

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
<b>ST27 Housing Mix, Type and Density</b>			
1192312	Resident	More information is required on how the council is going to create opportunities for Self and Custom Build. The reason many people want to self-build is that the large housebuilder companies create Identikit, homogeneous volume housing which does not suit the way they want to live (for example open plan living or home-workers). Self-builds tend to be more individual in their design and materials therefore, some flexibility and freedom of design needs to be allowed within planning policies.	The Council supports self build development, and policies in the Local Plan are enabling. High quality design is a priority for the Council. Innovation is supported where proposals do not have a negative impact on the environment/residential amenity.
REF108	Globe Consultation	Whilst any such proposal would need to satisfy highways requirements, we are confident that this can be achieved, and discussions are ongoing with highways officers. Similarly, there are ongoing discussions regarding the development opportunity with the Council's Development Management team, it is considered that the redevelopment of this site would accord with Policy ST27, which seeks, amongst other objectives, making efficient use of land and maximising development densities on sites in and adjoining town centres. It is important to note that this site is included within the Council's brownfield land register and, as such, is deemed to constitute an appropriate location for development, and one which would reasonably be included as an allocated site within the upcoming Local Plan. It is for this reason that we have issue with Policy ST14 given the premature nature by which our client's site at Blackstope Lane was discounted from the LAA process.	The Council supports self build development, and policies in the Local Plan are enabling. High quality design is a priority for the Council. Innovation is supported where proposals do not have a negative impact on the environment/residential amenity.
REF136	A and D Architecture	6) Policy ST27 should be modified to promote Park Home static caravan sector growth by including a new subsection E as follows: "E Park Home static caravan sites The Council recognises the need to provide fair and equal treatment to the group in the community aspiring to live in Park Home static caravan sites run by competent Site Operators and will support applications for the development of such sites and will grant licenses to Park Home Site Operators who can demonstrate viability."	The Council does not consider it necessary to allocate sites for Home Parks. There are policies in the plan which can be used to determine applications for Park Homes.
REF136	A and D Architecture	These statistics indicate that the District includes an averaged sized group in the community of people living in static caravans. The evidence base does not make the claim that demand for the sector is in decline (the Nomis web site entry for October 2019 is no different to that cited above). The SHM A-OAN update 2017 states that the population of the District is likely to age over the life of the Local Plan and since Park Home Lifestyles are popular with older people it is likely that demand for static caravans will increase over the life of the Local Plan. There is no evidence therefore to support reducing the static caravan fraction of the District Housing Stock over the life of the Local Plan and yet, by providing for no growth in the sector and yet this is precisely the outcome DBLP Policy will unjustifiably deliver. The Local Plan should be "significantly boosting the supply of homes" in the static caravan sector. That duty is reinforced by the popularity of the type amongst older people who, as a group, is set to increase over the life of the Plan. To avoid a charge of "discrimination by ageism" the Council should not just provide land for static caravan sector growth that keeps pace with the average target for housing growth because that would unfairly reduce choice amongst a group in the community that is disproportionately increasing. Thus, a growth target of 35 static caravans (0.384% of 9087 dwellings) by 2037 would discriminate against older people. Since the number of people aged 65 and over is set to increase by 46% to 2107 one estimate of a fair and equal treatment of the sector would be to allow fractional growth of 46% i.e. that the static caravan fraction of the housing stock should grow from 0.384% to 0.56% (=0.384 x 1.46). On that basis one estimate of a reasonable growth target in the sector without attempting primary research would be 51 static caravans (=0.56% of 9087 dwellings). The Council should therefore allocate land for at least 51 new Park Homes over the life of the Local Plan. Market research suggests that for a person aspiring to release equity and to release onto the market an under-occupied dwelling the Park Home static caravan option is an opportunity that should not be denied by lack of housing supply. The Local Plan should significantly boost the	The Council does not consider it necessary to allocate sites for Home Parks. There are policies in the plan which can be used to determine applications for Park Homes.

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		housing supply in this sector accordingly. Allocating no land for growth to serve this sector and this group in the community is unjustified negative planning that is contrary to national policy and makes the Local Plan unsound.	
