

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST45-Climate	Change Mitigation	and Adaption	
1189264	Resident	If you wanted to address climate change you wouldn't be aiming to build a load of new houses, regardless of how supposedly sustainable they are. Neither would you trying to increase the volume of traffic in the area.	The Local Plan has to provide a balance in delivering more homes and jobs, whilst also protecting and enhancing the environment of the District. The Local Plan also encourages the use of renewable energy, encourages public transport, tree planting and protects local wildlife.
1189633	Resident	I do not think it is possible to agree to this crucial aim and support your housing allocation plan. They are in direct conflict.	The Local Plan has to provide a balance in delivering more homes and jobs, whilst also protecting and enhancing the environment of the District. The Local Plan also encourages the use of renewable energy, encourages public transport, tree planting and protects local wildlife.
1189633	Resident	You appear to have a policy in place which does not make sense. In ST45 you state that you need to develop housing in: -locations which minimise the need to travel and maximise the ability to make trips by sustainable modes of transport. -You want to see higher densities of development in the most accessible sites. This does not match with policy ST2, which recommends adding 20% to the housing stock in rural settlements. As a resident of one of these settlements, and a committed environmentalist, confirm that it is impossible to commute from the village in a non wet/muddy way unless you have a private vehicle. Our public transport provision is not fit for purpose. It is also incorrect to assume that just providing EV points for new housing will solve this issue. We all know the total number of private care journeys needs to reduce, even if they are made by EV, and also that the majority of people are unable to afford EVs. I am worried that this lack of alignment between ST2 and ST45 is an indication that BDC are just paying lip service to our current climate and biodiversity emergencies. Your policy regarding offsetting development by tree planting also demonstrates a woeful misunderstanding of the value of established ecosystems. Please reconsider - you should be placing housing in towns, whether these be in existing location or new town developments - not adding to our climate issues by placing housing in completely unsuitable areas. Whilst I support any effort to improve in this area, in my opinion you need to revisit this area of the plan. Your proposals are weak and unambitious and fail to reflect the severity of the situation in which we find ourselves.	The majority of housing growth is being allocated to the main settlements where there is the supporting services and facilities. However, Bassetlaw is a largely rural District and many of our communities are small and have few services. In some of these locations there is a need for accommodation and employment and the Local Plan is providing a strategy that will support a proportionate level of growth subject to its size and level of existing services. Communities across the District are also developing Neighbourhood Plans to manage their growth in a way that will benefit them. The Local Plan also supports the Government's climate change agenda by promoting sites for renewable energy development, protects the environment such as those areas around existing towns, protects public spaces, encourages tree planting and promotes the use of sustainable construction and renewable energy technologies on new developments.
REF005	Rhubarb Farm	In addition, Rhubarb Farm is playing a small part in addressing climate change, as per Section 10.1: Climate Change Adaptation and Mitigation: The Farm's current composting toilet (funded jointly by Nottinghamshire County Council and Four Winds Energy Co-operative) saves approx 86,000 litres of water a year, based on Farm users, staff and visitors), so is making a small contribution to climate change measures. For all the above reasons, Rhubarb Farm wishes to ask the Planning Authority to give cognisance to the value of the work of Rhubarb Farm at Nether Langwith, and ensure that our work is supported and enabled in the future through the work of the Planning Authority.	Noted. Thank you for your comment.

