

**Bassetlaw Local Plan 2020-2037: Publication Version  
Regulation 19 Consultation August 2021 – October 2021**

**NRF-REF Responses 001-015**

REFERENCE NUMBER	ORGANISATION	PARTICIPATING IN HEARING SESSIONS
<a href="#">NRF-REF001</a>	Resident	Not indicated
<a href="#">NRF-REF002</a>	Residents	Not indicated
<a href="#">NRF-REF003</a>	West Stockwith Parish Council	Not indicated
<a href="#">NRF-REF004</a>	Resident	Not indicated
<a href="#">NRF-REF005</a>	Bassetlaw District Councillor	Not indicated
<a href="#">NRF-REF006</a>	Barton Willmore on behalf of Howard (Retford) Limited	Not indicated
<a href="#">NRF-REF007</a>	Resident	Not indicated
<a href="#">NRF-REF008</a>	Retford Civic Society	Not indicated
<a href="#">NRF-REF009</a>	Resident	Not indicated
<a href="#">NRF-REF010</a>	Residents	Not indicated
<a href="#">NRF-REF011</a>	Walkerigham Parish Council	Not indicated
<a href="#">NRF-REF012</a>	Harworth and Bircotes Town Council	Not indicated
<a href="#">NRF-REF013</a>	DHA Planning on behalf of Laing O'Rourke	Not indicated
<a href="#">NRF-REF014</a>	East Markham Parish Council	Not indicated
<a href="#">NRF-REF015</a>	Lanpro	Not indicated

# NRF-REF001



[REDACTED]  
[REDACTED] S

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**From:** [REDACTED]  
**Sent:** Tuesday, September 14, 2021 11:45:09 AM  
**To:** [REDACTED]  
**Subject:** Bassetlaw Plan

External Message - Be aware that the sender of this email originates from outside of the Council. Please be cautious when opening links or attachments in email

Good Morning [REDACTED]

Thanks for your response to my message. Below are my comments and thoughts from the Bassetlaw plan that I mentioned. I have found the forms to make representations and to be honest it is just baffling. I would dread to think how many people that form puts off raising their voice, and therefore the lack of genuine local consultation that takes place.

5.1.30 - "The Bassetlaw Retail and Leisure Study 2017 13 states there is no identified need for new retail development to 2035".

5.1.48 - "H&B has a good range of shops and services."

3.24 "Harworth and Bircotes will effectively double its size"

The study from 2017 is already four years out of date, and simply cannot take into account the statement in 3.24. Any town that will double in size MUST have a need for retail development. The current range of shops and services is not suitable for the growth taking place and we cannot wait to see the town double in size before acting on this need. Elsewhere in the plan there are comments around the leisure and retail money that leaves the Bassetlaw district; this is hardly surprising when H&B current offer is a handful of takeaways and hairdressers. Now is the time to capitalise on the growth of the town and financial boost that the new build property developments are bringing.

ST14 4.c)iii "support for healthy active lifestyles including space for local food growing"

Simply put, the support for healthy active lifestyles in Harworth and Bircotes needs to go a lot further than what sounds like an allotment space. With a town that will double in size and 2000 new homes and families investing in the area, there is a major need for increased leisure facilities, with a particular focus on health and activity. Taking into account the growth of the town, the current leisure centre will not be fit for purpose, and is arguably already in need of major investment. With many residents having to go out of town to Doncaster and Maltby to access classes and better facilities, the current leisure offer in the town already has shortcomings. The suggestion of improved cycling links is something that is pleasing to see, and needs to be delivered on. A safe green wheel around the town was mentioned in previous town plans and would be very welcomed, surely something that is possible on the back of the £2billion pound investment into walking and cycling announced last year.

ST14 4.c)i "a small-scale extension to Harworth & Bircotes town centre to include up to 500sqm of comparison goods floorspace, other main town centre uses, and associated infrastructure including an appropriate financial contribution towards the provision of a pedestrian crossing on Scrooby Road"

We have a traffic and speeding problem on Scrooby Road already. If the objective is to grow the town centre then we must develop the infrastructure and make this safer for pedestrians. As well as safe crossing there is a need for traffic calming measures such as speed bumps or cameras. The recently installed zebra crossings do not make it safer to cross and I have witnessed several occasions where cars have continued speeding and ignored pedestrians.

Thanks very much

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



# NRF-REF002



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 14 September 2021 15:03  
**To:** The Bassetlaw Plan  
**Subject:** Re: Objection to Bassetlaw Consultation Plan - Policy 15: HS1 Peaks Hill Farm

External Message - Be aware that the sender of this email originates from outside of the Council. Please be cautious when opening links or attachments in email

Hello

Objection to Bassetlaw Consultation Plan - Policy 15: HS1 Peaks Hill Farm

Further to our discussions, please can you include our objections with the submission to the local government.

kind regards  
[REDACTED]

Hello,

Further to the recent communication with home owners on Westerdale, Worksop and following the decision to proceed with the plan to build +1000 houses at Peaks Hill Farm. I would like to express our objections as follows:

1. There are considerable types of wildlife in the woodland area - buzzards, owls, bats, deers, foxes and hedgehogs, which we all know are becoming extinct. Removing any part of the woodland would affect their longevity.

2. The field behind the houses on Westerdale drops about 5 feet which could cause issues with drainage and future flooding.

Any houses built on the field would be lower than the current houses which would cause issues with privacy.

3. Infrastructure on surrounding roads - the two road junctions (off old Thievesdale onto Blyth Road and out onto main Thievesdale Road) are already busy with traffic throughput from cars, lorries and buses and will not be able to support more traffic to the point where it will become dangerous for the drivers and considerably affect commute time. Most houses have at least 2 cars now which will cause more traffic pollution to the environment. The routes between the M1 and A1 are already extremely busy during commuter hours.

4. Broadband issues - broadband is sporadic in this area - increased population in this area can only decrease the speed per household unless there are plans to spend government funds on this - ref the government policy on Building Digital UK. We know that the Digital divide is on the government's agenda to ensure everyone has access to broadband and devices.

5. Worksop town centre had declined rapidly over the past 15 years - shops closed due to rent increases, and increased drug use and crime. The proposed new houses will only bring people into Bassetlaw who want to

buy affordable homes and continue to commute to their workplace which will not help Bassetlaw's economy.

The factories and employment mentioned in your plan don't offer the wages and hours to support people buying these houses - whatever 'affordable' means to the individual! Typically, Wilkinsons and B&Q offer zero hours contracts at either living/or minimum wage which is not attractive to people with degree education or above, which seems to be the type of people you're trying to bring into the Bassetlaw area.

6. On visiting the hospital for an emergency through A&E, we were informed that the hospital had been reduced from 140 + beds to 90 beds hospital - staff were working round the clock as there was such a shortage, machines were having to be plugged in rather than have batteries due to costs/budget restrictions.

The children's ward is closed at night and discussions about closing the A&E department and moving it to Doncaster are on-going. The hospital cannot support the current population in Bassetlaw let alone support additional homes.

7. The doctors and dentists are at capacity in the town. You have to wait 2-3 weeks currently for a doctor's appointment, and 18-24 months to register for a dentist in the area. Doctors are encouraging social prescribing and referral through pharmacies and their own reception team.

Elderly people are not able to get the support they need through the social system for home visits and support. The situation is at breaking point - why would you stretch this further to the point that existing people within the town will leave and move to other areas where provision to look after their family is much better and safer!

8. Schooling - The primary schools in Worksop are full with some having to teach in porter cabins. The secondary schools don't have enough places to support all the children currently coming through the school system, let alone with increased population - with many having to travel outside of Worksop to get school places. There have been many cases recently of secondary school children not getting a school in Worksop.

Finally, following the meeting on the 13th Jan 2021

I want to see:

1. A green buffer zone between current homes on Westerdale and any new development. Preferably building behind 'Long Plantation' (Figure 14 in the Draft Plan) or a minimum 15 metres from the existing housing on Westerdale, to maintain a green corridor for privacy and wildlife

2. New dwellings to have gardens that back onto the 'buffer zone' to increase the distance between existing homes and new houses and to extend the green corridor

3. Any communal areas, such as youth facilities, playgroups, car parks and sports pitches, to be located away from any existing homes in the centre of the new development behind the treeline

4. Minimal street lighting across the estate to minimise light pollution

5. Low level housing near to any existing homes, such as bungalows, **not** higher-rise townhouses

6. Green pathways and corridors across all the development to connect existing woodlands, new cycle routes, walking routes to enable access to public transport

7. Maximise tree/shrub planting, open spaces, verges etc to create a more attractive environment to overlook

8. Build enough housing that local people can actually afford and cater for an increasingly elderly population with bungalows and smaller dwellings

9. Decent sized gardens for dwellings so people can benefit from outdoor space; do not allow developers to maximise their profits by creating a 'concrete city' environment.

[REDACTED]

[REDACTED]

[REDACTED]

On Thu, 9 Sept 2021 at 15:07, The Bassetlaw Plan <[TheBassetlawPlan@bassetlaw.gov.uk](mailto:TheBassetlawPlan@bassetlaw.gov.uk)> wrote:

Good afternoon [REDACTED]

Thank you for taking the time to speak to us today.

As requested, below is a link to the Council's Local Plan webpage which provides links to the representation forms and guidance for the Bassetlaw Local Plan 2020-2037: Publication Version Consultation.

<https://www.bassetlaw.gov.uk/planning-and-building/the-draft-bassetlaw-local-plan/bassetlaw-local-plan-2020-2037-publication-version-august-2021/submit-your-representation-for-the-bassetlaw-local-plan-2020-2037-publication-version/>

Additionally, I have linked the updated Bassetlaw Local Plan 2020-2037: Publication Version document which was published on the website at the start of the consultation on the 2<sup>nd</sup> September.

<https://www.bassetlaw.gov.uk/planning-and-building/the-draft-bassetlaw-local-plan/bassetlaw-local-plan-2020-2037-publication-version-august-2021/bassetlaw-local-plan-2020-2037-publication-version-august-2021/>

If you require any further assistance, please let us know.

Best regards

**The Planning Policy Team**

*Bassetlaw District Council*

Bassetlaw District Council

Queens Buildings

Potter Street

Worksop

Nottinghamshire S80 2AH

Tel.: (01909) 533 495

To:

**Subject:** Objection to Bassetlaw Consultation Plan - Policy 15: HS1 Peaks Hill Farm

External Message - Be aware that the sender of this email originates from outside of the Council. Please be cautious when opening links or attachments in email

Hello,

Further to the recent communication with home owners on Westerdale, Worksop and following the decision to proceed with the plan to build +1000 houses at Peaks Hill Farm. I would like to express our objections as follows:

1. There are considerable types of wildlife in the woodland area - buzzards, owls, bats, deers, foxes and hedgehogs, which we all know are becoming extinct. Removing any part of the woodland would affect their longevity.

2. The field behind the houses on Westerdale drops about 5 feet which could cause issues with drainage and future flooding.

Any houses built on the field would be lower than the current houses which would cause issues with privacy.

3. Infrastructure on surrounding roads - the two road junctions (off old Thievesdale onto Blyth Road and out onto main Thievesdale Road) are already busy with traffic throughput from cars, lorries and buses and will not be able to support more traffic to the point where it will become dangerous for the drivers and considerably affect commute time. Most houses have at least 2 cars now which will cause more traffic pollution to the environment. The routes between the M1 and A1 are already extremely busy during commuter hours.

4. Broadband issues - broadband is sporadic in this area - increased population in this area can only decrease the speed per household unless there are plans to spend government funds on this - ref the government policy on Building Digital UK. We know that the Digital divide is on the government's agenda to ensure everyone has access to broadband and devices.

5. Worksop town centre had declined rapidly over the past 15 years - shops closed due to rent increases, and increased drug use and crime. The proposed new houses will only bring people into Bassetlaw who want to buy affordable homes and continue to commute to their workplace which will not help Bassetlaw's economy.

The factories and employment mentioned in your plan don't offer the wages and hours to support people buying these houses - whatever 'affordable' means to the individual! Typically, Wilkinsons and B&Q offer zero hours contracts at either living/or minimum wage which is not attractive to people with degree education or above, which seems to be the type of people you're trying to bring into the Bassetlaw area.

6. On visiting the hospital for an emergency through A&E, we were informed that the hospital had been reduced from 140 + beds to 90 beds hospital - staff were working round the clock as there was such a shortage, machines were having to be plugged in rather than have batteries due to costs/budget restrictions.

The children's ward is closed at night and discussions about closing the A&E department and moving it to Doncaster are on-going. The hospital cannot support the current population in Bassetlaw let alone support additional homes.

7. The doctors and dentists are at capacity in the town. You have to wait 2-3 weeks currently for a doctor's appointment, and 18-24 months to register for a dentist in the area. Doctors are encouraging social prescribing and referral through pharmacies and their own reception team.

Elderly people are not able to get the support they need through the social system for home visits and support. The situation is at breaking point - why would you stretch this further to the point that existing people within the town will leave and move to other areas where provision to look after their family is much better and safer!

8. Schooling - The primary schools in Worksop are full with some having to teach in porter cabins. The secondary schools don't have enough places to support all the children currently coming through the school system, let alone with increased population - with many having to travel outside of Worksop to get school places. There have been many cases recently of secondary school children not getting a school in Worksop.

Finally, following the meeting on the 13th Jan 2021

I want to see:

1. A green buffer zone between current homes on Westerdale and any new development. Preferably building behind 'Long Plantation' (Figure 14 in the Draft Plan) or a minimum 15 metres from the existing housing on Westerdale, to maintain a green corridor for privacy and wildlife
2. New dwellings to have gardens that back onto the 'buffer zone' to increase the distance between existing homes and new houses and to extend the green corridor
3. Any communal areas, such as youth facilities, playgroups, car parks and sports pitches, to be located away from any existing homes in the centre of the new development behind the treeline
4. Minimal street lighting across the estate to minimise light pollution
5. Low level housing near to any existing homes, such as bungalows, **not** higher-rise townhouses
6. Green pathways and corridors across all the development to connect existing woodlands, new cycle routes, walking routes to enable access to public transport
7. Maximise tree/shrub planting, open spaces, verges etc to create a more attractive environment to overlook
8. Build enough housing that local people can actually afford and cater for an increasingly elderly population with bungalows and smaller dwellings
9. Decent sized gardens for dwellings so people can benefit from outdoor space; do not allow developers to maximise their profits by creating a 'concrete city' environment.

[REDACTED]

[REDACTED]

[REDACTED]



# NRF-REF003



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 16 September 2021 16:35  
**To:** The Bassetlaw Plan  
**Subject:** Bassetlaw Local Plan 2020-2037 : Publication Version, August 2021 Consultation

External Message - Be aware that the sender of this email originates from outside of the Council. Please be cautious when opening links or attachments in email

**Regulations 19 and 20 Town and Country Planning (Local Planning) (England) Regulations 2012: Bassetlaw Local Plan 2020-2037: Publication Version, August 2021**

**Regulations 16 and 17 Community Infrastructure Levy Regulations 2010 (as amended) Bassetlaw Community Infrastructure Levy - Draft Charging Schedule**

Dear Sir or Madam

I have been authorised by West Stockwith Parish Council to state that they have no major comments to make on these consultations.

Kind regards

[REDACTED]  
[REDACTED]  
Clerk, West Stockwith Parish Council  
C.Eng B Sc. FIEE FIRSE

[REDACTED], West Stockwith, Nottinghamshire [REDACTED]

Tel: +44 (0) 1427 890294 Mobile: [REDACTED]

**PLEASE NOTE NEW EMAIL ADDRESS FOR THE PARISH COUNCIL**

Email: [weststockwithpc@outlook.com](mailto:weststockwithpc@outlook.com) Personal Email [REDACTED]

Facebook: [www.facebook.com/weststockwith.parishcouncil](https://www.facebook.com/weststockwith.parishcouncil) Twitter: [@weststockwithpc](https://www.twitter.com/@weststockwithpc) Website: <http://www.west-stockwith-parish-council.org.uk>

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The map illustrates the railway network in the Doncaster, Sheffield, and Rotherham area. Key features include:

- Major Stations:** Doncaster Sheffield Airport, Harworth & Bircotes, Worksop, Retford, Tuxford, Gainsborough Central, Gainsborough Lea Road, and Gainsborough.
- Lines and Routes:**
  - Yellow Line:** Connects Doncaster to Worksop and Retford.
  - Blue Line:** Connects Worksop to Retford and Tuxford.
  - Green Line:** Connects Retford to Gainsborough and Lincoln.
  - Red Line:** Connects Retford to Tuxford and Newark.
  - Purple Line:** Connects Retford to Gainsborough and Lincoln.
  - Brown Line:** Connects Retford to Tuxford and Newark.
- Other Lines:**
  - To Doncaster:** Yellow and blue lines.
  - To Sheffield:** Green line.
  - To Chesterfield:** Blue line.
  - To Mansfield:** Blue line.
  - To Nottingham:** Brown line.
  - To Lincoln:** Purple line.
  - To Newark:** Red line.
  - To London:** Red line.
  - To Grimsby:** Pink line.
- Geographical Features:** The River Trent is shown flowing through the area, and several parks (Clumber Park, The Welbeck Estate) are marked.

**From:** [REDACTED]  
**Sent:** 21 September 2021 19:06  
**To:** The Bassetlaw Plan  
**Subject:** Fwd: Bassetlaw Consultation Plan - Policy 15: HS1 Peaks Hill Farm

External Message - Be aware that the sender of this email originates from outside of the Council. Please be cautious when opening links or attachments in email

Good afternoon,

I would like to re-confirm our objections we previously submitted. Also, we are very concerned that the green buffer will be in place **prior** to the building work starting, to limit disruption and noise given that multiple builders will be building on the land but to also create a safe place for the wildlife during the building works. If you're planting trees they will take years to create the sort of boundary that we would hope to be in place.

Earlier today, I read online of how it took two hours for ambulance to arrive from Newark to support someone having a heart attack. I am very concerned about the impact on our services. A couple of weeks ago I had a first aid course ran by two paramedics. They actually said they would bypass Bassetlaw hospital even if it was just for a splinter! This is really concerning for someone who is pregnant.

If the plan does go ahead I would like the following points to be considered:

I want to see:

1. A green buffer zone between current homes on Westerdale and any new development. Preferably building behind 'Long Plantation' (Figure 14 in the Draft Plan) or a minimum 15 metres from the existing housing on Westerdale, to maintain a green corridor for privacy and wildlife
2. New dwellings to have gardens that back onto the 'buffer zone' to increase the distance between existing homes and new houses and to extend the green corridor
3. Any communal areas, such as youth facilities, playgroups, car parks and sports pitches, to be located away from any existing homes in the centre of the new development behind the treeline

4. New dwellings to have minimum car-parking space to discourage multiple car ownership to reduce noise, traffic and pollution. (linked to climate change)
5. Minimal street lighting across the estate to minimise light pollution
6. Low level housing near to any existing homes, such as bungalows, not higher-rise town houses
7. Green pathways and corridors across all the development to connect existing woodlands, new cycle routes, walking routes to enable access to public transport
8. Maximise tree/shrub planting, open spaces, verges etc to create a more attractive environment to overlook
9. Cater for an increasingly elderly population with bungalows and smaller dwellings
10. Decent sized gardens for dwellings so people can benefit from outdoor space; do not allow developers to maximise their profits by creating a 'concrete city' environment.

**Ref: POLICY 15: HS1: Peaks Hill Farm**

I would like to object to the proposed plan re the above policy at Peaks Hill Farm.

1. There are considerable types of wildlife in the woodland area - buzzards, owls, bats, foxes and hedgehogs, which we all know are becoming extinct. Removing any part of the woodland would affect longevity.

2. The field behind the houses on Westerdale drops about 5 feet which could cause issues with drainage and future flooding.

Any houses built on the field would be lower than the current houses which would cause issues with privacy.

3. Infrastructure on surrounding roads - the two road junctions (off old Thievesdale onto Blyth Road and out onto main Thievesdale Road) are already busy with traffic throughput from cars, lorries and buses and will not be able to support more traffic to the point where it will become dangerous for the drivers and considerably affect commute time.

4. Broadband issues - broadband is sporadic in this area - increased population in this area can only decrease the speed per household unless there are plans to spend government funds on this - ref the government policy on Building Digital UK.

5. Worksop town centre is a very scary place to go... After recent experiences I will avoid going there.

The factories and employment mentioned in your plan don't offer the wages and hours to support people buying these houses - whatever 'affordable' means to the individual! Typically, Wilkinsons and B&Q offer zero hours contract at either living/or minimum wage which is not attractive to people with degree education or above, which seems to be the type of people you're trying to bring into the Bassetlaw area.

6. The doctors and dentist are at capacity in the town. You have to wait 2-3 weeks currently for a doctors appointment, and longer for a dental appointment. Doctors are encouraging social prescribing and referral through pharmacies and their own reception team.

Elderly people are not able to get the support they need through the social system for home visits and support. The situation is at breaking point - why would you stretch this further to the point that existing people within the town will leave and move to other areas where provision to look after their family is much better and safer!

7. Schooling - The primary schools in Worksop are full with some having to teach in porter cabins. The secondary schools don't have enough places to support all the children currently coming through the school system, let alone with increased population - with many having to travel outside of Worksop to get school places.

8. The process of notification about the Bassetlaw Plan falls out of your policy with only 2 flyers on lamposts on Westerdale and one tweet on twitter. According to your policy each home affected such have been notified by letter to give them the opportunity to attend the consultation sessions - this hasn't happened. We were informed at the consultation meeting that



notice of these meetings was on Social media. This is not inclusive to all residents and doesn't meet the government policy for assisted digital.

9. The 'consultation' meeting at Thievesdale was unhelpful with staff not having the answers to the many questions raised by the residents in this area. This consultation event would have been much better if Bassetlaw staff would have chaired the meeting with seating for people to be given the opportunity to ask questions and everyone to hear the answers. Similarly, it would have been helpful if all staff were fully informed about the plans and dates, as a number of us were told different dates by different staff members! It was chaos and I don't think anyone who attended came away with any answers. It clearly wasn't a consultation meeting - as no one was consulted on the day! Also, why have a meeting when people are working and can't attend!

I look forward to hearing about next steps and would welcome future emails to this email address.

regards

[Redacted signature]



The Bassetlaw Plan

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W: [www.bassetlaw.gov.uk](http://www.bassetlaw.gov.uk)

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# NRF-REF005



[REDACTED]

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**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** The Bassetlaw Plan  
**Attachments:** FW: Bassetlaw Plan\_Botany Bay  
Botany Bay 1.docx

**From:** [REDACTED]  
**Sent:** 24 September 2021 08:50  
**To:** [REDACTED]  
**Subject:** FW: Bassetlaw Plan\_Botany Bay

Hi [REDACTED]

[REDACTED] has confirmed he would like these comments to be a representation. Please could you get in touch and see whether he would like to use the rep form?