REF215	Resident	<p>46. The point was made in para. 37 above that there is little point in having a three tier settlement hierarchy if that split is to be ignored for evolution of more detailed policies.</p> <p>47. Draft Policy ST27 is yet another example of this disconnected approach.</p> <p>48. Draft Policy ST1 aligns the Main Towns and the LRS's - and that is a sound approach given the stated intended wider than normal role of these rural settlements.</p> <p>49. However ST27-2 states that for housing densities in the towns it should be an average of 30 dwellings per hectare (in fact at 12 dwellings to the acre a lower figure than is likely to make the most effective use of the land) whilst in all other settlements "... densities should reflect the character of the settlement and local housing needs unless otherwise promoted through a Neighbourhood Plan.."</p> <p>50. As in ST2 a strict and limiting criteria is introduced (local housing needs) without indicating what "local" means and how that correlates with the broader aims of the Local Plan.</p> <p>51. What the Draft policy also seems to be stating is that the planning of all rural settlements, large or small, is to be done through Neighbourhood Plans</p>	The Design Policy will be used to guide the density and scale of development in each area. In urban areas, 30 dwellings per hectare is considered to be a suitable starting point. The Council will continue to support the development of Neighbourhood Plans, but it is not intending to require areas to produce a neighbourhood plan. There are sufficient policies in the draft Plan which will be used to determine planning applications in rural areas.
1196559	Resident	ST27; Densities and space around buildings are both critical items and must be dealt with in line with ST26.	Thank you for your comments which are noted.
REF253	Fisher German	<p><b>Self-Build</b></p> <p>The requirement to deliver 2% serviced plots on sites of 100 dwellings or more is not supported. Whilst we agree that the Council should be actively seeking to support self-builders (it is a statutory requirement to do so), the method of delivery is considered fundamentally flawed. There is We are yet to see evidence that this method of delivery has been successful. In our experience most self-builders do not wish to be within or adjacent to a modern housing development, instead preferring bespoke, rural opportunities. Furthermore, just because individuals are registered on the self-build register it does not mean that they will all build their own property, even if suitable land was available. The reality is the difficulty and lack skills required will mean only a small percentage of those on the register will ever develop a self-build property. It is also important to note that individuals can be on multiple self-build registers, which inflates the figures across a number of areas.</p> <p>This policy requirement will serve to frustrate and slow housing delivery, given special consideration would need to be given to the location of the plots and how they can be accessed safely and independently from the typical development parcels. The delivery of plots following unsuccessful marketing is also considered to be more difficult than suggested within the Policy. The Policy assumes such plots could simply just be built out, but not many developers will want to build out single serviced plots. This could leave undeveloped plots for significant period of time. Such requirements will also deter developers, given the increased complexity and lack of certainty of outcomes.</p> <p>There appears to be no reference to self-build or the provision of serviced plots within the viability study and as such the impacts of such policy requirements and the impacts on site viability are not known. It is considered that such proposals are likely to negatively impact viability in both the costs of providing such plots and the reduced land values as developers seek to mitigate for potential risks.</p> <p>The Council should instead seek to ensure a positive policy environment exists where suitable self-build schemes, either of individual units or larger schemes providing serviced plots will be treated favourably. This encourages delivery in line with the Council's statutory duties, without compromising sites which make up a vital facet of the Council's overall proposed housing supply.</p>	Thank you for your comments which are noted. There is a caveat within the policy which enables self build plots to be return to market housing: 'Plots should be made available and marketed appropriately for at least 12 months. If after that time, they have not been sold the plot(s) may either remain on the open market as self-build or be built out by the developer as market housing'. As such, your theory will be tested through this policy mechanism. Sites/plots will also be offered to households who have registered an interest with the Council (those on the self build register).