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST45-Climate	Change Mitigation	and Adaption	
REF043 (INCLUDES PDF)	Director, Advance Further Energy Ltd	<p>In general, I would say that the aims of the plan are commendable, but I strongly feel that small changes are needed to the plan to maximise the chances of achieving the environmental and economic aims. I also think that The Council could use its powers to better effect to achieve the aims. The response outlined in this document is intended to provide changes which I hope would help The Council to (a) achieve the aims set out above (b) do so in a way which sets a leading example to other districts in Nottinghamshire and across the UK and (c) utilise mechanisms available to The Council to affect change. Specific recommendations with respect to the plan are outlined below. You may wish to incorporate these into existing or new policy measures: - The plan has a focus on new housing developments and on the sustainability of those projects. That is commendable given the significant embedded carbon emissions associated with new homes. However, given the large existing housing stock in Bassetlaw, and the long term emission reductions possible within these properties, it would be beneficial to residents to see measures to reduce carbon and improve the environmental performance of existing homes. Measures to do so may include: o Expanding green village proposals to encourage tree planting within existing communities in Bassetlaw. Education programmes surrounding retrofitting to improve insulation in existing properties – a measure which has significant impact on carbon emissions due to the high use of gas and oil for heating in the district as well as impacts on energy poverty in social and non-social housing stocks. o Incorporating tree planting schemes in residential areas which will improve the amenity of existing communities, offset carbon emissions and provide an opportunity for residents and businesses to help steer tree planting in Bassetlaw. - The UK Committee on Climate Change has stated clearly that new homes need to meet highest standards today in order to meet carbon targets. Without achieving the highest standards today, homes will need to be retrofitted at great cost to councils AND residents. I would also highlight how the building of a new home is the most economic time to implement standards and to minimise carbon emissions from first occupancy. The plan does not enforce the highest standards on new developments. As such, I would want to broaden the remit of planning to ensure homes are only built where they achieve the highest energy standards and that the council utilise the new (as of January 2020) national standard for solar generation and energy storage on new homes – which I helped to draft - There is growing interest in low carbon energy and decarbonisation which includes new technology, new business and new research. This presents an opportunity for Bassetlaw and the Local Plan – especially when we consider that through power stations and mining that we are historically an energy based economy. As such, I would recommend the following to attract and grow these activities within the District o Specific planning areas within the district allocated to businesses associated with sustainability. This should not just be limited to electricity generation with a policy remit extended to low carbon heat and transport. It may also extend to the manufacture products associated with sustainability. I note that a significant proportion of Bassetlaw jobs are in the manufacturing sector and as such, we should be encouraging further manufacturing which takes advantage of local skills and of wider sustainability opportunities. o The creation of a low carbon energy manufacturing park on the former power station sites/expansion of the existing zoning to encourage manufacturing. To achieve low carbon generation, enforce solar generation on all roofs, rather than allocating land parcels for exclusive use of solar assets. Zone D is reserved for solar generation assets here which at best could power around 20,000 homes. I would highlight that the closure of Cottam and High Marnham has resulted in the loss of electricity generation which could power around 7 million homes. Expanding Zone B to encompass a larger area of zone D could achieve the same aim and: Have a much larger impact on international decarbonisation through creating low carbon products- Link to wider investments such as manufacturing of batteries which are key strategic areas for the UK economy and electric vehicle sectors - Take advantage of strong electricity grid infrastructure existing on site which are necessary for manufacturing and often a high cost burden on developers - Incorporate low carbon energy generation (such as rooftop solar) as outlined in the policy i.e. achieving a similar electricity generation and gain multiple uses from the land. - Create jobs and wealth in the area which align to how the Bassetlaw economy is structured. - Potentially attract outside impact/environmental funding to support developments.</p>	<p>The Local Plan is providing a balance between the need for development and the protection of the environment. In addition, the plan has to be deliverable in terms of what the policies are intending to deliver. Although the Plan is providing a strong emphasis on renewable energy and low carbon technology it also need to be mindful about the added costs to development in an area that traditionally has low viability rates. The environment is a key objective in the Local Plan and the Council believes proposed environmental policies strike the most appropriate balance in protecting and enhancing the natural environment, promoting sustainable development and enabling development to occur in the most efficient, clean and sustainable way. The Local Plan is also promoting biodiversity net gain through the creation of new community woodlands and allocating a large former power station site for the energy and low carbon technology sectors to promote clean energy and provide a step change within the low economy. This will be detailed in a Local Development Order for the site in close consultation with key stakeholders and education settings.</p>

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST45-Climate Change Mitigation and Adaption			
REF043	Director, Advance Further Energy Ltd	There is no direct comment relating to measures to extract energy from sewage treatment works in the District. I note that these have a carbon benefit through reduced methane production and also through producing low carbon electricity which can be dispatched when the grid needs it. I note that 10.2.9 states energy from waste is a county matter. However, I would questions whether local planning mechanisms can be used to encourage energy from waste and encourage them to do so if possible. I would encourage how the local plan can facilitate or encourage energy from waste within the District in support of low carbon energy generation, low carbon heat or sustainability objectives. Seven Trent water already promote this and tangible projects in our district could impact our decarbonisation/sustainability	This is a commercial activity and will be down to the individual water authority to consider.
