

# Statement of Consultation

# for the

# Ashfield Local Plan 2023-2040: Additional Housing Site Allocations

**April 2025**

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## Introduction

* 1. On 29th April 2024 Ashfield District Council submitted its Local Plan to the Planning Inspectorate (PINS) and the first week of public examination hearings commenced 12th November 2024 to discuss matters pertaining to; procedural and legal requirements including Duty to Co-operate, meeting Ashfield’s housing needs and the spatial strategy and the distribution of development.
	2. A post hearing letter from the inspectors [[Examination Library ref. INS.05]](https://www.ashfield.gov.uk/media/jpzdb4qz/ins-05-adc-inspectors-interim-findings-letter-post-hearing-06-01-2025-a11y.pdf) was received by the Council on 6th January 2025. The letter asked the Council to undertake further work before hearings may continue. The Council has been asked to consider the appropriateness of the plan’s spatial strategy and identify additional sites for the housing requirement and the justification for the release of Green Belt land.
	3. The Council responded [[Examination Library ref. ADC.09 and ADC.10]](https://www.ashfield.gov.uk/local-plan-examination/examination-library/the-council-s-documents/) to the inspector’s letter setting out the intention to undertake immediate work in identifying further sites less than 500 dwellings, in accordance with the submitted plan’s spatial strategy.
	4. Following a decision at [Full Council on 17th February 2025](https://democracy.ashfield.gov.uk/ieListDocuments.aspx?CId=133&MId=4958&Ver=4), the Council proposed 13 additional housing sites. The proposed sites together with amendments to Policy H1: Housing Site Allocations supporting text have been assessed through an update to the Sustainability Appraisal, Habitat Regulations Assessment, and Equalities Impact Assessment. In accordance with the Town and Country (Local Planning) (England) Regulations 2012 (as amended), the Council undertook a 6-week period of public consultation on the potential new housing site allocations. The consultation ran from 20th February 2025 to 3rd April 2025.
	5. Additional information regarding collaboration and liaison with prescribed bodies is included in the Duty to Co-operate Statement of Compliance for the Ashfield Local Plan 2023 to 2040 [[Examination Library ref. DTC.01]](https://www.ashfield.gov.uk/media/uvdpfkdo/dct-01-10-duty-to-cooperate-statement-of-compliance-reg-22.docx).

## How did we consult?

* 1. Consultation was undertaken in line with the provisions of the ADC Statement of Community Involvement (SCI) [[Examination Library Ref. SD.06]](https://www.ashfield.gov.uk/media/ob3l2q4b/sd-06-statement-of-communuty-involvement.docx). The Council consulted all organisations and persons on the Council’s Local Plan database. This included the specific and general consultation bodies as set out in the SCI.

### Making copies of documentation available for inspection during the consultation

* 1. Copies of the Ashfield Local Plan 2023 to 2040: Additional Housing Site Allocations document, the North Policies Map, representation forms and guidance were made available to view at the following venues. A poster was also placed at these venues to advertise this.
* Ashfield District Council – Main Offices, Kirkby in Ashfield
* Sutton in Ashfield Library
* Kirkby in Ashfield Library
* Hucknall Library
* Selston Parish Hall
	1. In addition to the above, the following supporting documents were made available at the main Ashfield District Council Office:
* Sustainability Appraisal Addendum
* Habitats Regulations Assessment Addendum
* Equalities Impact Assessment Update Statement

### Emails and letters

* 1. Letters or emails were sent to 1396 individuals, companies, groups and organisations registered on the Local Plan Consultation Database to inform them of the public consultation.
	2. In addition to the above, details of the consultation, together with a publicity leaflet were circulated via other internal Council departments as follows:
* Business Support mailing list (in excess of 1000 contacts)
* Community groups and voluntary organisations database
* Town centre and markets mailing list.