Cheers

[REDACTED]

[REDACTED]

Planning Policy Manager  
Bassetlaw District Council

Queens Buildings  
Potter Street  
Worksop S80 2AH

Tel: 01909 533495

---

**From:** [REDACTED]  
**Sent:** 22 September 2021 15:09  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Bassetlaw Plan\_Botany Bay

[REDACTED]

Some thoughts about Level Crossings north of Retford

[REDACTED]

[REDACTED]

<https://www.bassetlaw.gov.uk/council-and-democracy/local-councillors/your-local-councillor/east-retford-west/james-anderson/>

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[REDACTED]

, , , ,

**T:**

**W:** [www.bassetlaw.gov.uk](http://www.bassetlaw.gov.uk)

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[REDACTED]

[REDACTED]

[REDACTED]

Image 1

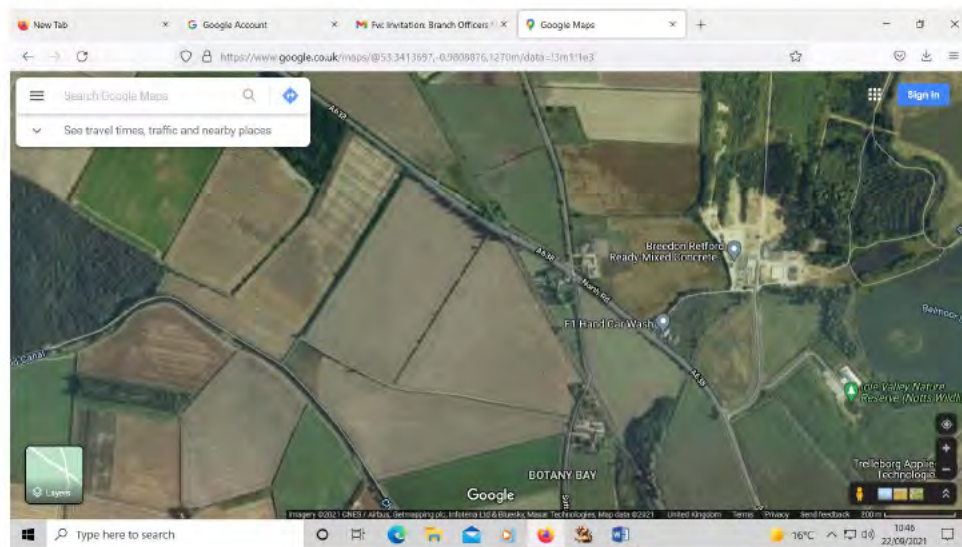
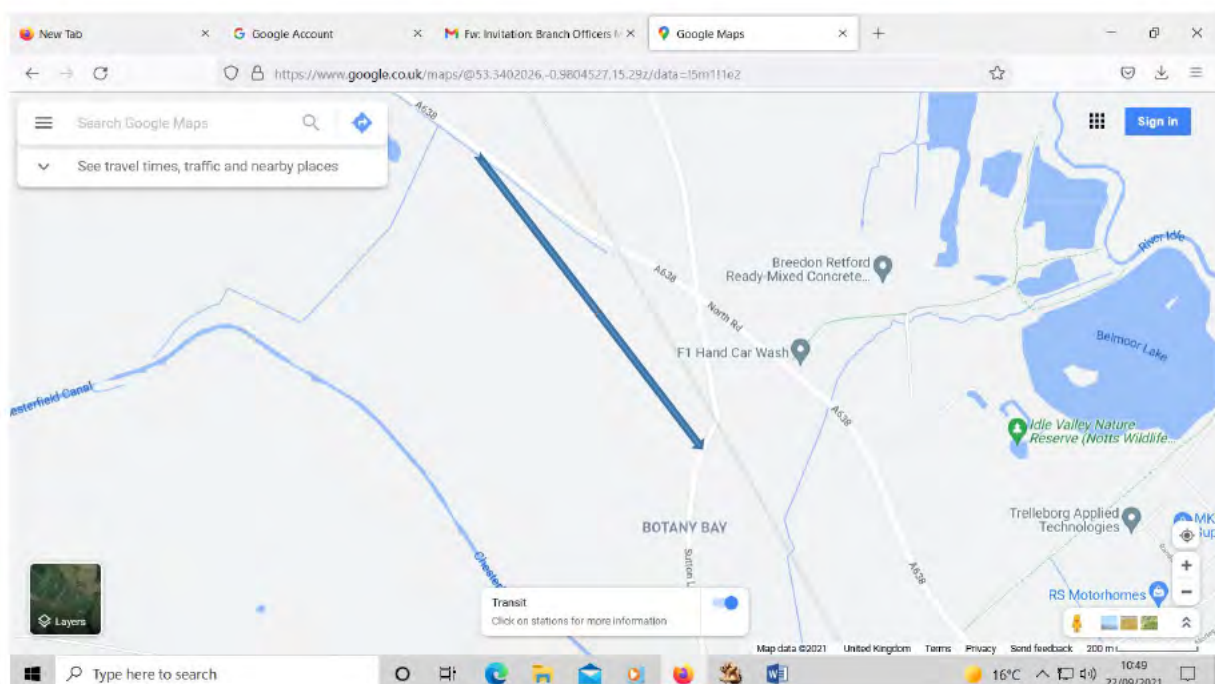
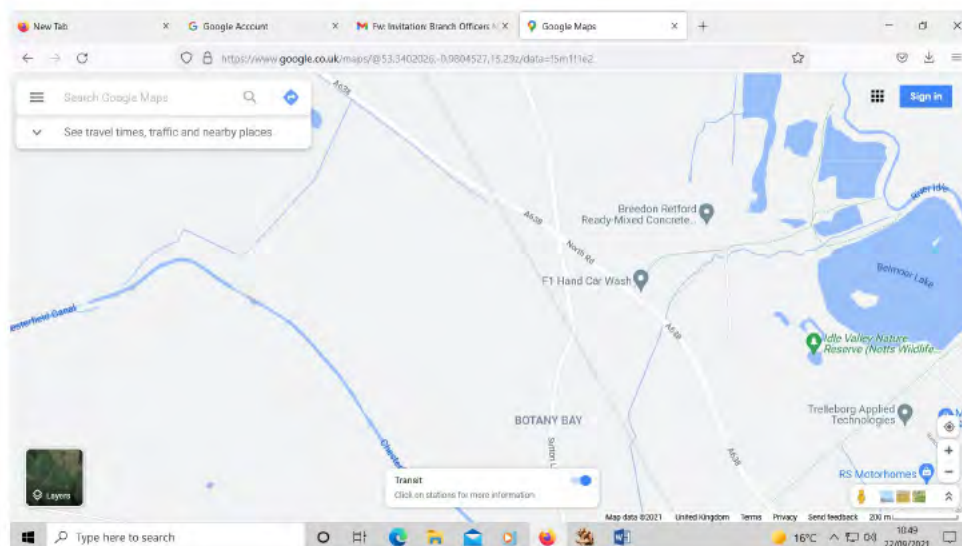


Image 2





[REDACTED]

Hello [REDACTED] and the Planning Strategy Department Bassetlaw District Council.

Trust you are all keeping well. Please can you consider this good opportunity to close TWO level crossings to the North of Retford.

Images 1 & 2 show the current layout of roads around Botany Bay.

A new highway with a small roundabout at each end of it as shown in the third image would enable all traffic using Sutton Lane from either direction to cross the railway without using the Botany Bay Level Crossing. I do believe that we should also close the Sutton-cum-Lound Level Crossing as well. It will be an inconvenience for some residents, but safety is a vital factor for both road and train users – you may be aware of a number of recent incidents at Rossington Level Crossing, and the RTA incident last year at Botany Bay involving the death of a local cyclist.

<https://www.bbc.co.uk/news/av/uk-england-south-yorkshire-57102590>

<https://www.doncasterfreepress.co.uk/news/crime/man-appears-in-court-over-smash-which-saw-car-crash-into-train-in-doncaster-3279328>

<https://www.lincolnshirelive.co.uk/news/local-news/sadness-cyclist-dies-after-crash-4735448>

I'm confident that Network Rail and the train operating companies will be only too pleased to assist with this plan.

I'm also confident that the parcel of land created by this new highway would be the ideal location for a further housing development for BDC. It is close to the new workplaces on Trinity Farm, it is on a well served bus route to and from Retford, the villages and Doncaster, and it will no longer need to have level crossing use to travel either on foot, by bike or by motor vehicle from the site.

I do believe that BDC should compulsorily purchase this land, and then build a number of predominantly rented dwellings to satisfy the needs of Retford residents who are slowly being priced out of rental accommodation in town.

I have no idea who owns this land, or if the compulsory purchase idea is feasible - I do know that we should seek every opportunity to make level crossings redundant.

The size of the parcel of land is flexible, and it appears to contain no significant ecological attributes.

I have also shared this email with [REDACTED]

[REDACTED]

[REDACTED]



# NRF-REF006



**From:** [REDACTED]  
**Sent:** 05 October 2021 12:40  
**To:** The Bassetlaw Plan  
**Cc:** [REDACTED]  
**Subject:** 26740 Representations to the Regulation 19 Local Plan  
**Attachments:** 26740 A3 DM Bassetlaw Local Plan Reps 21-10-05.pdf

External Message - Be aware that the sender of this email originates from outside of the Council. Please be cautious when opening links or attachments in email

Dear Sir / Madam,  
Please find attached representations to the Regulation 19 Local Plan submitted on behalf of [REDACTED]

We would be grateful if you would acknowledge these submissions.

Regards,

[REDACTED]  
Regional Support Senior Coordinator



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# Bassetlaw District Council

## Draft Bassetlaw Local Plan Regulation 19 Consultation

Representations on Behalf of Howard Retford Ltd

October 2021

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**Bassetlaw District Council Draft Bassetlaw Local Plan  
Regulation 19 Publication Version 2021**

**Representations on behalf of** [REDACTED]

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October 2021

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## 1 INTRODUCTION

- 1.1 Bassetlaw District Council (the “Council”) is currently inviting comments on its’ *Publication Draft Bassetlaw Local Plan 2021* (Publication Version August 2021) which includes revised strategic policies and site allocations for employment and housing which will guide decisions over the plan period (2020-2037).
- 1.2 The Council began preparing its new Local Plan in 2015 and, once adopted, it will replace the Bassetlaw Core Strategy and Development Management Policies DPD (2011) and will form the Development Plan document to be used by the Council to set out its long-term strategy and inform decision making up to 2037. The Local Plan intends to set out the requirements of the District, including housing and employment land supply, and set out how those requirements will be met.
- 1.3 The Draft Bassetlaw Plan was published for consultation in October 2016 under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This document was subsequently followed by Part 1 of the Draft Bassetlaw Local Plan (also a Regulation 18 consultation) which was submitted for consultation in January 2019. Further documents were issued for consultation under the Regulation 18 stage in 2020. In June 2021, the Council undertook a Focussed Consultation exercise considering land South of Ordsall.
- 1.4 This latest Draft is the Regulation 19 stage, and it is accompanied by a range of evidence-based documents. A Draft CIL Charging Schedule is issued in parallel for public consultation
- 1.5 These representations have been prepared and submitted by Barton Willmore LLP on behalf of our Client, Howard Retford Limited. Our Client has land interests across the District but is primarily focussed on Land to the South of Ordsall, Retford which is a draft allocation.
- 1.6 Our Client’s land to the south of Ordsall has been submitted to the Council via its “Call for Sites” process at the beginning of 2016. The Site has been discussed with the Council multiple times and the Council has supported it as a sustainable location for an “urban extension” to Retford including residential and community facilities. Our



Client has produced and submitted to the Council a Development Framework Document that demonstrates how the Site can be delivered as a residential allocation for the plan period; a copy of that Development Framework Document is attached at **Appendix 1** of these representations.

- 1.7 These representations express our Client's comments on the Publication Draft Local Plan, with particular emphasis on the delivery of housing. In June 2021 we provided comments to the Focussed Draft Consultation, and we attached these at **Appendix 2** (not repeated in the body of this document).
- 1.8 In addition, we attach at **Appendix 3** our comments in relation to the CIL Charging Schedule, Whole Plan Viability, and Infrastructure Delivery Plan.

## 2 LOCAL PLAN CONTEXT

### *Bassetlaw Vision*

- 2.1 Chapter 4 of the Local Plan sets out the Council's Vision and Objectives for Bassetlaw in 2037 for increased access to quality homes, high skilled jobs and a range of quality facilities and services. We support those aspirations; however, we stress that the key to the effectiveness of the Local Plan is in its ability to achieve that Vision.
- 2.2 The Vision for Retford set out in paragraph 4.6 is that it will have "*grown appropriately, with a wide range of new housing available better suited to meet local resident's needs irrespective of time in life, while a new country park, community infrastructure and transport improvements will provide benefits to existing and new communities*".
- 2.3 Our client fully supports the Council's vision for Retford as set out in Chapter 4. This represents a sustainable approach to growth. Our only comment is that there is no definition of what is meant by '*grown appropriately*'. This qualification is not defined and not appropriate for a main town in the hierarchy. We suggest that the terminology is changed to 'sustainably grown' to mirror Worksop's text.
- 2.4 We are concerned regarding the Council's strategy for a new Bassetlaw Garden Village and whether this will be achieved in the timeframes of the Local Plan. The proposed site is greenfield and not linked to any existing settlement. It is a freestanding location which does not benefit from any existing infrastructure. Whilst the Local Plan is rightly ambitious, there are question marks over whether an entirely new settlement can be achieved without significant external funding.

### *Strategic Objectives*

- 2.5 Our client is supportive of Objective 1 which seeks to locate development in sustainable locations whilst supporting a balanced pattern of growth across urban and rural areas.
- 2.6 We support Objective 2 which seeks to provide a choice of land to ensure the District's housing stock better meets local housing needs. We consider that the Local Plan must

focus development towards the District's main settlements to support their role and function as key service centres, not only for their own populations but their surrounding rural hinterlands. We consider that it is more appropriate for the Council to seek to deliver sustainable urban extensions which are defined by their sustainability benefits rather than solely through scale.

- 2.7 We disagree with Objective 5 which promotes the delivery of a new "sustainable heritage and a landscape-led Garden Village". Objective 5 also states that this is to be focussed around 'well connected' locally distinctive neighbourhoods. It is not clear what is meant by 'sustainable heritage'. Also, as the site is freestanding, it is unclear as how a well-connected place, with no existing infrastructure, can be achieved.
- 2.8 Whilst we note the Council's desire to follow the 'garden village movement', we do not consider that there is a driver for doing so in Bassetlaw. The garden village (and indeed the garden city) movement was driven by overcrowding in urban areas and a need to house significant amounts of people in new sustainably designed settlements. Bassetlaw does not suffer from those urban problems and its main settlements are suitable for urban expansion and, as above, would benefit from additional growth to maintain and enhance their vitality and viability. Such additional growth will be vital as the current population of those towns ages and the number of working age people naturally declines; it will be vital to encourage younger people and families to those towns.
- 2.9 Our client supports Objectives 8 and 9 which seek to deliver high-quality spaces.
- 2.10 We are supportive of Objective 13 which seeks to make efficient use of existing transport infrastructure. We suggest the provision of a new Garden Village contradicts this policy as extensive new transport infrastructure must be delivered to cater for the proposed village. In addition, the Local Plan states that the Rural Settlements are less accessible and so it would be more beneficial to guide a higher proportion of development to the main urban areas, particularly Retford and Worksop which benefit from strong transport connections.

### 3 SPATIAL STRATEGY

- 3.1 We are supportive of the Local Plan's spatial strategy promoting a 'step change' for Bassetlaw's economy with growth focused around strategic corridors and growth zones and the three Main Towns as articulated at paragraph 5.1.9. We also support the reference that the spatial approach seeks to align the employment and housing offer.
- 3.2 Paragraph 5.1.13 states that Policy ST1 acknowledges the importance of reducing the need to travel and prioritises major growth in the three Main Towns which we support. This is not only vital in terms of localised movement but has an impact on regional transport networks as evidenced by the comments within the Doncaster SOCG. The growth needed to support the district's aspirations needs to be realised within the district as far as possible.
- 3.3 As set out below, we have concerns with how the spatial strategy has proportioned growth across the District; specifically in relation to the low level of housing requirement proposed for Retford, the overstated requirement for rural settlements and the proposed Garden Village.

#### *Housing needs*

- 3.4 Paragraphs 5.1.18-5.1.21 provide the rationale for the housing required, based upon the standard objectively assessed housing needs as a minimum, then seeking to match housing growth with economic growth. Our client supports this position (and also as set out in the background paper). Bassetlaw benefits from its proximity to two LEP regions, these being the D2N2 and Sheffield City Region. It has and continues to experience considerable economic growth. As just one example, our client's project at Harworth Bircotes enjoys the benefit of planning permission and is bringing forward development projects that will create 5000+ jobs. The level of housing growth must match employment growth in this district, which would otherwise lead to in-commuting from a wider area.
- 3.5 The Council's AMR (PUB 004) sets out that the district has consistently delivered housing at levels greater than the standard OAN, a position that reflects the economic prosperity in the district.

- 3.6 The Council has prepared a robust assessment of housing and employment needs in its GL Hearn report (SS-07). That report recommended that the Council test 562 – 591 dwelling per annum (dpa) as their economic led housing need, which considers a higher job growth but also higher in commuting which is realistic, leading to 562 dpa, or lower job growth but greater self-containment at 591 dpa.
- 3.7 This has been further tested by the Council resulting in a proposed housing requirement of 591 dwellings per annum. Our client supports this position.

### ***Housing Supply***

- 3.8 Figures 7 and 8 of the Plan provides the housing distribution model for the district and as summary of housing supply. This is based upon re-based needs following the introduction of the standard methodology and an update of supply as set out in SS-003 Housing Supply Position (August 2021). Half of the stated supply is made up of committed sites with planning permission, which is a significant amount. Our client has sought to review this stated supply and it is noted that there is a lack of clarity regarding whether some of the sites are deliverable.
- 3.9 A housing trajectory is included in the appendices to the Local Plan. This includes several references to much older planning consents. There are no site notes available, and it is not clear as to whether the sites with older consents have now commenced on site.
- 3.10 In the case of Retford, Fig.8 highlights that proportionally, Retford benefits from less commitments than other settlements in the hierarchy. This reinforces the need to make significant new allocations in this settlement. It is also perhaps the strongest housing market location in the district.

### ***Local Plan Policy ST1: Bassetlaw's Spatial Strategy***

- 3.11 Our client is generally supportive of the structure and content of Policy ST1. The Plan notes that 'ST' policies are strategic in nature. One observation is that the housing requirement is a minimum, whereas the Local Plan distribution model refers to 'approximate' figures in the case of the main settlements, yet is firm stated in the case of the smaller villages and rural settlements. To avoid any potential that the

larger, most sustainable locations achieve less growth than the plan envisages, we would suggest that the wording be modified to refer to 'minimum' dwellings at parts 2a i)-iv).

- 3.12 The Plan requires some 3200 dwellings in the large and small rural settlements. It is unclear as to how these are to be delivered, given that the Plan itself proposes only 75 dwellings to be allocated in Tuxford, at category two of the hierarchy.
- 3.13 Part 3 of Policy ST1 refers to a windfall allowance of some 1200 homes to be delivered during the plan period. Our client is concerned that this could effectively be double counting with the required allowance for the larger and rural settlement as referred to above. The Council will also face the dual challenge of monitoring and drawing a distinction between these two categories as part the monitoring of the effectiveness of the Local Plan.

***Local Plan Policy ST2: Residential Growth in Rural Bassetlaw***

- 3.14 Policy ST1 of the Local Plan provides a broad distribution strategy. Our client is concerned that the Local Plan places too much emphasis on delivery within the rural areas, which is undefined. The Plan seeks to deliver some 3200 dwellings in the rural area yet allocates just one site for 75 units.
- 3.15 It is questionable as to whether the spatial strategy will therefore achieve its stated objectives and lead to a sustainable development pattern. Whilst we support the need to maintain the viability and vitality of rural services, this needs to be planned for by understanding the health and hinterlands of those services and the level of development that is needed to support them (and through locating that level of development in a location accessible to those services). As drafted, the Plan simply appears to provide a two-tier approach, allowing larger villages to grow by 20% and smaller villages to grow by 5%. As there are no allocations in any of these places, with the exception of Tuxford, it is unclear as to how this will be achieved.
- 3.16 The fundamental flaw of the Local Plan's proposed approach is that many of the 73 rural villages identified in the Local Plan for growth do not have any notable services to meet their day-to-day needs. It is not sustainable to encourage more households

to live in remote locations where they are encouraged to travel in sporadic patterns to access remote facilities. It is much more sustainable for those villages to be sustained by their rural hubs (the main settlements) where trips can be linked, and journeys made by public transport, such as Retford.

- 3.17 We object to Policy ST2 insofar as it proposes a 'Growth Requirement' for each village. Instead, the Council should enable a flexible approach to development to meet the needs of each settlement. This could be achieved via a criteria-based policy.
- 3.18 Part 2 of Policy ST2 does not appear to align with Part 1 as it introduces a strict set of criterion that might mean the objectives of Part 1 of ST2 can never be achieved in certain localities.
- 3.19 Part 3 of Policy ST2 is ambiguous. It is unclear how the tests of 'support from the community; could ever be achieved. Does this mean that just one letter of support would be required to meet the Policy test of a unanimous position?

***Local Plan Policy ST3: Bassetlaw Garden Village***

- 3.20 Throughout the formulation of the Local Plan, our client has raised concerns regarding the proposed Garden Village. These concerns are twofold.
- 3.21 Firstly, there does not appear to be the need for a new Garden Village in the district. Bassetlaw is not a constrained borough, nor does it have any Green Belt or environmental designations that could restrict development to such a scale. In contrast, it has a wide range of main, larger and smaller settlements which are capable of delivering the growth needed by the Council. We therefore disagree that there is the need for a new Garden Village and advocate that the defined Main Towns of Bassetlaw are capable of accommodating additional growth through urban extensions, which is considered to be a more sustainable option for development.
- 3.22 Secondly, the site in question is devoid of any existing infrastructure, benefitting from road access only (car borne traffic). It is not close to any other centres and the strategy appears entirely dependent on a new railway station to fulfil any sustainability credentials (paragraph 5.3.31 refers). Further, paragraph 5.3.33 states that in the early stages of development it is important that residents do not become car

dependent. The Plan is unclear as to how this will be achieved given the isolated status of this site.

- 3.23 We note that Policies ST3 and ST4 do not 'require' such infrastructure to be provided as part of the Garden Village, only that it is to be considered. Policies ST54, 55 and 56 are cross referred to, yet these policies seek only to safeguard land for a new railway station. The Local Plan does demonstrate how that essential infrastructure will be delivered.

***Local Plan Policy ST15: Provision of land for housing***

- 3.24 Our client support's Policy ST15 which seeks to allocate 13 strategic sites for development. For the reasons outline above, we are concerned with the proposals for the Garden Village and do not support it's inclusion.

***Policy 27: Site HS13: Ordsall South***

- 3.25 Our client is generally supportive of Policy 29 and Site HS13. This site has been subject to considerable scrutiny. During the summer of 2021, the Council undertook a Focussed Consultation around this allocation. Appendix 2 of the report is a copy of the submissions Howard (Retford) Limited submitted at this time and which we maintain at the Regulation 19 stage.
- 3.26 Our Client's land to the south of Retford is a sustainable and attractive location for housing development and its continued growth is considered to somewhat underpin the success of the housing market within the District.
- 3.27 As detailed within the enclosed Development Framework Document for our Client's Site in **Appendix 1**, the land to the south of Ordsall extends to 47.6ha and can accommodate approximately 1250 open market and affordable homes as well as potential small-scale employment opportunities and community spaces. This would contribute a significant proportion of housing to the Council's housing requirement whilst supporting growth of a designated Main Town.



- 3.28 The strategic location of the Site benefits from access to the A1 and highways connects to the surrounding settlements without having the need to pass through the centre of Retford.
- 3.29 As discussed earlier in these representations, Retford benefits from well-connected transport infrastructure, including Retford train Station, highways connectivity to the surrounding settlements and a wide range of bus services. The routes of the no. 42 and no.47 bus services are located to the north of our Client's site providing regular services to Retford, Worksop and other local areas. Crucially, in terms of attracting national and international investment to the area, Retford is located on the main railway network with quick access to London.
- 3.30 The Site also benefits from existing footpaths to the north along Ollerton Road. There is additional pedestrian access via Brecks Road and a PRow which runs west from the site providing access to open countryside.
- 3.31 As set out within our accompanying Development Framework Document (Appendix 1) the site is not considered to be of any notable quality or value. The Site is suitable for development as it is largely devoid of any significant landscape features and the land is largely flat. The Council's Draft Landscape Study provides an assessment of potential allocations for the Local Plan. The majority of our Client's Site is assessed under parcel reference 16H (LAA276). The methodology against which the sites within the study have been assessed is not clear, however, some value appears to have been attributed to the Site by virtue of views which are available from the Site out to the open countryside. In the first instance, we consider that similar views could only be attributed a low level of importance and do not interact with any protected landscape and such views would be equally available from a new development edge should our Client's Site be developed. Moreover, no assessment appears to have been undertaken of the Site's landscape and visual quality from outside views.
- 3.32 Development of the Site will not only provide the opportunity to provide new homes to the area but also provides the opportunity to support and enhance biodiversity. In addition, the Site is entirely within Flood Zone 1, the lowest risk of flooding, which further emphasises its suitability for development as an urban extension to Retford.
- 3.33 Having regard to our submissions to the Focussed Consultation exercise in June 2021 and reviewed the Regulation 19 document, we wish to make the below submissions.