REF043	Director, Advance Further Energy Ltd	Policy ST45 does encourage tree planting and mentions the Sherwood Forest Reforestation Project. However, the tree planting remit could be expanded to improve tree cover within other areas – specifically in urban areas – with benefits such as: - Improved air quality - Improved environments for residents - Better visual environment - Designation of Bassetlaw as a “Forest District” - More scope for finding areas for tree planting if areas cannot be found in the existing replanting scheme - Links to other schemes such as Tree planting with the Mayflower Pilgrim commemorations. Although air quality is mentioned, there are limited air quality monitoring stations online such as DEFRA online map3 Installation of air quality monitoring in urban areas to permit reporting and evidence based assessment of air quality in The District. Key areas include: - Traffic junctions where there is extensive idling of engines - Outside schools and areas where air quality has disproportionate impacts on children. - Areas where air quality should be high such as in parks and conservation areas. The District should seek these through EA and DEFRA programmes	The Local Plan is striving for better design of new developments which should include appropriate levels of open space and other methods to help our urban areas adapt to the threat and challenges of climate change. This includes improving air quality through the use of more sustainable materials , renewable energy technology and tree planting.
REF043	Director, Advance Further Energy Ltd	Although the plan places a minimum number of EV charging, it could extend further by specifying the types or rate of charging. The policy risks allowing developers to install slow charge units which would: - Potentially not encourage EV ownership as they do little more than a standard 3 pin plug - Expose the district to significant retrofitting costs to improve charging rates and infrastructure I would specifically expect ST45 to include either: - Minimum charging rates for EVs in alignment with national standards. Specifically, I would recommend “Fast Chargers” which can fully charge in 3-4 hours and are most common across the UK4. - Require 3 phase as opposed to single phase connections at all new dwellings. This is commonplace in Europe and recently recommended by Western Power Distribution/Renewable Energy Association in response to EV5s.	The Local Plan is supporting the Government’s agenda to be a zero carbon economy by 2050. However, the plan period is until 2037 and the measures included in the plan provide the necessary step-change and framework for the district to adapt appropriately towards a low carbon economy with the aim to meet the Governments 2050 target.
REF043	Director, Advance Further Energy Ltd	10.2.1 This statement does not reflect the latest Net Zero target from Government Update this statement to include the latest “net zero carbon” objectives. 10.2.5 It is not correct that wind/solar need to be located close to the source of power. This statement is actually quite misleading. Perhaps you mean “close to the source of consumption”? Regardless, the advantage of wind/solar is that they generate electricity which can be transmitted over the electricity network to a point of consumption. It is possible and viable to wheel electricity over the power network and there are numerous examples where this is commercially viable. As such, proximity is not necessarily a technical or indeed commercial advantage.	Thank you for your comment. Amendments have been made to the supporting text.
1191455	Resident	Given the need to reduce carbon emmissions, the Local Plan should mandate that all dwellings in new developments in the Plan should be carbon neutral and be built with solar panels & heat exchangers (for cheaper than retrofitting them). Also all new dwellings should have electric car charging ports built in to encourage the move away form the internal combustion engine. Similarly, any commercial development should also have solar panels and at least 50% or the parking should have electric charging points	A new development proposed will be subject to other environmental policies in the Local Plan. In addition, the Plan support the use of sustainable construction materials and methods. The Plan also identifies a site for the location of renewable energy development to support the Governments aim for the UK to be a low carbon economy.

