

2nd April 2025

Forward Planning Team,
Ashfield District Council,
Urban Road,
Kirkby-in-Ashfield,
Nottingham,
NG17 8DA

Sent via email: localplan@ashfield.gov.uk

Dear Sir/Madam,

Submission of Representations to Ashfield Local Plan 2023 – 2040: Additional Housing Site Allocations Consultation

Introduction

CarneySweeney are instructed by Whyburn Consortium (referred to as 'our client' hereafter) to submit representations to the current 'Additional Housing Sites Allocations Consultation' in respect of the emerging Ashfield Local Plan 2023 – 2040. These representations are structured to respond to the questions set out on the Representation Form, with our representations being applicable to all the proposed site allocations. A Representation Form has therefore been submitted against each proposed site allocation.

The 'Consultation on Additional Housing Site Allocations' document (February 2025), (referred to as the 'Consultation Document' hereafter) is reported to seek to address the concerns raised by the Inspectors following Week 1 of the Examination Hearing Sessions set out in their Interim Findings Letter (Examination Document Reference: INS05). However, INS05 is clear in outlining the Inspectors concerns in respect of a number of matters which do not form part of this consultation.

Overall, the Inspectors have raised concerns regarding the effectiveness and soundness of the spatial strategy and the role of the Sustainability Appraisal in determining that strategy. The Council are unable to identify sufficient homes to meet the housing requirement (Pre-Submission Regulation 19 document (referred to as 'the Submitted Plan' hereafter). The Inspectors have also asked that the Council demonstrate, alongside any proposed additional site allocations, reasons for why the spatial strategy is an appropriate strategy. Further to this, Inspectors have sought justification for Green Belt release for the Submitted Plan, with concerns raised that were it concluded that exceptional circumstances are found to exist to alter the Green Belt boundary, the housing shortfall would likely result in the need for further alterations to the Green Belt before the end of the plan period – a scenario which would be contrary to the provisions of Paragraph 143(e) of the National Planning Policy Framework (NPPF) (published, September 2023).

This current consultation only looks at the identification of proposed additional site allocations in isolation and fails to address the full extent of the concerns raised by the Inspectors. The proposed site allocations/additions forming part of this current consultation cannot therefore be found sound, as we explain further below.



Representations

Proposed Housing Sites and Proposed Additions to Policy H1

The Council are proposing the allocation of 13 additional sites to address the housing shortfall of circa 882 dwellings in the Submitted Plan. However, the proposed allocations only equate to 828 dwellings representing a shortfall of 54 dwellings. The new sites are insufficient to enable the Council to meet its housing requirement.

Paragraphs 4.4 and 4.5 of the Consultation Document refer to the proposed housing allocations in the Submitted Plan being reviewed and revised accordingly based on most recent information (dated April 2024) in terms of completions, yields and new permissions since April 2023. In this context, the Council state at Paragraph 4.5 of the Consultation Document that *"if the new sites proposed ... are also included, this will give a small over provision of 136 dwellings, or the equivalent of around 2% buffer on the balance of housing need."* Appendix 1 of the Consultation Document includes updated text to Policy H1 of the Submitted Plan, showing changes to the yields for some sites and also inclusion of additional text in respect of the proposed additional site allocations.

Whilst the 'yields' are shown to be revised there is no evidence justifying these revisions. Neither is this consultation supported by an updated Housing Trajectory reflecting the revised yields or the projected trajectory for the proposed additional site allocations. If the Council are expecting the proposed additional sites to come forward within 5 years, there is no evidence provided to demonstrate that they are deliverable within the meaning of the NPPF.

The proposed allocations in the Submitted Plan have also not yet been examined, and so should any of the sites and/or the indicated yields be found unsound by the Inspectors, the modest over provision of a circa 2% buffer the Council are reporting will be significantly reduced. This would also occur in the event the proposed additional site allocations forming part of this consultation are viewed to be unsound. Our review below demonstrates that a number of these site are unsound and cannot be viewed as deliverable:

- H1Kn Southwell Lane, Kirkby (60 Dwellings) – This site has previously been considered by the Council in Background Paper 1: Spatial Strategy and Site Selection (Examination Document Reference: BP.01) and not proposed for allocation for the following reason:

"... A Reserved Matters application was submitted for this site in 2018 and remains pending a decision. There has been little recent activity and therefore uncertainty surrounding realistic delivery."

