

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST34 - Landscape		Character	
1177432	Resident	The idea of Green Gaps is fully supported. These are necessary in order to protect the character of settlements and to prevent urban sprawl into the countryside. The Green Gap on the south side of Ordsall (GG7) is particularly welcomed as development in this area would have a big visual impact when entering Retford from the south (from London Road / Ollerton Road). This land is elevated and is particularly visible.	Noted. Thank you for your comment.
REF093	Resident	<p>Overall the policy reads very well. The supporting text (8.3.8-8.3.14) is helpfully clear that the approach is landscape- led and is not a coalescence policy. In other Plans these different approaches can sometimes become blurred. In a broader sense I would suggest that the proposed Green Gaps are a fundamental part of the Plan's approach to sustainable development. However, Policy ST34 is rather separate from the earlier set-piece strategic policies in the Plan. Planning Inspectors are nervous about such policies where they conclude (rightly or wrongly) that green gaps have been designed to prevent development taking place or limiting its scale (see the Hart Local Plan in Hampshire). In your case I suggest that it would do no harm to dovetail the proposed Green Gaps into the wider strategy. This would run with your summary point 3 in paragraph 4.6 of the Green Gap study.</p> <p>The resulting message would be:</p> <ul style="list-style-type: none"> • BDC has an overall strategy; • BDC has planned for strategic and local growth; • That growth will be sustainable; • In this context the Plan has identified Green Gaps; • The Green Gaps protect the landscape setting of the settlements concerned; and • The settlements affected have sufficient environmental capacity to allow them to grow elsewhere without impacting on the green gaps. Paragraph 8.3.13 will probably assist with your case at examination. The Council will be able to demonstrate that the policy intends that some development could take place without affecting the character of the landscape (but see below). 	An addendum report has been produced to respond to the comments received during consultation. This paper further explains the rationale for the Green Gap and their purpose - including how they intend to be managed through a revised Policy.
REF093	Resident	<p>Would there be merit in having the Green Gaps as a separate policy? - I raise this as I am unclear whether or not parts A and B of the policy would apply to the identified Green Gaps The policy (after the list of the Green Gaps) requires that development has a positive effect on the openness, appearance and functionality of the landscape quality of the Green Gaps concerned. I can see that paragraphs 8.3.13/14 provide some clarity on what may be acceptable. However, the approach in these paragraphs raise the following matters: Firstly, as drafted the policy requires a positive impact on landscape character to be achieved by proposed development. The more traditional policy approach is to ensure that any harm from development is not unacceptable. This will be a matter of local judgement and choice. In the event that you stick with the policy as drafted, I would imagine that you may be challenged either by a landowner or the Inspector about how this ambition would be managed/achieved. Secondly if the ambition of the policy is to support agricultural and other open rural uses in the identified Green Gaps (8.3.13/14) should the policy comment as such? In the event that you stick with the policy as drafted I would imagine that you may be challenged by either by a landowner or the Inspector about the relationship between a generally-worded policy on the one hand and the supporting text which potentially restricts development in a Green Gap to agriculture and other rural activities on the other hand. Thirdly the policy may need to define how it intends to address the 'adjoining the Green Gaps' issue. Some of the Gaps are extensive in scale and as such there will be significant tracts of land which are adjacent to the designated area. If not clarified the issue has the ability to be a DM officer's nightmare and a lawyer's playground in equal measure.</p>	Agreed. There is now a separate policy within the Local Plan specifically for the Green Gaps. This policy provides a criteria for applications.

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REF115	Canal and River Trust	<p>We welcome the aspirations of this section which should help to ensure that consideration is given towards the design of new development and the creation of new positive spaces. We do believe that it is essential that the document provides guidance and certainty to developers and decision makers over how waterfront spaces should be incorporated into new development. Waterfront areas feature unique characteristics as a setting for development and form key areas in Worksop and Retford for leisure, recreation and tourism. There are specific needs to ensure that development integrates positively with waterways, ensuring that development is designed to improve access to, along and from the waterway; and ensuring development optimises natural surveillance of the waterway.</p> <p>As such, we wish to highlight as an example of good practice, policy SP31 within the Rotherham Sites and Policies Document, adopted in June 2018. This states that: "Subject to satisfying other relevant planning policy, development adjacent to canals will be expected to:</p> <ul style="list-style-type: none"> a. Be of a high-quality design that integrates the canal into the development proposal in a way that treats the waterway as an area of usable space; b. Integrate the waterway, towing path and canal environment into the public realm in terms of the design and management of the development; c. Improve access to, along and from the waterway and improve the environmental quality of the waterway corridor; d. Optimise views of water and generate natural surveillance of water space through the siting, configuration and orientation of buildings, recognising that appropriate boundary treatment and access issues may differ between the towing path and offside of the canal; and e. Improve the amenity of the canal. Development that would have an adverse impact on the amenity of the canal by virtue of noise, odour or visual impact will not be supported." The existing policies in the draft Local Plan do not directly address requirements for waterside design and we believe that it is necessary for either Policy ST32: Design Quality or ST34: Landscape Character to be expanded to include a section addressing requirements for waterfront development. Although section 8.4 refers to general policies to consider Multi-Functional Green and Blue Infrastructure, this section does not directly address considerations for designs relating to built development and its impact on the local landscape. As a result, we do believe that policy text directly relating to waterfront development should be provided within either section 8.1 or 8.3 to make the plan effective. 	Thank you for your comments. Waterfront development, regeneration and design are specific issues related to particular places. The Local Plan does cover this either for proposed sites or design led planning policies.