- 3.34 Paragraph 7.14.4 states that construction of the first homes is not expected until at least 2027. Our client disagrees with this timetable in the Trajectory. A more realistic trajectory would be:
- Local Plan reg 19 stage - Autumn 2021;
  - Local Plan Examination – Early 2022;
  - Plan adopted late Spring 2022;
  - Masterplan developed Winter 2021 (as evidence to the EiP) – adopted by the Council Spring 2022;
  - Planning application (part outline, part detailed for phase 1) – submitted late summer 2022;
  - Application approved end of 2022;
  - Preliminary infrastructure works – Spring 2023;
  - First homes commenced – Autumn 2023; and
  - With an anticipated build out rate of 75 homes per year thereafter.
- 3.35 Paragraph 7.14.4 refers to land in use by Retford Golf Club as a training ground forming part of the wider site. The paragraph appears to state that this is surplus to requirements and not part of the sporting offer, yet it goes on to state that a financial contribution will be required to improve Retford Golf Club. The tests for the loss of such a facility are set out in NPPF paragraph 99 and the tests for contributions at NPPF paragraphs 56 and 57. If the land is not needed by the Golf Club and does not impact on the quality of the course, we are unclear as to why a contribution would be required. We further understand that the land in question is owned by the Golf Club, so presumably its management committee would decide how to invest any receipts. Consequential changes to the Policy wording at part 2 k) would be needed in addition.
- 3.36 Paragraph 7.14.7 refers to a Retford-Eaton Green Gap (Policy ST38 refers). This paragraph is confusing insofar as the Green Gap does not currently exist, it is being proposed via this new Local Plan. Our client has previously raised concerns about the justification for the Green Gap around Retford and regarding the proposal by the Council to allocate the strategic site at Ordsall South, yet include this as within a washed over Green Gap policy. That doesn't make much sense and is not justified in our view. Consequential changes to the Policy wording at part 2 a) would be needed in addition.

- 3.37 However, noting this our client fully accepts and positively embraces the need to ensure that, through good design, places retain individual identity and character. We believe that the intentions of the Council to ensure distinctiveness between Retford and Eaton can be achieved via good design and landscaping rather than a blunt policy tool.
- 3.38 If the Council maintains the need for a Green Gap, and that the Inspector considers it to be justified, then Site HS13 should be excluded from the Green Gap, with the proposals maps updated accordingly.
- 3.39 Paragraph 7.14.12 refers to a requirement of at least 10% biodiversity net gain. Our client seeks clarification as to why this has been applied only to Site HS13 and not all strategic allocations.

## **4 POLICIES FOR MANAGING DEVELOPMENT**

- 4.1 Chapters 8 – 11 of the Local Plan provide the Council’s proposed policies for managing the delivery of development, maximising development quality and minimising and mitigating harm. This Chapter provides our comments relating to relevant development management policies.

### ***ST38 Green Gaps***

- 4.2 We object to Local Plan’s 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.
- 4.3 Our Client’s land is proposed to be designated as a Green Gap GG8 (Retford West) within Policy ST38 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.
- 4.4 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.
- 4.5 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).
- 4.6 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.

- 4.7 We note that, to cater for the growing needs of the District and to facilitate a ‘step change’, development of greenfield land is inevitable over the plan period and it is not sustainable to prevent development on land that is well-suited for development and located on the urban fringe of settlements, such as Retford, without the risk of merging with any settlements to the south or surrounding area.
- 4.8 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.
- 4.9 We consider that the Council’s proposed Green Gap designation to the south and west of Retford should be deleted from the Local Plan.
- 4.10 Beyond this, the Council is also proposing to allocate land at HS13 and then wash over the Green Gap across it. This represents the introduction of a clear policy conflict between ST38, ST15 and ST27. Furthermore, there might also be tensions with the Council’s proposals to allow growth in some smaller settlements where they are also washed over by Green Gaps.

***Policy ST58: Provision and Delivery of Infrastructure***

- 4.11 Chapter 12.3 provides the Council’s approach to the provision of infrastructure. Our client is supportive of the timely delivery of infrastructure on site that is related to the proposed development.
- 4.12 We refer to our submissions attached at Appendix 3. At the time of writing, the IDP is not up to date and appears to be missing key entries. Whilst we appreciate that this is a ‘live’ document, it would be our intention to work with the Council and key providers to agree the requirements as the proposals for site HS13 emerge.

- 4.13 Having regard to Policy ST58 our client supports the Council's approach which seeks to deliver the required infrastructure at the right time, whilst recognising that it might not be possible in all cases to bring forward a scheme in one go.

## 5 CONCLUSIONS

- 5.1 The above representations have provided a review and commentary on the Bassetlaw Draft Local Plan Publication Draft 2021 on behalf of Howard (Retford) Limited).
- 5.2 Our client is generally supportive of the spatial approach set out and focus upon the three main towns of Worksop, Retford and Harworth Bircotes and considers that the Council has provided the right balance in meeting housing and employment needs.
- 5.3 Land at Ordsall South ({Policy ST27 and HS13) represents a sustainable urban extension that benefits from excellent public transport connectivity. The strategy for the release of this site is soundly based.
- 5.4 What is not justified is the Council's approach to the Green Gap to be washed over HS13, which potentially introduces a policy conflict. We consider that this could be easily resolved by an amendment to the Green Gap boundary so that it does not wash over the development site.
- 5.5 We have raised concerns with the lack of justification for a new Garden Village. This appears unnecessary in the context of Bassetlaw which is not as constrained as other boroughs and benefits from a great number of settlements which could accommodate the required growth in a more sustainable pattern.
- 5.6 We cross refer to the appendices to this document which include our previous comments on the Focussed Consultation, our masterplan for HS13 and our comments in relation to CIL, Whole Plan Viability and the Infrastructure Delivery Schedule.

**APPENDIX 1:**  
**DEVELOPMENT FRAMEWORK DOCUMENT –**  
**LAND TO THE SOUTH OF ORDSALL, RETFORD**





# ORDSALL SOUTH

A PLACE IN THE MAKING

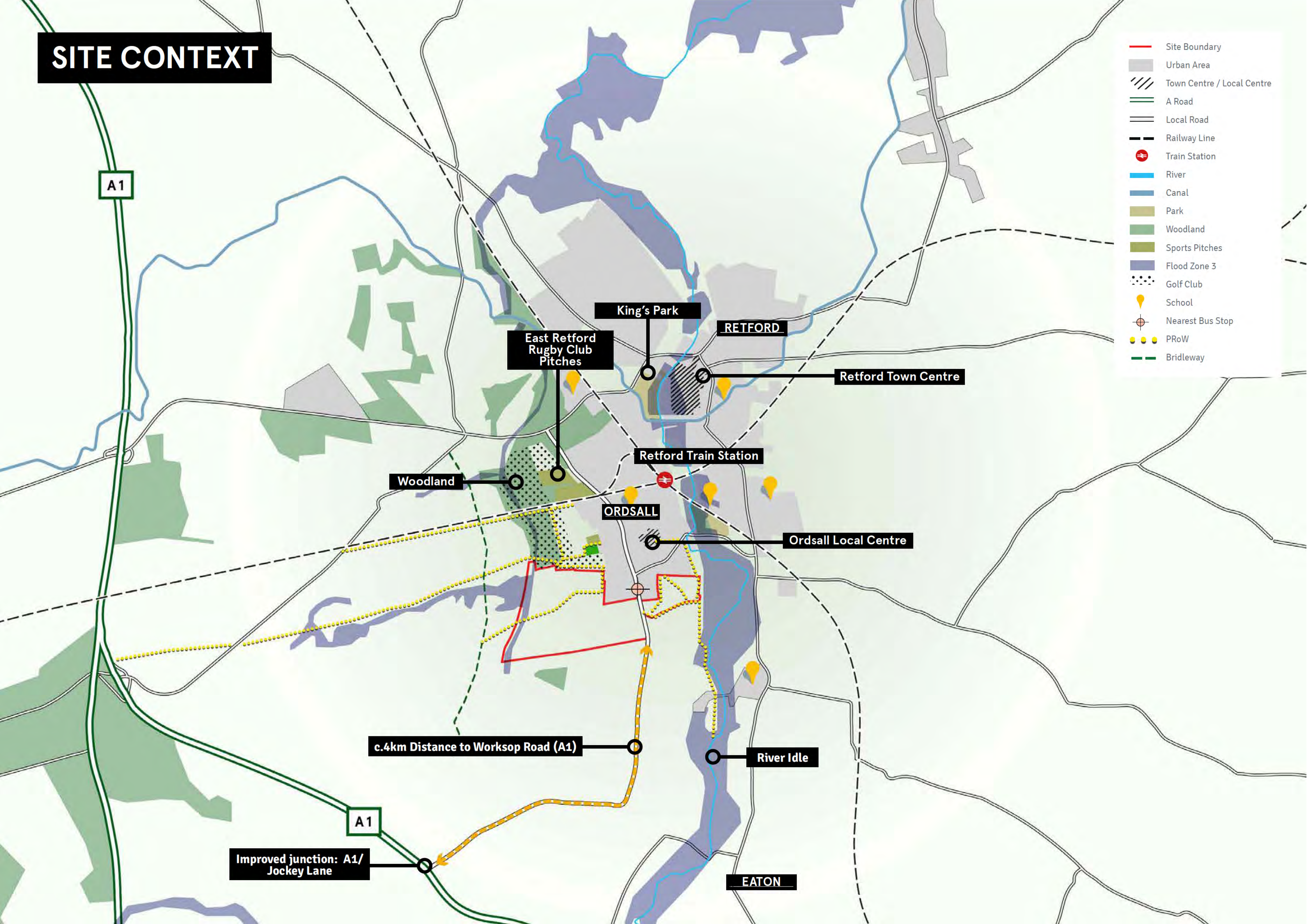




**BASELINE**

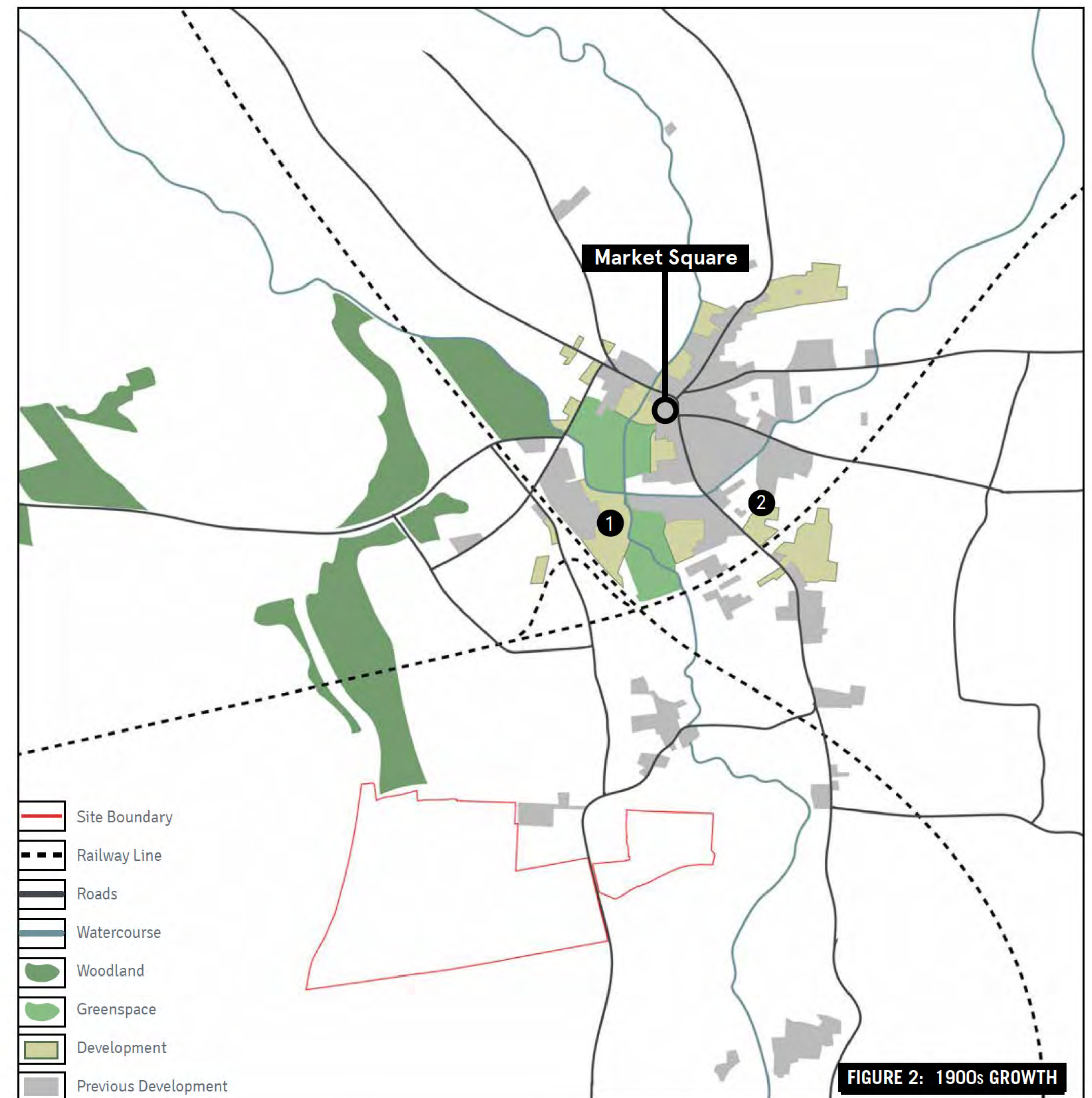
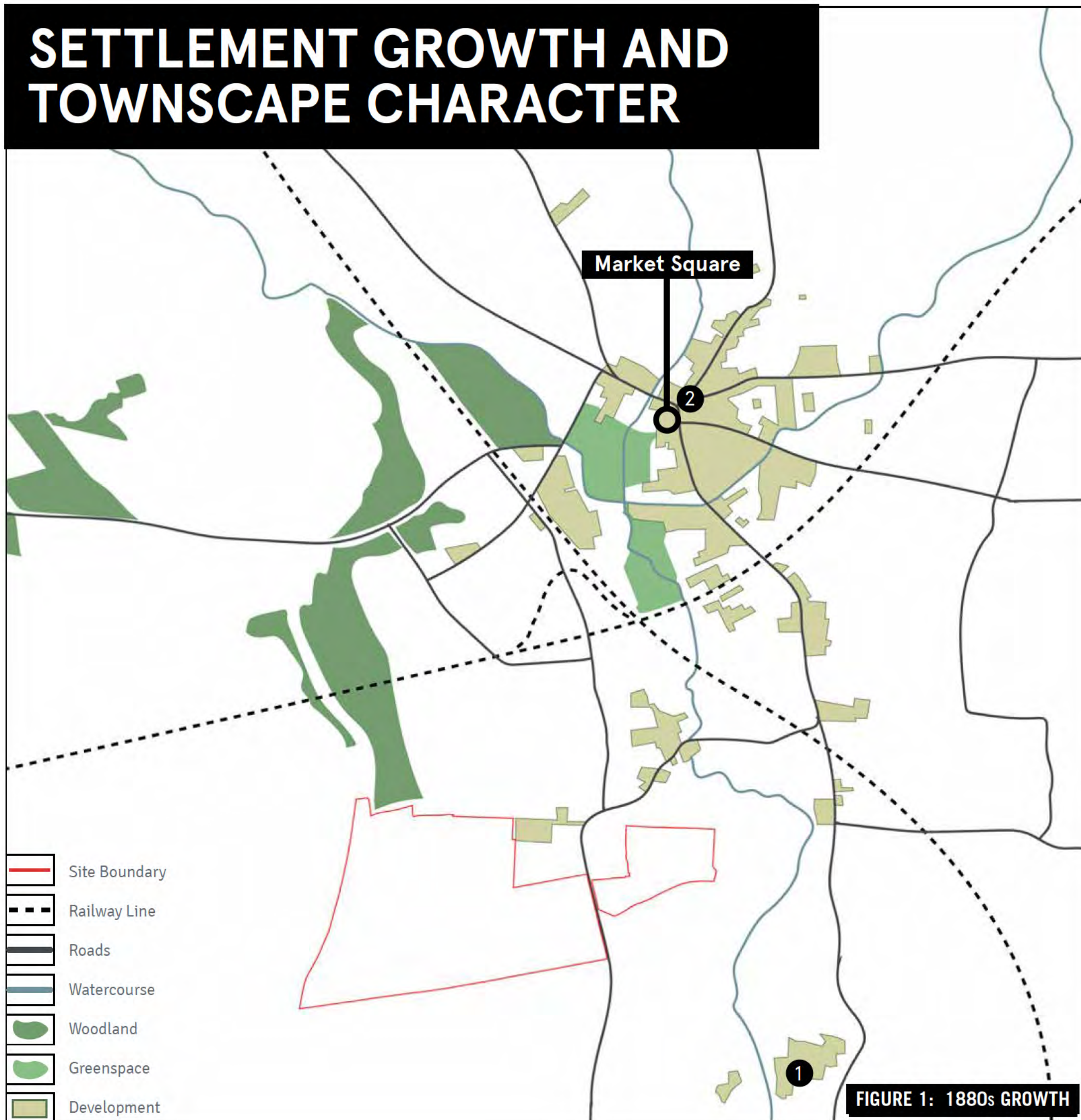


# SITE CONTEXT

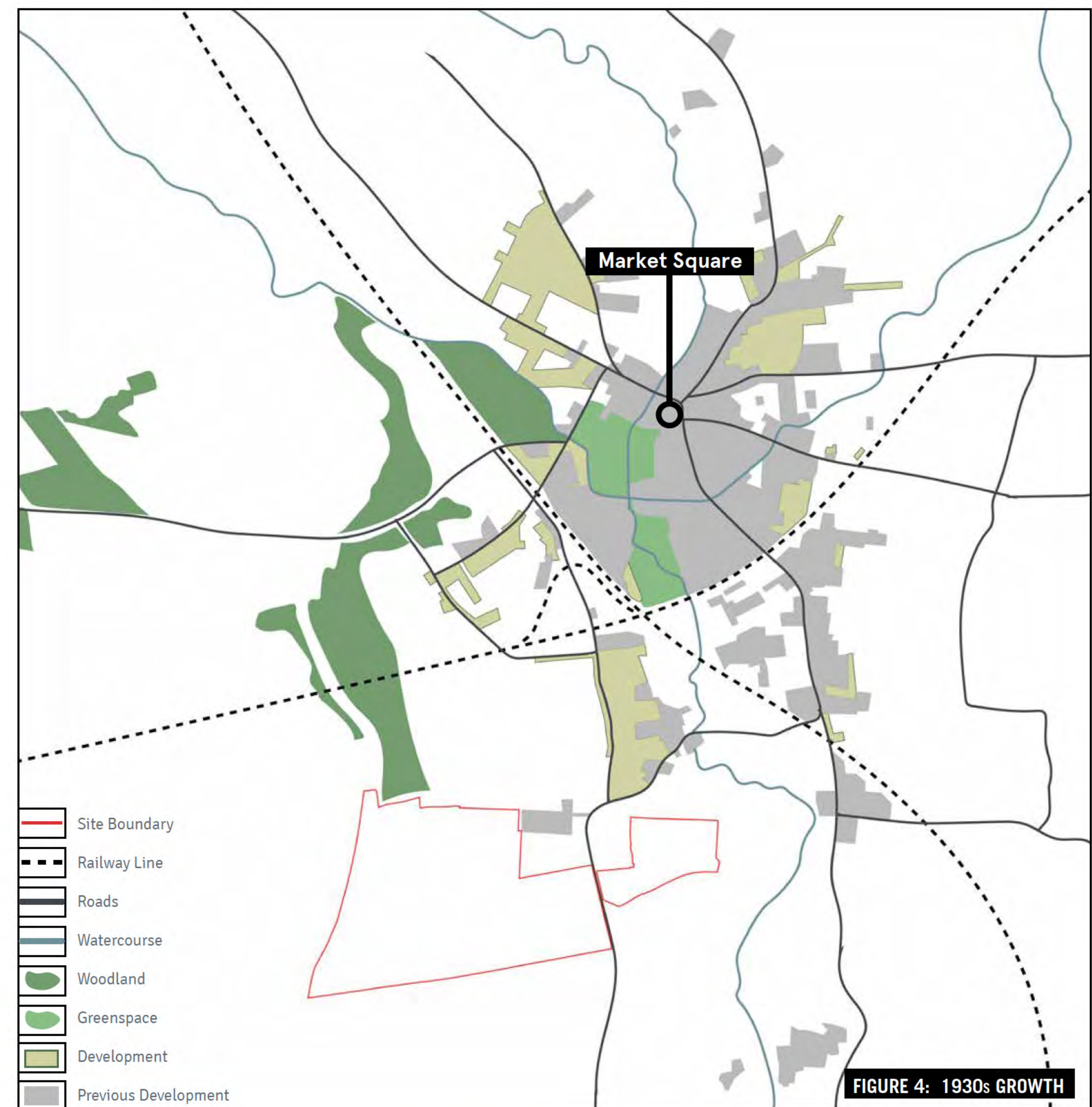
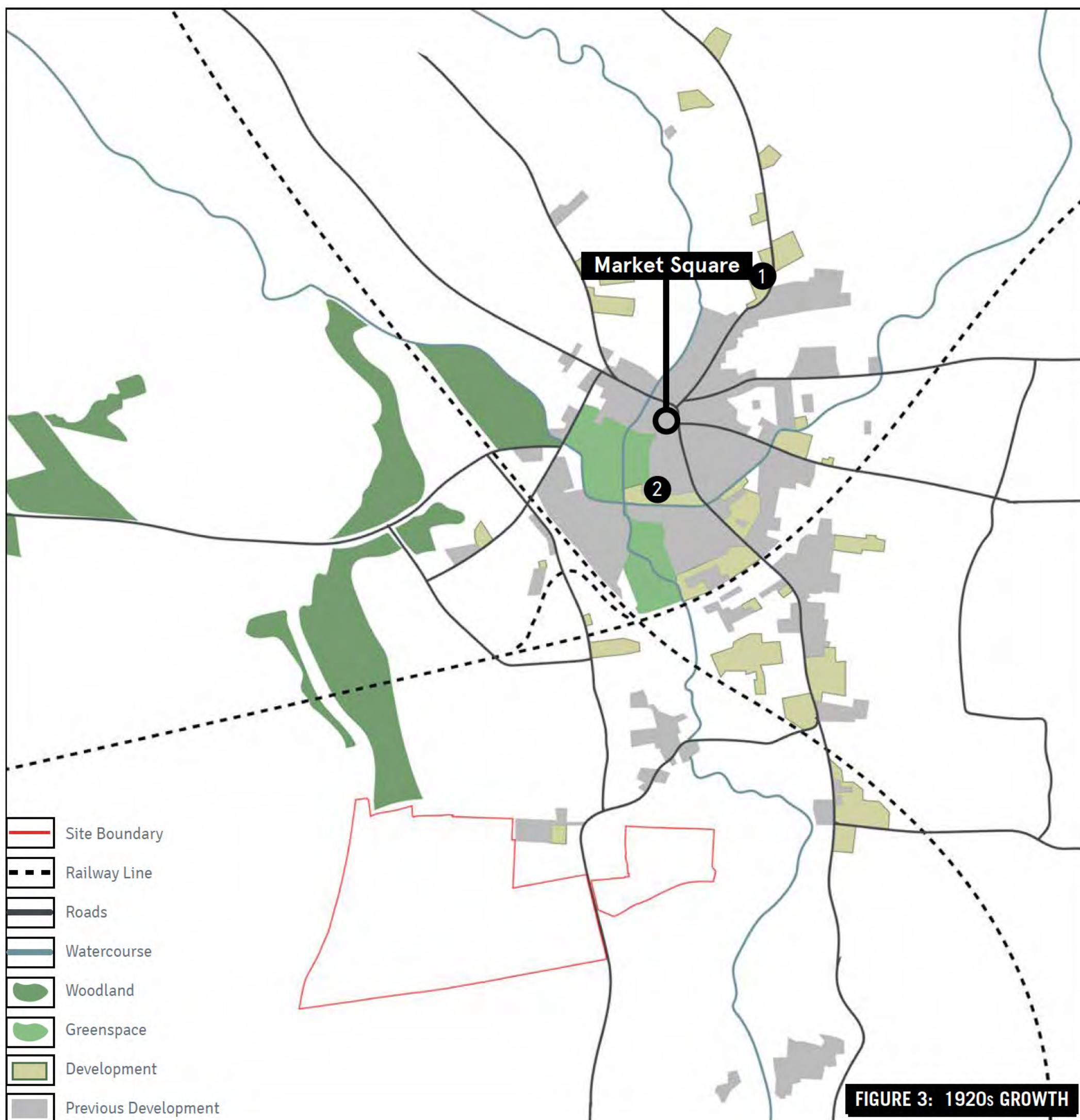




