

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

REF Responses 031-040

REFERENCE NUMBER	ORGANISATION	PARTICIPATING IN HEARING SESSIONS
REF031	Derek Kitson Architectural Technologist Ltd	Yes
REF032	Town Planning.co.uk	Yes
REF033	Stone Planning Services Limited on behalf of our client Charterpoint (NG22) Limited	Yes
REF034	Spawforths on behalf of Albemarle Homes	Yes
REF035	Home Builders Federation	Yes
REF036	Marrons Planning on behalf of Vistry Group	Yes
REF037	Pegasus Group on behalf of Harworth Group	Yes
REF038	Fisher German on behalf of The Hospital of the Holy and Undivided Trinity	Yes
REF039	Natural England	No
REF040	McLoughlin Planning on behalf of William Davis Homes	Yes

REF031



[REDACTED]

From: [REDACTED]
Sent: 20 October 2021 16:26
To: The Bassetlaw Plan
Subject: RE: Regulations 19 and 20: Bassetlaw Local Plan 2020-2037: Publication Version, August 2021 & Regulations 16 and 17: Bassetlaw Community Infrastructure Levy - Draft Charging Schedule
Attachments: reg-19-form-a-b-12pt ST1 and ST2.pdf; reg-19-form-b-12pt ST3 ST4 ST15.pdf; reg-19-form-b-12pt ST11.pdf; reg-16-cil-form-a-b-12pt.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

Good afternoon

Please find attached my representations for the Bassetlaw District Council Local Plan 2020-2037 Publication Version and the CIL draft charging schedule August 2021.

Please confirm receipt of this email and 4 attachments.

Kind regards

[REDACTED]

[REDACTED] Architectural Technologist Ltd
Trinity College Farm, Great North Road
Barnby Moor, Retford, Notts, DN22 8QQ
Tel. [REDACTED]
[REDACTED]

Please confirm receipt of this email

Please note - the office is open Tuesday to Thursday

Visitors by appointment only please, face coverings must be worn and social distancing strictly adhered to

Please note the office is closed on 22 October and reopens on 2 November 2021

From: The Bassetlaw Plan
Sent: 02 September 2021 16:00
To: The Bassetlaw Plan <TheBassetlawPlan@bassetlaw.gov.uk>
Subject: 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



Bassetlaw Local Plan 2020-2037

Publication Version Representation Form September to October 2021

Please submit electronically if possible to thebassetlawplan@bassetlaw.gov.uk

Please use this form to provide representations on the Bassetlaw Local Plan. Bassetlaw District Council must receive representations by **5pm on 21st October 2021**. Only those representations received within this period have the statutory right to be considered by the inspector at the subsequent examination.

Responses can be submitted via the electronic version of the comment form which can be found on the Council's web site at: www.bassetlaw.gov.uk/BassetlawPlan Alternatively this form can be completed and returned as an e-mail attachment to thebassetlawplan@bassetlaw.gov.uk or by post to **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

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Please tick/ delete as appropriate:

Please confirm you have read and understood the terms and conditions relating to GDPR.

Yes ☒

No ☐

Please tick as appropriate to confirm your consent for Bassetlaw District Council to publish and share your name/ organisation and comments regarding the Bassetlaw Local Plan.

I confirm my consent for Bassetlaw District Council to share my name/ organisation and comments regarding the Bassetlaw Local Plan including with the Planning Inspectorate.

Yes ☒

No ☐

Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Bassetlaw Local Plan.

I would like to opt in to receive information about the Bassetlaw Local Plan.

Yes ☒

No ☐

Printed Name: 

Signature: 

Date: 20 October 2021

This form has two parts:

Part A - Personal details – need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part A- Personal Details

1. Personal Details

Name: [REDACTED]

Organisation (if applicable): Derek Kitson Architectural Technologist Ltd

Address: Trinity College Farm, Great North Road, Barnby Moor

Postcode: DN22 8QQ

Tel: 01777 816686

Fax:

Email: [REDACTED]

2. Agent Details (if applicable)

Agent:

Organisation (if applicable):

Address:

Postcode:

Tel:

Fax:

Email:

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Derek Kitson Architectural Technologist Ltd

3. To which part of the Local Plan does your representation relate?

Policy: ST1 and ST2

Paragraph: 5.2.1-5.2.13 inclusive and 1-3 inclusive

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

- 5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.** If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policies ST1 and ST2 refer generally to housing growth, its location and the identification of large and small settlements. These policies, particularly in relation to both large and small rural settlements, do not appear to bear any resemblance to the NPPF paragraphs 78 and 79.

There is little reference, if any, to the fact that smaller villages are reliant upon services in our larger villages and with this lack of understanding of how our villages can interact when the service provision is real comes a lack of willingness to promote meaningful and prolonged growth in housing, population and employment. Strategic Objective No. 6 refers to the promotion of Rural Bassetlaw as a living and working landscape. This is completely at odds with the negative and restrictive values within ST1 and ST2.

Paragraphs 5.2.1 and 5.2.2 are at odds with the NPPF which is generally supportive of rural development and clearly supports this where it will maintain or enhance the vitality of rural communities. Paragraph 5.2.2, however, clearly shows that any growth is to be limited and refers to the current scale of services and infrastructure capacity as a limiting factor. This means future development will be negated if the existing service provision etc is poor therefore infrastructure and services will remain static and this lack of investment will be its own development restricting tool. In reality, there should be a recognition that development itself will help with service provision. This is a well understood principle of development and there is a clear recognition of a “critical mass” of families and homes that can and will support and lead to improvement of services.

