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ASHFIELD LOCAL PLAN 2023 TO 2040: MAIN MODIFICATIONS CONSULTATION

**Land South of Salmon Lane,
Annesley Woodhouse**

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July 2026



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1. Introduction

- 1.1.1. These representations are submitted on behalf of the promoters of Land South of Salmon Lane, Annesley Woodhouse (Site Reference KA062).
- 1.1.2. Previous more detailed representations to the Council were made in February/March 2025 in relation to the proposed additional housing allocations consultation and the need for Ashfield District Council to identify sufficient deliverable housing sites to address the housing shortfall identified by the Local Plan Inspectors.
- 1.1.3. Those representations demonstrated that Land South of Salmon Lane represents a sustainable and deliverable opportunity capable of making a meaningful contribution towards meeting housing needs throughout the Plan period.
- 1.1.4. Whilst we acknowledge that the Main Modifications seek to address issues identified through the examination process, we remain concerned that the amended Plan has not adequately considered all reasonable alternatives and does not represent the most appropriate development strategy when assessed against the reasonable alternatives available. The Plan therefore continues to fail the tests of soundness, particularly in relation to whether it is justified and positively prepared.
- 1.1.5. These representations focus specifically on the implications of the Main Modifications and the extent to which they continue to exclude Site KA062 despite its strong capability of aligning with the overarching objectives of the Local Plan.

2. Summary

- 2.1.1. Our principal concern is that the Main Modifications continue to concentrate additional housing growth in a limited number of locations rather than pursuing a more balanced and dispersed pattern of development across the District.
- 2.1.2. This approach does not appear to reflect the wider spatial strategy of the Local Plan, which seeks to distribute growth across Ashfield's settlements and ensure that development occurs in sustainable locations.
- 2.1.3. In our view, the Main Modifications fail to adequately consider whether additional sites would provide a more sustainable and appropriate distribution of growth.
- 2.1.4. The omission and lack of consideration of site KA062 is not justified given:
- Its close relationship with major employment opportunities.
 - Its accessibility to existing and emerging employment sites.
 - Its ability to contribute towards housing needs.
 - Its ability to deliver substantial public open space and wider community benefits.
 - The acceptance through Main Modifications that additional Green Belt release is likely necessary to meet housing requirements.

3. The Main Modifications Result in an Over-Concentration of Development

- 3.1.1. A key concern arising from the Main Modifications is that additional housing growth has become increasingly concentrated within a relatively small number of locations.
- 3.1.2. Whilst some concentration of development can be appropriate, the Local Plan's overarching strategy has consistently sought to distribute growth across the District, in order to support sustainable communities, maximise accessibility to employment opportunities, and avoid unnecessary pressure on infrastructure being focused in limited areas.
- 3.1.3. The Local Plan's spatial strategy is for dispersed growth. Where all proposed additional housing allocations through the Main Modifications are concentrated in few areas, the new allocations do not reflect the spatial strategy.
- 3.1.4. Policy S1 Part 5 of the Local Plan submission version (doc ref. SD.01) states the following (our emphasis in bold):

*"Delivering homes via **dispersed development**, focusing on sites of less than 500 dwellings;"*

And the following under Part 6:

"Maximising the economic development potential of key sites including land adjacent to M1 Junction 27 and Sherwood Business Park;"

- 3.1.5. If the Plan's spatial strategy is genuinely one of dispersed growth and aims to maximise economic development potential of key sites with specific reference to M1 Junction 27, why have the additional allocations become heavily focussed in a relatively limited number of locations while sustainable alternatives such as Salmon Lane have not been taken forward, or even considered?
- 3.1.6. The Main Modifications move further away from that balanced approach by focusing additional development within two principal locations rather than considering a broader range of sustainable alternatives.
- 3.1.7. The result is a strategy that is not well-aligned with the stated spatial objectives of the Plan and less effective in delivering genuinely sustainable development across Ashfield District.
- 3.1.8. A more dispersed pattern of growth would provide greater flexibility in accommodating needs in locations across the District, that support a wider range of sustainable development.

4. Failure to Adequately Consider Reasonable Alternatives

- 4.1.1. The Planning Inspectorate requires Local Plans to be based on the most appropriate strategy when considered against the reasonable alternatives.
- 4.1.2. Site KA062 was promoted specifically in response to the housing supply concerns identified during the examination process, over a year and a half ago. However, the site was not fully assessed alongside the sites now being advanced as main modifications.
- 4.1.3. As a consequence, there remains insufficient evidence demonstrating why Site KA062 was discounted in favour of other sites, particularly where the site has not been assessed within the Sustainability Appraisal Addendum ('SAA') (doc ref. MOD.003).
- 4.1.4. The Main Modifications and supporting SAA have not demonstrated that:
- The site was subject to a robust comparative assessment.
 - The benefits of the site were properly considered.
 - The site's relationship to major employment growth areas was appropriately weighted.
 - The site's ability to contribute towards a more balanced development strategy was adequately assessed.
- 4.1.5. In the absence of such evidence, it cannot be concluded that the modified strategy represents the most appropriate strategy available.
- 4.1.6. Accordingly, we consider that the Plan is not justified because it has not been demonstrated that all reasonable alternatives have been assessed consistently and objectively.