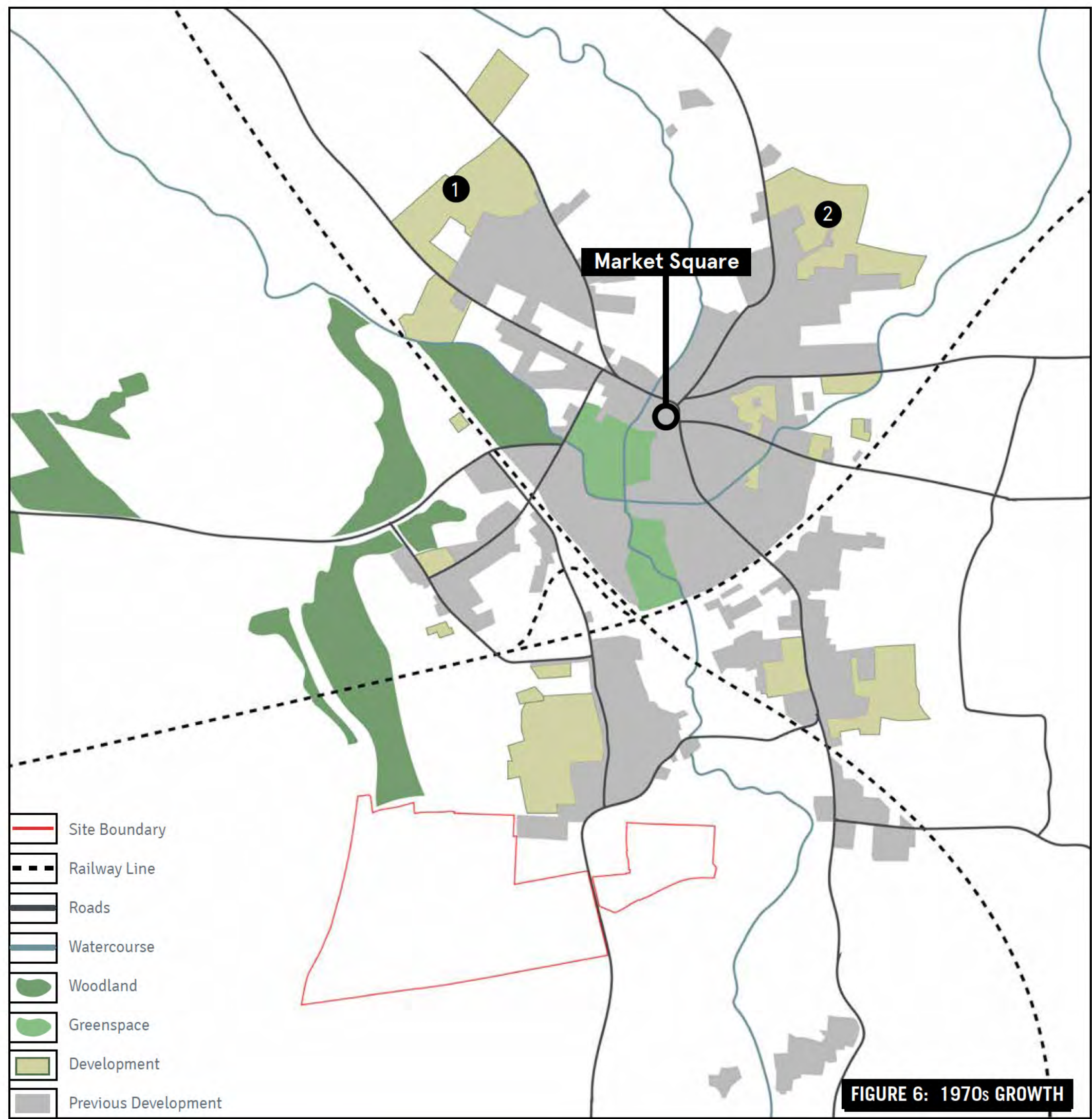
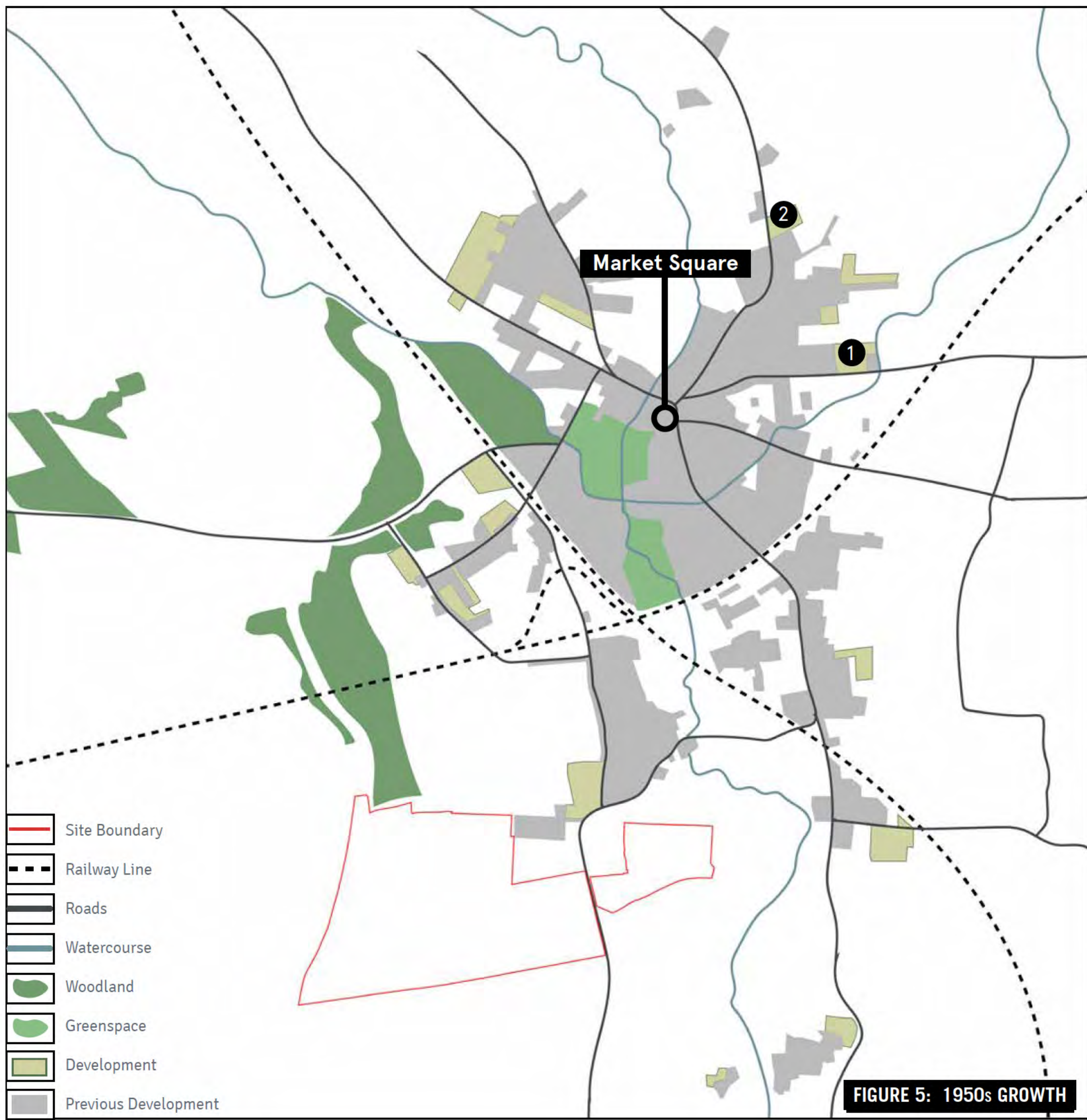
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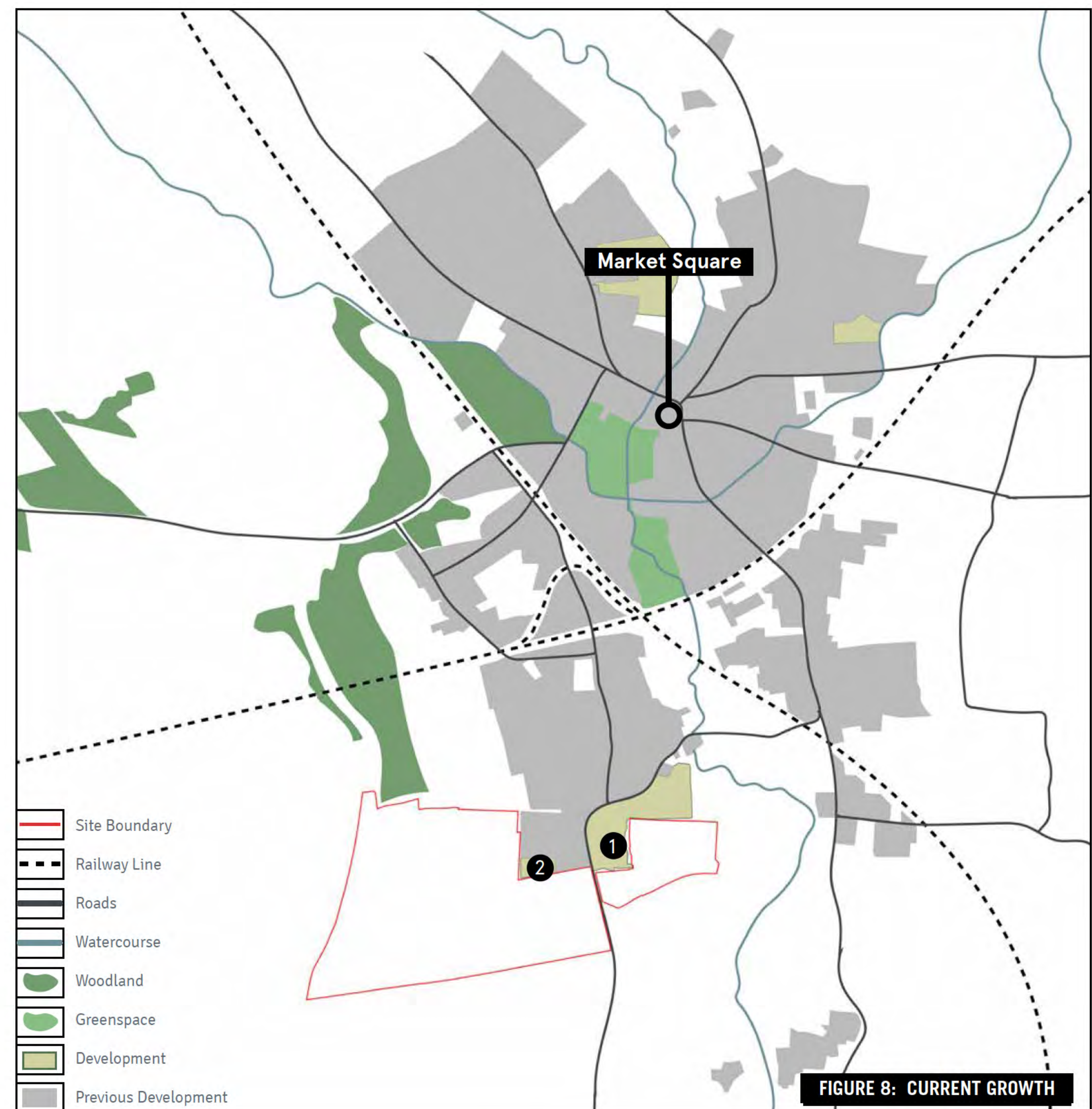
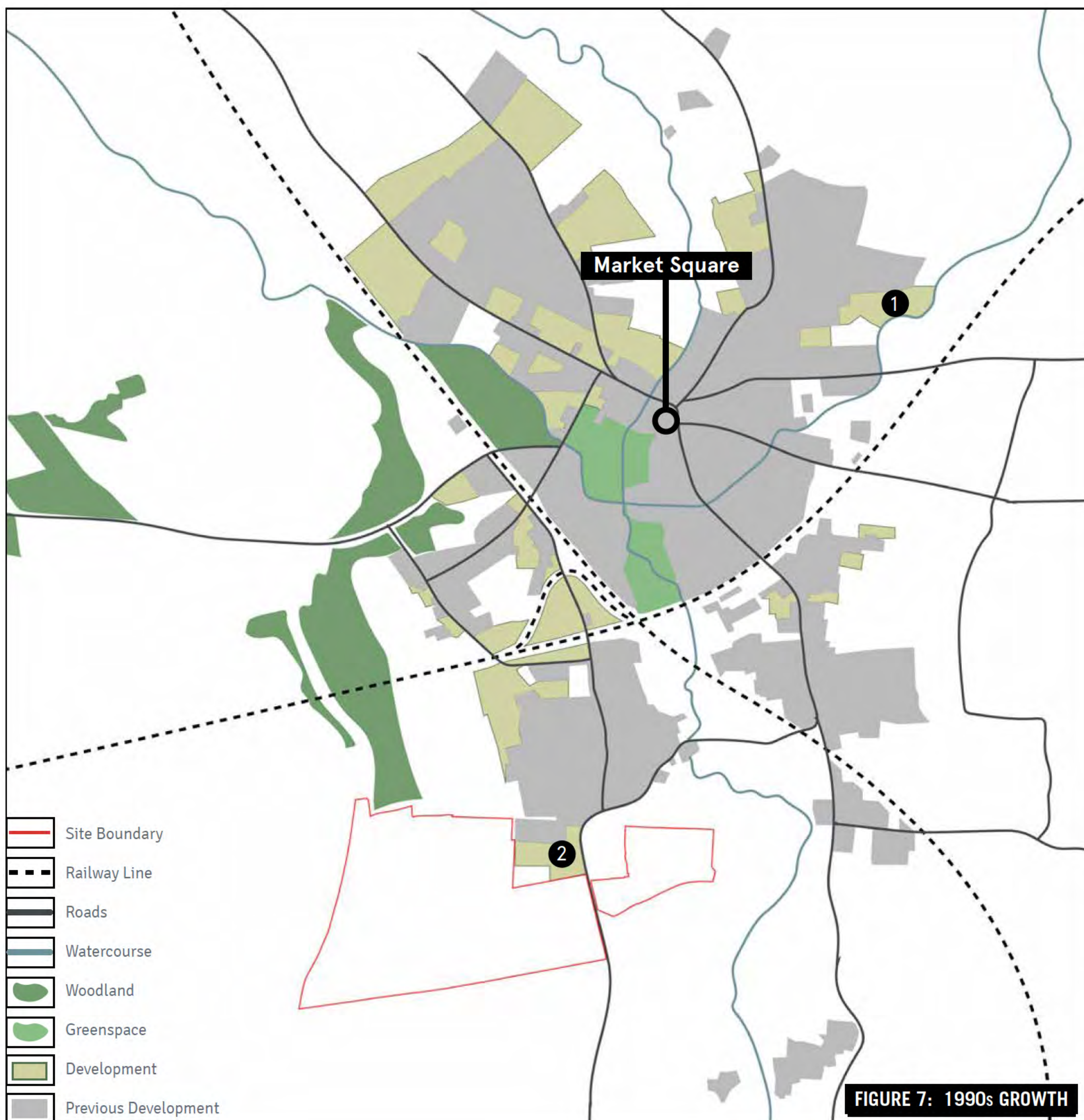














# LOCAL NEIGHBOURHOOD



- Site Boundary
- Town Centre
- Railway Line
- Train Station
- River
- Woodland
- Sports Pitches
- Allotment
- Golf Club
- School
- Local Shop(s)
- Sports Facilities
- PRoW
- Bridleway
- Primary Bus Route

2KM WALKING  
DISTANCE

A1



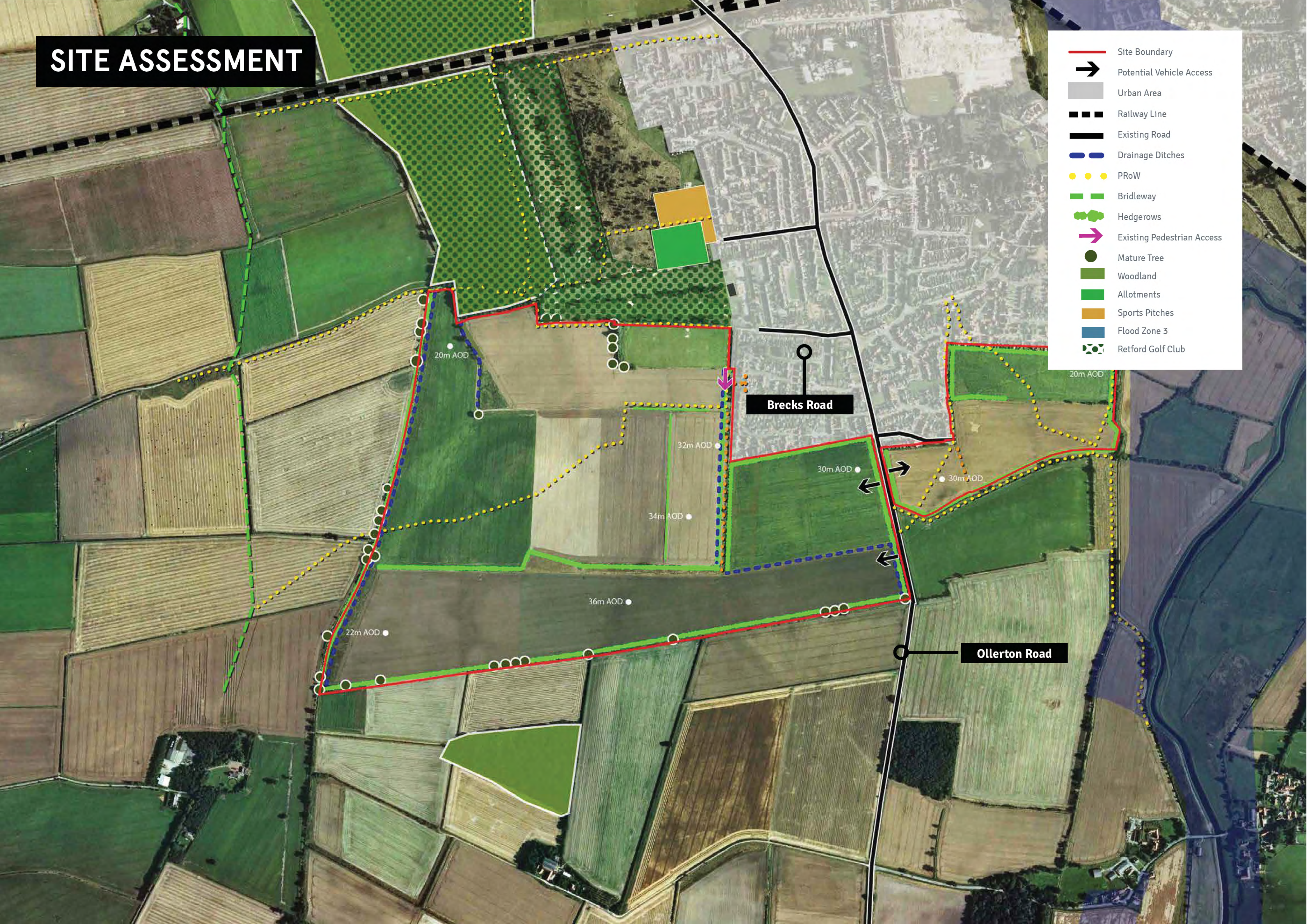
# PHOTOGRAPHIC ANALYSIS (NEIGHBOURHOOD)





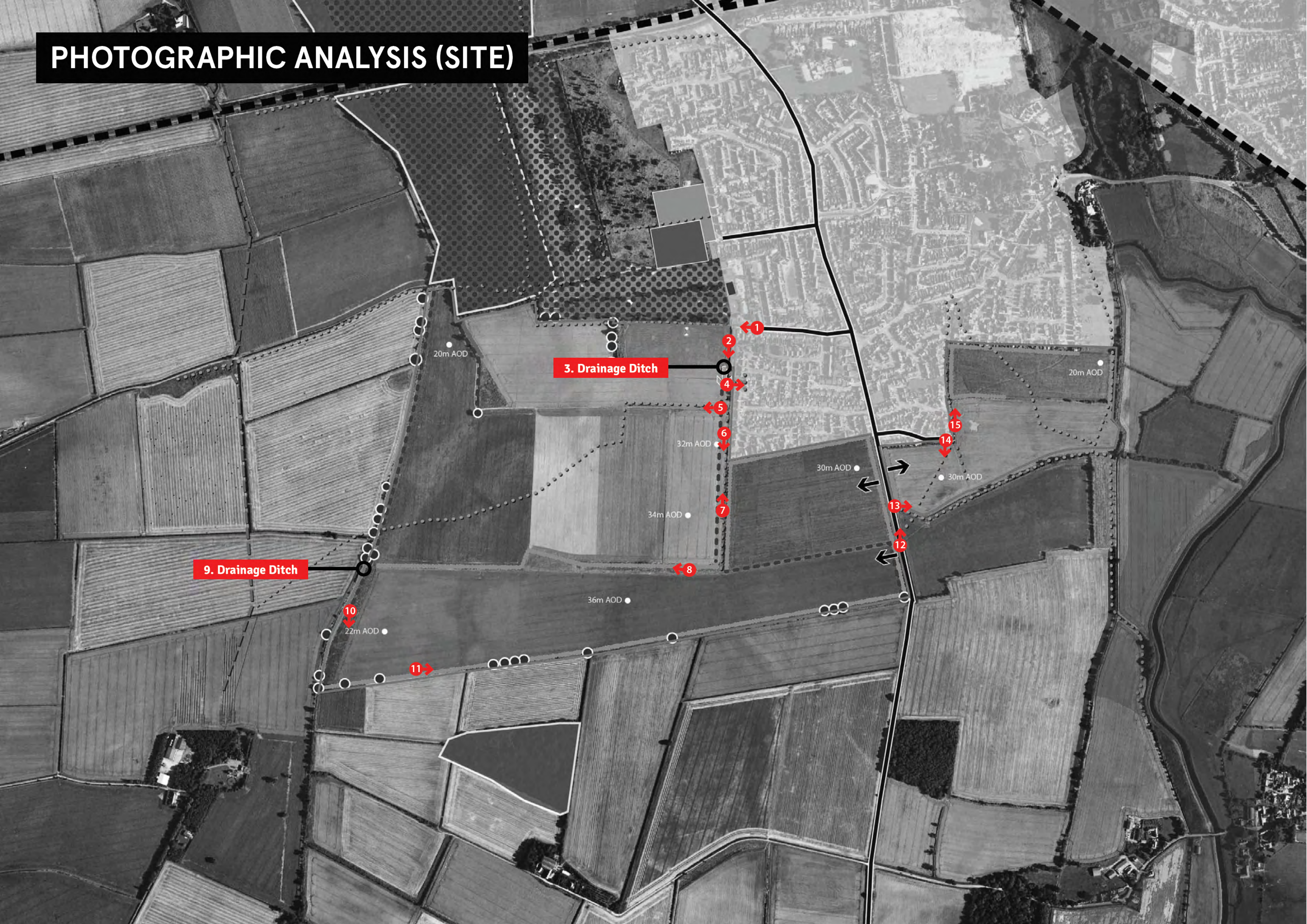
# SITE ASSESSMENT

- Site Boundary
- Potential Vehicle Access
- Urban Area
- Railway Line
- Existing Road
- Drainage Ditches
- PRoW
- Bridleway
- Hedgerows
- Existing Pedestrian Access
- Mature Tree
- Woodland
- Allotments
- Sports Pitches
- Flood Zone 3
- Retford Golf Club

