls Royce, Hucknall
  - Derby Road, Kirkby
  - Opposite Vernon Farm, Derby Road, Kirkby
  - Skegby Road, Annesley Woodhouse
  - Rookery Farm, Sutton
  - Silverhill Lane, Sutton
  - Tibshelf Road, Sutton
  - Fackley Road, Sutton
  - Becks Lane, Sutton
  - Rushley Farm, Sutton
  - Alfreton Road, Selston
  - Winter Closes, Underwood
- 4.6 There was a significant amount of concern in relation to the cumulative impact of development in Ashfield and other districts on roads and motorway junctions, leading to congestion.
- 4.7 The ACCESS group raised issues regarding the potential increase in traffic density and air pollution from the proposed housing and other development along the A611 Corridor from its junction near the A60/A617 near the West Notts Technical College to the B6009 junction at Hucknall.
- 4.8 There was general concern that Policy EV1 (Green Belt and Countryside) applies the Green Belt test (very special circumstances) to the defined Countryside, in the context that the National Planning Policy Framework (NPPF) does not set out a 'very special circumstances' test for proposed development in the Countryside. The two designations are very different and it was felt to be inappropriate to have a policy test which covers both designations.
- 4.9 Opposition to the timescale of the plan being too short and not complying with paragraph 157 of the NPPF, with the soundness of the plan being compromised. It was also considered that the timescale may lead to a disjointed approach to housing delivery across the Greater Nottingham area, and consideration of a fifteen year timescale should be given, in line with Mansfield, Gedling and Broxtowe Councils.
- 4.10 Concerns were raised over specific possible cases of surface water run off and the potential contamination of water by the new road proposed at Rolls Royce.
- 4.11 Objections to the loss of Green Belt, agricultural and open countryside.

- 4.12 Some alternative employment sites were proposed as a result of the consultation. However, there are sufficient existing sites allocated throughout the District to meet the anticipated demand and no changes are proposed.
- 4.13 The Council's decision to prepare a Local Plan was welcomed by the Whyburn Group and considered to follow the requirements of the National Planning Policy Framework.
- 4.14 There was support for the plan from Natural England concerning the emphasis on public transport, walking and cycling, and the protection and enhancements of environmental assets.
- 4.15 The Theatre Trust supported the inclusion of theatres as an element of social infrastructure.
- 4.16 There was general support for the plan and policies from English Heritage, National Trust, Natural England, Nottinghamshire Wildlife Trust and Nottinghamshire County Council, with minor changes recommended to the text.
- 4.17 Gedling Borough Council supported the proposed employment allocations, including Rolls Royce and considers they are consistent with the Greater Nottingham Aligned Core Strategy Policy. The comments identify that Hucknall, as a Sub Regional Centre has a key role both in growing and diversifying the local economy as part of Greater Nottingham area.
- 4.18 Mansfield District Council identified that the employment and economic regeneration approaches aligns with the Mansfield and Ashfield joint Economic Strategy.
- 4.19 Selston Parish Council understood the need for additional building within the rural areas as this is imposed by central government, but it objected to the possible large scale building proposed for Green Belt land. Selston Parish Council expressed concerns about the lack of retail and community services in Selston and Underwood. The number of new homes planned for the area also raised concerns about the impact on the existing services. The Parish Council made a request for a retail allocation to be included in the housing allocation on Alfreton Road, Selston (Policy HG1Va).
- 4.20 General support from Derbyshire County Council was expressed in terms of the preferred housing target. It advised that higher growth could significantly compromise the main Green Belt purposes and there are unlikely to be any significant cross boundary implications for Amber Valley and Bolsover districts due to the scale of provision.

- 4.21 There was support from the National Farmers Union with regard to the rural economy and Green Belt policy.
- 4.22 Network Rail supported the Green Belt policy, particularly in respect of railway installations within rural locations. This is considered to be consistent with the advice in the NPPF allowing essential local transport infrastructure in the countryside.

### **Key changes made to the Local Plan Preferred Approach**

- 4.23 The Local Plan Preferred Approach has been subject to a number of changes to the wording of policies and text to reflect:
- Comments of consultees and respondents to Local Plan Preferred Approach.
  - Editing and formatting to the wording of the policies and text to give uniformity to the Plan.
  - Updating of the information set out in the Plan.
  - Changes considered to be necessary to reflect national planning policy guidance.
- 4.24 The Local Plan was extended to run from 2010 to 2024 to cover a ten year period. The consequence was that additional housing figures were identified as follows: The Portrait of Ashfield was amended to include additional information in the area profiles on the historic character of Hucknall, Sutton-in-Ashfield/, Kirkby-in-Ashfield and Selston, Jacksdale and Underwood.
- Hucknall; 2,460 dwellings for the period 2010 to 2024.
  - Sutton-in-Ashfield and Kirkby-in-Ashfield; 4,438 dwellings for the period 2010 to 2024.
  - Selston, Jacksdale and Underwood; 742 dwellings for the period 2010 to 2024.