[Extract from Table 3, Page 25 of Examination Document Reference: BP.01]

BP.01 is dated October 2023 and on the basis that the Council discounted this site as a proposed allocation at that time due to uncertainty surrounding a realistic delivery, there is no evidence to demonstrate that this site is deliverable and will now come forward in a realistic timeframe.

Furthermore, Paragraph 6.5 of the Consultation Document states that *"... the potential yield for this site is based on historic lapsed permissions and sketch layout"*. The Council's reliance on a historic lapsed planning permission for the proposed yield is unsound, as is the proposed allocation of a site in the absence of any evidence to demonstrate its suitability and achievability. This Site is referred to as a new SHELAA site in the Consultation Document, reference: KA057, however the SHELAA assessment does not form part of this current consultation. The Council's assessment of suitability, availability and achievability of this site is therefore not evidenced. This is despite Paragraph 6.4 of the Consultation Document referring to the site as being *"... available, potentially suitable, and potentially achievable in the SHELAA"*.



In addition to the above, it is noted that part of this site is currently proposed to form part of a wider nature site designation (EV4) on the Policies Map - North for the Submitted Plan (Examination Document Reference: SD.02a). The Council's justification to now propose a housing allocation on part of a proposed nature site designation is also not evidenced.

- H1Ko Former Kirkland's Care Home, Fairhaven, Kirkby (20 dwellings) – This site is not shown to be the subject of any planning permission and neither a pending planning application for residential development. This site has previously been considered by the Council and discounted as a proposed allocation in the Submitted Plan for the following reason:

"This site was formerly occupied by a care home before being demolished in 2020. It is owned by Nottinghamshire County Council but was not put forward for assessment via the SHELAA. In respect of housing, the site cannot be deemed developable where the availability of the site is not certain, and therefore cannot be relied upon for future delivery. Ashfield Council have been proactive in approaching the landowners but have not received any submission for the site to be assessed for development potential."

[Source: Table 4, Page 27 of Examination Document Reference: BP.01]

Paragraph 6.6 of the Consultation Document refers to the site as being available, potentially suitable and potentially achievable in the SHELAA (reference: KA058). However, there is no evidence supporting this to demonstrate that this site is now available and deliverable.

- H1Kp Pond Hole, Kirkby (54 dwellings) – The availability of this site is questioned as despite the site being earmarked for redevelopment for residential use in the Kirkby Town Centre Spatial Masterplan, the site remains undeveloped and has not been the subject of any planning application for its redevelopment and therefore is not viewed as being deliverable. This site is also referred to as a new SHELAA site (reference: KA059), again with the SHELAA Form not forming part of this consultation – therefore its suitability, availability and achievability is not evidenced.
- H1Kq Former Wyvern Club site, Land End, Kirkby (12 dwellings) – The suitability of this site is questioned as the proposed allocation appears to be on the basis of the site forming part of the Kirkby Town Centre Spatial Masterplan.

However, within the Spatial Masterplan document the site is shown to fall within 'Project B1' and referred to as forming part of the western 'station' gateway opportunity to redevelop and reconfigure the area to enhance access to/from the station, and to provide a focus to the gateway, and to develop vacant land on the edge of the town centre. There is no reference to this site being earmarked for residential development.

The site is also not the subject of any planning approval or pending planning application, and so there is no evidence to demonstrate that this site is available and deliverable. Whilst the Consultation Document refers to this site being a new SHELAA site (reference: KA060), the SHELAA Form does not form part of this consultation and so its suitability, availability and achievability is not evidenced.

- H1kr Ellis Street, Kirkby (24 dwellings) – This site is adjacent to proposed allocation H1Kp Pond Hole, Kirkby. As per our comments above in respect of H1Kp, the availability of the site at Ellis Street H1kr is questioned as despite the site being earmarked for redevelopment for residential use in the Kirkby Town Centre Spatial Masterplan, the site remains undeveloped and has not been the subject of any planning application for its redevelopment. This site is also referred to as a new SHELAA site (reference: KA061), again with the SHELAA Form not forming part of this consultation – the suitability, availability and achievability of this site is therefore not evidenced. There is therefore no evidence to demonstrate that this site is deliverable.