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REF285	Home Builders Federation	<p>Under the Self Build &amp; Custom Housebuilding Act 2015, the Council has a duty to keep a Register of people seeking to acquire self &amp; custom build plots and to grant enough suitable development permissions to meet identified demand. The NPPG (ID: 57-025-201760728) sets out ways in which the Council should consider supporting self &amp; custom build. These are :-</p> <ul style="list-style-type: none"> <li>• developing policies in the Plan for self &amp; custom build ;</li> <li>• using Council owned land if available and suitable for self &amp; custom build and marketing such opportunities to entrants on the Register ;</li> <li>• engaging with landowners who own housing sites and encouraging them to consider self &amp; custom build and where the landowner is interested facilitating access to entrants on the Register ; and</li> <li>• working with custom build developers to maximise opportunities for self &amp; custom housebuilding.</li> </ul> <p>The HBF is supportive of the Council's policy approach towards self &amp; custom build for its potential additional contribution to overall HLS as set out in Policy ST27 :-</p> <ul style="list-style-type: none"> <li>• Bullet Point (B) - the Council will support proposals for self-build &amp; custom build housing that help meet the needs of those on the Self Build &amp; Custom Housebuilding Register, provided they are compliant with other Local Plan policies ; and</li> </ul> <p>10</p> <ul style="list-style-type: none"> <li>• Bullet Point (D) - Neighbourhood Plans will be expected to consider the local need for self-build housing and where appropriate identify allocations for self-build &amp; custom housing.</li> </ul> <p>The HBF is not supportive of restrictive policy requirements for the inclusion of self &amp; custom build housing on housing site allocations, which only changes housing delivery from one form of house building to another without any consequential additional contribution to boosting housing supply. The HBF object to Policy ST27 Bullet Point (C), which states that :-</p> <ul style="list-style-type: none"> <li>• On housing allocations of 100 dwellings or more 2% of the proportion of developable plots should be set aside for self-build &amp; custom housebuilding. Plots should be made available and marketed appropriately for at least 12 months. If after that time, they have not been sold the plot(s) may either remain on the open market as self-build or be built out by the developer as market housing.</li> </ul> <p>The provision of serviced plots for self &amp; custom build on housing allocations of 100 or more dwellings should not be sought. This policy requirement seeks to place the burden for delivery of self &amp; custom build plots onto developers contrary to national guidance, which outlines that the Council should engage with landowners and encourage them to consider self &amp; custom build. The Council's proposed policy approach should not move beyond encouragement by seeking provision of self &amp; custom build plots on allocated housing sites of 100 or more dwellings.</p> <p>All policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. The Council's Self &amp; Custom Build Register alone is not a sound basis for setting a specific policy requirement. As set out in the NPPG, the Council should provide a robust assessment of demand including an assessment and review of data held on the Council's Register (ID 2a-017-20192020), which should be supported by additional data from secondary sources to understand and consider future need for this type of housing (ID 57-0011-20160401). The Council should also analyse the preferences of entries as often only individual plots in rural locations are sought as opposed to plots on larger housing sites. It is also possible for individuals and organisations to register with more than one Council so there is a possibility of some double counting. The Register may indicate a level of expression of interest in self &amp; custom build but it cannot be reliably translated into actual demand should such plots be made available. The Council has provided no supporting evidence on entries on its Register.</p> <p>The Council's policy approach should be realistic to ensure that where self &amp; custom build plots are provided, they are delivered and do not remain unsold. It is unlikely that the provision of self &amp; custom build plots on allocated housing sites of 100 or more dwellings can be co-ordinated with</p>	<p>Thank you for your comments which are noted. There is a caveat within the policy which enables self build plots to be return to market housing: 'Plots should be made available and marketed appropriately for at least 12 months. If after that time, they have not been sold the plot(s) may either remain on the open market as self-build or be built out by the developer as market housing'. As such, this provides a flexible approach which enables developers to test the market.</p>