No changes were made in relation to employment land as the demand figures reflected a period to 2026.

- 4.25 The Vision and Strategic objectives were identified as reflecting the Preferred Approach. However, some of the strategic objectives were subdivided to give greater clarity.
- 4.26 Most of the objections received were in relation to the residential site allocations from local residents. Whilst the Council recognised the concerns and objections of those residents, decisions had to be balanced with the wider needs of the District as a whole and the potential to deliver improvements, as well as national planning guidance.

4.27 Sites were assessed in relation to the Council's Vision, the Strategic Housing Land Availability Assessment (SHLAA) the Sustainability Appraisal (SA). For this reason, and on the basis of evidence provided, the Council considered the majority of the housing site allocations set out in the Local Plan Preferred Approach were the most appropriate sites for future development.

4.28 Due to issues with regard to access, ownership, environmental issues and highway constraints, the following housing sites have been removed from the Local Plan:

- HG1Sg – Land at the Avenue, Sutton
- HG1Sa – Rear of Hilltop Farm, Huthwaite
- HG1Kh – Kirklands Residential Home, Fairhaven, Kirkby
- HG1Hp – Land Rear of 162 – 220 Nottingham Road, Hucknall
- HG1Vi – Land At Station Road, Selston

4.29 A number of large housing sites (over 10 dwellings) had planning permission since the Preferred Approach stage. It was proposed that the following sites are included as allocations under policy HG1:

- HG1 Sa - Stoneyford Road, Stanton Hill (planning permission);
- HG1Sg - Former Sutton Pools Complex, Brook Street, Sutton (planning permission);
- HG1Sy - Sheepwash Lane/Coxmoor Road, Sutton (planning permission);
- HG1Sx - Eastfield Side/Mansfield Road, Sutton (resolution for approval subject to a Section 106 Agreement);
- HG1S0 - Land off Vere Ave, Sutton and Gilcroft Street/St Andrew's Street, Skegby (planning permission).

4.30 Additional employment sites were put forward, as follows:

- Wyburn Farm, Hucknall approximately 18 ha,
- Land off Hamilton Road/Coxmoor Road, Sutton-in-Ashfield approximately 6 ha
- Land off Hamilton Road adjacent to Oakham Business Park, Sutton in Ashfield approximately 10 ha,
- Land adjacent to Caulderwell Wood, Northern Sherwood Way, Sutton in Ashfield approximately 14 ha
- Land off Pinxton Lane, Kirkby in Ashfield approximately 34 ha (Mowlands)
- Winter Closes, Underwood approximately 1.8 ha.

None of these sites were taken forward, reflecting the additional analysis undertaken in the Local Economy Summary Paper Supplementary

Analysis. The employment site PJ2Sf A38/Coxmoor Road was not taken forward as planning permission had been granted for residential development.

- 4.31 The Preferred Approach set out a combined policy covering the Green Belt and Countryside. This has been separated into a Green Belt Policy (EV1) and a Countryside Policy (EV2) within the Local Plan. It was accepted that it is not appropriate to apply the same policies to Countryside as those which apply to Green Belt as this does not accord with advice in the National Planning Policy Framework (NPPF).
- 4.32 A change to the policy on water quality was made to emphasise that opportunities should be taken to restore and enhance watercourses
- 4.33 A significant change was to include the safeguarding of land for minerals in Policy SP2. The Coal Authority and Nottinghamshire County Council minerals planners had pointed to the need to protect minerals. This is also a requirement in the NPPF in relation to minerals.
- 4.34 Rolls Royce was identified as a mixed use site to reinforce the link between the employment and housing requirements.
- 4.35 Policy EV12 Historic Environment Policy included additional criteria on the re-use of heritage assets, new shop-fronts, and the protection of valued existing shop-fronts.
- 4.36 Policy PJ3 - Rural Business Development, part of the Policy relating to reuse of rural buildings was been removed as it is covered by Green Belt and Countryside policies.
- 4.37 Policy PJ5 Education Skills and Training was amended to give greater emphasis to educational needs and contributions towards educational requirements.
- 4.38 Policy HG4 Open Space was amended to refer to new residential development contributing towards open space rather than green space. The policy was also amended so that contributions could be made towards town centre and public realm improvements where it is inappropriate to provide open space on site.
- 4.39 The town centre boundary of Hucknall was amended to align with the proposed Inner Relief Road.
- 4.40 Reference to Low Street/High Pavement, Sutton as a Business and Community Quarter was removed as this may change when the Masterplan is reviewed. There was also a requirement for a large supermarket in Sutton town centre and it would be better to be more flexible with regard to future development if this site.