1195486	Gamston with Eaton and West Drayton Parish Council	Policy ST34 refers to a map showing green gaps we have been unable to find it as it mentions one between Retford South and Eaton. Could Bassetlaw forward a copy to us?	Noted. Thank you for your comment.
REF194	Clarborough and Welham Parish Council	It is pleased to see that the Policy to maintain the separation between existing villages is to remain. Being a Parish in which there are two villages the Parish Council feels that it is important that this separation continues in order to identify the two communities within the Parish. It allows the two communities to continue their existing independent character.	Noted. Thank you for your comment.
REF201	Severn Trent	Severn Trent are supportive of the inclusion of bullet point 3, as it highlights the need to protect Watercourses, watercourses form a vital part of the natural water system. The culverting or removal of watercourses can make it difficult to drain developments resulting in flows being connected to the sewerage system.	Noted. Thank you for your comment.

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REF249	Pegasus Group	<p>Policy ST34 of the Draft Bassetlaw Local Plan states: The Policy is accompanied by supporting text concerning 'Green Gaps' at paragraphs 8.3.8 to 8.3.14. The Green Gaps are illustrated on the Draft Policies Map. This indicates that Green Gaps are collectively proposed to extend to the south of Oldcotes, around most of Langold and around Carlton in Lindrick. It is noted that part of the proposed site lies within the Green Gaps area of GG2: Oldcotes-Langold-Carlton in Lindrick.</p> <p>5.3 Each of the evidence base documents which are referred to in the Draft Policy are discussed further below:</p> <p>Landscape Character Assessment – Bassetlaw, Nottinghamshire, August 2009</p> <p>5.4 This Landscape Character Assessment was identified directly in the text of Policy ST34 as one of the documents which have informed the creation of the policy (albeit the Policy text appears to erroneously refer to this as the 'Landscape Capacity Assessment').</p> <p>5.5 The site lies within the Magnesian Limestone Ridge regional character area and specifically the landscape character parcel of ML03: Langold, which is identified as having a 'very good' landscape condition and a 'moderate' landscape sensitivity, which equates to the policy of: 'Conserve'.</p> <p>5.6 Despite the results of the Landscape Character Assessment, part of the site has already been deemed acceptable for housing, as confirmed by the planning application 15/01605/OUT. It is therefore considered that there is no reason why the evidence set out in the Landscape Character Assessment would preclude further development in the wider site area and no specific evidence to suggest that this area would need to form part of the Green Gaps, in order for them to serve their primary function. In conclusion, the Green Gap area to the north of Langold should be amended to exclude the full area of the extended site proposals. This would not detrimentally impact on the openness, appearance and functionality of the landscape quality of the Green Gap and specifically the Green Gap would continue to deliver its primary purpose of preventing coalescence between Langold and Oldcotes. This would not then prevent the development proposals, along with their proposed landscape mitigation, from being able to deliver future sustainable development which was compliant with Policy ST34.</p>	<p>The Green Gap to the north of Langold does exclude the two sites that have existing planning permission. It does however include the remaining open land between the development site and the village of Oldcotes. The reasoning and justification for including this area is identified within the Green Gap Study.</p>
REF270	Barton Willmore	<p>We acknowledge the requirement for development proposals to demonstrate how they have regard to landscape character areas, and we support the inclusion of mitigation measures. However we strongly object to Local Plan's emerging approach to identifying "Green Gaps". The Local Plan and Policies Map identifies these 'Green Gaps' as existing between settlements and around settlement fringes, some of which are protected such as Conservation Areas. Our Client's land is proposed to be designated as a Green Gap GG8 (Retford West) within Policy ST34 and Local Plan Proposals Map. Three proposed Green Gaps for Retford (GG6, GG7 and GG8) enclose the entire southern, eastern and western boundary of the designated Main Town, which seeks to essentially safeguard the entire area to the south of Retford from development. Notwithstanding our Client's clear case as to the appropriateness of land to the south of Retford as a location to meet the future development needs of the town, we object to the designation of a Green Gap in this location as a matter of principle. We consider that the Green Gap policy is not justified, serves no meaningful planning policy purpose and seeks to add an undue level of protection to land on the basis that it is not the Council's current preference for development. The Council's justification for the above policy approach is set out within the evidence base for the Draft Local Plan within the 'Green Gap Study'. The Study has been prepared to safeguard areas of "important landscape" in sensitive locations and as a reaction to development pressure within the district (Section 5). It is our Client's position that the document does not justify the allocation of the Green Gaps. Paragraph 5.2 of the document simply states "it is certain that