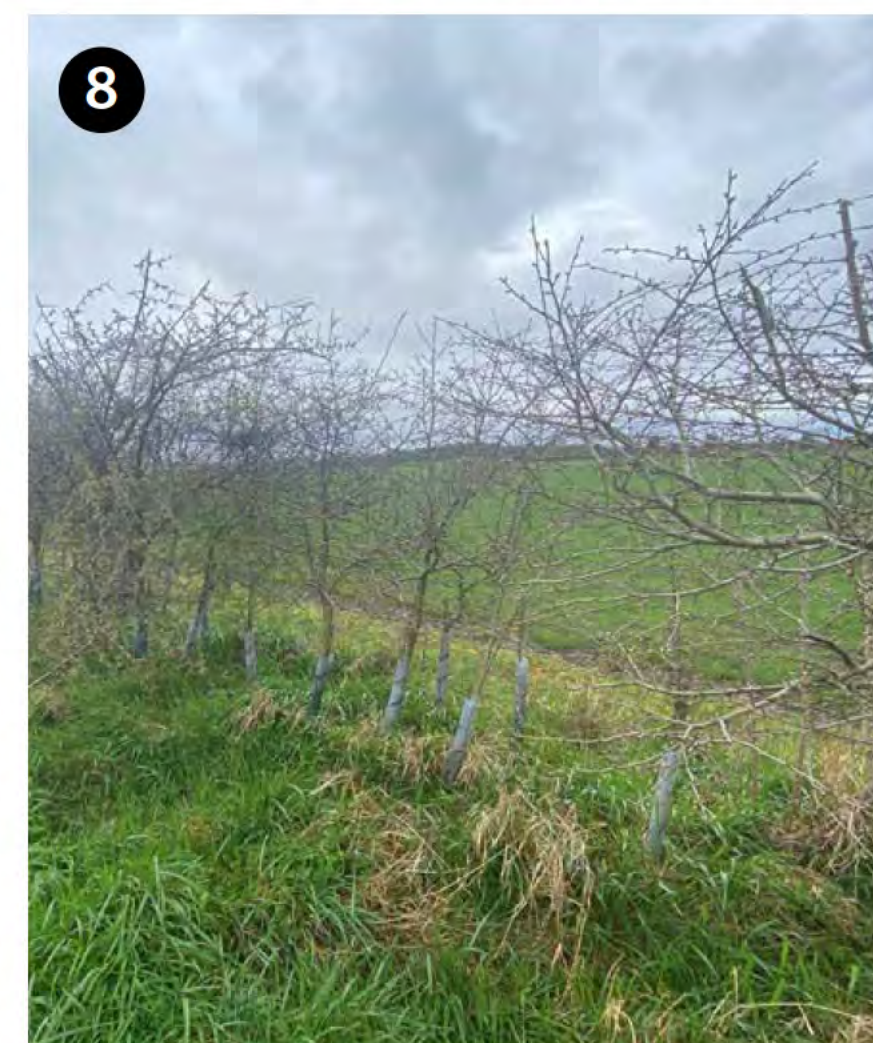
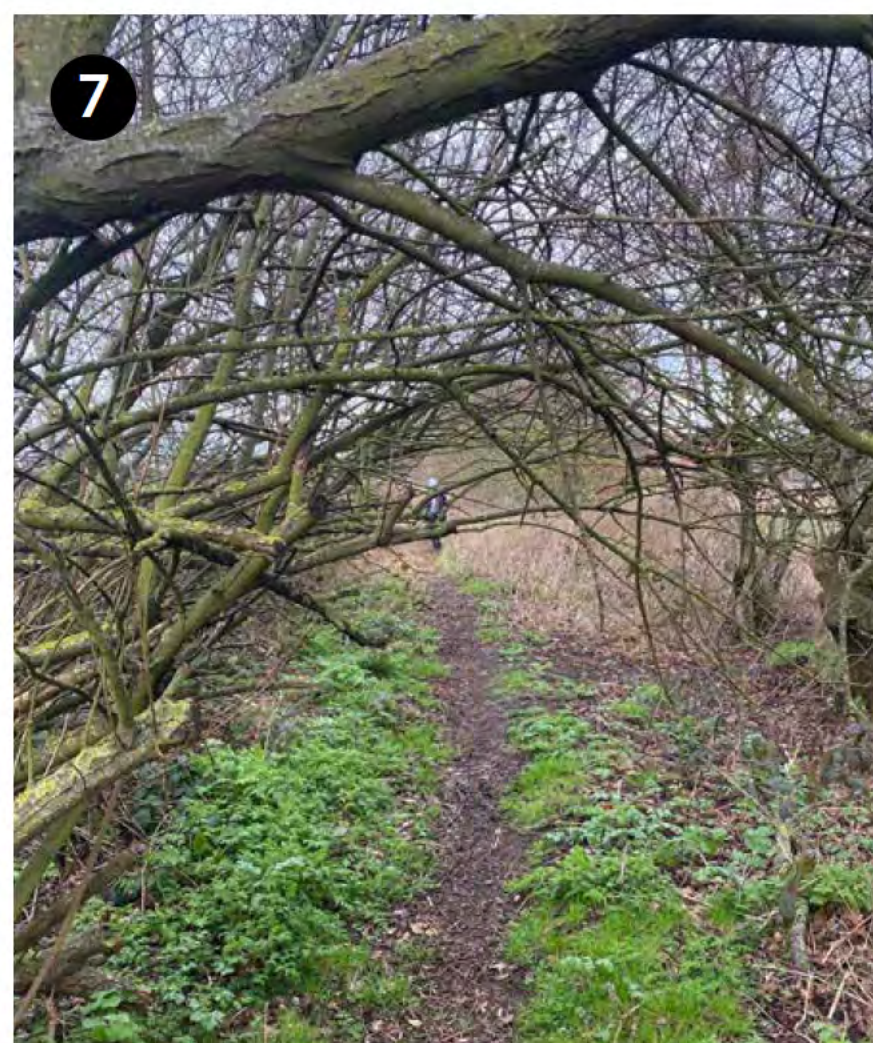




# PHOTOGRAPHIC ANALYSIS (SITE)











**VISIONING**



# LANDSCAPE FIRST



Woodland



Wetland



Sports Pitches



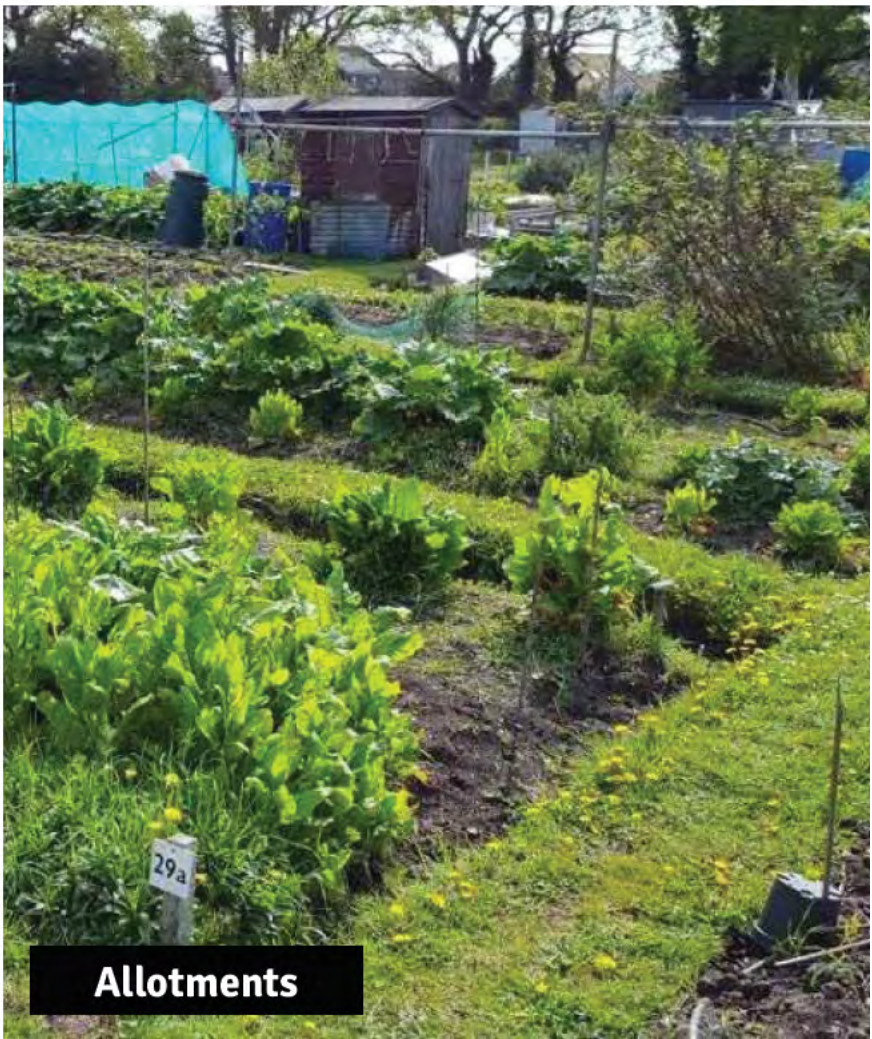
Landscape Corridor



Landscape Buffer



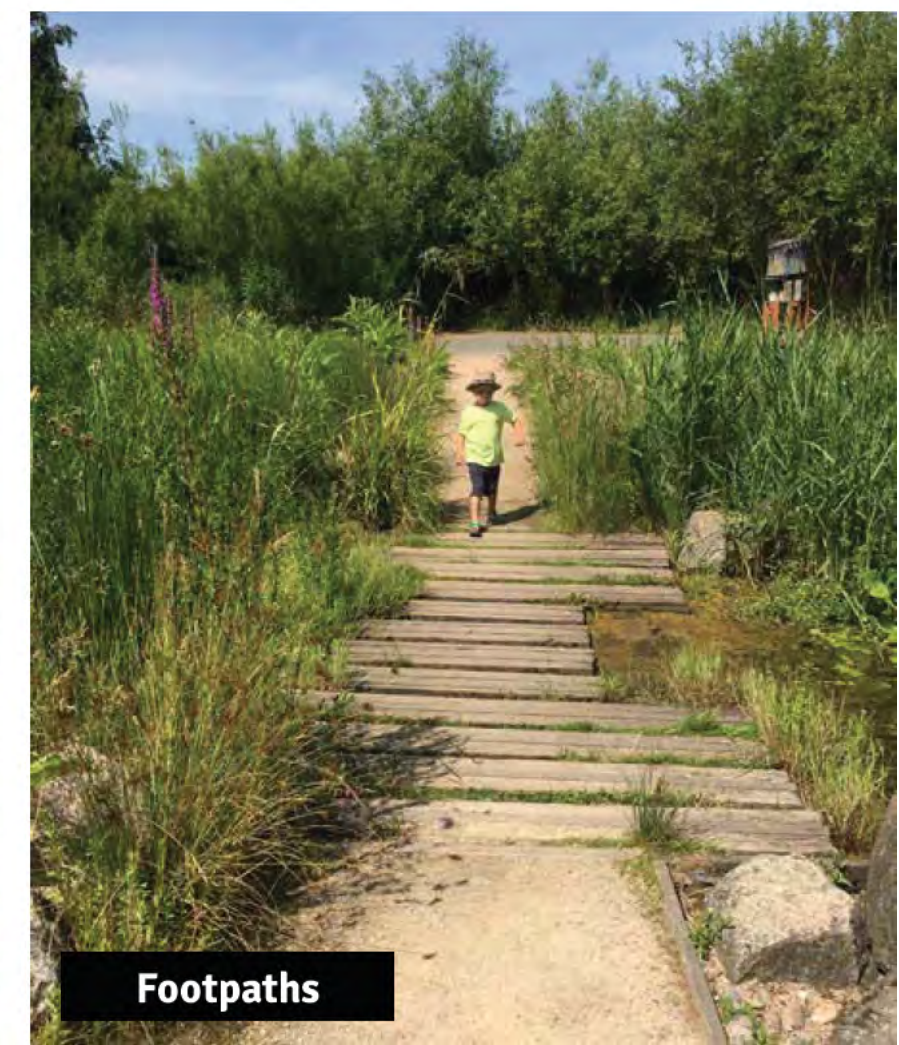
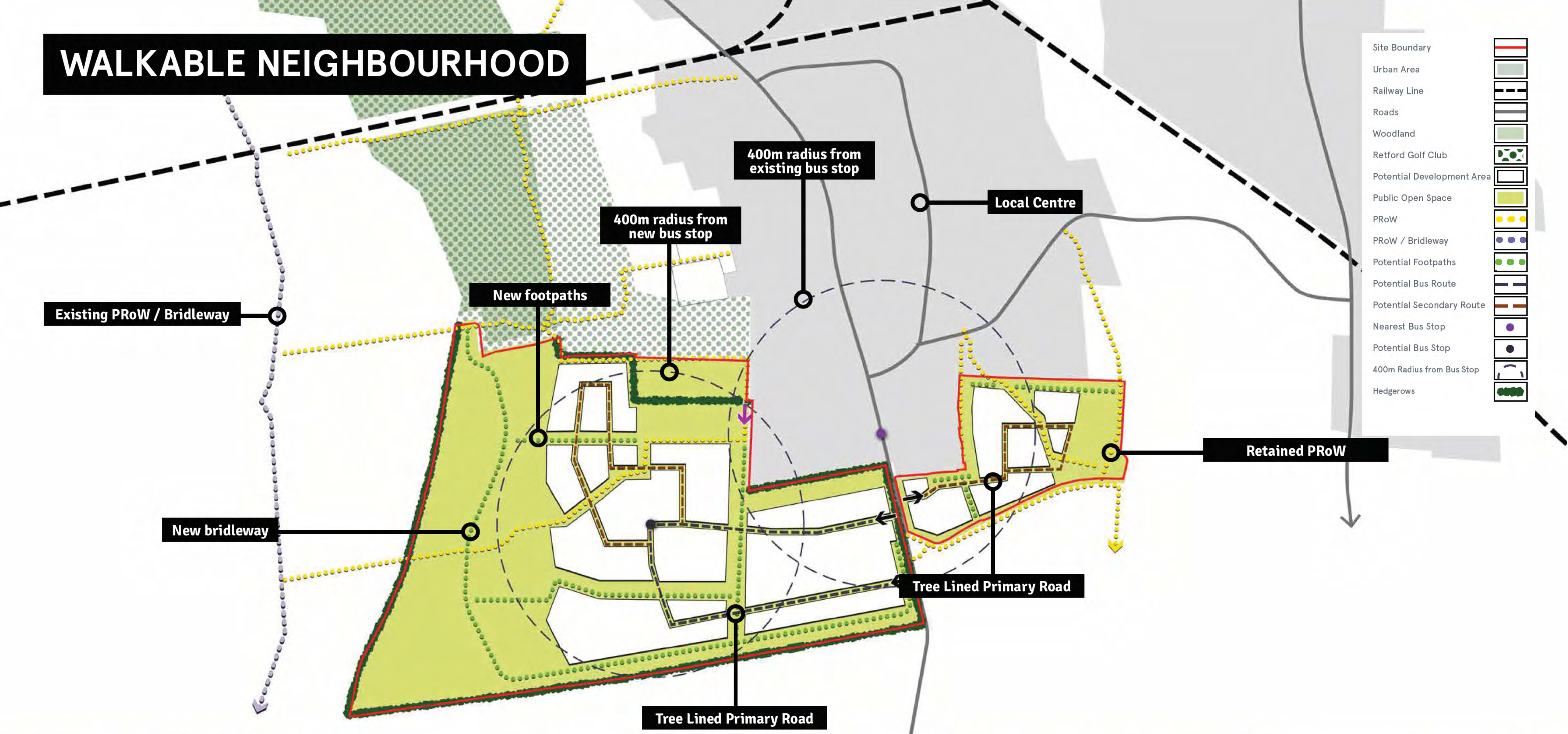
Parkland



Allotments

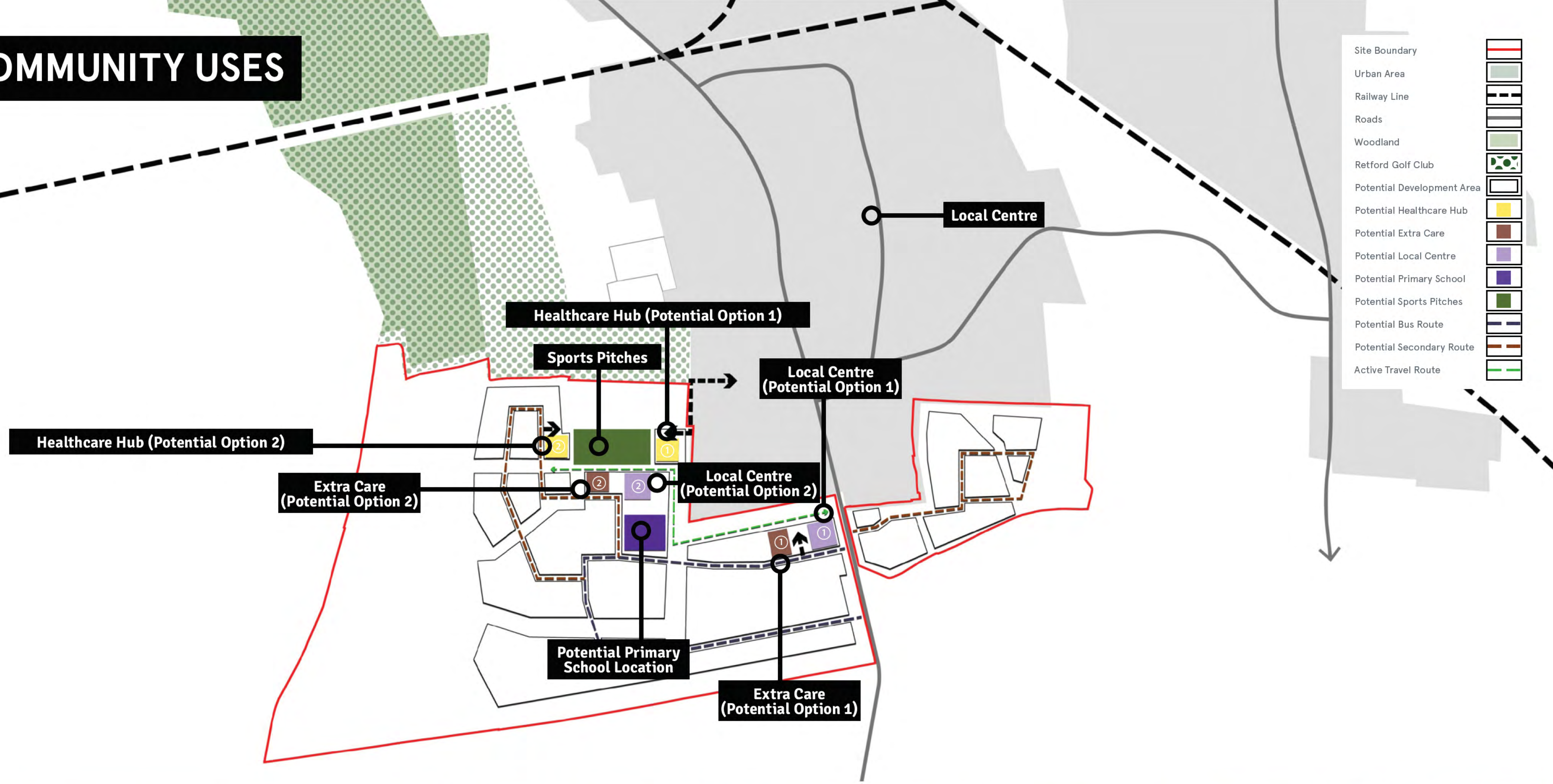


# WALKABLE NEIGHBOURHOOD





# COMMUNITY USES



Healthcare Hub



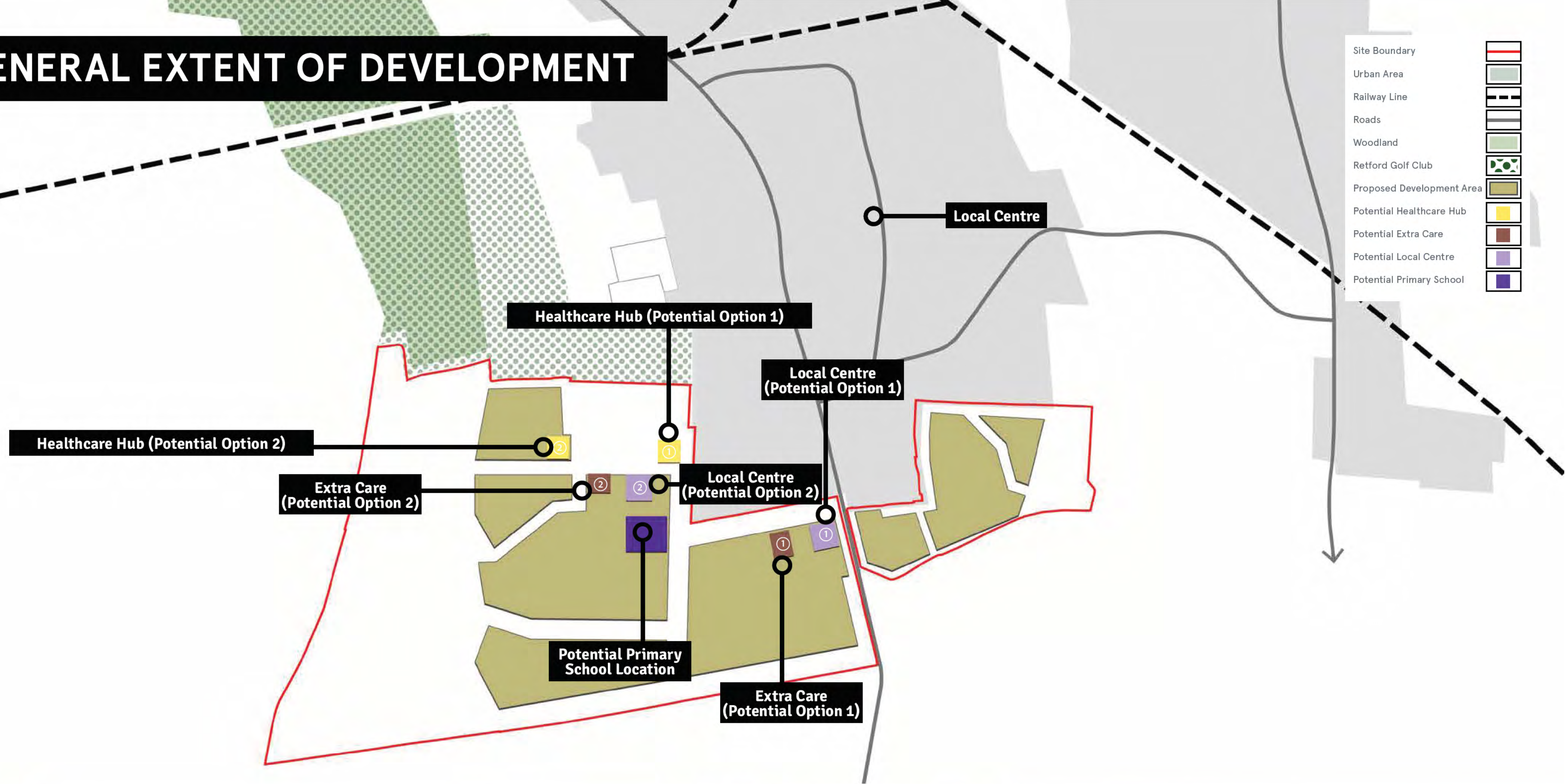
Local Centre



Recycling Centre



# GENERAL EXTENT OF DEVELOPMENT





**APPENDIX 2:**  
**PLANNING PERMISSION [LPA REFERENCE 15/00971/OUT]**

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Draft Bassetlaw Local Plan:  
Focussed Consultation June 2021 and  
Ordsall South Preliminary Concept Plan

Representations on



July 2021

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## **Draft Bassetlaw Local Plan: Focussed Consultation June 2021 & Ordsall South Preliminary Concept Plan**

**Representations on behalf of** [REDACTED]

<b>Project Ref:</b>	26740/A3/DM/jc	26740/A3/DM/jc
<b>Status:</b>	Draft	Draft
<b>Issue/Rev:</b>	01	02
<b>Date:</b>	29 June 2021	7 July 2021
<b>Prepared by:</b>	DM	DM
<b>Checked by:</b>	DM	DM/jc

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Date: July 2021

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## **1 INTRODUCTION**

- 1.1 We write on behalf of [REDACTED] as promoters of land at Ordsall South. Our client is fully supportive of the emerging Local Plan's proposal as it relates to Ordsall South but wishes to make a number of helpful observations in relation to the current consultation process.
- 1.2 These submissions sit alongside our client's duly-made submissions to the Local Plan and we look forward to further engagement with the Council as the Local Plan evolves.