### Website

* 1. An accessibility checked copy of the Additional Housing Site Allocations consultation document, representation forms (and guidance on making representations), frequently asked questions, all supporting documents and evidence base was available to view and download from the [Council's website](https://www.ashfield.gov.uk/planning-building-control/local-plan/emerging-local-plan/additional-housing-site-allocations-consultation/).

### Formal Notices

* 1. Formal notices were posted in the following newspapers:
* Eastwood and Kimberly Advertiser
* Hucknall Dispatch
* Mansfield Chad

## Who responded?

* 1. A total of 42 persons or organisations responded resulting in a total of 263 individual representations.  Of these:
* 153 representations considered the additions to the Local Plan to be Sound.
* 100 representations considered the additions to the Local Plan to be Unsound, of these 39 also considered it to not be Legally Compliant.
* 10 representations were comments (neither sound nor unsound).

It should be noted that where the representor did not answer Qu.3. of the consultation: *Do you consider the proposed additions to the Local Plan to be SOUND?*  Ashfield District Council Planning Officers made a professional judgement to interpret the response, based on the content of their submission.

## What was said?

* 1. Table 1 over the page provides a summary of the key issues raised pursuant to the Ashfield Local Plan 2023 to 2024: Additional Housing Site Allocations consultation.

## Table 1: Summary of key issues raised to the proposed Additional Housing Allocations Consultation

## Site Specific Issues

|  |  |  |  |
| --- | --- | --- | --- |
| **Proposed Housing Site Policy Reference and Name** | **Number of representations which do not consider the Plan Sound** | **Number of representations which consider the Plan Sound** | **Summary of key issues**  |
| H1Kl: Central Avenue, Kirkby in Ashfield | 7 | 12 | * Of the 7 representations which do not consider the Plan sound, 3 ‘support’ the allocation of this site.
* Support for the brownfield site and consider it to be achievable, suitable and available given it now has full planning permission.
* Uncertainty that the new allocations will meet the identified shortfall of 882 dwellings.
* The revised windfall position is not backed by ‘compelling evidence’ as required by para. 71 of the NPPF.
* The Plan will only meet the transitional ‘need rules’ of the new NPPF (para. 234 - Annex 1) rather than seek to meet the areas housing needs in full.
* Other more suitable sites are available.
 |
| H1Km: Abbey Road, Kirkby in Ashfield | 7 | 11 | * Of the 7 representations which do not consider the Plan sound, 3 ‘support’ the allocation of this site.
* Considered that very special circumstances exist for this site to come forward in the Green Belt and represents a sustainable and viable option in the context of being able to meet the Council’s identified housing needs.
* Uncertainty that the new allocations will meet the identified shortfall of 882 dwellings.
* The revised windfall position is not backed by ‘compelling evidence’ as required by para. 71 of the NPPF.
* The Plan will only meet the transitional ‘need rules’ of the new NPPF (para. 234 - Annex 1) rather than seek to meet the areas housing needs in full.
* The site is located in the Green Belt and referred to the Secretary of State.
* Other more suitable sites are available.
 |
| H1Kn: Southwell Lane, Kirkby in Ashfield | 7 | 13 | * Support for development of disused land
* This brownfield site is well located to serve the community’s needs in a highly sustainable manner. It fully complies with Framework and Government policies and is strongly supported.
* Contamination and possible ground stability issues have already been investigated and are not a barrier to development.
* Site could accommodate a higher yield than proposed and should be allocated for at least 70 dwellings.
* Lapsed planning permission.
* Wildlife constraints on site.
* Likely contamination issues.
* Uncertainty that the new allocations will meet the identified shortfall of 882 dwellings.
* The revised windfall position is not backed by ‘compelling evidence’ as required by para. 71 of the NPPF. The Plan will only meet the transitional ‘need rules’ of the new NPPF (para. 234 - Annex 1) rather than seek to meet the areas housing needs in full.
* Other more suitable sites are available.
 |
| H1Ko: Former Kirklands Nursing Home, Kirkby in Ashfield | 7 | 12 | * This site will provide an additional 20 rented homes to serve the community’s needs and is strongly supported.
* Support repurposing of land to generate more housing for the community.
* Likely contamination issues.