5. Site KA062 Represents a Highly Sustainable Development Opportunity

- 5.1.1. One of the most significant advantages of Site KA062 is its immediate proximity to major employment opportunities, as emphasised under Policy S1, Part 6.
- 5.1.2. The site is located adjacent to Sherwood Business Park and within close proximity to significant employment growth associated with Junction 27 of the M1 corridor. The site is less than 500m from recently approved employment development and sits within one of the District's most important employment locations.
- 5.1.3. This relationship between housing and employment is a fundamental principle of sustainable planning.
- 5.1.4. Residents would be able to access significant employment opportunities through walking, cycling, and other sustainable travel modes, reducing reliance upon the private car and helping to create a more sustainable pattern of development.
- 5.1.5. Few of the additional sites taken forward through the Local Plan process can demonstrate such a strong and direct relationship with major existing and emerging employment sites.

5.2. Sustainable Travel Opportunities

- 5.2.1. The site's location creates a genuine opportunity to deliver integrated housing and employment growth.
- 5.2.2. Development could facilitate new active travel connections between Annesley Woodhouse, Sherwood Business Park, new employment development around Junction 27, surrounding recreational assets, and new recreational assets.
- 5.2.3. This is entirely consistent with national and local planning objectives which seek to reduce travel distances and encourage sustainable transport choices.

6. Green Belt Consideration

- 6.1.1. The Main Modifications and earlier stages of the examination process have established that Green Belt release may be necessary where justified in order to meet housing needs.
- 6.1.2. The critical question is therefore not whether Green Belt land can be released, but whether the most sustainable and appropriate sites have been selected for development.
- 6.1.3. Site KA062 performs strongly in this regard.
- 6.1.4. Previous submissions demonstrated that the site:
- Is located adjacent to existing built development.
 - Is strongly related to major employment areas.
 - Would not unduly undermine settlements separation.
 - Can be developed whilst delivering substantial new publicly accessible open space.
 - Can deliver significant public benefits.
- 6.1.5. Furthermore, whilst it is acknowledged that Grey Belt was not introduced until the December 2024 version of the NPPF, it has previously been argued that the site demonstrates characteristics consistent with the concept of Grey Belt land and should therefore be considered appropriately.
- 6.1.6. At a minimum, these factors demonstrate that the site should have been fully assessed as part of the Council's review of alternative sites.
- 6.1.7. Importantly the SAA has not assessed the site, and the Council have failed to even consider if the site might be suitable in that regard, and potentially of greater benefit than those sites proposed to be allocated.

7. Community Benefits

- 7.1.1. Site KA062 is not simply a housing opportunity. Previous representations established that approximately 50% of the site could be introduced as publicly accessible green infrastructure, including the creation of a substantial community park.
- 7.1.2. This would provide:
- Significant new public open space.
 - Health and wellbeing benefits.
 - Biodiversity enhancement opportunities.
 - Recreational opportunities for existing and future residents.
 - A long-term environmental asset for Annesley Woodhouse and surrounding employment areas.
- 7.1.3. These benefits are significant and distinguish the site from many of the other locations being promoted through the Local Plan process.

8. Housing Delivery Benefits

- 8.1.1. The Site is capable of delivering approximately 250-300 dwellings whilst retaining substantial areas of open space.
- 8.1.2. The ability to provide a meaningful contribution towards housing requirements is particularly important given the housing supply concerns raised during the examination process.
- 8.1.3. The inclusion of Site KA062 would improve flexibility within the Plan and provide an additional source of housing delivery should any of the proposed allocations fail to come forward at the anticipated rate. Particularly where the Plan relies on a significant delivery from Windfall sites, which is not guaranteed to materialise.
- 8.1.4. The site would therefore strengthen the effectiveness of the Local Plan rather than undermine it.

9. Soundness

9.1. Positively Prepared

- 9.1.1. The Plan has not been positively prepared because the Main Modifications fail to fully explore highly sustainable opportunities capable of contributing towards the identified housing needs.

9.2. Justified

- 9.2.1. The Plan is not justified because it has not been demonstrated that Site KA062 and other reasonable alternatives have been assessed consistently against the strategy now proposed through the Main Modifications.
- 9.2.2. The concentration of additional growth in a limited number of locations has not been shown to represent the most appropriate strategy when considered against the reasonable alternatives.

9.3. Effective

- 9.3.1. The Plan is not effective because it does not provide sufficient flexibility within the housing land supply and relies upon a relatively concentrated development strategy, and a significant portion of supply deriving from windfalls, which may not materialise.

10. Conclusion

- 10.1.1. We object to the Main Modifications on the basis that they fail to adequately consider Site KA062 and continue to promote an overly concentrated pattern of development which does not fully align with the Plan's wider spatial strategy.
- 10.1.2. Land South of Salmon Lane represents a sustainable, deliverable and justified alternative capable of making a significant contribution towards housing delivery.
- 10.1.3. The Site benefits from exceptional proximity to major employment sites, strong sustainable transport opportunity, the capacity to deliver substantial new public open space, and the ability to contribute meaningfully towards housing requirements.
- 10.1.4. The Main Modifications and SA do not in any way explain why this opportunity has been excluded while less strategically located sites have been progressed, including Green Belt sites.
- 10.1.5. We therefore request that the Inspectors recommend further modifications to the Plan requiring the Council to, at a minimum, assess Site KA062 within the SA and consider its inclusion as an allocation, to ensure that the Local Plan is positively prepared, justified, and effective.
- 10.1.6. For those reasons, we consider the Plan remains unsound unless amended to give appropriate recognition to the development opportunity presented by Land South of Salmon Lane, Annesley Woodhouse (KA062).