- 4.41 A new policy on the Protection of Community Facilities has been included to reflect the emphasis in the NPPF and the Localism Act on community assets.
- 4.42 Minor changes are also proposed to the Policies Map to incorporate comments received regarding town centre boundaries, the deletion and addition of housing sites, and changes to open areas.

### **Ashfield Local Plan Publication Representations Period, 2013 - Summary of Issues Raised.**

- 4.43 The Local Plan Publication document and Sustainability Appraisal (SA) were approved by the Council on 25<sup>th</sup> July 2013. The Local Plan Publication and SA were subsequently available for representations for the period from 16<sup>th</sup> August to 5.00pm, 30<sup>th</sup> September 2013 in accordance with the Local Planning Regulations.
- 4.44 Listed below are the consultation methods which were undertaken as part of the Local Plan Publication consultation:
- All relevant consultation documentation was made available for inspection at the four Council Offices and all four major libraries throughout the District (Hucknall, Kirby, Sutton and Selston) for the duration of the consultation period;
  - The media was used to publicise the consultation and the content of the documentation;
  - Letters or emails were specific consultees, Duty to Cooperate bodies and to general consultees including individuals, companies and groups on the Local Plan Consultation Database;
  - Responses were requested on the form provided with responses being in writing, by email or via an online consultation tool.
- 4.45 A total of **1471** comments from **327** respondents are identified in the local plan database from the Regulation 20 consultation with representations being received from developers, landowners, residents, statutory consultees and members of the public. A summary of the main issues from the representation period are set out below. However, the Council considered that the representations received over the period did not raise any fundamental or significant new issues that had not already been raised and considered by the Council.

#### Key issues raised by representations

- 4.46 **Some respondents suggested that the Council had failed to meet the duty to cooperate.** The Council considered that it had worked



extensively with neighbouring authorities in Nottinghamshire and Derbyshire, as well as other key stakeholders.

- 4.47 **Some respondents had concerns that the Council's Strategic Housing Market Assessments was inadequate and out of date.** The Council acknowledged that the SHMA could not be relied on hence the substantial amount of effort Ashfield District Council has put into updating its evidence base with the production of various studies that replicate the work of the SHMA but can be given greater reliance on in the planning system. Ashfield's housing requirement was set at the higher end of the dwelling forecasts for the scenarios considered from the Population and Household Forecasts study.
- 4.48 **Concern expressed regarding the timescale of the Plan. This included representations from Nottingham City Council, Gedling Borough Council and Broxtowe Borough Council regarding the need for the Plan to aligned with the timescale of the Aligned Core Strategy (to 2028).** The Council set out that the Local Plan Publication (August 2013) makes it clear that, although the timeframe of the Plan is shorter than preferred by the NPPF, it is anticipated that further plans will be produced alongside Ashfield's communities and neighbourhoods soon after adoption to plan for a longer period. The Council recognises that their Local Plan has a shorter timeframe than preferred by the NPPF, but believes that the Localism agenda allows the Council to be pro-active in its choice of timescale in terms of local preference.
- 4.49 **Suggested that the Council had not met objectively assessed housing needs for Ashfield.** In line with Government policy advice set out in the NPPF, the Council has adopted a positive approach in seeking to meet the objectively assessed housing needs of the District, and to deliver the Council's vision of economic and housing growth. The Population and Household Forecasts study undertaken by Edge Analytics was completed in October 2011. The new forecasts use a nationally recognised population model called 'POPGROUP'. The model is based on the ONS 2008 sub-national population projections using the best available data for births, deaths, inward, outward migration to and from the District together with, where applicable, international migration. The results are given as population numbers and the effects that changes in numbers will have on the number of households and the labour force. The Study does not provide an answer to 'how many houses should be built', but provides a picture to inform the Council what the implications of different futures, or taking certain decisions, are likely to be. A number of different scenarios are considered and the total objectively assessed need for the District was identified as 7,640 (546 dwellings per annum) for the period 2010 to 2024.
- 4.50 **Concerns that the Affordable Housing viability study was out of date and there is no overall viability assessment taking account of the cumulative impact of policies. Suggested by HBF that Policies**

**includes a number of local standards which have not been justified and impact on viability.** The Viability Study was updated in December 2013 before submission and did not identify issues with the affordable housing requirements or policy impact on viability.