similar pressures will continue over the next 20 years" indicating that there has been substantial development in recent years and "in some cases" settlements extending into the countryside. We note that, to cater for the growing needs of the District and to facilitate a 'step change', development of greenfield land will be necessary over the plan period and it is not sustainable to prevent development on land that is well-suited for development and located on the</p>	<p>There is a clear justification for Green Gap policies (or similar), based on planning practice and guidance. Examples can be drawn from several Local Plans and Neighbourhood Plans (see Section 3) The matter is, therefore not one of principle but more about whether the extent of any given Green Gap is justified and how the flexibility within a redrafted Green Gap policy would allow for appropriate development to occur. The landscape to the South of Retford is distinctive comprising north-south running ridge or plateau, with extensive views in all directions and the slopes and bottom of the River Idle valley. It provides a countryside setting, with access opportunities, for the Retford housing areas of; Ordsall, South Retford, Thrumpton & White Houses and it is a rural setting for the village of Eaton. Whilst it may be justifiable to examine the details of the Green Gap where it adjoins the built up area and/or to consider if well planned and landscaped residential development may be appropriate, there is no justification for the removal of Green Gap 8 in its entirety.</p>

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		<p>urban fringe of settlements such as Retford without the risk of merging with any settlements to the south or surrounding area. Whilst there is planning merit in maintain distinctiveness and local characteristics of settlements, the Green Gap study provides no meaningful evidence to demonstrate that protection of land to south of Retford is important to maintaining its character or distinctiveness. There is nothing significant or distinctive regarding the area to the south of Retford and its relationship with surrounding villages which are physically and visually removed from Retford. We consider that the Council's proposed Green Gap designation to the south and west of Retford should be deleted from the Local Plan.</p>	
REF275	Consultant	<p>The necessity to have requirements to protect the area of landscape character, and how developers have regards for these areas is clearly understood and supported. We do, however, strongly oppose the emerging approach presented in the Local Plan to identify Green Gaps and its current use in the Local Plan. These are identified in the policies maps as areas between the settlements and around settlement fringes, some of these areas are already classified as conservation areas. There are three Green Gap areas proposed around Retford, on the southern, eastern and western boundaries (GG6, GG7, GG8). This is seeming in place to restrict development in this area on the outskirts of Retford. Regardless of our clients appropriate, and previously identified, land suitable of meeting the need of the town, we also object to this policy due to its lack of substantial justification, serving no meaningful planning purpose and an over the top protection from future development. The current layout of policy combined with the Flood Risks in channels development of Retford in an unnatural, uncharacteristic and unsustainable manner. These restrictions will have major impacts of Retford, the town centre and the villages that rely upon it. There is no evidence to suggest the area of land south of Retford is important to retain the character of the town. We believe that the green gap designation to the south and west of Retford should be removed from this Local Plan</p>	<p>The landscape to the South of Retford is distinctive comprising north-south running ridge or plateau, with extensive views in all directions and the slopes and bottom of the River Idle valley. It provides a countryside setting, with access opportunities, for the Retford housing areas of; Ordsall, South Retford, Thrumpton & White Houses and it is a rural setting for the village of Eaton. Whilst is may be justifiable to examine the details of the Green Gap where it adjoins the built up area and/or to consider if well planned and landscaped residential development may be appropriate, there is no justification for the removal of Green Gap 8 in its entirety.</p>
REF280	Avant Homes and Wyndthorpe Developments.	<p>From review of the background evidence, it is clear that the Council's intended function of the Green Gaps are to set clear, long term, defensible and recognisable boundaries using readily recognisable features such as roads, streams, belts of trees or woodland edges, footpaths/tracks, canals and railway lines. At face value, it would appear that such a prohibitive methodology shares similarities with the function of the Green Belt. The extent of the Green Gaps are taken from the 2009 Landscape Character Assessment which had broadly characterised areas. In some cases, the landscape has changed due to development which may have affected the classification and shape of these broad areas which would resultantly implicate that the extent of the selected Green Gaps would change alongside this. An updated landscape character assessment along with a more accurate Green Gap Report assessing individual sites on their merit would be welcomed and is encouraged to provide a robust evidence base for such a restrictive policy. Indeed the relevance of this exercise is further justified by virtue of the approved planning application in relation to land off Doncaster Road (ref 18/01148/FUL).