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST45-Climate	Change Mitigation	and Adaption	
REF066	Resident	<p>These are mainly in respect of the 'innovative green agenda' of the plan. According to the UN IPCC the planet is facing catastrophic and irreversible climate and ecological breakdown unless drastic changes are made within the next 10 years and starting NOW. These changes need to be at an international, national and local level. It is in this context that your plans must be viewed and judged. Whilst it is positive that it speaks of green issues and infrastructure, I feel strongly that it needs much more ambition, urgency, commitment, and creative detail in responding to the greatest crisis that mankind has ever faced! The plan repeatedly mentions the phrase 'low carbon' in respect of development (e.g. 4.1.5, 4.1.10, 4.2.12, 7.10.10) but surely we should be aiming for carbon neutral. The heating of homes is one of the biggest contributors to climate breakdown, so all future developments need to be as highly insulated and energy efficient as possible. Finally, whilst it is good to hear about the securing of new community woodlands, billions of trees will need to be planted nationwide to help offset carbon emissions, and it would be great to hear the details of ambitious local targets and sites that can make a really significant contribution to this.</p>	<p>The Local Plan is supporting the Government's agenda to be a zero carbon economy by 2050. However, the plan period is until 2037 and the measures included in the plan provide the necessary step-change and framework for the district to adapt appropriately towards a low carbon economy with the aim to meet the Governments 2050 target.</p>
REF066	Resident	<p>Section 10.2.3 speaks positively of the old power station sites' providing significant potential for renewable energy. However this is then undermined by talk of low carbon production and the need to balance this with the impact on landscape and ecology (10.2.5). More worryingly 10.2.2. talks of the Government block on onshore wind generation unless in an area suitable. There is no mention of any such areas and yet Bassetlaw is full of potential sites. If we are to stand any chance of avoiding catastrophic climate breakdown then there needs to be a massive increase in renewables and onshore wind is the most cost effective. Old power station and pit sites e.g. Bevercotes and Bircotes would seem ideal. I regularly pass the large turbines on the old Bilsthorpe pit site and they are quiet and not unpleasant to look at. They are much less intrusive than the original power stations and mines. If we do not grasp these opportunities now then the science tells us that future generation will pay a terrible price. The impact on communities will be far, far greater than that of wind turbines and solar panels!!</p>	<p>National Policy on onshore wind has changed over time. There are constraints on existing power station sites for large scale wind turbines such as the existing electricity grid and cables. High Marnham is being promoted for the energy and low carbon technology sectors and more detail will be provided through the development of a Local Development order for the site.</p>
1193104	Resident	<p>In addition to the 5 trees you intend to plant for each new house there are already 100 plus oak saplings thriving on the Sandhills plus other quicker growing natives like birch and elder. You already have a quick win towards your aspirations in this area With most of the householders in Ordsall paving and tarmaccing their front gardens the Sandhills as it stands with its young forest will help to mitigate this, both as somewhere for the water to go and the flora and arbour to soak it up</p>	<p>Noted. Thank you for your comment.</p>

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST45-Climate	Change Mitigation	and Adaption	
REF118	Lound Parish Council	<p>Many of the small rural areas identified in the Bassetlaw Spatial Assessment Background Assessment paper are listed as being without a 'Doctors' or a 'Shop' and will be wholly reliant on private transport to facilitate everyday necessities including employment. This is in direct conflict with ST45 1a and 1c: In addition, many of the Small Rural villages have recently experienced extreme weather conditions, some of which may be attributable to climate change. On many occasions, this has resulted in the temporary loss of public transport. resulting in isolation for some demographic groups for days, with no access to hospitals, groceries/convenience stores or physical social networks. As the Draft Local Plan covers a period of 20 years these considerations should be factored into the Plan especially in those areas that are susceptible to such conditions. ST45 Climate Change Mitigation and Adaption, does little to enforce its recommendations. The policy is a list of recommendations or encouragements that developers are likely to disregard due to their own cost implications. This policy should clearly define standards and requirements that must be met without exception and in conjunction with other policies. All planning proposals should clearly demonstrate that sustainability and climate change have been clearly addressed and all such issues mitigated to ensure that these problems are not compounded for future generations in SRS' thus leaving some residents without the means to support everyday requirements.</p>	<p>A new development proposed will be subject to other environmental policies in the Local Plan. In addition, the Plan support the use of sustainable construction materials and methods. The Plan also identifies a site for the location of renewable energy development to support the Governments aim for the UK to be a low carbon economy.</p>
1195911	Aspbury Planning Limited	<p>Criteria d) relating to providing electric vehicle parking in new residential schemes is too vague and the policy sub text does not set out what is expected within new residential developments in respect of domestic connections.</p>	<p>The policy states that development need to provide the necessary infrastructure i.e. the provision of a capable socket or electricity point at the parking space/garage. It will then be up to the householder to provide the electric point that can connect to the socket or electric provision provided.</p>
REF198	Consultant	<p>Policy ST45 page 145 The climate is something we can all do something, no matter how small, about. This policy, however, includes criteria that is not planning based including references to Building Control and also retrofitting of existing buildings. Laudable as these are, they are not planning issues. The promotion of carbon neutral development throughout the district would be greatly enhanced if there was a dedicated officer with the relevant qualifications that could engage in early discussions with applicants, agents and energy consultants so that the project has the correct starting basis.</p>	<p>Noted. Thank you for your comment.</p>

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST45-Climate	Change Mitigation	and Adaption	
REF222	Notts CC - Public Health	It is recommended that the relevant polices mention the need to minimise risk of construction impacts on residents including dust, noise, vibration and odours. It is recommended that the Plan references to improve air quality rather than maintain air quality. As any improvement in air quality is positive for human health. It is recommended that the title of Policy ST45: Climate Change Mitigation and Adaptation. be amended to include Improving Air Quality or Reducing Air Pollution whichever is relevant. In addition, that policy point 3h be amended. This is because air pollution and climate change are separate issues but with a similar primary cause – the burning of fossil fuels. For technical guidance see reference in the HIA included within appendix one.	A clearer reference for air quality and air pollution has been included within the revised text of the Policy. There remains reference to air quality in the supporting text to the policy.
