



ASHFIELD DISTRICT LOCAL PLAN EXAMINATION IN PUBLIC OCTOBER 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.

- 1.3 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.

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 10 raises a number of questions in relation to the historic environment, to which Historic England responds consecutively below:

Matter 10 – Site Allocations

Issue: Whether the proposed site allocations are justified and deliverable/developable at the point envisaged.

Relevant Policies H1, S6a and S6b

Questions

Site Allocations Overall

Q10.2 In deciding whether to allocate sites for development, how did the Council take into account the effects of development on:

- ***Landscape character; and***
- ***Heritage Assets.***

- 2.2 Historic England notes that with regard to the historic environment site allocations are supported by heritage evidence in the form of the '*Heritage Site Assessment for the Local Plan*', dated September 2023. This document considers the level of harm to the historic environment, as well as the level of change to historic landscape character, that is likely to result from proposed site allocations.
- 2.3 However, Historic England notes that the Heritage Site Assessment document was not produced until after the Regulation 18 stage of the Local Plan process; an iteration of the Plan which included proposed site allocations. Our response to this consultation stage raised concerns about the lack of a heritage evidence base for the Plan and set out our view that at that stage the Plan did not demonstrate a positive approach to the historic environment as required by NPPF para. 190 and raised issues of soundness of the Plan in respect of historic environment.
- 2.4 We note that the Heritage Site Assessment assessed all potential development sites identified (44) as having the potential to harm a designated or non-designated heritage asset, and from these 44 sites 12 priority sites were

identified. The document states that these were sites that merited a more detailed review based on the number of designated assets in the vicinity and/or the high archaeological potential of the sites which required further review. HE commented on the methodology for the HIA and also on an amended version of the HIA in late 2023.

- 2.5 At the Regulation 19 stage the Council produced '*Background Paper 1: Spatial Strategy and Site Selection*', dated October 2023, with the Council's Heritage Site Assessment noted as being used to inform this background paper.
- 2.6 With regard to the proposed allocation of sites S6a and S6b (formerly site S8), in our Regulation 18 consultation response we noted the lack of HIA information available and thus that no assessment had been undertaken of the likely impacts of these strategic employment allocations on heritage assets and their settings.
- 2.7 At Regulation 19 stage the Heritage Site Assessment was available to inform the Plan, and HE notes the conclusions that with regard to these two employment sites the level of likely harm to the historic environment was assessed as cumulatively substantial, and also the level of change to historic landscape character was assessed as substantial for each site individually and also cumulatively; with the recommendation being to remove these sites as proposed allocations from the Plan. As the Council chose to continue with the allocation of these sites in the Regulation 19 Plan, despite the findings of their own heritage and landscape evidence, it is not clear how the effects of development on landscape character and the nearby heritage assets were taken into account, and thus we raised this in our representation.
- 2.8 Planning applications for employment development on both sites were submitted in 2022, with HE objecting on heritage grounds to the application for development to the south-east of Junction 27 of the M1 and raising concerns regarding the development to the north-east of this junction, as well as concerns regarding potential cumulative impacts. Planning permission has now been granted on both of these sites for employment development and the sites remain as proposed allocations within the Local Plan. Historic England has therefore removed its objections to these site allocations, but we remain concerned regarding the cumulative impact of these developments on nearby heritage assets and would draw attention to the policy criteria requiring:

"A scheme of an appropriate scale, layout, form and materials which respects the significance and setting of affected heritage assets, minimising any harm to designated and non-designated heritage assets and their setting".

Q10.4 Do the Plan's policies provide sufficient specificity of the requirements expected of the larger site allocations (i.e. those of 100 dwellings and above), particularly for sites where there is no planning permission in place?

- 2.9 In relation to certain site allocations Historic England considers that there is a need for greater detail to be added as site specific requirements, to ensure that harm to heritage assets is minimised.
- 2.10 In this regard, Heritage Impact Assessments (HIAs), as part of the evidence base of a Local Plan, can provide valuable recommendations for enhancement and mitigation measures in relation to proposed site allocations, in order to lessen harm to the significance of a heritage asset and thus ensure that the allocation is justified and deliverable. However, we note that in some cases the HIA recommend mitigation measures for site allocations have not been carried through into the relevant policy text.
- 2.11 The NPPF is clear that *“plans should.....contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”* - para. 16 d) and in addition, Historic England’s advice in HEAN 3 states that:
- “3.1 Site allocation policies are a positive feature of a Local Plan as they can highlight the specific criteria against which a development needs to be judged and thereby speed up the implementation process, providing clarity for a wide range of audiences. It is recommended that the policy and/or supporting text provides clear references to the historic environment and specific heritage assets where appropriate”.*
- 2.12 In this regard we refer to our Statement of Common Ground, which highlights those site allocation policies where we consider further detail would be appropriate, with regard to heritage matters. We are pleased to note that the Council has suggested amended wording for many of the site allocation policies to include more specific requirements, in most cases to mitigate harm to heritage assets and their settings. Please see Appendix 1 of the SoCG for further details.