</p> <p>A flaw of the Green Gaps Report is that the Council's preferred allocations have been excluded from the assessment and further scrutiny, implying that their environmental suitability for development has already been pre-determined. The rejection of the preferred allocations from the assessment should therefore deem the assessment as incomplete and biased in determining the extent of the proposed Green Gaps. The Green Gaps proposed will define the spatial plan for duration of the plan period and can therefore be seen as a 'long-term' prohibitive policy which will have a detrimental impact on the flexibility of maintaining a deliverable 5 year housing land supply and changing economic circumstances. The extent of the coverage of the Green Gap proposed is significant in scale, wrapping around major urban areas and constraining the majority of growth within the edge of the defined boundary in what can be considered sustainable and viable locations for residential growth. Although it is noted that the Green Gaps have left directions for growth for some urban areas¹, the sustainability and viability of the remaining unrestricted land has not been factored in to the plan's flexibility to deliver housing, resulting in potential future supply issues for Bassetlaw if the preferred allocated sites are deemed unsuitable or are subsequently un-deliverable over the plan period.</p>	<p>It is intended that, whilst they would be open to review in future Bassetlaw Local Plans (or any successor documents), Green Gaps should have robust and easily recognisable boundaries. To achieve this, applying the principles for drawing Green Belt boundaries is quite reasonable. However, this does not state or imply any intent that Green Gaps are a backdoor way of introducing Green Belt into Bassetlaw. This is made explicit in the wording of the proposed new, separate, Green Gap policy and its explanation in Section 6 of the Green Gap Study. The 2009 assessment remains pertinent in conjunction with the more recent NE Natural Character Areas. The Green Gaps have been defined based on the emerging policy context, recognising existing commitments and emerging allocations for new housing and employment around settlements. As noted above, should preferred/allocated sites fail to come forward within the plan period, those sites and their relationship with Green Gaps can be considered in a future review(s) of the Local Plan.</p>

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REF280 (LAA)	Avant Homes and Wyndthorpe Developments.	<p>Carlton-in-Lindrick adopted their latest revision of the neighbourhood plan in February 2019, within this, policies or importance are implemented within this plan which has had influence within the Green Gap Report, and the also informing the Draft Local Plan.</p> <p>The Neighbourhood Plan has allocated two large sites for future growth within the area; Land East of Doncaster Road, and Firbeck Colliery. The land East of Doncaster Road is currently being developed by Avant Homes after obtaining planning permission for 151 dwellings (18/01148/FUL). Firbeck Colliery is proposed for 407 dwellings and is pending a planning decision. Through the determination of the associated planning application, this site was deemed suitable for development in respect of both both environmental and technical constraints. Policy 10 identifies locations of important views from Doncaster Road highlighting 6 views east, of which these areas have been included within the designated Green Gap in the Draft Local Plan. The purpose of this policy is to show no support towards developments which will negatively impact the views into their respective areas. As one of the views (view 6) is directed at the recently approved development it can be considered that the views do not implicate that no residential development shall be placed however is there to promote to “conserve, protect and/ or otherwise enhance the views for the benefit of the communities, for leisure, recreation use, and of provision as a haven for wildlife.” A design should therefore be adaptive to benefit these sought for qualities.</p>	The Green Gaps have been defined based on the emerging policy context, recognising existing commitments and emerging allocations for new housing and employment around settlements. As noted above, should preferred/allocated sites fail to come forward within the plan period, those sites and their relationship with Green Gaps can be considered in a future review(s) of the Local Plan.
REF281	Notts Campaign to Protect Rural England	<p>We welcome this policy, especially “B. All developments of 10 or more dwellings and non residential development of 1000sqm or more floorspace, will be supported subject to the provision of: 1. Measures to facilitate and encourage safe access by cycle and foot;</p> <p>2. Protection of, connection to, and extension of where practicable, existing pedestrian, cycle and equestrian routes as part of a convenient, safe and attractive network for users;</p> <p>3. Public transport enhancement where justified, including measures to encourage public transport use”</p> <p>The recognition in 3. that measures to encourage public transport use will (often) be needed is welcome. Rigorous assessments independent of applicants and developers will, however, be necessary to ensure that the “where justified” condition in 3. is not used as a reason not to provide public transport alternatives.</p>	Noted. Thank you for your comment.
