



## **DISCLAIMER**

This document or some parts of it may not be accessible when using adaptive technology.

If you require assistance with accessing the content of the document, please contact us and quote the document name and the web page you found it on:

- email: Forward planning – [localplan@ashfield.gov.uk](mailto:localplan@ashfield.gov.uk)
- telephone: 01623 457381



## **ASHFIELD DISTRICT LOCAL PLAN EXAMINATION IN PUBLIC NOVEMBER 2025**

### **Historic England Statement**

#### **1.0 Overview**

1.1 Historic England (HE) has been involved with the Local Plan process throughout, including responding to consultations on the following:

- Sustainability Appraisal (SA) Scoping Report in February 2020
- Regulation 18 Draft Local Plan consultation in November 2021 and
- Regulation 19 / Pre-Submission Draft consultation in January 2024.

HE also commented informally on the Ashfield Local Plan Heritage Impact Assessments (HIAs) September 2023, and subsequent amendments, produced as part of the evidence base to inform the Local Plan. Additionally, HE has produced a Statement of Common Ground (SoCG) in conjunction with Ashfield District Council in October 2025, which suggests various modifications to the Plan, and we can confirm that we have no concerns in respect of Duty to Co-operate matters.

1.2 At the Regulation 19 stage HE submitted a representation to the Pre-Submission Plan, highlighting several issues:

- we suggested that the recommendations of the Heritage Impact Assessment with regard to avoidance/mitigation and enhancement measures should be incorporated into the Plan within site specific policy wording;
- we did not consider Policy EV9 Historic Environment to be a sound policy, as we did not consider it to be legally compliant or effective;
- we maintained our objection to two sites proposed as strategic employment allocations at Junction 27 of the M1, noting that the Council had not taken account of its own heritage assessment and its recommendations, which, in line with our view, considered that such development could result in substantial harm to the Grade II\* heritage asset Annesley Hall Registered Park & Garden (RPG) and other associated heritage assets, with no mitigation measures included within the policy text; and
- we had some detailed comments on specific proposed allocations and policy wording, and we suggested amendments that would make policies effective and justified.

Therefore, we have welcomed certain modifications to the Plan suggested by the Council, which will address some of the above issues. Details of these proposed amendments and any matters on which HE and the Council are still in disagreement over, are set out in the SoCG - SCG.08: <https://www.ashfield.gov.uk/media/gk2b32q5/statement-of-common-ground-historic-england-2025-redacted.docx>

## **2.0 HE Current position in relation to the Inspectors Matters, Issues and Questions, October 2025**

- 2.1 With regard to the Inspectors' Matters, Issues and Questions Paper, Matter 7 raises a number of questions in relation to heritage and the natural environment, to which Historic England responds consecutively below:

### **Matter 7 – Heritage and the Natural Environment**

**Issue:** Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to heritage and the natural environment.

#### **Relevant Policies - EV1-EV10**

##### *Heritage and the Natural Environment*

#### **Q7.4 Has Policy EV9 been shaped by engagement with all stakeholders, including infrastructure providers and statutory consultees to ensure its consistency with national policy?**

- 2.2 As highlighted in paragraph 1.1 above, Historic England, as a statutory consultee, has been involved in the Ashfield Local Plan process since responding to a consultation on the Sustainability Appraisal (SA) Scoping Report in February 2020.
- 2.3 At the Regulation 18 consultation stage HE suggested some modifications to bring Policy EV9 more into line with the NPPF, particularly with regard to heritage assets of archaeological interest and non-designated heritage assets, as well as unidentified heritage assets.
- 2.4 At the Regulation 19 stage we made significant comments regarding Policy EV9, as we did not consider that the policy in the format proposed was sound, as it was not legally compliant or effective.
- 2.5 In response to our comments the Council is now proposing changes to the wording of Policy EV9, which have been discussed with HE and we support the proposed modifications to the policy text. Full details of these and the amended wording of Policy EV9 are set out in Appendix 1: Areas of Common Ground between Ashfield District Council and Historic England of the SoCG.

- 2.6 HE therefore considers that the Council has fully engaged with us in seeking to ensure that Policy EV9 is consistent with National policy.

***Q7.6 Do policies EV1 to EV10 serve a clear purpose, avoiding unnecessary duplication of national policy? Is the wording consistent with national policy?***

- 2.7 With regard to Policy EV9, duplication of national policy was an issue that HE raised in our Regulation 19 consultation response, as well as the issue of consistency with National policy.
- 2.8 Amendments to the policy wording to address these issues have been discussed with the Council and HE is supportive of the proposed modifications to Policy EV9, as set out in Appendix 1: Areas of Common Ground between Ashfield District Council and Historic England of the SoCG.

***Q7.7 Do policies EV1 to EV10 provide clear direction as to how a decision maker should react to a development proposal?***

- 2.9 With regard to Policy EV9, the issue of giving clear direction to decision makers was raised by HE in our Regulation 19 consultation response.
- 2.10 HE considers that the amendments to the policy wording proposed by the Council to address this issue will provide clarity to decision makers and HE is therefore supportive of the proposed modifications to Policy EV9, as set out in Appendix 1: Areas of Common Ground between Ashfield District Council and Historic England of the SoCG.

### **3.0 Summary**

- 3.1 With regard to policy EV9, Historic England considers that the amendments proposed in our Statement of Common Ground with the Council should be implemented to ensure that the policy serves a clear purpose, provides clear direction and is consistent with national policy as set out in the NPPF.
- 

938 words

Elizabeth Boden MA MRTPI  
Historic Environment Planning Adviser (Midlands)

[elizabeth.boden@historicengland.org.uk](mailto:elizabeth.boden@historicengland.org.uk)

27th November 2025