- H1Sam Beck Lane South, Sutton (106 dwellings) – This site is not shown to be the subject of a planning permission or a pending planning application, and is noted to have previously been discounted by the Council as a proposed allocation due to highway issues stated as follows:

“SA008: Beck Lane South, Skegby. This site is located to the north of the existing settlement boundary, to the south of a permissioned housing site (H1Saa) and allocation (H1Su), and partially to the north of a smaller allocation (H1Sf) at Beck Lane. There are significant highways issues in this location and direct access from Beck Lane would not be supported by Nottinghamshire County Council Highways. In principle there may be opportunities to develop the land comprehensively with the adjacent site, however the cumulative impact on the transport system needs to be considered due to capacity constraints with consented and other pipeline developments along the Beck Lane corridor, both in Ashfield and Mansfield Districts. This site has an estimated yield of 106 dwellings.”

[Source: Page 53, Examination Document Reference: BP.01]

Paragraph 6.17 of the Consultation Document states the following:

“The site was not previously taken forward as a proposed housing allocation due to access constraints. However, further investigations are progressing regarding the provision of a suitable access to the site which may potentially result in little or no further capacity being required from Beck Lane and the junction directly off. It is therefore envisaged that the land would be available in the medium term, subject to a satisfactory position being reached with a third party and the County Council’s Highways Department.” (underlining is our emphasis)

There is no evidence to demonstrate that the highway concerns which resulted in the Council discounting this site as a proposed allocation in the Submitted Plan have been addressed. Whilst investigations may be ongoing, the provision of a suitable access remains outstanding. Furthermore, the site is not currently available as stated at Paragraph 6.17 of the Consultation Document which outlines the availability being in the medium term and also subject to agreements being reached with other parties. As there is no evidence to demonstrate that a suitable access can be secured and the necessary agreements can be reached with the relevant parties, this site cannot be viewed as deliverable.

In addition to the above, we comment as follows in terms of the following proposed additional site allocations:

- H1Km Abbey Road, Kirkby (38 dwellings) – This site is noted to be the subject of a pending planning application, reference V/2023/0312, with a resolution to grant subject to the completion of a S106 agreement for “Outline application with all matters reserved except means of access for a residential development of 38 unit” following Planning Committee on 5th February 2025.

Whilst we do not dispute the resolution for the pending planning application, this site is located in the Green Belt, with the application being referred to the Secretary of State. Whilst the outcome of the deferral is awaited, the Inspectors for the Examination have sought justification from the Council for Green Belt release in the Submitted Plan, which has not been provided as part of this consultation despite a further Green Belt site being proposed for allocation.

- H1Sai Pendean Way, Sutton (12 dwellings) – This site is noted to have the benefit of full planning permission for 12 dwellings, reference V/2023/0156, approved subject to conditions on 16th April 2024 with the relevant pre-commencement conditions having been discharged. It is further noted that an application to vary the wording of Condition 2 and 3 attached to planning permission reference: V/2023/0156 has been subsequently approved on 25th September 2024 (reference: V/2024/0305).



The Consultation Document makes reference to progress being underway with the completion of site naming and numbering. It is further noted through our research that some of the units are being released for sale by the developer. The sales process associated with this site therefore suggests that the development is likely to be at an advanced stage and/or near completion prior to any subsequent adoption of the Submitted Plan. Therefore, the allocation of such a site is questioned.

- H1Saj Between Redcliffe Street & Leyton Avenue, Sutton (18 dwellings) – This site is noted to be the subject of application reference: V/2023/0613 for “*Outline application with all matters reserved for a residential development 18 dwellings*”. This application secured a resolution to grant subject to completion of a S106 Agreement by Members of Planning Committee in July 2024, but to date, the application remains pending for determination. A delay of over 6 months for completion of the S106 Agreement, for a relatively minor scale of development, suggests issues with deliverability. In the absence of any details regarding the latest position for this site and progress for completion of the S106 Agreement, the proposed allocation of this site is questioned.
- HS1san Radford's Farm, Dawgates Lane, Skegby (90 dwellings) – This site is noted to be subject of application reference: V/2024/0489 “*Application for Outline Planning Permission with Some Matters Reserved For Up To 90 Dwellings And Access*” with a resolution to grant, subject to completion of a S106 Agreement, by Members of Planning Committee on 19th March 2025.

Notwithstanding the above, we question the soundness of an allocation as the site is located in an open countryside location and detached from the ‘Main Urban Area’ boundary shown on the Policies Map - North.