REF282	National Trust	<p>While National Trust generally supports Policy ST34 we believe that it should be more aspirational. We suggest that proposals should be required to have specific regard to national and local Landscape Character Assessments, rather than only those assessments intended to inform the local plan (currently listed in Part A). It would also be beneficial if the aspiration of supporting the Sherwood Forest Restoration Plan referred to at 10.1.11 was incorporated into this policy. It is not clear how Green Gaps have been identified as the associated report only includes an assessment of the areas already suggested.</p> <p>Consequently, it is unclear why a Green Gap should not be established between Worksop and the A1 where the risk of linear urban sprawl is clearly at its most marked. It is notable that while this area to the east of Worksop has not been assessed by the Green Gaps Report, the report specifically refers to ‘settlements extending into the countryside with the potential for them to merge in the future... erosion of local landscape character between settlements some of which is locally valued and has historic value. Examples of this include... Worksop (E). The (commercial) development of Manton Wood with major HQs and warehouses; ... [and] The A1 junctions, services and associated development (Blyth, Morton...),’ p15. With a proposed Garden Village to be sited between Worksop and Retford, the Draft Local Plan is promoting an extended area of urban sprawl stretching from Worksop to within 2.5km of Retford, which conflicts with its own Green Gap Report. We suggest that the proposed Green Gaps ought to be revisited with additional areas being identified on the basis of how well they meet a range of criteria.</p>	Additional work has been undertaken to review the comments on the Green Gaps and identify policy revisions. The review concluded that there will be no change to the boundaries of the proposed Green Gaps, but there will be a separate policy in the updated version of the Local Plan. This will provide more local detail for development within and adjoining green gaps.

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1197091	William Davis	<p>Whilst there are no objections to Part A and B of Policy ST34 there are significant concerns regarding Part C on Green Gaps, specifically GG4: Worksop West – Shireoaks and Rhodesia. A review by a suitably qualified and experienced landscape architect (see attached) has identified that this policy is not consistent with national policy nor justified by the evidence (namely the Site Allocations: Landscape Study (November 2019) and Green Gaps Report (November 2019)) as required by the tests of soundness. The Green Gaps Report justifies the inclusion of the green gap element of Policy ST34 with reference to paragraphs 170 and 171 of the NPPF. Of relevance these set out three matters:</p> <ul style="list-style-type: none"> • protecting and enhancing valued landscapes; • recognising the intrinsic character and beauty of the countryside; and • allocate land with least environmental or amenity value. <p>No robust evidence has been provided which follows the Guidelines for Landscape and Visual Impact Assessment Edition 3 (GLVIA) Box 5.1 to justify the identification of GG4 as a ‘valued landscape’ worthy of protection and enhancement. Regarding intrinsic character and beauty of the countryside, this is an emotive and subjective matter which can only be judged against the value of the landscape. Again, the landscape study fails to meet the full criteria for defining value. Finally, the allocation of land of least environmental or amenity value; value has not been considered in line with the accepted guidance of GLVIA3. As such the Green Gap policy is not consistent with national policy. The Green Gap Report also references Planning Guidance on the Natural Environment stating it supports Green Gaps. The quote provided from the guidance does not at any point mention Green Gaps. The only place where there may be implied support for the Green Gap policy in Plans can also include policies to avoid adverse impacts on landscapes and to set out necessary mitigation measures, such as appropriate design principles and visual screening. Excluding land by the Green Gap map based blanket ‘no development’ policy does not accord with the subtler requirement of the guidance seeking appropriate design principles and visual screening. In fact mitigation is practically addressed in full by Policy ST34.B allowing the use of clauses 1 – 6 when assessing and informing/guiding all new developments. There are also a number of concerns with the supporting evidence to the policy. The attached review sets these out in detail but in summary these are:</p> <p>Site Allocations: Landscape Study (November 2019):</p> <ul style="list-style-type: none"> • not a landscape character assessment and does not meet evidence required by the NPPF • lack of methodology • document does not identify the author(s) nor their qualifications • weak descriptions and incorrect statements in the findings table • the Views and Landscape Features map for 14H, do not identify the locations of the photographs making it difficult to locate the viewpoints on the ground. • We are not told what lens or camera is used so the images do not meet GLVIA3 guidance. 	<p>This is overstated, it is not prescribed that GLVIA3 is used in all studies. Indeed, the approach to defining Green Gaps was intended to be broadly based, including: Use of the existing evidence base (e.g. the relevant NCAs and the 2009 Study).