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		<p>the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on a housing site from both a practical and health &amp; safety</p> <p>11 perspective it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. If demand for plots is not realised, there is a risk of plots remaining permanently vacant effectively removing these undeveloped plots from the Council's HLS.</p> <p>Where plots are not sold, it is important that the Council's policy is clear as to when these revert to the original developer. It is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible from the commencement of development. The proposed marketing period of 12 months is too long. The consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical problems created if the original housebuilder has completed the development and is forced to return to site to build out plots which have not been sold to self &amp; custom builders.</p> <p>The 2019 NPPF states that policies should be clearly written and unambiguous so that a decision maker knows how to react to a development proposal (para 16d). The requirement for appropriate marketing is vague, which means uncertainty for developers. If the policy is to be effective, the Council should provide further clarification of its requirements which should be justified by supporting evidence.</p> <p>As well as on-site practicalities any adverse impacts on viability should be tested. It is the Council's responsibility to robustly viability test the Local Plan in order that the cumulative impact of infrastructure, other contributions and policy compliant requirements are set so that most development is deliverable without further viability assessment negotiations at planning application stage and the deliverability of the Local Plan is not undermined. The Bassetlaw Interim Whole Plan &amp; Community Infrastructure Levy (CIL) Viability Assessment by NCS Nationwide CIL Services dated August 2018. does not test the financial impact of Policy ST27.</p> <p>The Council is also reminded that self &amp; custom build are exemption from Community Infrastructure Levy (CIL) contributions and affordable home ownership provision as set out in national policy. On housing sites allocations of 100 or more dwellings, fewer dwellings are eligible to make contributions towards infrastructure and affordable housing, which may have detrimental impacts. The Council may have aspirations for self &amp; custom build but this should not be pursued at the expense of delivering affordable housing.</p> <p>Before the pre-submission Local Plan consultation, Policy ST27 should be amended to delete Bullet Point (C).</p>	
REF285	Home Builders Federation	<p>Policy ST28 states that on schemes of 50 or more dwellings, at least 20% should be designed to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations. The 2019 NPPF states that policies should be clearly written and unambiguous so that a decision maker knows how to react to a development proposal (para 16d). It should be clear that the requirement for 20% M4(2) compliant dwellings only applies to schemes of 50 or more dwellings for housing schemes for older people. There should be no conjecture that this requirement applies to general family housing schemes. Before the pre-submission Local Plan consultation, Policy ST28 should be modified.</p>	This will be kept under review as the Plan progresses.

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1197091	William Davis	The approach to mix, density and type set out in Part A is broadly supported. However, the wording of Part 3 is unclear. It states that new housing development will be supported where it provides "...a mix of market and affordable housing, and specialist housing for older people and disabled persons". This could be interpreted to mean that all residential sites should include specialist housing. This would be opposed as not every site is suitable for specialist housing or capable of accommodating it. The approach to self-build is not supported. It is not considered necessary or practical to provide self-build dwellings on residential schemes. It is understood that there are currently 75 people on the Self Build Register but the policy will provide 140 plots, substantially more than necessary. There are a number of practical issues related to the provision on market housing sites including health & safety, payment of developer contributions and phasing. A number of similar policies have been found not to be sound and removed from emerging Local Plans due to these issues. It is considered that it would be more appropriate to include a policy that is supportive of self-build subject to certain criteria. It may also be possible to include an element of self-build in the new settlements being proposed as suitable parcels can be more easily built into the masterplan.	Part 3 of the Housing Mix Policy will be amended to clarify 'an appropriate mix of housing' will be supported. The quantum of development will be determined by the Affordable Housing Policy and Specialist Housing Policy. The Government requires Councils to take a proactive approach to the delivery of self build plots. Whilst there is currently in excess of 84 households on the Self Build Register, this covers a three year period. As such, that equates to 28 households per annum (420 households over the Plan period). The Policy enables a flexible approach which could see plots returned to market housing within a 12 month period if there is no demand.
1197091	William Davis	As with Policy ST27, the broad thrust of the policy is supported. However, it is unclear if the requirement for 20% of schemes to be designed to meet Part M4(2) refers to residential schemes or schemes for care homes. If for residential schemes, it is considered that the evidence provided does not justify the requirement for PartM4(2). The wording is also considered unsound given that it says 'at least 20%' which does not provide certainty for developers. Given the concerns raised about the Viability Assessment, a review of the viability assessment will be required taking account of the increased costs resulting from Part M4(2).	This relates to residential schemes. The Whole Plan Viability Assessment indicates that it is deliverable. The Council's evidence (Bassetlaw Local Housing Needs Assessment 2020) provides justification for this policy.