* High-risk surface water flooding.
* Uncertainty that the new allocations will meet the identified shortfall of 882 dwellings.
* The revised windfall position is not backed by ‘compelling evidence’ as required by para. 71 of the NPPF.
* The Plan will only meet the transitional ‘need rules’ of the new NPPF (para. 234 - Annex 1) rather than seek to meet the areas housing needs in full.
* Other more suitable sites are available.
 |
| H1Kp: Pond Hole, Kirkby in Ashfield | 7 | 11 | * Of the 7 representations which do not consider the Plan sound, 2 ‘support’ the allocation of this site.
* Forms part of an urban regeneration scheme under Policy S11
* Support for the site which has the backing of the Kirkby Town Centre Masterplan.
* The site will be a key element in the regeneration of Kirkby Town Centre.
* Highly sustainable site and is strongly supported.
* Availability of the site is questioned.
* Uncertainty that the new allocations will meet the identified shortfall of 882 dwellings.
* The Plan will only meet the transitional ‘need rules’ of the new NPPF (para. 234 - Annex 1) rather than seek to meet the areas housing needs in full.
* The revised windfall position is not backed by ‘compelling evidence’ as required by para. 71 of the NPPF.
* Other more suitable sites are available.
 |
| H1Kq: Former Wyvern Club, Kirkby in Ashfield | 7 |  12 | * Of the 7 representations which do not consider the Plan sound, 2 ‘support’ the allocation of this site.
* Forms part of an urban regeneration scheme under Policy S11.
* Support the allocation of this brownfield site as it is located in Kirkby Town Centre and identified within the Town Centre Masterplan.
* Site forms part of the western station ‘gateway’ for town centre redevelopment, further supporting its development prospects.
* Uncertainty that the new allocations will meet the identified shortfall of 882 dwellings.
* The Plan will only meet the transitional ‘need rules’ of the new NPPF (para. 234 - Annex 1) rather than seek to meet the areas housing needs in full.
* The revised windfall position is not backed by ‘compelling evidence’ as required by para. 71 of the NPPF.
* Other more suitable sites are available.
 |
| H1Kr: Ellis Street, Kirkby in Ashfield | 8 | 11 | * Of the 8 representations which do not consider the Plan sound, 2 ‘support’ the allocation of this site.
* Forms part of an urban regeneration scheme under Policy S11.
* Site is identified as a Priority Project in the Kirkby Town Centre Spatial Masterplan and can capitalise on its town centre location.
* This site has the potential to provide new homes in a highly sustainable central location.
* It will contribute to the regeneration of Kirkby Town Centre and is strongly supported
* Uncertainty that the new allocations will meet the identified shortfall of 882 dwellings.
* The Plan will only meet the transitional ‘need rules’ of the new NPPF (para. 234 - Annex 1) rather than seek to meet the areas housing needs in full.
* The revised windfall position is not backed by ‘compelling evidence’ as required by para. 71 of the NPPF.
* Other more suitable sites are available.
* Volume of traffic in the area of concern.
 |
| H1Sai: Pendean Way, Sutton in Ashfield | 7 | 11 | * Of the 7 representations which do not consider the Plan sound, 2 ‘support’ the allocation of this site.
* Uncertainty that the new allocations will meet the identified shortfall of 882 dwellings.
* The Plan will only meet the transitional ‘need rules’ of the new NPPF (para. 234 - Annex 1) rather than seek to meet the areas housing needs in full.
* The revised windfall position is not backed by ‘compelling evidence’ as required by para. 71 of the NPPF.
* Other more suitable sites are available.
 |
| H1Saj: Between Redcliffe Street & Leyton Avenue, Sutton In Ashfield | 7 | 11 | * Of the 7 representations which do not consider the Plan sound, 2 ‘support’ the allocation of this site.
* Support the allocation of this brownfield site given it has resolution to grant planning permission for residential development, subjecting to the signing of the s106.
* The site is bounded by existing residential development, and is considered it to be achievable, suitable and available.
* Uncertainty that the new allocations will meet the identified shortfall of 882 dwellings.
* The Plan will only meet the transitional ‘need rules’ of the new NPPF (para. 234 - Annex 1) rather than seek to meet the areas housing needs in full.
* The revised windfall position is not backed by ‘compelling evidence’ as required by para. 71 of the NPPF.
* Other more suitable sites are available.
 |
| H1Sak: Rookery Lane, Sutton in Ashfield | 7 | 11 | * Of the 7 representations which do not consider the Plan sound, 2 ‘support’ the allocation of this site.