1196560	Resident	Yet again, the proposed mega builds will have a damaging effect on the environment. Large new builds are not the way forward. This is already recognised in Europe. The proposed development at Cottam will have a substantial negative effect on wild life, on the existing community, on road use and the damaging effect from many extra cars being driven on small rural roads which are inadequate for them.	A new development proposed will be subject to other environmental policies in the Local Plan. In addition, the Plan support the use of sustainable construction materials and methods. The Plan also identifies a site for the location of renewable energy development to support the Governments aim for the UK to be a low carbon economy.
REF253	Fisher German	There is no evidence provided to justify the requirement for five trees per dwelling to be planted. The supporting text states that “The Council’s Plan supports the Sherwood Forest Reforestation Project” however neither document discuss a requirement for five trees per dwelling to be planted. There is no justification for this policy requirement and as such it should be deleted. If evidence can be provided for a specified number of trees to be planted per dwelling, it is considered that an offsite contribution option should also be offered. This would ensure that the most efficient use of land is implemented on development sites and that tree planting across the District can be undertaken in a comprehensive and planned manner (similar to that of the National Forest).	Further supporting information is provided in relation to the various types of carbon off-setting schemes the local plan is encouraging. Tree planting is an important part of this and new developments should contribute physically towards climate change mitigation. Large scale developments will be expected to accommodate the trees on their sites, but there will also be the opportunity to contribute towards off-site new community woodlands.

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST45-Climate	Change Mitigation	and Adaption	
REF255	Sheffield City Region	Importantly, the Draft Plan also set economic and housing ambitions within the broader challenge of climate change and the need to reduce carbon emissions as well as adapt to the effects of a changing climate. In November 2019 the MCA took the decision to declare a climate emergency. Since then we have undertaken work to develop our approach to responding to this and committed to reach 'net zero' carbon emissions by 2040. As such, I particularly welcome the Draft Plan's acknowledgement of these challenges and the ambition for Bassetlaw to transition to a low carbon district. In line with the MCAs commitment to net zero, I strongly support the development of renewable and decentralised and low carbon energy at High Marnham (Policy ST7) as well as the approach set out in Section 10 on Climate Change Mitigation and Adaption . I also note that the principles of low carbon design and energy efficiency are also reflected in other policies, particularly Policy ST32 on design, which is to be welcomed. Overall, it will be important for the Draft Plan to continue to develop these aspects so that it is in a position to reflect the net zero carbon commitment announced by Government.	Noted. Thank you for your comments.
REF270	Barton Willmore	Object to the imposition of a tighter Building Regulations standard for water consumption than required nationally. There is no evidence within the Local Plan to suggest that Bassetlaw experiences water management conditions that present challenges in excess of those experienced nationally and, therefore, what evidence there is for requiring that development goes beyond national standards.	Information and advice on water consumption and standards in relation to this policy have been provided by the water authorities.
REF273	Anglian Water	Policy ST45 refers to developments being required to minimise water consumption by meeting the optional requirement of 110 litres/per person/per day. Anglian Water and the Environment Advice has issued advice to local planning authorities (copy attached) stating that there is evidence to demonstrate a need for optional water efficiency standard to be applied in the Anglian Water supply area. As such we fully support the inclusion of this standard in the policy. The standard is intended to apply to residential development proposals rather than other types of developments. As such we would suggest the wording of Policy ST45 be amended for clarity as follows: ' 3. e) Promoting water efficiency.....by residential development proposals meeting the tighter Building Regulations optional requirement of 110 litres per person/per day' Opportunities for a more holistic and integrated approach to water management should form part of the plan, to encourage multi-functional water management assets which support other community objectives. This approach combines different elements of water management (e.g. combining SuDS with a water re-use system to both manage runoff and provide an alternative non-potable water supply) together with town planning and design (e.g. integrating the planted SuDS features throughout a development to contribute to 'greener' streetscapes). Fully support the reference made to development proposals incorporating water re-use measures wherever possible to reduce demand on existing water supply.	Noted. A change to part 3 of the policy has now been reflected in the revised Policy.