</p> <ul style="list-style-type: none"> - Recognising recent commitments and potential allocations in the Local Plan. - Taking account of Neighbourhood Plans. - Information from recent site visits. <p>The extent to which the approach to Green Gaps reflects National Guidance and good practice is, therefore, a matter of opinion. There is no compelling argument that not using a methodology such as GLVIA3 renders the proposed policy unsound. The Local Plan is positively prepared, and the Green Gaps policy is part of a wider approach/appropriate strategy to enable sustainable development, consistent with national policy. With reference to the NPPF, it is not necessary for a landscape to be designated for it to be “valued.” The definition of Green Gaps will not prevent the overall development requirement from being met. The Green Gap policy is not about allocating sites, therefore, there is no need to specifically consider whether an area of land has the “least environmental or amenity value.” For some of the intended functions of a Green gap, the current quality of the land may not be an overriding consideration. At a more strategic level, the definition of Green Gaps is part of a wider approach to achieving sustainable development, focusing on brownfield land, new villages and the regeneration of former power station and mining sites. It is not correct to say that the Green Gap policy is intended to prevent all development. The proposed separate Green Gap policy (see Section 6) is explicit that if development reflects local landscape and character it may be acceptable within or adjoining a Green Gap</p>

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Unfortunately the figure does not identify the character areas nor the settlement names which for the reader, particular the general public, makes it difficult to locate not only areas of land but also towns and villages that would assist with orientation.</p> <p>At 8.3.5 on page 120, the text makes reference to sensitivity. This subject is covered in the 2009 LCA where it finds the landscape, which falls in the policy zone MLPZ11 (14H in the Landscape Study), to be only of moderate sensitivity. This fact is not mentioned neither in the 2019 Landscape Study nor in the 2019 Green Gap Report nor considered in either of their conclusions. Such moderate sensitivity increases the landscapes capacity for change even when considered against other factors such as condition and value.</p> <p>8.3.6 continues to underpin the importance of the 2009 LCA and indeed states that a 2019 review confirms the principles of the 2009 assessment remains sound. It is important therefore to look at these principles and findings of the 2009 LCA. This will be done in the review of the Landscape Study that follows. The supporting text of the policy goes on to reference the green gaps proposal in the policy. At 8.3.8 it states that important undeveloped areas of land exist between settlements and around settlement fringes. It goes onto state at 8.3.9 that the gaps between settlements also help give the sense of leaving one place and arriving at another. The text however does not state the role of the land around the fringes of settlements. It would help the reader if the local plan included, in the supporting text of the policy, a statement on the role of the fringes of settlements in the green gap proposals. At 8.3.11 the text helpfully sets out the guidance for Green Gaps in terms of openness, appearance and function. What is noted is that the term used is guidance and not recommendations in the Green Gaps Report. It can be inferred that the report is therefore seen by the local plan as merely offering advice or information aimed at resolving issues affecting land between settlements or around settlement fringes. By dint of such a statement it is reasonable to imply that other robust assessment such as that provided by applicants could equally inform and guide the policy on green gaps or new development therein. The Para. 8.3.11 goes on to acknowledge that green gaps have a capacity to accommodate development. As such it is reasonable to say that the policy does not exclude appropriate development from green gaps. At 8.3.12 overleaf it suggests that significant development could adversely affect openness, appearance, functionality and therefore quality of these landscapes. Two issues arise from this statement, firstly what level of significance is acceptable? In GLVIA3 significance is measured from major to low or negligible. Secondly, it is important to recognise that all development has significance; it is the measure or scale of that significance that is important to the impact on landscape or its visual qualities. For instance a development could be acceptable if its significance is found to be limited especially if it retains key elements of openness (say, as part of proposed open space), improves or retains appearance (adds to woodland or hedgerow cover) and allows the landscape to function in whatever role is considered appropriate whether as it was previously or as it could be in the future. This returns to the opening paragraphs of the policy where it accepts that the Bassetlaw landscape has changed and was influenced by human activity and given the inevitable progress of the economy, society and places the landscape will continue to be influenced and changed. actually states that Green Gaps do not prevent development taking place. It sets out examples of possible appropriate forms of development, such as agricultural buildings and rural uses, but does not restrict appropriate development to those uses. This therefore should not exclude open space or landscaping that could be demonstrated</p>	<p>This is overstated, it is not prescribed that GLVIA3 is used in all studies. Indeed, the approach to defining Green Gaps was intended to be broadly based, including: Use of the existing evidence base (e.g. the relevant NCAs and the 2009 Study).</p> <ul style="list-style-type: none"> - Recognising recent commitments and potential allocations in the Local Plan. - Taking account of Neighbourhood Plans. - Information from recent site visits. <p>The extent to which the approach to Green Gaps reflects National Guidance and good practice is, therefore, a matter of opinion.</p> <p>There is no compelling argument that not using a methodology such as GLVIA3 renders the proposed policy unsound. The Local Plan is positively prepared, and the Green Gaps policy is part of a wider approach/appropriate strategy to enable sustainable development, consistent with national policy. With reference to the NPPF, it is not necessary for a landscape to be designated for it to be "valued." The definition of Green Gaps will not prevent the overall development requirement from being met.