- 4.51 **Issues were raised in relation to various housing allocations in the Green Belt:**
- HG1Kd Oppose Vernon Farm, Kirkby-in-Ashfield and HG1Ke Derby Road (Off Abbey Road/Richmond Road, Kirkby-in-Ashfield.
  - HG1Vg Winter Closes, Underwood
- 4.52 **Representations identified that Green Belt land should not be utilised for housing allocation when land was available in the countryside to the west and north of Kirkby-in-Ashfield and around Sutton-in-Ashfield.**
- 4.53 **Concern regarding the robustness of the 2013 Strategic Green Belt Review and long term Green Belt boundaries.**
- 4.54 **Concerns raised on specific housing site allocations.** The Housing Technical Paper (Examination Library ref: ADC/SE/36) sets out the Council's approach to Housing Site Allocations. Sections 4, 5 and 6 of the Housing Technical Paper provide an analysis and justification for the approach taken.
- 4.55 **Concern that the same weight has been given to national and local environmental designations in Policy EV4.** It is acknowledged that amendments need to be made to part 3 of Policy EV4 to differentiate between designated international, national and local sites of biological or geological importance for nature conservation.
- 4.56 **Selston Parish Council set out concerns about housing and employment allocations and the impact of development on the local infrastructure.**
- 4.57 **Questions raised on the methodology of the Sustainability Appraisal.** The SA Framework was produced along with other the Aligned Core Strategy local authorities and neighbouring authorities and was published in the Scoping Report (June 2009). This allows for a shared approach to dealing with sustainability issues across Nottinghamshire. In response to consultation responses this SA Framework was later refined. The submitted SA report concludes that the Local Plan Policies perform well when judged against the SA framework and other reasonable alternatives.
- 4.58 **Issue raised that additional employment sites should be allocated along the MARR.** The sites allocation in Ashfield and immediately

adjacent authorities provided a high degree of flexibility and choice for potential occupiers.

**4.59 Concerns about the lack of infrastructure to support proposed development particularly regarding the impact of additional traffic on roads in the District.** The Infrastructure Delivery Plan (IDP) has been carried out by the Forward Planning Team at Ashfield District Council. It builds on the Greater Nottingham and Ashfield Infrastructure Capacity Study, June 2009 and takes into account the Greater Nottingham Infrastructure Delivery Plan, June 2012. The IDP has three parts:

- A written statement that describes the current situation and anticipated needs.
- Identification of the comments received from infrastructure providers in relation to the housing sites proposed in the Local Plan.
- A schedule that describes the **what**, **how**, **where** and **when** of infrastructure requirements.

In terms of congestion, the Ashfield Transport Study Update, May 2013 reached a number of conclusions:

- Congestion across the highway network is predicted to increase with sections of the network operating at or near to operational capacity. The additional traffic from the full development scenario disperses widely across the network, resulting in more roads that are predicted to operate close to their practical capacity where highway delays will be come perceptible to the driver.
- There are a few sections of the highway network which are predicted to operate beyond their ultimate capacity and as such significant delays are predicted. These routes include:
  - Sections of the Hucknall bypass and the A611 Annesley Road;
  - A38 between Sutton Road and A617; A617 between the A38 and the A60.
- The rural developments in the vicinity of Selston have limited strategic impact although local impacts may be identified at the detailed planning application stage.
- The implementation of a package of walking, cycling and public transport proposals in combination with a series of initiatives to encourage the use of non-car modes can mitigate some of these impacts (around 37% over the combined peaks). However, this assumes a high quality 15 minute frequency public transport service to all sites which may not be viable in all cases.

- A combination of road widening and signalisation schemes have been identified to address the residual highway impacts for the junctions in the vicinity of the Hucknall developments.
- The study confirms that regardless of where the development goes, there will be impacts along the A38 due to cumulative impacts and the limited number of main road routes.
- The impacts in the vicinity of the towns of Sutton and Kirkby are generally associated with the A38 or the main route through Kirkby Town Centre. Two alternative mitigation strategies have been identified to address these areas of congestion.