Hucknall Site Allocations

H1Ha – Seven Stars Public House, West Street/Ogle Street, Hucknall

Q10.10 Having regard to the site being a locally listed heritage asset and with archaeological potential, is the proposed allocation justified? What effect might these factors have on the potential dwelling yield?

- 2.13 HE did not comment on this proposed site allocation at Regulation 19 stage, and we would suggest that the advice of the Council's local heritage specialists is sought.

H1Hb – Linby Boarding Kennels, East of Church Lane, Hucknall

Q10.11 What effect does the allocation have on the significance of nearby heritage assets?

- 2.14 HE did not comment on this proposed site allocation at Regulation 19 stage, and we would suggest that the advice of the Council's local heritage specialists is sought.

H1Hd – Land adjoining Stubbing Wood Farm, Watnall Road, Hucknall

Q10.16 What effect does the allocation have on the significance of nearby heritage assets? Is it justified?

- 2.15 The site lies to the southwest of the Grade II Listed 'Hucknall Battle Headquarters' of Hucknall aerodrome and comprises a below-ground command post and tunnel with a three-storey observation tower above ground. The significance of the asset derives from: its historic interest as a rare example of an airfield Battle Headquarters dating from the early part of the Second World War; its architectural interest as being built to a non-standard and probable unique design with a substantial brick observation tower; and its group value as part of the wider context of the former RAF Hucknall with two First World War aircraft hangers (Grade II) and a Second World War Wing Test Hangar (Grade II). The position of the Battle HQ next to the airfield enhances our understanding of how airfields were defended during the early period of the Second World War, and how strategies evolved to combat Germany's novel invasion methods.
- 2.16 With regards to the effect of the allocation on the significance of these nearby heritage assets, HE commented at the Regulation 18 stage of the Plan that *'development of this site is likely to impact on the setting of the structure'*, recommending that an HIA be undertaken prior to allocation, and if the principle of development is accepted then a policy should be included within the Local Plan setting out how the heritage asset would be addressed; possibly through a masterplan approach, incorporating a suitable buffer area, and also a positive conservation management plan.

- 2.17 It is noted that the subsequent HIA assessed the level of harm to the historic environment as ‘*total loss to less than substantial harm*’ but recommended retaining the allocation with mitigation.
- 2.18 In order to justify the allocation, HE welcomes the references to mitigation measures within the policy text for this site and that the recommended masterplanning approach has been incorporated. We also welcome that our comments at Regulation 19 stage have been taken on board with regard to the requirement for a management plan, maintenance of access to the heritage asset, enhancement through interpretation and that it should not be preserved in isolation.
- 2.19 We refer to our SoCG “*Appendix 1 – Areas of Common Ground*” where the Council have proposed to amend paragraph 6.24 of the Plan to read:
- “It is proposed that development is sited away from the Listed Heritage asset (Hucknall Battle Headquarters) which will be enhanced with greater visibility and interpretation, and a new buffer planting will complement the existing green infrastructure at Starth Wood and create a green corridor. A concise masterplan will be available to identify essential requirements expected by the Council and will provide more detailed advice and guidance specific to the site. As part of any future planning application the Council will require a management plan for the heritage asset to be submitted.”*
- 2.20 HE supports the above suggested modification to the Plan and considers that with these requirements added to the policy wording, harm to the significance of the heritage assets should be sufficiently mitigated.

3.0 Summary

- 3.1 With regard to the overall approach to the historic environment, Historic England considers that the amendments suggested in our Statement of Common Ground should be implemented to ensure that the Plan will deliver a positive strategy for the historic environment as required by the NPPF.

2113 words

Elizabeth Boden MA MRTPI
Historic Environment Planning Adviser (Midlands)

elizabeth.boden@historicengland.org.uk

30th October 2025