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST45-Climate	Change Mitigation	and Adaption	
1197036	Woodland Trust	Strongly support the policies on tree planting in new development outlined in para2 of this policy. Setting targets in this way is an excellent means of securing developer contributions towards new tree planting, which will both absorb carbon and enable adaptation to climate change through shading in summer and flood alleviation in winter months. We also support the reference in the supporting text to creating new community woods as part of larger new housing development. We would like to see the policy improved by also mentioning the need to protect existing trees and woods, to preserve the climate benefits that they already deliver. Also, we would like to see the Council do an audit of its own land holding and those of partners to look for further opportunities for tree planting and woodland creation (eg in parks or on underused areas of open space).	Noted. Thank you for your comment. The Council will produce a "green audit" where it will look at how the Council can become more low carbon and introduce additional renewable energy technology on its assets and explore the opportunities for new tree planting.
REF282	National Trust	National Trust supports Policy ST45 Climate Change Mitigation and Adaptation. If Part 2 of the policy relates to onsite provision of 5 trees per dwelling and/or a contribution towards woodland planting elsewhere then it may be helpful if this was made explicit in the policy or supporting text.	Noted. Thank you for your comment. The policy does support off-site provision on the identified newly designated "community woodlands" identified across the District.

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST45-Climate	Change Mitigation	and Adaption	
REF285	Home Builders Federation	<p>Policy ST45 requires all new residential developments with off-road parking to ensure that infrastructure provided is capable of connection for electric vehicle charging. (This requirement is also repeated in Policy ST50 – Promoting Sustainable Transport). The HBF is supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. Recently the Department for Transport held (ended on 7th October 2019) a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings. This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which is expected to come into force in the first half of 2020. The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCP in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space. It is proposed that EVCPs must be at least Mode 3 or equivalent with a minimum power rating output of 7kW (expected increases in battery sizes and technology developments may make charge points less than 7 kW obsolete for future car models, 7 kW is considered a sufficiently future-proofed standard for home charging) fitted with a universal socket to charge all types of electric vehicle currently on the market and meet relevant safety requirements. All charge points installed under the Building Regulations should be un-tethered and the location must comply with the Equality Act 2010 and the accessibility requirements set out in the Building Regulations Part M. The Government has estimated installation of such charging points add on an additional cost of approximately £976. The Council's viability evidence is set out in Bassetlaw Interim Whole Plan & Community Infrastructure Levy (CIL) Viability Assessment by NCS Nationwide CIL Services dated August 2018. This assessment excludes any costs associated with the provision of EVCPs. Before the pre-submission Local Plan consultation, the Council should undertake further viability work to fully test the cumulative impacts of all policy compliant requirements. The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible. The Government's consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. The Government recognises that the cost of installing charge points will be higher in areas where significant electrical capacity reinforcements are needed. In certain cases, the need to install charge points could necessitate significant grid upgrades which will be costly for the developer. Some costs would also fall on the distribution network operator. Any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied. The Council has not recognised the technical feasibility and viability impacts as identified by the Government. It is the HBF's opinion that the Council should not be getting ahead of Government proposals for Building Regulations. Before the pre-submission Local Plan consultation, the requirement for EVCPs should be deleted from Policies ST45 and ST50. Policy ST45 also requires new developments to minimise water consumption by meeting the Building Regulations optional requirement of 110 litres per person per day. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day then the Council should justify doing so by applying the criteria set out in the NPPG (ID 56-013-20150327 to 56-017-20150327). The Written Ministerial Statement (WMS) dated 25th March 2015 confirmed that "the optional</p>	<p>Connection for residential and commercial electric vehicle standards are set out within the supporting documents to the Local Plan and are recommendations from Nottinghamshire County Council's residential and commercial parking standards.</p>

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST45-Climate	Change Mitigation	and Adaption	
		<p>new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG". The NPPG refers to "helping to use natural resources prudently ... to adopt proactive strategies to ... take full account of water supply and demand considerations ... whether a tighter water efficiency requirement for new homes is justified to help manage demand" however the Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. The Council's own evidence states that areas in Bassetlaw covered by Severn Trent Water are not classed as water stressed. Bassetlaw District is only partially in the area covered by Anglian Water classed as an area of serious water stress. Under current Building Regulations, all new dwellings achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. Before the pre-submission Local Plan consultation, this requirement should be deleted from Policy ST45.</p>	