* Support the allocation of this site given it forms Phase 2 of the adjacent H1Sx residential development has resolution to grant planning permission subject to the s106.
* There is a good deal of certainty that these new homes will be delivered well within the Plan Period.
* Uncertainty that the new allocations will meet the identified shortfall of 882 dwellings.
* The Plan will only meet the transitional ‘need rules’ of the new NPPF (para. 234 - Annex 1) rather than seek to meet the areas housing needs in full.
* The revised windfall position is not backed by ‘compelling evidence’ as required by para. 71 of the NPPF.
* Other more suitable sites are available.
 |
| H1Sal: Newark Road, Sutton in Ashfield | 6 | 13 | * Of the 6 representations which do not consider the Plan sound, 3 ‘support’ the allocation of this site.
* This is a substantial area of land that will benefit from new housing and draw further business into the local area.
* More housing is positive and supports additional investment in the local area.
* Support for the additional H1 allocations closest to Mansfield in recognition of the fact that ADC needs to meet its housing needs in sustainable locations, and on the basis that developers will be required to address the issues identified and mitigate against the impacts on infrastructure and facilities.
* Uncertainty that the new allocations will meet the identified shortfall of 882 dwellings.
* The Plan will only meet the transitional ‘need rules’ of the new NPPF (para. 234 - Annex 1) rather than seek to meet the areas housing needs in full.
* The revised windfall position is not backed by ‘compelling evidence’ as required by para. 71 of the NPPF.
* Other more suitable sites are available.
 |
| H1Sam: Beck Lane, Skegby, Sutton in Ashfield | 8 | 13 | * Of the 8 representations which do not consider the Plan sound, 2 ‘support’ the allocation of this site.
* Support for this site given its sustainable location between nearby emerging allocations and is a logical addition to H1Saa and H1Su.
* The site is in a sustainable location, just north of Skegby and in close proximity to facilities, services and employment opportunities in Sutton-in-Ashfield and Mansfield.
* Support for the additional H1 allocations closest to Mansfield in recognition of the fact that ADC needs to meet its housing needs in sustainable locations, and on the basis that developers will be required to address the issues identified and mitigate against the impacts on infrastructure and facilities.
* Uncertainty that the new allocations will meet the identified shortfall of 882 dwellings.
* The Plan will only meet the transitional ‘need rules’ of the new NPPF (para. 234 - Annex 1) rather than seek to meet the areas housing needs in full.
* The revised windfall position is not backed by ‘compelling evidence’ as required by para. 71 of the NPPF.
* No evidence to demonstrate that the highway concerns have been addressed.
* Current spatial strategy flawed.
* Natural England - Development of over 100 houses may impact Teversal Pastures SSSI. Any development in these locations would need to provide sufficient information to provide evidence that the proposal would not damage or destroy the interest features for which the SSSI has been notified.
* Other more suitable sites are available.
 |
| H1San: Radford Farm, Dawgates lane, Skegby | 9 | 12 | * Of the 8 representations which do not consider the Plan sound, 2 ‘support’ the allocation of this site.
* Support for the additional H1 allocations closest to Mansfield in recognition of the fact that ADC needs to meet its housing needs in sustainable locations, and on the basis that developers will be required to address the issues identified and mitigate against the impacts on infrastructure and facilities.
* Located in open countryside and detached from the Main Urban Area.
* Access issues along a single vehicle width road.
* Surface water issues along Woodhouse Lane.
* Uncertainty that the new allocations will meet the identified shortfall of 882 dwellings.
* The Plan will only meet the transitional ‘need rules’ of the new NPPF (para. 234 - Annex 1) rather than seek to meet the areas housing needs in full.
* The revised windfall position is not backed by ‘compelling evidence’ as required by para. 71 of the NPPF.
* No evidence to demonstrate that the highway concerns have been addressed.
* Current spatial strategy flawed.
* Natural England - Development of over 100 houses may impact Teversal Pastures SSSI. Any development in these locations would need to provide sufficient information to provide evidence that the proposal would not damage or destroy the interest features for which the SSSI has been notified.
* Other more suitable sites are available.
 |