## **2 ORDSALL SOUTH PRELIMINARY CONCEPT PLAN**

- 2.1 As authors of the Preliminary Concept Plan, our client does not wish to comment upon the content of the document which has been produced to help the Council understand the potential of Ordsall South and the development parameters.
- 2.2 Our client is, however, keen to point out that the document does not represent a 'fixed scheme' at this stage. It is the firm view of our client that Ordsall South will be a consultative and dynamic process, with the design evolving in consultation with the community. The aim is to create a new neighbourhood in Retford which provides much needed new homes, homes for young people and the elderly, community facilities and local employment opportunities. This is to be set within an attractive and publicly accessible network of green infrastructure which includes new footpaths and bridleways, community growing and woodlands, formal and informal open spaces and playing pitches.
- 2.3 As the project evolves, our client is producing a number of evidence-based reports to support the scheme including a drainage and flood risk assessment, transport and access reports and ecological impact studies. These will enable the further evolution of the designs for the site.
- 2.4 It is noted that the current Council consultation is 'Focussed' towards specific themes of the Local Plan and this particular site only. In taking this approach, the site is not being considered in comparison with other development locations and will be the sole focus of attention. Our client wishes to note that we support Ordsall South as it represents the best option for development in Retford which is most accessible to both the Town Centre and A1 corridor. Development of this site will negate the need for multiple other sites around Retford in less sustainable locations.

### **3 POLICIES MAPS: RETFORD INSET**

- 3.1 Our client notes that in addition to the allocation boundary, the Policies Maps seeks to wash over the proposed allocation with a 'Green Gap' designation (Policy ST40 refers). We refer to our client's representations to the November 2020 consultation. We do not believe that there is sufficient evidence to support such a designation around Retford.
- 3.2 Also, if proved sound, the designation of the allocation as lying within the Green Gap would cause a policy tension. We fully recognise that the Council has stated its intention to ensure separation of Eaton from south Retford. We believe that this can be better achieved via the creation of good design and strong defensible boundaries via the allocation. The Council could add a criterion to Policy 29 and HS13 to that effect.
- 3.3 The Policies maps now seeks to 'safeguard land' to the western part of the site for a 2-form entry primary school and a health hub. This marks a change from the November 2020 consultation. Whilst the provision of such facilities on site is supported by our client, discussions are yet to be undertaken with Nottinghamshire County Council on the level of provision and where a school should be best located. By zoning the western part for that purpose, it potentially limits the design opportunities on site and might not be in the optimum location. Instead, we would prefer that Policy 29 and HS13 refer to the need for a school and health hub as criteria. This provides the Council with greater flexibility to accommodate the needs of the County Council.



## 4 FOCUSED CONSULTATION DOCUMENT

- 4.1 Our client has reviewed the June 2021 focussed Consultation document subject to this consultation. The following comments are provided:

### *Site HS13: Ordsall South*

- 4.2 Paragraph 7.14.2 states that *"a condition of the redevelopment is that revenue generated by the scheme should be reinvested in the quality of the sports offer at the golf club"*. For the avoidance of doubt, this statement needs to be qualified as it relates only to the parcel of land which is controlled by Retford Golf Club, not the wider site. Clarity is sought from the Council as to how that would be achieved.
- 4.3 Paragraph 7.14.3 states that the Council will approve a masterplan prepared by the promoter. Whilst we accept this general proposition, the Council will need to engage with the consultant team to ensure that the masterplan can be prepared and agreed in a timely manner.
- 4.4 Paragraph 7.14.4 states that construction of the first homes is not expected until at least 2027. Our client disagrees with this timetable in the Trajectory. A more realistic trajectory would be:
- Local Plan reg 19 stage - Autumn 2021;
  - Local Plan Examination – Early 2022;
  - Plan adopted late Spring 2022;
  - Masterplan developed Autumn 2021 (as evidence to the EiP) – adopted by the Council Spring 2022;
  - Planning application (part outline, part detailed for phase 1) – submitted late summer 2022;
  - Application approved end of 2022;
  - Preliminary infrastructure works – Spring 2022;
  - First homes commenced – Autumn 2022;
  - With an anticipated build out rate of 50 homes per year thereafter.

- 4.5 Paragraph 7.14.7 refers to a Retford-Eaton Green Gap. As we set out in our submissions to the November 2020 consultation, we do not believe that there is sufficient evidence to warrant a specific policy on a Green Gap around Retford. However, our client fully accepts the need to ensure that, through good design, places retain individual identity and character. We believe that the intentions of the Council to ensure distinctiveness between Retford and Eaton can be achieved via good design and landscaping rather than a policy tool.
- 4.6 Our client supports the helpful suggestions in paragraphs 7.14.8-7.14.13 relating to the provision of green infrastructure.
- 4.7 At 7.14.14, we refer to our comments above in relation to the policies maps. The location of the school and health hub needs to be further discussed with the County Council. Whilst we agree that it needs to have the very best connectivity, this might be restricted by inclusion of the 'safeguarded land' part of the Council's strategy. We believe that a criteria-based Policy in HS13 would be better.
- 4.8 Paragraphs 7.14.15-7.14.17 relate to transport and access. The text suggest that a new dual roundabout will be required on Ollerton Road. We have yet to discuss this with Nottinghamshire County Council and therefore the text should refer only to new access arrangements to be provided. We note that roundabouts can be expensive and even unsightly, so early discussions with the County Council is essential.

#### **Policy ST58: Safeguarded Land**

- 4.9 For the reason cited above, we do not see the need for part A, 7 of Policy ST58 and consider that the Council's aspirations would be better served by including appropriate wording into Policy 29 and HS13 site specific requirements.

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ENVIRONMENTAL PLANNING  
HERITAGE  
GRAPHIC COMMUNICATION  
PUBLIC ENGAGEMENT  
DEVELOPMENT ECONOMICS

**APPENDIX 3:**

**ILLUSTRATIVE DEVELOPMENT MASTERPLAN [LPA REFERENCE 15/00971/OUT]**

---

## Bassetlaw District Council

Regulation 19 Local Plan (August 2021):  
CIL Draft Charging Schedule (Doc PUB-008)  
Infrastructure Delivery Plan (IDP PUB-009)  
Whole Plan Viability (PUB-0010)

Representations on Behalf of [REDACTED]  
Delivering Ordsall South (Site HS13)

October 2021

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**Bassetlaw District Council**

**Regulation 19 Local Plan (August 2021)**

**Representations on behalf of** [REDACTED]

<b>Project Ref:</b>	26740/A3/DM	26740/A3/DM/jc
<b>Status:</b>	Draft	Final
<b>Issue/Rev:</b>	01	
<b>Date:</b>	14/9/21	5/10/21
<b>Prepared by:</b>	DM	DM
<b>Checked by:</b>	DM	DM/jc

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## **1 INTRODUCTION**

- 1.1 We write on behalf of Howard (Retford) Limited ('our client') who wish to make submissions in connection with the Draft CIL Charging Schedule, Infrastructure Delivery Plan and Whole Plan Viability. (Documents PuB 008, 009 and 0010).
- 1.2 Howard (Retford) Limited is a landowner and promoter active within the district. Our client controls land at Harworth Bircotes which is allocated for employment development under Policy ST7 (Site EM007 Snape Lane) and which benefits from outline planning permission. Reserved Matters have now been progressed on part of this site and our client and their delivery partner (Mulberry Commercial) have held detailed discussions with the Council and County Council regarding the delivery of infrastructure. This provides relevant and recent experience of the issues associated with CIL in Bassetlaw.
- 1.3 In addition, our client controls land at Ordsall South, which is proposed to be allocated under Policy 27 Site: HS13. Our client is keen to work alongside the Council to ensure that the site can be developed in a sustainable manner which provides the necessary social infrastructure.
- 1.4 We have reviewed the Draft Charging Schedule (PUB-008), the Infrastructure Delivery Plan (PUB-009) and the Whole Plan Viability assessment (PUB-0010). The submissions below focus on Ordsall South (Site HS13) and the approach to infrastructure and viability for this Site.
- 1.5 As a point of clarification, the Whole Plan Viability differentiates between 'strategic' sites and other sites, whereas Policy ST15 in the Local Plan does not make that distinction.



## 2 INFRASTRUCTURE DELIVERY PLAN (IDP PUB-009)

- 2.1 The IDP is a recently prepared document (dated August 2021). Paragraph 1.1.4 notes that it is a 'live' document which the Council expects to update annually and if new infrastructure requirements emerge. Our client supports this approach noting that this might require adjustments to viability appraisals accordingly.
- 2.2 Paragraph 3.3 notes that the Council's approach to infrastructure is focused on the following topics:
- Education;
  - Healthcare;
  - Green infrastructure and open space;
  - Transport;
  - Flood management; and
  - Water supply and wastewater management.
- 2.3 These categories are broadly supported by our client. However, it is noted that the provision of infrastructure must be related to the site in question. Appendix 2 of the IDP provides a schedule of costs for Site HS13. We have extracted this in the Table below for ease of cross reference and wish to make several comments.
- 2.4 Whilst our client fully supports the provision of appropriate infrastructure to deliver this site, we are concerned with some the provisional figures and justification for the sought contributions. There is no further detail provided within the IDP as to how the contributions sought have been derived.

### Total contributions & potential errors

- 2.5 The total under the column 'likely contributions' column is £19,962,896. Yet our review suggests that the total of all entries listed is £10,451,448. There appears to be a mathematical error?

- 2.6 In addition, it is noted that a number of the rows in the Table appear to relate to infrastructure required for other sites and might not be related to HS13 (see below). Sites H7, H9 and H10 are referred to (see fourth column). This is particularly relevant to the sought transport contributions.

Education provision

- 2.7 Our client accepts that a primary school will need to be provided on site. This is likely to be a single-form entry school that serves both the development site and wider catchment, plus early years provision. The figure sought of £4,936,648 is based upon the formulaic calculation of number of places only and would be the same approach from NCC even if it was an off-site contribution. Given that our client is providing land for the new school, the standard formula should be reduced or adjusted to take into account land values.

Healthcare provision

- 2.8 Our client accepts that a contribution towards GP provision is appropriate. As we have set out in our masterplan, it is the intention to provide for this on site. On this basis, the costs of the development and land needs to be factored into the approach. It is unclear as to how the figure of £488,000 has been derived.
- 2.9 Our client does not accept a contribution towards Bassetlaw hospital. This is not a standard approach. The notes to this entry suggest that the figure is based upon a standard NHS cost multiple (not evidenced) and general population increase. There is no specific evidence that this is related to the subject site. Further, the notes state that there are no capital improvement projects planned at the hospital, either in general or because of the development of this (and other) Local Plan sites. Such a contribution is therefore unjustified and does not meet the relevant tests.
- 2.10 In respect of adult social care, general taxation and the recently announced National Insurance contributions are the Government's intended funding strategy for enhanced adult social care. NCC cannot seek to tax development for these matters as they are not related to the site and would not meet the relevant tests for contributions.

*Sport facilities and Green Infrastructure*

- 2.11 Our client agrees that these are matters that are integral to the proposed allocation. We accept that some funding might be required. However, it is more likely that the specific requirements will form part of the development scheme rather than as additional costs.
- 2.12 The exception to this is the Country Park. Whilst an important component to the project, there is the opportunity to achieve an exceptional green space for the residential of Ordsall and Retford to enjoy. We very much look forward to shaping the design of this with the Council as the masterplan advances. In addition to the capital investment, the maintenance and stewardship of the Country Park needs to be considered. It might be appropriate for the Council to identify the Country Park at Ordsall as a “district-wide” piece of green infrastructure to which wider CIL / Section 106 funding can be used.

*Flood management / SuDS / Utilities*

- 2.13 These measures will be incorporated into the design of the site. Separate Section 106 requirements are likely to be unnecessary.

*Transport and connectivity*

- 2.14 Our client fully accepts that there will be a need for off-site highway improvements. The schedule below identifies some junctions at a high level. We look forward to more detailed discussions with NCC as the project evolves, particularly as some lines are identified as ‘desirable’ rather than essential.
- 2.15 One observation at this stage is that the sought bus contribution of £1,400,000 is much higher than the ‘total cost’ figure of £460,000. Clarification is sought as to how this has been calculated.

2.16 Extract from IDP Appendix 2 – Site HS13.  
(See **Appendix 1**).

### **3 WHOLE PLAN VIABILITY (PUB-0010)**

- 3.1 Howard (Retford) Limited has undertaken a review of the Whole Plan Viability report as prepared by Nationwide CIL Services (NCS). The findings of this report are that based upon the assumptions used by the Council's consultant, the strategic sites demonstrate no additional viability margin to accommodate CIL Charges. Our client concurs with this finding.
- 3.2 It is, however, noted that the methodology used in the report is based on several scenario testing models using Section 106 costs at £1,750, £3,000, £4,500 and £6,000 per dwelling respectively. In contrast the IDP for HS13 assumes a cost of £15,970 per dwelling. This raises the possibility that the Whole Plan Viability report has underestimated the true costs of development. Whilst the findings would remain unchanged, it might be that sought provision of 25% affordable housing for greenfield sites cannot be achieved in some worked examples.

## 4 SUMMARY

- 4.1 [REDACTED] is keen to work closely with the Council in the delivery of Ordsall South (HS13) as the masterplan and planning application evolves. Careful consideration will need to be given to the phasing of the site to ensure that a positive cash flow can be achieved.
- 4.2 The IDP and Whole Plan Viability assessment provide a useful starting point in the consideration of the required infrastructure in this context. Appendix 2 of the IDP identifies the categories of sought contributions. Further clarification is required for the breakdown of several of the costs sought, particularly where the costs of land needs to be factored in.
- 4.3 [REDACTED] supports the overall conclusion that Site HS13 cannot provide for CIL in addition to the on-site costs and Section 106 requirements. We trust that these representations will be taken into account.

## **APPENDIX 1**

### **EXTRACT FROM IDP APPENDIX 2 – SITE HS13**

Site HS13: Ordsall South, Retford											Phasing			Notes
Infrastructure Type	Infrastructure Item	Location	Site	Priority	Funding mechanism (S106/other)	Total cost	Joint project	Funding received	Funding gap	UKly S106 contribution	1-5 years	6-10 years	11-15 years	
Education, primary	1.0 form entry primary school & 26 place early years facility	Ordsall South	HS13	Essential	S106	4,936,648	N/A	0	4,936,648	4,936,648	Y	Y	Y	Provision of approximately 2.5ha site and financial contribution to provide 1 form entry (210 place) school and 26 place early years facility. Per rise cost based on the contributions outlined in the NCC Planning Obligations Strategy. 236 primary school places @ £20,918 per place
Healthcare, GP surgeries	Non-specific contribution towards a primary care healthcare hub on site	Ordsall South	HS13	Necessary	S106	488,000	N/A	0	488,000	488,000	Y	Y	Y	Y Specific projects and timescales for new infrastructure project have not yet been identified by CCG. The HUDU model and standard NHS floor space requirements for primary
Healthcare, Baseline Hospital	Non-specific contribution towards increasing acute healthcare capacity in the area	Baselaw Hospital, Worksop	HS13	Necessary	S106	55,200	N/A	0	55,200	55,200	Y	Y	Y	Y health care facilities generate the amount of clinical space required per dwelling. Standard NHS costs generate a cost per dwelling based on the future expansion of the population. £610 per dwelling + £69 per dwelling for acute care
Adult Social Care	Extra care housing on site	Ordsall South	HS13	Essential	S106	?	N/A	0	?	?	Y	Y	Y	Y Costs unknown at this stage. To be agreed with NCC Adult Social Care.
Sports facilities	Provision of sports facilities on site	Ordsall South	HS13	Necessary	S106	?	N/A	0	?	?	Y	Y	Y	Y Provision to be agreed at time of application to meet identified needs evidence by Playing Pitch Strategy and Built Sports Facilities Strategy & through discussion with Sport England.
Community centre	Provision of a community centre on site	Ordsall South	HS13	Necessary	S106	?	N/A	0	?	?	Y	Y	Y	Y Cost unknown at this stage
Green infrastructure	Provision of a country park on site	Ordsall South	HS13	Essential	S106	?	N/A	0	?	?	Y	Y	Y	Y Cost unknown at this stage
Green infrastructure	Provision of children's play space on site	Ordsall South	HS13	Necessary	S106	1,080,000	N/A	0	1,080,000	1,080,000	Y	Y	Y	Y Standard BDC costs of provision are £150,000 for a NEAP & £80,000 for a LEAP
Green infrastructure	Provision of multifunctional open space on site	Ordsall South	HS7	Necessary	S106	163,200	N/A	0	163,200	163,200	Y	Y	Y	Y Provision of 4ha open space on site. Based on BDC open space standards of provision 4.4ha per 1000 population. Standard BDC costs of £10,000 per 10,000sqm generate a cost per dwelling of £204.
Green infrastructure	Provision of allotment space	Ordsall South	HS7	Desirable	S106	10,000	N/A	0	10,000	10,000	Y	Y	Y	Y Provision of 10 plot allotment site on site. Standard BDC costs at £10,000 per site
Green infrastructure	Provision of trees to contribute to carbon offsetting	Ordsall South	HS7	Desirable	S106	80,000	N/A	0	80,000	80,000	Y	Y	Y	Y Standard BDC cost of £100 per dwelling
Flood management	Provision of a sustainable drainage scheme	Ordsall South	HS10	Essential	Build cost	?	N/A	0	?	?	Y	Y	Y	Y Costs unknown at this stage. To be agreed with the Environment Agency and LFA.
Transport, highways	Contribution towards improvements at A620 Babworth Road/B6420 Mansfield Road/A620 Straight Mile/Sutton Lane	Retford	HS9	Essential	S106	2,150,000	Y	0	1,920,000	1,920,000	Y	Y	Y	Y Project identification and indicative cost identified through the Mansfield Transport Study 2021. Technical specification and improvements to be agreed with NCC Local highways Authority
Transport, highways	Contribution towards improvements at London Road/Whinney Moor Lane/Bracken Lane	Retford	HS9	Essential	S106	220,000	Y	0	15,000	15,000	Y	Y	Y	Y
Transport, highways	Contribution towards improvements at London Road/Whitehouse	Retford	HS9	Essential	S106	1,080,000	Y	0	85,000	85,000	Y	Y	Y	Y
Transport, highways	Contribution towards improvements at A620 Babworth Road/Ordsall Road	Retford	HS9	Essential	S106	1,080,000	Y	0	90,000	90,000	Y	Y	Y	Y
Transport, highways	Contribution to Ordsall Old Village traffic management scheme	Retford	HS13	Essential	S106	?	N/A	0	?	?	Y	Y	Y	Y Project specification and cost to be agreed through discussion with NCC.
Transport, highways	Contribution to Eaton Village traffic management scheme	Eaton	HS13	Essential	S106	?	N/A	0	?	?	Y	Y	Y	Y
Transport, public transport	Contributions to extended bus service through the site	Ordsall South	HS13	Essential	S38/S278	460,000	N/A	0	460,000	1,400,000	Y	Y	Y	Y Costs based on NCC's Public Transport Planning Obligations Funding Guidance for developers, Jan 2020. It assumes an initial investment of approx. £150,000 for years, and then £80,000 for 2 years. The level and duration of subsidisation to be agreed with NCC
Transport, public transport	Contributions to improved bus stop infrastructure on the site	Ordsall South	HS13	Essential	S38/S278	128,400	N/A	0	128,400	128,400	Y	Y	Y	Y Costs based on NCC's Public Transport Planning Obligations Funding Guidance for developers, Jan 2020. It assumes provision of six bus stops & associated infrastructure @ £21,400 per pair
Transport, walking/cycling	Provision of a new footpath and marked cycle path along the Ollerton Road frontage	Ordsall South	HS13	Essential	Build cost	N/A	N/A	0	N/A	N/A	Y	Y	Y	Y Costs unknown at this stage.
Transport, walking/cycling	Contribution to a cycleway along Brecks Road	Ordsall South	HS13	Necessary	S106	?	?	0	?	?	Y	Y	Y	Y Costs Unknown at this stage.
Transport, walking/cycling	Provision of public right of way extension through the site	Ordsall South	HS13	Desirable	Build cost	?	N/A	0	?	?	Y	Y	Y	Y Costs unknown at this stage.
Transport, walking/cycling	Contribution to a cycle link to Ordsall Old Village	Ordsall South	HS13	Desirable	S106	?	?	0	?	?	Y	Y	Y	Y Costs unknown at this stage.
Utilities, waste water	Waste water management infrastructure and/or treatment upgrades	Retford	HS13	Essential	Build cost	N/A	N/A	0	N/A	N/A	Y	Y	Y	Y This is a prerequisite of development and is factored into the developer's build costs. Provision will be secured via planning condition through discussion with the relevant utility provider.
Utilities, water	Water management infrastructure and/or treatment upgrades	Retford	HS13	Essential	Build cost	N/A	N/A	0	N/A	N/A	Y	Y	Y	Y
Total S106 development contributions required from site										£19,962,896.00				
Number of dwellings allocated in the Local Plan										1250				
Infrastructure cost per dwelling										£15,970.32				



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GRAPHIC COMMUNICATION  
PUBLIC ENGAGEMENT  
DEVELOPMENT ECONOMICS

# NRF-REF007



[REDACTED]

---

**From:**

[REDACTED]  
13 October 2021 15:50

**To:**

The Bassetlaw Plan

**Subject:**

Bassetlaw Draft Plan Representation.

**Attachments:**

bdp2021.docx

External Message - Be aware that the sender of this email originates from outside of the Council. Please be cautious when opening links or attachments in email

This input is in the form of the enclosed attached file. From [REDACTED], [REDACTED].

## Bassetlaw Draft Plan input October 2021

Filename – bdpi 2021

Date 12/ 10/2021

This representation is not in the format requested by the planning inspectorate. I believe this input to be legally compliant, sound, and in the spirit of co-operation. The need to do so is part of my critique of Bassetlaw Draft Plan (BDP) . If this representation is not accepted in format and content I believe disenfranchises freedom of free speech from the general public. I have submitted inputs to previous stages of the plan, noting the radical changes from plan iteration to subsequent plan iteration. My input is specific to my prime interest, conservation of Lound village.

The 2011 existing plan, Core Strategy, categories Lound village as being a category CS9 “No Build”. A paragraph is included in the plan to justify the no build decision.