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST45-Climate	Change Mitigation	and Adaption	
1197091	William Davis	<p>Overall the aims of the policy are supported as they are consistent with national policy (NPPG paragraphs 148 and 149) as they support appropriate measures to ensure the future resilience of communities and support the transition to a low carbon future. As with other policies, consideration will need to be given to the potential impact on viability of higher policy requirements. Clarification is sought regarding Part 1d of the Policy as it is unclear exactly what would be required of developers. It is considered the use and implementation of Electric Vehicle Charging Points (EVCP) is complex as the notion is relatively new. As such, there are several differing charging sockets and no standardised format is currently available. Therefore, any charging point installed on a dwelling by a developer may not suit the purchaser's or end user's vehicle, or beyond this, even become obsolete as advancements within this field continue. As Government funding is available for homeowners to install EVCP within any given dwelling it is considered an appropriate option that enables choice for the end user for the developer to install a suitable feed and spur to the point of charging, allowing the homeowner to purchase the required EVCP socket. Moreover, it must be noted that until technology has suitably advanced EVCPs are not achievable on all dwellings. Homes with frontage parking would represent safety hazards should cables be fed from dwellings across car parking spaces. This is of particular concern when the dwelling built is to meet Part M4(2) or (3) standards. Therefore, until such time as a viable solution to this issue has been established any emerging Policy should allow for flexibility for developers to install EVCP "where suitable"; or alternatively the policy seek provision of a dedicated electric spur to be conveniently located for future EVCP provision by the occupier. In addition to this, the installation of charging point hardware will have implications on the local electricity network. Government recognises that the cost of installing EVCP will be higher in areas where significant capacity reinforcements are required. In certain areas grid upgrades may be required which will place viability burdens upon the developer. Any impacts these costs may have on housing supply should be mitigated through EVCP exemption so as not to affect the delivery of homes. The Department of Transport (DfT) undertook a consultation on EVCP (ending 7th October 2019.) This set out the Government's intentions to standardise EVCP within the building regulations. This is expected to come into force in 2020, therefore any Local Policy shift in advancement of this may immediately become out-dated and considered unfeasible or unviable. Therefore, in order to be effective and meet the test of soundness, it is proposed that part 1d of the Policy be amended to read "requiring that all new residential developments that are providing off-road parking ensure that a suitable feed and spur to an appropriate location for a charging point are provided". The requirement for five trees to be provided per dwelling is not supported. This requirement is considered to be overly rigid and not justified by the evidence. It is noted that the Council Plan aims to encourage tree planting and seek to rejuvenate the Sherwood Forest area although no specific project is referred to. It is unclear how this requirement will be delivered, join up with the requirement for biodiversity net gain or whether it will meet the tests for obligations. As such it is proposed that the wording of the Part 2 of the policy be amended to; "The provision of trees onsite will be supported where feasible and consistent with landscape character and context of the site. Where offsite net gains are being provided under the Government's biodiversity net gain scheme, support will be given to schemes which increase the number of trees and extent of woodland in Sherwood Forest." An SPD on biodiversity net gains, green infrastructure or design and landscaping could potentially be used to provide further guidance on tree planting.</p>	<p>Connection for residential and commercial electric vehicle standards are set out within the supporting documents to the Local Plan and are recommendations from Nottinghamshire County Council's residential and commercial parking standards.</p>

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST45-Climate Change Mitigation and Adaption			
REF299 (LAA) Bevercotes	Gladmans	<p>Policy ST45(A) requires that all new residential developments that are providing off-road parking ensure infrastructure are capable of providing connection for electric vehicle charging. 5.6.2 Before requiring electric vehicle charging points in residential development through planning policies, the Council should engage with the main energy suppliers to determine the network capacity to accommodate any adverse impacts if all dwellings were to install a charging facility. If recharging demand became excessive, there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables, and new substation infrastructure may be necessary. Furthermore, such costs should be included in the Council's viability testing otherwise there may be an adverse impact on housing delivery. The requirement for all new residential developments to provide infrastructure capable of connection for electric vehicle charging is repeated in Policy ST50. The Framework is clear that policies should avoid unnecessary duplication¹¹ and in this regard the duplication of a policy requirement should be removed from the Plan. Policy ST45 also requires new developments to minimise water consumption by meeting the Building regulations optional requirement of 110 litres per day. Any such requirement should be justified having applied the criteria set out in the PPG¹².</p>	Noted. Thank you for your comments.