## Non-site-specific issues

|  |  |
| --- | --- |
| **Part of Plan** | **Summary of key issues**  |
| Policy H1: Housing Allocations (Reps. – 3) | * Updated draft Policy H1 is sound. However, the Council should reassess the additional allocations in light of comments raised to ensure that this policy is consistent with national policy, justified and effective.
* Current allocated sites offer a limited ‘whole plan’ buffer.
* Further sites should be allocated to meet the housing requirement.
* Object to the removal of H1Sam – Land at Fackley Road (Phase 2) Teversal.
 |
| General support (included in site specific rep count above) | * Agreed that more homes are needed in the area but are conscious of the limitations in public services e.g. GP practices, schools and road networks available to support new communities, therefore it makes complete sense to spread new homes throughout the area of Ashfield.
* The development of brownfield sites which will greatly improve the aesthetics of our local area is welcomed.
* Support the Council’s decision to allocate additional sites for housing. This decision will help go towards ensuring that housing needs are met in full over the whole Plan period and to ensure the Plan is positively prepared and sound.
* The additional sites are supported as part of the Council’s planned comprehensive strategy to deliver housing in the most appropriate locations to serve the needs of the communities they represent.
* The submitted Plan now being examined through the Hearings process was the result of years of work, scrutinized by public consultation such that the resultant Plan is widely supported by the communities it is intended to serve. The additional sites being put forward by the Council are in accordance with the vision developed over a number of years and widely endorsed by the community
 |
| Other ‘objections’(Reps.- 3) | * Infrastructure already overwhelmed.
* Loss of Green Belt.
 |
| Comments(Reps. - 10) | * Issues raised to the Sustainability Appraisal, in respect of H1Ka: Beacon Farm, Kirkby.
* Volume of traffic.
* Other additional sites are available and some are being promoted.
* Environment Agency - Sites & H1Kn, H1Kq & H1Sal – Advice provided on how new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them, in accordance with NPPF 200.
* National Highways - Any potential sites anticipated to have an impact on the Strategic Road Network (SRN) are recommended to be subject to consultation with National Highways and appropriately assessed in line with the Department for Transport (DfT) Circular 01/2022. Development proposals in the Local Plan should be supported by a robust transport evidence base including the undertaking of a Transport Assessment where relevant, and we would welcome engagement with the Council as part of this process.
* Whilst the further allocated sites are generally supported, these would not, by themselves, adequately provide a sustainable level of growth in the south of the district. It is therefore considered that exceptional circumstances for Green Belt release have been demonstrated. This has justified Green Belt release at both a District-wide and site-specific level to avoid unsustainable patterns of growth and development across Ashfield. The reduction of harm to maximise beneficial use of land has been placed in the forefront of these considerations.
 |