Strategic Policy S1 in the Submitted Plan refers to the ‘Main Urban Areas’ as being at the top of the settlement hierarchy, comprising Sutton in Ashfield; Kirkby-in-Ashfield; Hucknall and areas in the district adjacent to Mansfield Urban Area to accommodate the largest scale of growth. In contrast, at the bottom of the settlement hierarchy is the area referred to as ‘The remainder of the District’ comprising open countryside including land in the Green Belt and all other small villages/hamlets within the District not defined as ‘Main Urban Areas’; ‘Strategic Employment Areas’; ‘Named Settlements’; or ‘Blenheim Industrial Estate’.

The proposed allocation of this site therefore, whilst it may be subject of a planning application, does not align with the settlement hierarchy set out in Strategic Policy S1 in the Submitted Plan and therefore cannot be found sound.

Our review of the proposed additional site allocations has identified that 434 dwellings across 10 allocations are questioned and viewed as unsound. Only 3 sites have not been questioned which would deliver 394 dwellings – this is not sufficient to address the housing shortfall of 882 dwellings in the Submitted Plan. On this basis and based on our review, the Council cannot demonstrate the identification of suitable sites to address the housing shortfall in the Submitted Plan, and therefore the approach taken to identify additional sites on the basis of the spatial strategy for dispersed development in the Submitted Plan cannot be found sound and remains unsupported by evidence.

Do you consider the proposed additions to the Local Plan to be LEGALLY COMPLIANT?

No. The Sustainability Appraisal Addendum (referred to as ‘SA Addendum’ hereafter) has only assessed the proposed site allocations and proposed changes to Policy H1.



Paragraph 1.1.6 of the SA Addendum states that the report “... has been prepared to assess the implications for the SA of the proposed additional sites...”. Paragraph 1.3.1 outlines the proposed changes, stating as follows:

“the proposed changes subject to this SA Report Addendum relate to the identification of additional sites for inclusion in the Draft Local Plan... Proposed amendments to the policy wording of Policy H1: Housing Site Allocations that identifies the sites are also set out. No further changes to the plan text have been identified at this stage.”

During the Hearing Session on Matter 3 – Spatial Strategy, the Council verbally confirmed to the Inspectors that the submitted spatial strategy is Option 10 of the Sustainability Appraisal (Examination Document Reference: SD.03) minus the two strategic allocations at Whyburn and Cauldwell Road. The submitted spatial strategy is not therefore Option 3 ‘dispersed development’, but an entirely new spatial strategy option which has not been tested as part of the Sustainability Appraisal process, and neither is it supported by the evidence base.

The Sustainability Appraisal continues to be improperly considered by the Council as it does not provide appropriate evidence to support the plan’s spatial strategy, although it does support the very different strategy which formed part of the Regulation 18 Draft Local Plan.

In the absence of the spatial strategy being tested through the Sustainability Appraisal process, the Submitted Plan and the proposed allocations and additions forming part of this consultation cannot be found to be legally compliant.

Do you consider the proposed additions to the Local Plan to be SOUND?

No. The Inspectors’ Interim Findings Letter (Examination Document Reference: INS05) is clear in outlining concerns regarding the effectiveness and soundness of the spatial strategy as the Council are unable to identify sufficient homes to meet the housing requirement. Our review of the proposed additional site allocations has found that the Council cannot demonstrate the identification of suitable sites to address the housing shortfall via the spatial strategy for dispersed development in the Submitted Plan.

The Inspectors’ concerns closely echo our comments to date that the evidence base for the submitted local plan is not robust and fails to demonstrate a sound spatial strategy. This has been reinforced by the Inspectors’ decision to postpone the Hearing Sessions due to “... the importance of establishing a sound spatial strategy to set the context for the rest of the examination...” (INS05, underlining is our emphasis).

The Inspectors’ subsequent response (Examination Document Reference: INS06) notes that the Council’s response “... is principally focussed on the work to identify additional sites...”, with the Inspectors going on to state the following:

“... please ensure that you address all of the points raised including those regarding the effect on the Green Belt. The Council should also provide, alongside any additional sites proposed to be identified, coherent reasons why the Spatial Strategy would be an appropriate strategy. [underlining is our emphasis]

If the Council resolves to identify any additional sites currently within the Green Belt, very clear justification should be provided as to why you are not pursuing other sites outside the Green Belt.”