REF300 -	Natural England	<p>Natural England welcomes this policy and considers that it is a positive step to tackling climate change. Whilst we welcome the provision for planting 5 new trees per dwelling or 5 trees per 1000sq metres of non-residential we would emphasise that planting should result in the right trees in right places (as discussed above). Advise that other habitats e.g. wetlands, grassland and heathlands can also offer valuable sequestration. Tree planting must be carried out in a coordinated way to create valuable areas of woodland which should be part of the wider approach to the Nature Recovery Network. In addition you may want to consider areas which could be left to "re-wild" to allow natural regeneration of woodlands. Welcome section 3 of the policy wording which includes nature-based solutions to climate change.</p>	Agreed. We will continue to work with relevant partners to identify the best places and types of trees to support the local environment.

REFERENCE NUMBER	ORGANISATION	COMMENTS	OFFICER RESPONSE
ST45-Climate	Change Mitigation	and Adaption	
REF323	Emery Planning	This Section of the Plan seeks to promote opportunities to improve energy efficiency and minimise CO2 emissions. Policy ST45 seeks to secure the reduction of greenhouse gases in accordance with the provisions of the Climate Change Act 2008. Support the aims and objectives of this policy as well as, the recognition at Paragraph 10.2.3 of the significant potential for renewable energy and low carbon generation on site at High Marnham. This positive strategy, to be delivered through Policy ST46 (and ST7), supports the NPPF emphasis to promote energy from renewable and low carbon sources, with policies designed to maximise the development of low carbon energy. The Former High Marnham Power Station site provides an excellent opportunity to positively and actively meet the aims of this Section of the Plan with its accessibility to the national Grid connection and critically, potential for reuse of excess power, heat and hot water from J G Pears Low Marnham CHP. Again, this is supported at paragraph 151 of the NPPF which states Local Plans should "... identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for collocating potential heat customers and suppliers." Pleased that this unique opportunity has been recognised and is being grasped by the LPA to realise the opportunity for sustainable reuse of this existing energy efficient site which already provides opportunities for decentralised energy.	Noted. Thank you for your comment.
REF327	Scrooby Parish	In Rural Villages the build / installation of equipment (Solar Panels, Wind Turbines, Water, Waste Water Treatments, etc.) should not be allowed to have a major detrimental effect on the nature and character of the village and its environs. Additionally, the efficient husbandry of the trees in and around rural settlements should not be blocked or mismanaged by any contra tree planning applications. Current pruning and felling applications, all based on sound agricultural and wildlife reasoning, have been currently blocked or refused by the Tree Preservation Order procedures and rulings.	Noted. Thank you for your comment.
1197287	Resident	It should be taken into account that each newhouse has a carbon footprint of up to 80 carbon tonnes. Instead of 5 trees per house a more realistic figure would be 50 bearing in mind that it takes many years for a tree to grow to a size to have a significant effect on carbon absorption. Once planted trees need to be properly maintained and monitored for five years.	The level of trees per property has also considered the viability of such an ask and the size of the land needed to accommodate the trees.
1197290	Resident	I support this policy. It could be more ambitious. We must improve insulation and efficiency in existing housing stock dramatically to meet the 2050 target. Focusing more on re-developing existing buildings would help with that.	Noted. Thank you for your comments.
REF428	Resident	Still allowing development on land that floods and increases risk to other homes as seen 'yet' again in the Grove Lane, Blackstope Lane, Braken Lane, Retford Beck situation.	Any new development proposed on land that is identified as being in a "flood zone" will need to justify why it needs to be developed in that location and what appropriate mitigation is required. This is identified within National Planning guidance and the revised flooding policies in the Local Plan.