</p> <p>The Green Gap policy is not about allocating sites, therefore, there is no need to specifically consider whether an area of land has the "least environmental or amenity value." For some of the intended functions of a Green gap, the current quality of the land may not be an overriding consideration. At a more strategic level, the definition of Green Gaps is part of a wider approach to achieving sustainable development, focusing on brownfield land, new villages and the regeneration of former power station and mining sites. It is not correct to say that the Green Gap policy is intended to prevent all development. The proposed separate Green Gap policy is explicit that if development reflects local landscape and character it may be acceptable within or adjoining a Green Gap</p>
REF295	dmc20eighteen		

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ST34 - Landscape	Character	<p>would sit comfortably within the open character, role and function of the Green Gap. And in Para. 8.3.14 it indicates that if evidence is presented that shows new development is well sited, well designed and landscaped the policy would not prevent such development taking place. Policy ST34.A There are various anomalies in the titles of the evidence documents as stated in the paragraph where evidence documents are referred to. After enquiries of the local plan team at Bassetlaw DC were made, it was confirmed that “In terms of the reference in part A of Policy ST34 this is referring to the Bassetlaw Landscape Character Assessment 2009 and the more recent Landscape Study in relation to the potential development sites undertaken in Nov 2019”. The enquiry confirmed that “the references should be made clearer in any revision to the Local Plan”. These anomalies in matters of evidence undermine the policy and place inaccurate and confusing source information in front of the public and also the Secretary of State when examining the soundness of the plan. What the enquiry does now confirm is that the 2009 LCA remains pertinent evidence to the policy.</p> <p>Policy ST34.B The requirements for “testing” a development as set out in 1 - 6 are most commendable and underpinned by national policy. As such they must be the means, the process, by which new development whether in Green Gaps or outside, could be found to be appropriate as set out in Para’s 8.3.13 and 8.3.14 previously. It therefore falls upon the proposer or applicant to meet the test to show that development is indeed acceptable.</p> <p>Policy ST34.C The Green Gap policy is noted and will be commented upon in detail in the following review of the Green Gaps Report 2019. However, the final policy paragraph (unnumbered) is somewhat at odds with the supporting text to the policy as it now becomes more restrictive. It now seeks a positive impact on landscape qualities whereas at 8.3.13 development must show it sits comfortably within the qualities of the landscape of the Green Gap the latter being, a more benign perhaps neutral requirement on the development. As has been stated, all development has an effect; it is the scale of significance that is the test, the final paragraph of the policy does not allow the significance to be measured. This anomaly between policy and supporting text should be addressed to avoid confusion.</p>	
REF300	Natural England	Natural England welcomes this policy and particularly the references to the National Character Areas (NCAs) and the links to green infrastructure.	Noted. Thank you for your comment.
REF301	Freeths	The Green Gap allocation in this location would not serve to prevent the coalescence of towns and villages. Given the existing and proposed developments and the existing and proposed infrastructure in this area, the allocation as a Green Gap between Carlton Road Ashes Park Avenue would inhibit the potential to maximise the development potential and infrastructure benefits of linking the proposed distributor road (ST51) with Ashes Park Avenue. The comprehensive development of this area would also allow for a strong defensible urban boundary that would enhance the green corridor along Worksop’s northern fringe, defined by the strong mature vegetation, woodland blocks and prominent ridge line.	The identification of this green gap has been supported by an independent report on local landscape quality and the historic environment towards the north of Worksop. There are significant landscape and heritage assets or existing designations that would limit and further manage development in this location.

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REF304	Pegasus	<p>5.1 Policy ST34 of the Draft Bassetlaw Local Plan states: “A. Proposals for development should be informed by, and be sympathetic to, the special qualities and features of the District’s landscapes as identified in the Bassetlaw Landscape Capacity Assessment [*], Bassetlaw Site Allocations Assessment 2019 [**] and Bassetlaw Green Gaps Report 2019, or successor. B. Development proposals will be expected to demonstrate that their location, scale, form, design and materials will protect and enhance: 1. The special qualities and features of the landscape in that locality; 2. The visual relationship and environment around settlements and their landscape settings; 3. Distinctive landscape elements including but not limited to watercourses, woodland, trees, hedgerows and field boundaries, and their function as ecological corridors; 4. Visually sensitive skylines, river corridors and significant views towards key landscapes and heritage features; 5. The green infrastructure network supporting health, wellbeing and social interaction. 6. Habitat connectivity. C. Green Gaps, as shown on the Policies Map, are designated between: 1. GG1: Bircotes - Bawtry 2. GG2: Oldcotes-Langold-Carlton in Lindrick 3. GG3: Carlton in Lindrick – Worksop North 4. GG4: Worksop West – Shireoaks and Rhodesia 5. GG5: Clarborough – Welham 6. GG6: Retford East 7. GG7: Retford South – Eaton 8. GG8: Retford West Development of undeveloped land and intensification of developed land in and adjoining the Green Gaps will only be supported where it does, either individually or cumulatively, with other existing or proposed development have a positive impact on the openness, appearance and functionality of their landscape quality.’ NB * It is understood that this should state ‘Landscape Character Assessment, 2009’ ** It is understood that this should state ‘Bassetlaw Local Plan Site Allocations: Landscape Study 2019’ 5.2 The Policy is accompanied by supporting text concerning ‘Green Gaps’ at paragraphs 8.3.8 to 8.3.14. The Green Gaps are illustrated on the Draft Policies Map. This indicates that Green Gaps are collectively proposed to extend around the full extent of the eastern, southern and western boundaries of Retford. It also illustrates the boundaries between the 8 Green Gaps, with the ‘Retford West’ area extending around westwards from a boundary defined by Ollerton Road. Our clients site lies within this area of the Green Gaps 5.3 However, there are inconsistencies between the Green Gaps are illustrated on the Draft Policies Map and the findings of the evidence base which was used to aid with their identification. Specifically, it is understood that there was no evidence in the supporting documents referenced in the Draft Policy to justify the extent of Green Gaps which have subsequently been identified on the Policies Map. In particular this concerns the area to the south of Retford in which our client’s site is located. 5.4 Each of the evidence base documents which are referred to in the Draft Policy are discussed further below:</p>	
1197220	Resident	<p>Green gaps between settlements have been stated as being very important to the identity of a settlement. The development of Peaks Hill farm opposite Freshfields will completely destroy this identity. As you approach Worksop along the A60 the rural feel gained from the fields and woodland would be lost forever. This amenity view is important to peoples mental health. This development will be visible from the public rights of way in Carlton in Lindrick and completely erode this sense of space and well being.</p>	<p>The identification of this green gap has been supported by an independent report on local landscape quality and the historic environment towards the north of Worksop. There are significant landscape and heritage assets or existing</p>

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			designations that would limit and further manage development in this location.
REF327	Scrooby Parish	Is welcomed	Noted. Thank you for your comments
REF377	Resident	The other strategy we support is the allocation of a green buffer around the settlement of Retford to maintain its unique geography and minimise the growth of Retford into the countryside (ST34). Our only reservation is with the Bassetlaw Green Gaps report 2019. The settlements close to the west (Babworth), south (Eaton), and east (Little Gringley and Welham) are to be separated from the settlement edge of Retford by green gaps, but the green gap separating Clarborough Parish from Retford is inadequate (it leaves out a large part of Clarborough Parish extending towards Retford), and there is no green gap to separate Retford from Tiln. Clarborough (St John's Drive) is only one mile from Retford (Bigsby Road) at closest, but the proposed Clarborough and Welham green gap covers less than half the distance (approx. 600 yards). Tiln is only one mile from Retford (Linden Homes development on Tiln Lane) at closest. The land extending north-west from Bolham Manor towards Tiln and north-east from Bolham Manor via Bolham Hall and Moorgate Farm (Grade 2 Listed) towards Bolham Cottage Farm provides an attractive landscape of wooded hills, hedgerows and grassland and forms a barrier between Retford and Tiln. The land immediately north-east of Retford and sloping downhill from Bolham Manor eastwards as far as the Chesterfield Canal (SSSI) and the proposed Clarborough and Welham green gap is attractive farmland comprising a western area of open arable fields (with excellent long distance views from the proposed Clarborough and Welham green gap towards Moorgate Farm and Bolham Hall visible on the skyline), and an eastern area of grass fields and hedgerows. Indeed, the Bassetlaw green gaps report 2019 acknowledges the attractive nature of the low-lying land to the west of Chesterfield Canal between Retford and Clarborough but outside the proposed Clarborough and Welham Green gap. We hope that Bassetlaw DC will expand the proposed green gaps into the above land areas immediately outside Retford to protect the separation between Retford and Tiln and Clarborough, and to avoid expansion of Retford into open countryside, otherwise a large part of the open countryside within Clarborough Parish and between that village and Retford, as well as a smaller area within the administrative boundary of Retford will not be included in a green gap.	The identification of this green gap has been supported by an independent report on local landscape quality and the historic environment towards the north of Retford. There are significant landscape and heritage assets or existing designations that would limit and further manage development in this location. A review of these has taken place following consultation in January and there remains no reason to expand the Green Gap to the north of Retford. This has been based on previous landscape character work at a local and District level. The revised Local Plan however does now include a separate policy for Green Gaps which helps to clarify their intent.
REF466	Resident	I fully support the green gaps designated on the plan. Its essential that development is balanced and housing isn't allowed to sprawl all over the countryside. I fully support the local plan, it has been well considered.	Noted. Thank you for your comments
REF467	Resident	I fully support the green gap designated area around our town. Retford, so that housing development doesn't sprawl over the countryside.	Noted. Thank you for your comments