REF299	Gladmans	<p>5.2.1 Gladman broadly support the suggested approach of Policy ST27 which seeks to provide a range of housing types to meet the ever-growing needs of the District. In particular, Gladman remain supportive of the fact that the above policy does not set out a prescriptive approach regarding the specific mix of properties.</p> <p>5.2.2 Reflecting on our previous representations, Gladman consider that reference to Neighbourhood Plans should not be referenced in the text of the policy. The approach advocated by the Council is better suited to dealing with housing mix, tenures, types and sizes. If a Neighbourhood Plan were to come forward and sought to impose specific requirements, then the flexibility proposed by Policy ST27 would be lost.</p> <p>5.2.3 The second element of Policy ST27 outlines the Council's proposed policy approach towards self and custom build housing. Whilst Gladman are broadly supportive of this policy element we are of the opinion however that criterion C of the Policy ST27, which states on housing allocations of 100 dwellings or more 2% of the proportion of developable plots should be set aside for self-build and custom housebuilding, should be deleted from the Plan.</p> <p>5.2.4 The provision of serviced plots for self and custom build on housing allocations of 100 or more dwellings places the burden for delivery of self and custom build plots onto the developer contrary to national guidance. Whilst acknowledging the Council's aspirations for self and custom build housing, the policy should not move beyond encouragement by seeking provision of self and custom build plots on allocated housing sites of 100 dwellings or more.</p> <p>5.2.5 Gladman would be happy to explore self-build and custom build plots further with the Council, in relation to our land interests at Bevercotes Colliery.</p>	Thank you for your comments which are noted. Neighbourhood Plans are required to be in conformity with Local Plans. The Council will continue to support the development of Neighbourhood Plans where they propose to deliver the aims and objectives of the Bassetlaw Local Plan. The Government requires Councils to take a proactive approach to the delivery of self build plots. Whilst there is currently in excess of 84 households on the Self Build Register, this covers a three year period. As such, that equates to 28 households per annum (420 households over the Plan period). The Policy enables a flexible approach which could see plots returned to market housing within a 12 month period if there is no demand.

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REF299	Gladmans	<p>5.3.1 The above policy requires development proposals of 50 or more dwellings to provide a minimum of 20% of homes to meet M4(2) Building Regulations. In principle Gladman acknowledge the importance of delivering housing to assist in meeting the needs for older people and those with mobility issues. The proposed introduction of higher optional standards for M4(2) however must be supported by robust evidence that would address an identified need for such properties in line with the requirements of the Framework10.</p> <p>5.3.2 Gladman suggest the policy is modified and flexibility added to the policy wording which provides 'support' for the provision of M4(2) but does not set a policy requirement which could impact development viability.</p>	This relates to residential schemes. The Whole Plan Viability Assessment indicates that it is deliverable. The Council's evidence (Bassetlaw Local Housing Needs Assessment 2020) provides justification for this policy.
REF310	P&DG	<p>Self-build Policy ST27 refers to self and custom build housing, stating that the Council will support proposals for self and custom-built housing to help meet the need of those wishing to build their own home. Part C stipulates that allocations of more than 100 dwellings should provide a 2% proportion of plots for self-build projects, which would expire after 12 months of no interest. While it is accepted that schemes of self and custom build homes should be encouraged through the Local Plan process, it has been proven not to be a sound process in neighbouring and more recent Local Plan Examinations (Bolsover and Mansfield) to put forward a distinct percentage requirement in policy.</p>	Thank you for your comments which are noted. Lia Council I am reviewing the density Estates housing mix, type and will make any necessary amendments.
REF327	Scrooby Parish	<p>Policy ST28: Specialist Housing Having a specific policy of this nature is welcomed.</p>	Thank you for your comments which are noted.
REF401	East Markham Parish Council	<p>EMPC endorses this policy. However, it should be noted that recent developments have failed to reflect the character of the village and have not provide adequate starter homes or homes for elder residents. East Markham Parish Council also draws BDC attention to its Neighbourhood Plan policy NP2 that specifically states the following. 1. New housing developments should deliver a housing mix that reflects the demonstrable need for smaller dwellings. 2. Developers must show this local need has been taken into account in the different housing types and bedroom numbers proposed. It is our view that this policy has been ignored in recent planning submissions by BDC.</p>	Thank you for your comments which are noted.