(Source: Examination Document Reference: INS06)



The Council's approach to this current consultation does not give any consideration to how the concerns associated with the submitted spatial strategy for dispersed development would be addressed but instead focuses on an approach to address the housing shortfall in isolation of the other concerns raised by the Inspectors. The Council should be taking a more fundamental approach in reviewing the Inspectors' concerns, which in our opinion, oblige the Council to revert to the previous spatial strategy within the Regulation 18 consultation stage as this is the only spatial strategy which is supported by the submitted evidence base, Sustainability Appraisal and Green Belt Assessment.

The Council have also not provided any further evidence to demonstrate why the spatial strategy is an appropriate strategy, which has been requested by the Inspectors. This question has previously been raised at Question 3.3 of the Inspectors' Matters, Issues and Questions (Examination Document Reference: INS03) where the Council were asked to explain "Why was the submitted approach to disperse development chosen and is it an appropriate strategy having regard to reasonable alternatives?" The Council's response (Examination Document Reference: HS 3.1) is noted to be as follows:

"Council's response

3.3.1 The Spatial Strategy for Ashfield is set out Policy S1 of the Local Plan and sets out how future growth will be delivered taking account of the geography and key attributes of the District. It considers the size of settlements and their role and function, and how the Council aims to deliver its Vision by guiding the distribution of development across the District.

3.3.2 In choosing the Spatial Strategy, Officers first worked with Members of Local Plan Development Committee (formerly known as the Local Plan Working Group) to agree a Vision for Ashfield which is both aspirational and achievable.

3.3.3 The Council then considered a number of alternative options for spatial growth. These took into consideration the key issues that the Plan is seeking to address, the outcome of previous Local Plan consultations, and a broad the evidence base including (but not limited to) the Strategic Housing and Employment Availability Assessment (SHELAA), the identified housing and employment requirement for the District, a Brownfield Land Capacity Assessment, and the Green Belt Harm Report.

3.3.4 The range of alternative spatial options have been considered in the Sustainability Appraisal (SA) [SD.03] accompanying the Plan. Option 3 in the SA has now been taken forward as it represents the best option to deliver sustainable development and meet the Vision for the District. The SA also sets out the reasons why other options were discounted.

3.3.5 Background Paper 1: Spatial Strategy and Site Selection [BP.01] sets out in Chapters 2, 3 & 4 the Council's reasoning for choosing Option 3: Dispersed Development, this is also set out in the Sustainability Appraisal (SA) [SD.03], together with the reasons why other options were discounted – see Table 5.5 of the SA Report."

[Source: Ashfield District Council's Hearing Statement Matter 3 – Examination Document Reference: HS 3.1]

The above response does not demonstrate how the spatial strategy in the Submitted Plan is an appropriate strategy but rather focuses on the process undertaken by the Council and the alternative options assessed which in our opinion is a flawed process. As per our comments in respect of the SA Addendum, the spatial strategy forming part of the Submitted Plan is not 'Option 3: Dispersed Development', but a 'new option' which has not been tested and therefore, it is not known if the spatial strategy is appropriate. The Council's decision to continue with the submitted spatial strategy of 'dispersed development' on sites of 500 dwellings or less remains unjustified.



As set out in our Hearing Statement submission to Matter 10 (Examination Document Reference: HS 10.4), during the Hearing session for Matter 3 – Spatial Strategy, the Council stated that they are relying on the Lichfield Paper ‘Start to Finish’ for imposing a development cap of 500 dwellings or less, a document which has not formed part of the evidence base for the Submitted Plan, and neither does it form part of this current consultation. The Council’s reliance on this paper, as verbally stated in the Hearing Session for Matter 3, to justify a ‘cap’ on the scale of development continues to be unjustified.

We reiterate that the latest Lichfield Paper ‘Start to Finish’, dated September 2024, does not support the view expressed by the Council during the Hearing Session for Matter 3 that sites of 500 dwellings or less have a faster rate of delivery.

Page 11 of the September 2024 Lichfield Paper ‘Start to Finish’ states as follows:

“...When combining the planning approval period and planning to delivery period only sites comprising 99 dwellings or less will – on average – deliver anything within an immediate five-year (or parliamentary) period. Interestingly, sites of between 100 and 499 dwellings and all sites of 1,000 dwellings or more have a very similar combined planning approval and planning to delivery period of 6 to 7 years, despite significant variation in site size...”