The January 2020 BDP called for a carte Blanc development housing development tariff right across the Bassetlaw District of 20%, 42 dwelling requirement in the case of Lound.

The Nov 2020 BDP included ST2 definition and category for Lound, with a radically reduced development requirement of 5%, 10 dwellings, and a planning option of further 5% should the neighbourhood plan be adopted.

The current iteration whilst maintaining the previous development 5% requirement now specifies a number of qualifying options to further enable planning permission.

I am no enthusiast of Neighbourhood Plan (NHP). The radically changing BDP development requirement changes from plan iteration to iteration, makes producing any neighbourhood plan an onerous and near impossible task. Evolution, the practice of keeping the best, is preferable to the practice of revolution, changing it all, each time. If BDP had been evolved from the current core strategy, or spatial awareness been incorporated earlier in the plan, much work and angst could have been avoided. Incorporating localism into district planning on the face of it, is appealing. The assumption that development in

itself is desirable, is presumptive. Elections giving residents the option to choose suitable sites for development inevitably gives rise to “Not in my backyard” voting. That results in the larger number residents that live remote to a site determining the fate of those living next to developments.

Currently L neighbourhood plan (NLNP) is away for independent assessment. On its return it is assumed that it will be taken to referendum. Our plans steering group has fostered confidence in residents mainly through our local news sheet “Crier” and I have found out any opposition or any alternative view is certainly not encouraged by our parish council or published in the Crier. It appears highly likely that LNP will be adopted at referendum. Subsequently it follows that the plan would then get gain planning approval. To provide phased introduction of development building LNP suggests that buildings can be built piecemeal basis. This obviously is not what happens for scale and efficiency in the building trade.

Lound development requirement of 10 dwellings up to 2037 is no more than a sustainable growth from natural change of use, possible plot infill, homes specific for rural workers, or an occasional luxury pad for a local footballer.

Given Lounds probable approval of LNP, since the steering group and parish council have a common membership with now the option of a developer led initiative through consultation with the parish council. Lound future development appears to be open ended, and could end up with twice the housing development of other like size neighbouring villages. That will go down well in a village, where the residents survey of 2017 showed that 93% of residents wanted no appreciable change. May I suggest ??

Drop LNP in its present form, or don't take it to referendum. Critically examine Lounds inclusion as being ST2 small settlement, in light of passed history. Accommodate development through change of use of existing agricultural buildings on the main proposed site. That should give a start to forming an acceptable solution.



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# NRF-REF008



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 14 October 2021 12:13  
**To:** The Bassetlaw Plan  
**Subject:** Representations on the Plan  
**Attachments:** Retford Civic Society representations.pdf

External Message - Be aware that the sender of this email originates from outside of the Council. Please be cautious when opening links or attachments in email

Attached to this email is a pdf setting out representation from Retford Civic Society on the publication version of the Bassetlaw Local Plan. Please acknowledge receipt and confirm that the Society's representation will be passed in full to the Inspector appointed to examine the Plan.

## **Bassetlaw Local Plan**

### **Representations to the Local Plan Inspector by Retford Civic Society**

**October 2021**

#### **Introduction**

Retford Civic Society is a registered charity. It has almost 300 members and has been in existence for over 30 years. In that time it has organised and carried out around 100 projects to improve the Retford environment, bringing in several million pounds in grant funding. In 2015 it was presented with the Marsh Civic Award, the highest accolade available in the Civic Movement, for its 'Outstanding Contribution to the Civic Movement'. The Society is very much in favour of development which benefits the town. Although it reviews all local planning applications, it rarely opposes the principle of new building.

The Society has for some years been pressing Bassetlaw District Council to get a Local Plan adopted so that control over the scale and location of development can be regained. It has sought to be positive in its comments on previous drafts. However there are elements of the Plan now being put forward for examination which are considered unacceptable. The Society has made its concerns clear to the Council in correspondence and at meetings but has received no satisfactory explanation. Consequently, it has no alternative but to object to the Plan as submitted and to request that the Inspector finds it unsound unless it is changed so as to address the Society's concerns.

#### **The scale of housing growth.**

Retford Civic Society objects to the number of houses provided for in the Plan. In the Society's opinion it is excessive and should be reduced to a number close to that indicated by applying the Government's 'standard method' of assessment. There is insufficient justification for departing from the 'standard method' of assessment to the extent proposed and because of this the Plan as submitted should be judged unsound.

Providing so many houses will result in unnecessary loss of greenfield and agricultural land. If the houses are all built it will result in existing residents experiencing additional traffic, pressure on infrastructure and loss of valued views and open spaces to a greater extent than is necessary. If they are not all built within the period of the Local Plan it will restrict the ability of local people in the future to determine the appropriate form and location of development having regard to circumstances at the time.

The table below records the number of dwellings completed in recent years. The average since 2006 has been 395 dwellings a year (dw pa). There has been a relatively high rate recently but that has reflected catching up after the last recession together with the fact that BDC has granted a very large number of permissions - equal in 2020 to 10.5 years supply of housing land. It is not indicative of a long term trend. In only 2 of the 15 years have completions exceeded 591 dw pa which the Plan states is the housing requirement. Only once, in 2020-2021, have completion reached 717 dw pa – the scale of provision actually proposed in the Plan. If the Local Plan is adopted with too high a housing requirement there is a real risk that annual completions will fail to meet this. Actual delivery may well be below 75% of what the Plan says is required. Should that occur the benefit of having an adopted plan, in terms of the ability to control house building, would be lost as the Government's Housing Delivery Test would result in there being a presumption in favour of development even where it involves land not allocated for development.



	2006 -07	2007 -08	2008 -09	2009 -10	2010 -11	2011 -12	2012 -13	2013 -14	2014 -15	2015 -16	2016 -17	2017 -18	2018 -19	2019- 20	2020 -21
Dwelling completed	331	541	359	160	264	303	226	249	241	338	462	551	434	694	775

Source. BDC monitoring reports

Applying the ‘standard method’ of assessment, the need for housing is 288 dw pa. Over the 17 years of the Plan this is equivalent to 4896 dw. The Plan provides for 12198 dw or 717 dw pa across the Plan period, which is almost 2.5 times what is required by the ‘standard method’.

No reasoned explanation has been provided for the decision to plan for such a massive number of new dwellings. During the consultation periods notices displayed widely by the Council claimed that the scale of housing provision was required by the Government. When in June 2021 the number of houses in the proposed Ordsall allocation was increased from 800 to 1250 Cllr White, the BDC Cabinet member with responsibility for the Plan, was quoted in the Retford Times (on 17 June) as saying:

*The Government has a national target of delivering 300,000 new homes a year. This is placing a significant pressure on BDC to build more houses as we have to meet our share of this figure. ....I agree with local concerns, the increase from the original commitment of 800 houses (at Ordsall) is unwanted and unexpected but government planning policies which prioritise developers’ interests over community benefits have backed us into a corner. .... If there were options available to restrict the expansion they would have been taken.’*

The clear message to the public has been that the scale of house building is dictated by the Government and cannot be disputed. That is simply untrue.

National Planning Practice Guidance states that in some cases it may be appropriate to exceed the provision indicated by the ‘standard method’. Circumstances where this may apply include, but are not limited to, situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.

None of these circumstances apply in Bassetlaw. There are no national or regional growth strategies pointing towards accelerated growth in Bassetlaw. No strategic infrastructure improvements are planned. There is no requirement to meet the housing need of adjoining authorities – indeed Doncaster’s recently adopted Local Plan provides for 57% more houses than required by the ‘standard method’ of assessment.

BDC claims that the scale of housing growth is justified because of the need to keep housing in balance with the growth in employment. This is examined in three separate reports to BDC by consultants GL Hearn.

Hearn's January 2019 report analysed the structure of local employment and applied national projections to estimate how it might change. Their conclusion was that employment was likely to grow by 3,400 jobs during the Plan period and that this would require about 63 ha of employment land and housing growth of 390 dw pa. (Hearn 2019 Paras 1.8 and 1.9)

It should be noted that Hearn's reports all take into account widely varying estimates from several independent organisations and involve a large number of assumptions about such things as employment density, plot ratio, commuting patterns and household structure all of which introduce considerable margins for error into the calculations.

In July 2020 Hearn reviewed its previous study based on updated information. They concluded that employment growth during the Plan period was likely to be 3800 jobs (para 1.6) - slightly more than previously projected. The requirement for employment land was also raised a little to 84 ha (para 1.11). No specific recommendation for the scale of house building was made, but a spectrum of possible requirements was set out ranging from 236 to 519 dw pa (table 6).

In November 2020 Hearn produced a third report. They had been asked to consider the implications of employment growth at a higher rate than previously judged likely, having regard to the extensive area of employment land being promoted in the Plan.

They accepted (page 32) that it is valid to test a growth scenario where manufacturing and transport jobs perform more strongly than indicated in previous projections. Full development of all the identified employment sites, except for Appleyhead, would in their view produce 5878 additional jobs. Development of the Appleyhead site would produce 3857 to 5358 further jobs (table 16 page 36). These figures are far in excess of the 3800 additional jobs forecast as likely.

In Table 19 (page 44) they set out alternative estimates of the need for additional houses. These range from 236 dw pa to 646 dw pa. The latter figure assumes that all employment sites would be fully developed and that the Appleyhead site would deliver a high job density. A lower job density at Appleyhead would give a housing requirement of 591 dw pa – again assuming all the identified employment sites are fully developed. They conclude that the most realistic and reasonable upper range for Bassetlaw to test in its Plan is 562 – 591 dw pa.

It is significant that in Hearn's third report they state again that the latest forecast, adjusted for growth sectors, is 3,800 additional jobs to 2037 (para 4.23). They do not depart from their views that manufacturing employment is likely to keep falling (Hearn January 2019 para 7.16) and that the potential in the area for large scale distribution remains relatively untested. (Hearn Jan 2019 para 10.8). They do not recommend adopting any other figures. They merely advise BDC that if it considers that higher than expected employment is likely it should test the implications of providing 562 – 591 dw pa. There is no indication that BDC has carried out any further analysis or that they have undertaken the testing recommended by Hearn.

When compared with Hearn's estimate of 3800 additional jobs during the Plan period, the assumption in the Plan that there will be 9735 additional jobs is wholly unrealistic.

BDC appears determined to plan for an exceptionally high rate of housing growth for reasons which are entirely unclear. Despite repeated requests by Retford Civic Society, no explanation has been provided for the choice of 591 dw pa (the maximum of the range which Hearn suggested should be tested) as the housing requirement for the Plan. The actual proposal in the Plan is for even more than this, as provision is made for 12,198 dw or 717 dw pa. There is simply no justification for this scale of housing provision. And there is nothing to show that BDC has seriously evaluated any

alternatives such as planning for a level of housing provision close to that resulting from application of the Government's 'standard method' of assessment.

Retford Civic Society is keen to see more jobs being provided in the District. But to plan on the basis that all identified employment sites will be fully developed within the Plan period is wholly unrealistic. It would require a sustained expansion of employment on a scale never previously seen.

Bassetlaw has been seeking to attract inward investment and new jobs for a long time. However, the servicing of employment land has been a constant problem, generally relying on limited public sector investment and there is no evidence that this investment will come forward during the Plan period on the scale assumed. Once serviced, employment sites have generally taken a long time to fill up. Although there have been a few instances of individual large scale developments leading to what Hearn refers to as 'outliers' in the take-up of employment land, these have been exceptions and progress has been steady rather than dramatic. There is no reason to believe things will change to the extent implied by the maximum of the range which Hearn considered worth testing, let alone to an extent which would justify the level of housing actually proposed in the Plan.

Despite repeated requests from the Retford Civic Society, BDC has failed to tie the servicing of Retford's only employment allocation to the development of adjacent housing land in the same ownership. Requiring that some of the profit from this housing development be used to service the employment land would ensure that plots which can be used by individual businesses are made available in a timely manner. Without such a requirement there will be no incentive for Trinity Hospital to bring forward the employment land and the charity's past performance suggests that it may be a very long time before they do so. The first phase of their Randall Way employment site (which is now to be extended) was allocated for development in the late 1980's but it was almost 20 years before anything was done to make the land suitable for business use. BDC's failure to grasp this simple opportunity and the lack of detail about implementation elsewhere calls into question their assumption that employment land generally will be developed at a greatly accelerated rate.

While it is reasonable to hope for more success in attracting new jobs, employment sites in Bassetlaw will be competing against those in neighbouring authorities. Nearby Doncaster in particular has well developed and funded plans to continue its expansion of jobs centred on ready access to the A1, M18, Robin Hood's Airport and the regional rail hub.

Retford Civic Society considers that the scale of house building provided for in the Plan is unnecessary, unjustified, harmful and wholly disproportionate. It should be reduced to close to that indicated by the Government's 'standard method' of assessment. In the unlikely event of employment growth occurring at such a rate as to warrant accelerated housing provision this could be dealt with in a future review of the Plan.

### **New Village**

Retford Civic Society supports in principle the proposal for a new village at Five Lanes End. It is essential, however, that this development does not start until there is a mechanism in place to ensure that retail and other community facilities, including public transport services, are in place at an early stage to serve residents. This should be clearly stated in the Plan. There must be no possibility of the development ending up as little more than a housing estate in the countryside.

### **Housing in Retford**

Retford Civic Society considers that the proposed extension to Ordsall is not needed and could be simply removed from the Plan if a more sensible housing target were adopted. Even if house

building on the District-wide scale proposed by the Council is accepted, putting so many more houses into Ordsall is unacceptable.

A recent by-election has made it clear that this element of the Plan is opposed by most people who will be affected by it. Longstanding ward councillor Helen Richards, who was part of the ruling labour party, resigned her seat and membership of the party in protest at its continued inclusion in the Plan. In the subsequent by-election, at which the Ordsall allocation was a key issue, she just failed to be re-elected. The seat was won by a conservative candidate for the first time in many years. He shared her view on this matter and altogether 80% of those who voted supported candidates opposed to the expansion of Ordsall as proposed in the Plan.

This is a very large allocation of land. It is unclear why BDC has decided to concentrate so many houses in one place rather than spread them around in a number of smaller sites which would be more easily absorbed by the community. The failure to adequately explain this proposal was highlighted when the June 2021 version of the Plan increased the number of houses proposed here from 800 to 1250. The only explanation for this increase ever provided by BDC was in the press statement by Cllr White quoted above which claimed it was required by government planning policies. There was no relevant change in Government planning policy between the November 2020 and the June 2021 versions of the Plan and there is nothing in Government Policy which required the number of houses proposed at Ordsall in previous drafts of the Plan or which required that number to be increased in the June 2021 version of the Plan.

Ordsall was once a relatively small village. It has already expanded a lot in recent years with minimal improvement to the local infrastructure. What is now proposed would see its population double relative to what it was in 2011.

This would lead to a very considerable increase in traffic on local roads. Improvements to a few junctions would not off-set the narrowness of many of these roads or remove the two pinch-points at the river bridge and where West Carr Road crosses the railway. Although improved facilities for cycling are suggested, the cycle lane along West Hill Road is likely to adversely affect local residents who need to park in the highway and the cycle lane along Brecks Road is impractical as the highway is too narrow. The increased traffic generated by 1250 more dwellings would inconvenience local people, making the area a much less pleasant place in which to live and this is unacceptable when there are alternatives available.

The Plan indicates that implementation of this housing allocation will bring with it substantial community benefits. There is very little to indicate how this would be achieved or to show that the proposal as a whole would be deliverable.

The only specific built provision required in the Plan is one community shop but many villages of this size can no longer support an established shop. Even with 1250 houses occupied the viability of a shop here is far from certain. There is nothing to indicate how and when the other proposed facilities would be provided.

It is unlikely that BDC would be able to run and maintain the country park, or to provide and maintain the sports pitches, changing rooms and other community facilities, or that these would prove attractive to any commercial or charitable operator. The local County Councillor has confirmed that the Education Authority has no plans to build a new school here. There is no indication that the health authorities would provide building based services here.

The Ordsall allocation should not proceed unless and until all this provision is secured as otherwise what is proposed in the Plan may not be deliverable and there is a very real risk that what would be provided would be just another big housing estate with minimal facilities, situated as far within Retford as it is possible to be from the facilities of the town centre. It would disproportionately increase the amount of travel by car and do little to benefit Retford town centre.

### **Retford Town Centre**

The Society regrets the lack of detailed proposals for Retford town centre in the Plan. However it is working with others to address this by producing a Neighbourhood Plan for the area.

Policy ST14 is generally welcomed as it will help protect the vitality and viability of Retford town centre. However, it applies only to areas defined on the Proposals Map as 'Primary Shopping Area'. Within Retford this excludes the area known as Cannon Square. The Society objects to this omission which fails to reflect the character and importance of this area.

Cannon Square is in the conservation area and has a very high concentration of listed buildings. It is an important and distinctive part of the town centre. Indeed the cannon features regularly on publicity material for the town. Although the centre of gravity of commerce in the town centre has shifted south, historically Cannon Square was the focus of retail activity and on the ground floor all the premises from the Olde Sun Inn to the library are still in commercial use. Almost all still have shop fronts, many of which are traditional in form with narrow fascias and ornamental woodwork at the sides. Several original archways remain which would previously have provided access by horse, coach or cart to the rear of the premises.

The character of Cannon Square as part of the commercial and historic town centre must be conserved and where possible enhanced. It could be seriously harmed if ground floor premises are converted to residential use. This would break up the continuity of business frontages, reduce footfall and the attractiveness of other premises for business use, and erode the character of the area as a whole. To prevent this and help conserve the character of the area, the Society considers that an Article 4 Directions restricting change of use from Class E to residential should be made.

BDC has indicated recently that it does not intend to consider any Article 4 Directions restricting change of use from Class E to residential until after the Plan has been adopted and that in Retford any such Direction should be considered as part of the Neighbourhood Plan. However Government policy is that such Directions should only apply in very limited circumstances and it is unlikely that Cannon Square could be protected in this way unless it is included within the defined Primary Shopping Area.

No significant reason has been put forward by BDC for excluding Cannon Square from the Primary Shopping Area and for this reason the Society considers the Plan unsound and unsatisfactory. The Plan should be amended to include the Cannon Square area within the Primary Shopping Area so that this area can be properly protected and conserved and so that the obstacle to a future Article 4 Direction arising from it being outside the designated Area is removed.

Retford Civic Society

October 2021

# NRF-REF009



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 15 October 2021 09:59  
**To:** The Bassetlaw Plan  
**Subject:** Representation on the Local plan  
**Attachments:** Local Plan to inspector BB.docx

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Attached are comments from me on the latest Local Plan. Please acknowledge receipt and ensure they go before the appointed inspector.

[REDACTED]



15 October 2021

Phone [REDACTED]

Dear Sir,

### **Bassetlaw Local Plan**

I would like the following comments on the publication version of the Local Plan to be considered by the Planning Inspector when the Plan is examined. Please confirm that they will be passed in full to the appointed person.

#### **Introduction**

I am a member of Retford Civic Society and have been involved in drawing up the Society's representations on the Local Plan. I support these representations but to save the Inspector's time will not repeat them here.

There is one element of the Plan which I am personally opposed to but which has not been fully addressed by the Civic Society as it is largely outside its area of interest.

#### **The proposed new village**

For many years local and national planning policy has favoured concentrating new housing in, and adjacent to, existing built-up areas to minimise the amount of travel by car to schools, shops, jobs and other facilities. New villages have been promoted elsewhere in the country largely only where green belt and other restrictions make it very difficult to find room for development. It is not clear why Bassetlaw District Council is so determined to develop a new village. Earlier versions of the Plan proposed new villages at Gamston Airfield, Bevercotes colliery and Cottam power station but these sites have been dropped in favour of one at Five Lanes End.

The proposed new village is not needed as housing need can be met without it. It would lead to much more travel by car than would be the case if the same number of houses were built in or next to existing built-up areas.

The Plan suggests that residents of the new village would benefit from good bus and train services, but this is unrealistic. It is very unlikely that a railway station would be viable even if the new village eventually reached 4000 houses. It would certainly not be viable within the period of the Local Plan. Many Bassetlaw villages now have no bus services at all, and the only villages with a regular service are those on routes between larger centres such as Retford to Doncaster or Retford to Newark. The proposed new village would not be on such a route. It is suggested that services would be subsidised by the development, but this is not sustainable in the long run. It is likely that most people in the proposed village would be wholly dependent on the car for travel.

The Plan suggests that the new village would have extensive cultural, recreational and shopping facilities. By the end of the Plan period it would have only some 500 homes. Few if any Bassetlaw villages of that size can now support even a shop. For many years the village will be little more than a housing estate in the countryside. During that time residents will have become reliant on travel to larger centres for shopping, education, recreation and employment. Even if the village eventually reaches a population of 4000 it is not clear where the finance will come from to provide all the promised facilities and, in particular, to run them in the long term. Many villages of 4000 houses cannot support primary and community healthcare facilities, sports pitches and changing accommodation or a secondary school. Those that can are generally service centres for a surrounding rural area and several smaller villages and therefore have a



large population supporting their facilities. Because of its location, this new village will not have that function but will be very much a stand-alone community. There is a very serious risk that the extensive facilities suggested in the Draft Plan will never materialise.

It is suggested that the development would incorporate high standards of design in relation to buildings, landscape and the environment generally. This is of course welcome, but such standards should be expected of all new development and do not require the establishment of a new village.

**The concept of a new village in Bassetlaw is unnecessary, unsustainable and probably not deliverable in the manner proposed in the Plan. It should be removed from the Plan. If the scale of house building proposed is reduced to close to that indicated by the Government's 'standard method' of assessment, this could be achieved without wider implications for the Plan as a whole.**

Yours faithfully

A solid black rectangular box used to redact the signature of the sender.

# NRF-REF010



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 October 2021 11:15  
**To:** The Bassetlaw Plan  
**Subject:** Bassetlaw Local Plan 2020-2037 Publication Version August 2021

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We write to register our concern about the "Soundness" of one aspect of the above as it relates to rural growth. A change in Paragraph 3 of Policy ST2 since the November 2020 version introduces a statement implying that a "developer-led pre-application community consultation" could replace a neighbourhood plan when support for residential development is being considered.

The expression "developer-led" is very worrying as a developer's opinion on what is reasonable or proportionate would surely be less impartial than that of the local community. We applaud the enormous amount of work that our Neighbourhood Steering Group has undertaken and accept the contents of the Bassetlaw Local Plan as it concerns our village with the exception of this latest change.

We strongly believe that the reference to a "developer-led" consultation should be removed.

[REDACTED]

[REDACTED]

# NRF-REF011



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 19 October 2021 16:46  
**To:** The Bassetlaw Plan  
**Subject:** Walkeringham Parish Council - Comments

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The Parish Council would like to comment that the Draft Local Plan is now out of line with the adopted Walkeringham Neighbourhood Plan. The Local Plan has adopted a 5% maximum growth whereas Walkeringham's NP is much higher. This was based on advice from the Planning/NP Team at BDC during the development of the NP. The Parish Council would like to understand which takes precedence when considering planning determinations and whether or not that the higher levels that many rural parishes have adopted is fair.

Kind Regards

[REDACTED]  
**Clerk to Walkeringham Parish Council**  
<https://walkeringham.info>

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# NRF-REF012



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 20 October 2021 12:14  
**To:** The Bassetlaw Plan  
**Subject:** Local Plan consultation

External Message - Be aware that the sender of this email originates from outside of the Council. Please be cautious when opening links or attachments in email

Dear Sir/Madam

The Harworth & Bircotes Town Council has no issues with the Local Plan and supports its on-going progress towards completion.

Yours faithfully

[REDACTED]  
Officer  
Harworth & Bircotes Town Council

**NRF-REF013**





[REDACTED]

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**From:** [REDACTED]  
**Sent:** 19 October 2021 10:13  
**To:** The Bassetlaw Plan  
**Subject:** Reg 19 Consultation Response - [REDACTED]  
**Attachments:** CIL Reps Form.pdf; BDC Reg 19 Reps LOR.pdf

External Message - Be aware that the sender of this email originates from outside of the Council. Please be cautious when opening links or attachments in email

Dear Sir/Madam

Please find attached representations in relation to the Reg 19 Bassetlaw Plan and CIL consultations on behalf of [REDACTED]

Could you please acknowledge safe receipt?