The imposition of this ‘cap’ has continued as part of this consultation process, which is unsound as there is no basis to justify a ‘cap’ to proposed allocations. This approach would result in any sites over 500 dwellings being immediately dismissed as part of any site selection process, a process which is commented on below.

Paragraph 5.1 of the Consultation Document refers to potential new housing sites being drawn from the following sources:

- *New permitted sites (post Local Plan submission);*
- *Site with a resolution to grant permission subject to signing of s106 legal agreement*
- *Sites previously not selected from the SHELAA, including consideration of any new sites submitted to this process since the submitted Local Plan was finalised*
- *Ashfield District Council and partnership pipeline projects.*

The above ‘sources’ do not align with the site selection process set out in Background Paper 1: Spatial strategy and Site Section (Examination Document Reference: BP.01). BP.01 refers to the following sequential approach being undertaken for the site selection process in respect of the proposed allocations in the Submitted Plan:

- **Stage 1:** *Sites with planning permission;*
- **Stage 2:** *Sites with a resolution to grant planning permission subject to signing a Section 106 legal agreement;*
- **Stage 3:** *Brownfield (previously developed) sites assessed through the SHELAA as ‘achievable’ or ‘potentially achievable’ and consistent with the Council’s strategic approach for sustainable growth;*
- **Stage 4:** *Greenfield sites assessed through the SHELAA as ‘achievable’ or ‘potentially achievable’ and consistent with the Council’s strategic approach for sustainable growth;*
- **Stage 5:** *Green Belt sites assessed through the SHELAA as ‘achievable’ or ‘potentially achievable’ and consistent with the Council’s strategic approach for sustainable growth.*

There is an inconsistency between how the Council have approached the site selection process for the additional sites compared to those forming part of the Submitted Plan. Whilst we acknowledge that the Council may look to review sites previously considered through the SHELAA process, however, where these have been previously discounted, there should be clear evidence to justify why any such site/s are now being proposed for allocation. This evidence is not provided as part of this consultation process.



Furthermore, the Council's approach to consider sites from "Ashfield District Council and partnership pipeline project" is also unjustified, which we have commented on separately above in respect of the following proposed additional site allocations:

- H1Kp Pond Hole, Kirkby - proposed yield 54 dwellings
- H1Kq Former Wyvern Club site, Land End, Kirkby – proposed yield 12 dwellings
- H1kr Ellis Street, Kirkby (24 dwellings) – proposed yield 24 dwellings

The spatial strategy and the site selection process cannot therefore be found sound as there is no evidence base justifying the approach taken by the Council in the Submitted Plan, and neither as part of this consultation process.

In addition to this, the proposed additions do not address the Inspectors' concerns regarding the justification for the release of land from the Green Belt for the Submitted Plan; this is despite the authority proposing the release of a further site in the Green Belt, reference: H1Km, Abbey Road. There is also no evidence to demonstrate that further Green Belt release will not be required at the end of the plan period as required by Paragraph 143(e) of the NPPF (September 2023).

Ashfield District Council are now the subject of increased housing numbers set out in the new standard method approach following the publication of the new NPPF in December 2024, and so the Council are most likely going to need to undertake a further review of the Green Belt at the end of the plan period. The Council's approach to continue to proceed with a spatial strategy which is not justified or evidenced, fails to demonstrate how the proposed additions would seek to future proof the plan at the time from any subsequent Green Belt release, and therefore cannot be viewed as being consistent with national planning policy.

Do you consider the proposed additions to the Local Plan to comply with the DUTY TO CO-OPERATE?

No. Whilst we note that the Duty to Cooperate is not raised in the Inspectors' Interim Findings Letter (Examination Document Reference: INS05), there is no evidence to show engagement with stakeholders/consultees as part of the proposed additions to the Local Plan.

Overview

The Consultation Document is only seeking to address one concern raised by the Inspectors following Week 1 of the Examination Hearing Sessions. This has therefore resulted in a consultation which is not supported by evidence to justify the Council's approach, which continues to rely on an untested spatial strategy, and fails to future proof the plan from any subsequent Green Belt release. The Submitted Plan and the proposed additions forming part of this consultation cannot therefore be found sound.

We trust that our representations above will be taken into account, and we would welcome confirmation that our representations have been received.

Yours faithfully,



Kam Saini
Director
CarneySweeney