Kind regards

[REDACTED]  
Director (Planning)

Crawley: 01293 763086  
Maidstone: 01622 776226

Email: [REDACTED]



planning transport design environment infrastructure

[www.dhaplanning.co.uk](http://www.dhaplanning.co.uk)

Maidstone Office: 01622 776226 | Crawley Office: 01293 763086

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Bassetlaw District Council  
Planning Policy  
Queens Buildings  
Potter Street  
Worksop  
S80 2AH

Our ref: JB/MA/16129

19 October 2021

Dear Sir/Madam,

**DRAFT BASSETLAW LOCAL PLAN REGULATION 19 REPRESENTATIONS  
ON BEHALF OF LAING O'ROURKE**

This letter is prepared on behalf of [REDACTED] in respect of the Bassetlaw District Council Regulation 19 Local Plan consultation held between September and October 2021.

Our client controls the Centre for Excellence in Modern Construction (CEMC) (formerly known as Explore Industrial Park), near Worksop, which is Europe's largest and most advanced pre-assembly manufacturing facility. Laing O'Rourke has been developing the site for industrial development over the last few years. We welcome the fact that the site has been properly recognised as forming an important part of the Council's economic development strategy in the emerging Local Plan.

**Centre for Excellence in Modern Construction (CEMC)**

As previously mentioned in our Regulation 18 letter, our client controls the CEMC, which is a major cross-boundary employment site to the west of Worksop. The CEMC site is a large former quarry, colliery and brick refractory site which was acquired by Laing O'Rourke in 2007. The site area is divided almost equally between Bolsover (Derbyshire) and Bassetlaw (Nottinghamshire). However, the area within Bassetlaw district comprises the most developable land.

Planning permission was granted in 2007 for the existing pre-cast concrete manufacturing facility,<sup>1</sup> followed in 2010 by outline planning permission for a master-planned class B1/B2/B8 off-site manufacturing hub on the wider CEMC site.<sup>2</sup> Due to the nature of the proposal, 10 years were allowed for the submission of reserved matters.

<sup>1</sup> Bassetlaw reference 02/07/00278

<sup>2</sup> Bassetlaw reference 02/08/00530

planning transport design environment infrastructure land

t. 01622 776226 e. [info@dhaplanning.co.uk](mailto:info@dhaplanning.co.uk) w. [www.dhaplanning.co.uk](http://www.dhaplanning.co.uk)  
Maidstone Office, Eclipse House, Eclipse Park, Sittingbourne Road, Maidstone, Kent, ME14 3EN  
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Our client has invested millions of pounds into the site to date. A new off-site manufacturing facility making pre-cast concrete products was constructed in 2008 together with a new access road onto the A619. In addition, other enabling works have taken place, including decontamination of the entire site, ecology translocations and the creation of a substantial new ecological mitigation area, interim drainage works including the realignment of part of Darfoulds Dyke in accordance with the approved masterplan and structural landscaping across the site. Development platforms have also been created across the entire site. The site has therefore been subject to substantial investment to ensure that it is ready and available for development.

Planning permission has since been granted for a further large-scale manufacturing facility (the "AMF") to the west of the current factory, within Bassetlaw district. Development has formally commenced on that site.

There are two further development parcels available for development within the part of the site falling within Bassetlaw district, both of which are currently used on an interim basis as open storage and car parking in association with the existing factory use, for which planning permission was granted in 2018. However, the longer-term plan is to develop further industrial buildings on these parcels. Overall, around 16ha of employment land is available at the site within Bassetlaw.

Two prototype buildings (an apartment block and a large house) have been constructed on one of the Bolsover plots, for testing and marketing purposes in order to showcase the company's products.

Around 270 people are employed at the existing manufacturing facility. Once developed in full, the permitted masterplan scheme is likely to employ in excess of 1,000 people overall (including the sites within Bolsover as well as those in Bassetlaw).

### ***Current Bassetlaw Local Plan***

The site does not benefit from any specific designations on the current 2011 Proposals Map. As a result, in planning terms, the site is treated as being in the open countryside.

The adopted Core Strategy and Development Management Policies DPD 2011 is silent in relation to the site. As a result of the site not being formally recognised as an employment site, and being located in the countryside, Policy DM1 (Economic Development in the Countryside) applies. This policy is aimed at rural employment uses generally, rather than a major employment development site such as CEMC.

### ***Scope for future development***

Whilst all of the plots within that part of CEMC within Bassetlaw are either in permanent or temporary use, some of the existing plots are being currently used for external storage on an interim basis rather than the more intensive and substantial uses proposed in the permitted masterplan. These plots remain available for longer-term development for employment uses. It is noted that the GL Hearn Bassetlaw Housing and Economic Development Needs Assessment November 2020 recognised that:

*"The expansion of Laing O'Rourke's Explore Steetley site is also an indicator of the advanced manufacturing and assembly in modern construction in the District."*

Laing O'Rourke regularly bids for major construction projects, some of which may require further facilities to be constructed at CEMC, depending on the nature and location of the project. Laing O'Rourke has previously undertaken pre-application discussions with Bassetlaw District Council about plans for such potential buildings, although to date the buildings have subsequently not been required. However, in the event of a successful bid requiring a new facility to be constructed, it will often be necessary to erect the building quickly.

As a result, whilst at present there are no detailed proposals for any of the under-utilised Bassetlaw plots, that position is liable to change rapidly should a particular contract require development of these plots.

### ***Bolsover Local Plan 2020***

The Bolsover Local Plan 2020 allocates the developable parts of CEMC within its jurisdiction for general employment uses. Unlike the previous outline permission, these are not restricted to off-site manufacturing uses.

To date, Bassetlaw and Bolsover District Councils have worked closely on all strategic matters relating to the CEMC site. For example, the Councils collaborated closely on the outline planning permissions, which include the same conditions and wording on both permissions.

### **Comments on the Regulation 19 Local Plan**

#### ***Policy ST7: Provision of Land for Employment Development***

We strongly **support** the formal allocation of the site for general employment development under Policy ST7(4).

**We do however request that the site name is updated to reflect its new title: the Centre of Excellence for Modern Construction.**



***Policy ST10: Existing Employment Sites and Buildings***

We **support** the changes to this policy, which address the concerns set out in our Regulation 18 response. Specifically, we welcome the addition of the words “and/or” at the end of each requirement, which provides greater clarity.

**Draft CIL Charging Schedule October 2021**

As set out in the enclosed form, we welcome and **fully support** the proposal to set a nil rate for traditional B-class employment development in the new charging schedule and strongly encourage adoption of the new schedule at the earliest possible opportunity.

I trust the above is helpful. We do not need to attend the Examination but would be grateful if the points above could be relayed to the appropriate Inspector(s).

If you would like to discuss this further, please do not hesitate to contact me.

Yours faithfully,

[Redacted signature]

[Redacted name]

Director

[Redacted contact information]

# NRF-REF014





[REDACTED]

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**From:** East Markham Parish Clerk <parishclerk@eastmarkham.org.uk>  
**Sent:** 21 October 2021 09:54  
**To:** [REDACTED]  
**Subject:** RESPONSE TO THE BASSETLAW PLAN FROM EAST MARKHAM PARISH COUNCIL  
**Attachments:** EMPC Response to BDC Local Plan October 2021.docx

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Hi

I understand that Councillor Hunt has recently contacted your department and was assured that response to the consultation, by email, was acceptable. I have been asked by East Markham Parish Council to send the attached response to the Bassetlaw Plan. Could you please acknowledge receipt of this and confirm that this response will be taken into account.

Many thanks.

Kind regards

[REDACTED]  
Clerk to East Markham Parish Council

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**From:** The Bassetlaw Plan [mailto:TheBassetlawPlan@bassetlaw.gov.uk]  
**Sent:** 13 September 2021 14:09  
**To:** The Bassetlaw Plan <TheBassetlawPlan@bassetlaw.gov.uk>  
**Subject:** Reminder: Regulations 19 and 20: Bassetlaw Local Plan 2020-2037: Publication Version, August 2021 & Regulations 16 and 17: Bassetlaw Community Infrastructure Levy - Draft Charging Schedule



**Regulations 19 and 20 Town and Country Planning (Local Planning) (England) Regulations 2012: Bassetlaw Local Plan 2020-2037: Publication Version, August 2021**

## **RESPONSE BY EAST MARKHAM PARISH COUNCIL ON BASSETLAW DISTRICT COUNCIL'S PUBLICATION PLAN**

A meeting of East Markham Parish Council was held in October 2021 to discuss the Publication Version of the Bassetlaw Draft Plan and formulate our response. The Council acknowledges the problem that Covid has made for the District Council but is of the view that more face-to-face meetings could have taken place throughout the district. Failing that each parish should have received a paper copy to be made available parishioners without access to the internet or with difficulty travelling giving them the ability to contribute to the process.

**POLICY ST1.** The plan again appears to have been housing led with less emphasis on job creation. It is anticipated that over the plan period the population of the district will grow by 18600 but in the plans life only 5878 jobs will be created rising to 9735 if the Apleyhead project is successful. With this level of population growth, it is inevitable large numbers will be travelling outside the district for work. In housing standard methodology 288 dwellings per year are required this we agree is insufficient to house the estimated population increase, however Bassetlaw are planning to build 591 homes per year a total of 10,047. Given an estimated occupation rate of 3 per household 10,047 will give an increase population growth 30,142 far in excess of the estimated growth of 18600. A figure of 413 per annum would be more realistic giving 6,195 dwellings a figure more in line with population growth.

**POLICY ST2** The Council acknowledges that the parish has now been classified as a small rural village with a 5% cap on development throughout the life of this plan. We have little faith that this cap will be adhered to by the District Council.

At the last census, (2011) East Markham had 490 dwellings, this had increased to 524 by August 2018 representing a rise in Housing stock of 5.7%. Since August 2018 a further 16 houses have been built making the total housing stock 540 properties by 2020. In addition, there are an additional 54 houses in construction and planning permissions for a further 25 houses or conversions. When these buildings are developed the housing stock in the village will have increased by 130 houses (a staggering 25%) since 2011. The increase in dwellings over the last 9 years has produced a lot of pressure on our narrow village roads. Recent construction of dwellings on Beckland Hill and High Street have seen significant increases in congestion on the village's roads.

The Parish Council would also request that BDC review access to the village. At the time of writing, there are only two entrances left for traffic to the village, whereas there used to be four. This is funnelling traffic onto Askham Road, Farm Lane and Beckland Hill. We believe that this increase in traffic represents a danger as is evidenced by three car crashes on this stretch of road during the past 12 months. East Markham Parish Council requests that the access from the village from the A57 to High Street (Western Entrance) be reinstated to take pressure off traffic around the School on Askham Road, and also for the Priestgate to West Markham road over the A1 to be repaired and reopened as a matter of urgency.

Another area where the infrastructure of the village has not kept pace with development is with regard to drains and sewers. In February 2020 the village suffered from the discharge of raw sewage from drains close to the school. This was attended by Severn Trent Water but



the problem recurred twice again since. Church Street has also experienced raw sewage flowing across the road in front of the actual Church. In addition there has been repeated flooding of residential properties in both York and Low Street. The Village's neighbourhood plan has a specific policy NP7 relating to this (see below). There is little evidence that BDC have considered this in recent decisions.

#### **POLICY NP7: Reducing the Risk of Flooding**

1. All development proposals other than residential extensions and other minor development within East Markham village will be required to demonstrate that;
    - a. the development proposals will not have a detrimental impact on the foul and surface water drainage infrastructure; and
    - b. the development does not increase the rate of surface water run off or increase flood risk in the area; and
    - c. the scheme is designed and constructed such that it does not increase the level of flood risk in the area, and where appropriate can contribute to the reduction of flood risk; and
    - d. the scheme protects existing watercourses and land drainage systems. In circumstances where this approach is impractical the developer will be required to propose a reasonable alternative in accordance with the most up to date local policy; and
- the scheme incorporates sustainable drainage techniques into their layout and design. In circumstances where this approach is impractical, the developer will be required to propose a reasonable alternative in accordance with the most up to date local policy.

For the above reasons the Parish Council is of the opinion that East Markham should be classified as a village not suitable for further development from 2020 and for the life of this plan.

EAST MARKHAM PARISH COUNCIL is further concerned that there is no provision in the plan for Small and Medium Enterprises to locate in villages like East Markham. The plan is in danger of ensuring villages become nothing but bed and breakfast communities with residents commuting out for work. There needs to be a greater emphasis on providing opportunities for small start-up businesses with high speed internet connections and excellent connectivity to the wider area.

East Markham Parish Council make the following comments about housing, economic development and individual sections within the plan.

The plan is driven more by housing development than by economic interest. In the plan the projected population increase will be 18,600 by 2037. Given the present birth rate in the UK to achieve this growth there will be an inward migration of approx. 7,000 people. The plan assumes with no supporting evidence that 9,735 additional jobs will be provided over the period of the plan. This would appear over optimistic. The plan also calls for the building of 10,047 houses this seems to be an oversupply of houses given the probable population increase. East Markham Parish Council is of the opinion the district is being used to provide

low-cost housing for surrounding councils which are unable or unwilling to meet their own housing needs.

### **POLICY ST 3 Garden Village**

Given the present financial conditions created by the pandemic we consider the provision of a garden village as an expensive venture. In our opinion there is little chance of either government or developer contributions funding the level of investment required for this project. In addition, the economic developments on this site given its proximity to the A1 and North/ South, East /West connectivity would attract warehouse/logistic companies not noted for their high skill high wages, a theme in the plan. There is no indication that the railway company or the Government will provide the necessary funding for a station at this site.

### **POLICY ST 6 Cottam Regeneration**

This site given the problems associated with contamination and its remote location it is difficult to see either people or businesses willing live or set up here. It will require a disproportionate use of resources.

### **POLICY ST 8 High Marnham**

The policy to use the former power station site at High Marnham has some merit. However, if it is to for the manufacture of green energy products there are no plans to improve transport links to this remote location, or plans for housing to accommodate workers in the vicinity. There would need to be a carefully worked out plan to enable staff and visitors to journey to the site. It would be unthinkable for personnel using a green energy site to use CO2 generating transport.

### **POLICY ST 10 Existing Employment Sites**

We note there is no mention of the former Bevercotes Colliery Site or the land at Gamston Airport in the document. The Bevercotes site already has an expired planning permission for warehousing. The Parish Council views this site as having potential to instead of warehousing provide accommodation for high tech manufacturing using the airport site as an incentive for employers. It would require the use of some CIL and 106 monies to upgrade the Twyford Bridge junction, but would provide much needed employment to the area.

### **POLICY 35 Design Quality**

We have no faith in the District Council oversee high class design throughout the district. They already have a Successful Places Supplementary Policy Document approved in 2013 with regard to design, plot size and amenity space. In East Markham 5/6 bedroomed properties have been built on very small plots with amenity space much less than that outlined in Successful Places. Properties have also been allowed where living spaces are close to adjoining boundaries and overlooking adjoining residences. This has been repeatedly pointed out to BDC but they have still granted permissions.

### **Cycle networks**

Throughout the document the use of cycling as a mode of transport is frequently identified. The local cycle network is far from adequate for a number of reasons. It is neither

joined up, extensive or maintained. In Retford alone, most of the cycle lanes are taken by residential parking. This endangers cyclists further when having to overtake parked cars.

The cycle path from Retford to Markham Moor is far too narrow and poorly maintained. Riding a cycle with a child trailer, three wheeler cycle, or anything wider than a normal cycle is incredibly difficult due to the width of the path available.

With a little further civils, paths could be widened to accommodate cyclists and pedestrians safely coexisting.

In an age where use of the motor vehicle should be discouraged, practical alternatives should be provisioned. In our opinion, a strong and maintained network of cycle paths, connecting the key residential areas of Blyth, Carlton in Lindrick, Langold, Misterton and Tuxford, to the main three towns of Retford, Worksop and Harworth should be a major priority for any progressive and green strategic plan.

56% of all car trips in England are less than 5 miles and in a relatively flat region, many of these could be converted to cycle journeys, reducing pollution, congestion and improving general health. Furthermore, a stronger cycle network green infrastructure would encourage people to work and live in the area, as many people are moving away from long commutes. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729521/national-travel-survey-2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729521/national-travel-survey-2017.pdf)

Some disused railways lines and canal paths could be enhanced or repurposed as commuting and leisure routes, improving the lifestyle and health of local people as well as tourism to the area.

**NCN 647 (National Cycle Network route)** is fragmented and not fit for purpose. The route is not direct and has not been invested in. As a result, it takes in some narrow roads that have 60mph speed limits, as well as some unfinished sections of grass/mud track. (e.g. the route from Tuxford to Fledborough).

**NCN 6 (National Cycle Network route)** is a pretty and quiet route for summer recreational riding and hardened mountain bikers, but is not suitable for normal commuter type cycles, in many places it is muddy and not well maintained.

## **POLICY ST46 C**

Where developments are planned, adequate off street parking must be provisioned, far too much parking on pavements discourages walking and endangers local residents who are often forced to walk in the roads.

## **POLICY ST52 Flood Risk and Drainage**

All new developments should refer to local town/parish councils for consultation relating to local concerns and historic flooding or drainage problems.

In areas where existing drainage systems are old or inadequate, especially where sewage and rainwater share the same pipework, that new developments are only sanctioned where

additional or enlarged drainage systems are provided by the developer and/or waste-water company. E.g. Severn Trent.

### **POLICY ST54 points 2 & 3**

These points are to be applauded but should be prioritized ahead of 'motor transport' forms of infrastructure plans, if Bassetlaw intend to really prioritise the green agenda and healthy and active lifestyles as well as improvement of air quality.

Points a, b, c, e & f are primarily focused on cycle lane facilities within town centres rather than encouraging cycle and walking access to towns.

With relatively flat roads, and with wide grass verges, most highways between the key residential areas of Blyth, Carlton in Lindrick, Langold, Misterton and Tuxford, to the main three towns of Retford, Worksop and Harworth could easily be improved to create safe cycle/walking infrastructure between these areas.

Obvious candidates for such improved cycle lane / footpath improvement could include (but are not limited to):

- a. Tuxford to Markham Moor via Sibthorpe
- b. Markham Moor to Retford (current cycle path is narrow and poorly maintained)
- c. Retford to Worksop, passing Ranby Prison on B6079, this should also be extended to the planned development of Apley Head Junction. POLICY ST10: Site SEM01: Apley Head Junction, Worksop, as well as the planned POLICY ST4: Bassetlaw Garden Village.
- d. Retford to Barnby Moor on the B638
- e. NCN 647 route, improvements to 'weak links' Clumber to Tuxford, Tuxford to Fledborough.
- f. The above points b. & e. from Retford and Tuxford could support green modes of travel to the planned 'High Marnham Green Energy Hub', with very little effort. The last thing we want to encourage is commuting to a 'Green Energy Hub' via motorized transport, especially given that it is 5-10 miles from the large residential areas of Tuxford and Retford.

### **POLICY ST50 Carbon Emissions**

The District Council do not have a visible record in this matter. In East Markham they allowed the developer to install large volume LPG tanks to 41 houses. The Parish Council made representations that in view of climate Change the installation of air source heat pumps would be more su

#### **4.2.1.8 – Strategic Objective**

East Markham development is not reflecting the local character of the village. Thanks to the conservation policy, we have seen a flurry of fake threshing barns in recent years. Again, the Neighbourhood Plan has a specific policy relating to this and it included below for reference. East Markham Parish Council draws BDC's attention to the ongoing development on the old Two Sisters Chicken Factory site where there are no pedestrian links to existing houses.

### **POLICY NP1: Development Design Principles**

1. Proposals should demonstrate a high design quality that will contribute to the character of the historic, rural village. In order to achieve this new development should:
  - a. incorporate green boundary treatment including native trees and hedgerows; and
  - b. use materials that are in keeping with the character of the surrounding area; and
  - c. demonstrate how the buildings, landscaping and planting creates well defined streets and attractive green spaces that respond to the existing built form in terms of enclosure and definition of streets and spaces.
2. The conversion of buildings should be done sensitively to reflect the historic character of the building and its surroundings.
3. Schemes should demonstrate a layout that maximises opportunities to integrate new development with the existing settlement pattern. This should include a layout that enables new pedestrian connections to be made.
4. Where development sites are adjoining, proposals should include pedestrian links to connect both sites where feasible.

#### **4.2.13.**

Little evidence of an alternative to travel by car in the village. The bus service is not comprehensive enough to provide an alternative to the car for work purposes. In addition, there is not enough consideration for other forms of transport within the plan.

#### **5.1.32.**

East Markham Parish Council believes that recent development already has had an adverse impact on the character and amenity of the village. The proportionate cap of 20% has been in existence for some time but there is little evidence that BDC has taken character and amenity into consideration.

#### **5.2.11.**

The 5% proportionate cap is not Government policy but is BDC policy. In the event of a conflict between BDC 5% cap and the Governments no upper limit EAST MARKHAM PARISH COUNCIL seeks clarification as to what takes priority

### **POLICY ST29 Affordable Housing.**

East Markham Parish Council fully endorses this policy and requests that it is enforced.

### **POLICY ST 27 Housing Mix**

East Markham Parish Council endorses this policy. However, it should be noted that recent developments have failed to reflect the character of the village and have not provide adequate starter homes or homes for elder residents. East Markham Parish Council also draws BDC attention to its Neighbourhood Plan policy NP2 that specifically states the following. 1. New housing developments should deliver a housing mix that reflects the demonstrable need for smaller dwellings. 2. Developers must show this local need has been taken into account in the different housing types and bedroom numbers proposed. It is our view that this policy has been ignored in recent planning submissions by BDC.

**POLICY ST 54 Transport**

East Markham Parish Council recognises the need for better transport infrastructure but would question BDC's ability to deliver. At the time of the plan, East Markham has plans for 59 houses in and around the Mark Lane / Beckland hill area with little evidence of any thought as to how to provide safe routes in and out of the village for residents.

**POLICY ST 57 Digital Infrastructure**

The council supports this policy. Recently houses have been built in our village and the purchasers have been unable to access digital services due to lack of availability.

Produced by Councillor A Hunt on behalf of and in consultation with East Markham Parish Council.

# NRF-REF015



**From:** [REDACTED]  
**Sent:** 21 October 2021 09:58  
**To:** The Bassetlaw Plan  
**Subject:** Bassetlaw Local Plan 2020-2037: Publication Version Representation  
**Attachments:** Bassetlaw Local Plan Publication Version rep.pdf

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Dear Sirs/Madam,

Please find attached a representation for the Bassetlaw Local Plan Publication Version.

If you have any queries please do not hesitate to contact me.

Kind regards

Please note that I work Tuesdays, Wednesdays and Thursdays.

[REDACTED]  
Associate Planning Director | BA (Hons) MRTPI

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Date: 21<sup>st</sup> October 2021

Our ref: 2981

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Nottinghamshire  
S80 2AH

Sent via email to: [thebassetlawplan@bassetlaw.gov.uk](mailto:thebassetlawplan@bassetlaw.gov.uk)

Dear Sir/Madam,

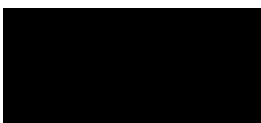
**Bassetlaw Local Plan 2020-2037: Publication Version**

Please treat this letter as representations to the Bassetlaw Local Plan 2020-2037 Publication Version. These comments are submitted to the Council via the specified email address by the deadline of the 21<sup>st</sup> October 2021.

Policy ST51 accords with paragraph 155 of the National Planning Policy Framework and the principle of it is supported by us. The proposed policy ST51 on renewable and low carbon energy generation and its accompanying text are supportive and weighted positively towards the development of commercial scale renewable energy schemes (including ground mounted solar).

If you have any queries, we would be happy to discuss these with you.

Yours faithfully,



**Associate Planning Director**