There is a glowing example of how this works in practice in Bassetlaw with the very proactive attitude adopted by the community of Mattersey & Mattersey Thorpe in producing their Neighbourhood Plan. The realisation that certain services had already closed and the strong desire to retain those existing services such as the village shop and school was all transferred into a very proactive and positive Neighbourhood Plan which recognises the need for homes and families.

How do you keep a “built form” whilst at the same time allow development of such a nature to conform to the NPPF requirements?

The rural restrictions suggested in this Local Plan are therefore wrong and at odds with the NPPF.

Continue on a separate sheet if necessary

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

1. Omit the proposal for a Garden Village completely.
2. Redistribute residential and economic development into our existing rural settlements or even identify other rural areas suitable for employment opportunities, possibly alongside main vehicular roads, A1 and A638.
3. Identify and accept the “cluster” aspect of village life and reliance in accordance with NPPF paragraph 79 making these policies more reflective of the aims of the NPPF.
4. Revised document in total to be more in tune with NPPF paragraphs 84 and 85 inclusive when it comes to policy ST11.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes ☒

No, I do not wish to participate in hearing session(s)

No ☐

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

On the basis that if considered appropriate, my suggestion is to completely remove all reference to Garden Village for residential provision. The provision of employment on this site is to be supported.

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Bassetlaw Local Plan 2020-2037

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Part A - Personal details – need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Derek Kitson Architectural Technologist Ltd

3. To which part of the Local Plan does your representation relate?

Policy: ST3, ST4 and ST15

Paragraph: 5.3.1-5.3.43 inclusive, paragraphs 1-5 inclusive, paragraph 1 of ST15-table

Policies Map: Figure 9

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policies ST3, ST4 and ST15 all of which refer in whole or part to the provision of a garden village.

A lot of work appears to have been devoted to this particular aspect of Rural Development and it is true it will deliver homes, employment, shops, schools, train station etc, etc.

What appears to be missing is any identified need for this. The Council's own 5 year housing land supply is clearly oversubscribed as it is, with a supply of 1,677 dwellings over the 5 year requirement. This equates to a 122% buffer.

This new Garden Village proposes 500 new homes within the plan period but this allocation is not included within the housing land availability numbers.

The current housing supply is 11,698 dwellings over the plan period (again without any inclusion at all of homes within the Garden Village), at the average build out rate of 591 per annum this gives up approximately 20 years supply. Where therefore is the need?

Any need for a large new settlement to rival any of the current large settlements is therefore way off in the future.

There does not appear to have been any form of "sequential test" or approach to identify this particular site. The LPA have previously identified Gamston Airfield and Cottam Power Station as sites for a garden village, both have been removed but at least they were brownfield sites not greenfield allocations.

It would appear that from the LPA's own figures housing growth has been at a high level for the last 3 years, this may be enhanced by recent national issues (Covid and Brexit) and it is doubtful that the current build rates can be maintained, if only due to lack of and cost of materials. The recent price rises of most building materials will soon take the edge off growth unless other factors intercede to bring labour and material availability back to sustainable levels.

In terms, therefore, of response, need, justification, location etc, the argument for a Garden Village has not been made.

Continued on a separate sheet

Continue on a separate sheet if necessary

5. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

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3. Identify and accept the “cluster” aspect of village life and reliance in accordance with NPPF paragraph 79 making these policies more reflective of the aims of the NPPF.

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Yes, I wish to participate in hearing session(s)

Yes ☒

No, I do not wish to participate in hearing session(s)

No ☐

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

On the basis that if considered appropriate, my suggestion is to completely remove all reference to Garden Village for residential provision. The provision of employment on this site is to be supported.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

Policy: ST3, ST4 and ST15

Paragraph: 5.3.1-5.3.43 inclusive, paragraphs 1-5 inclusive, paragraph 1 of ST15-table

Policies Map: Figure 9

Continuation sheet

What is clear is that the provision of such a large housing offer, if successful, will pull development away from our existing rural settlements.

The economies of scale will win out with house builders producing a more favourable offer in the new Garden Village over those smaller developments and developers in the existing settlements with the likely outcome being the building of large homes in the villages rather than smaller family homes or senior citizen homes. Services will dwindle and close as growth is capped and even stopped in some of those villages.

The negative impact of a Garden Village on our existing rural settlements will be great and irreversible and there is no evidence that this negative effect has been considered either by the Council or other rural communities. These villages will become dormitories.

All current Neighbourhood Plans show a need for affordable and senior citizen homes. If the rural services fail why would Neighbourhood Plans wish to promote these types of homes in areas where sole reliance on a motor car is essential. Improvements in infrastructure in particular public transport would greatly assist with this problem.

Those occupants in the new Garden Village will be alright but no one else in the rural areas will be and this is totally contrary to the NPPF guidance.

Furthermore, the site is greenfield and, as such, is at odds with NPPF.



Bassetlaw Local Plan 2020-2037

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Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Derek Kitson Architectural Technologist Ltd

3. To which part of the Local Plan does your representation relate?

Policy: ST11

Paragraph: 1 a)-g) inclusive and paragraph 2

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

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It is strongly suggested that much of the criteria in policy ST11 is at odds with Part 6 of the NPPF Building a Strong Competitive Economy, particularly paragraphs 84 and 85 which refer to supporting a prosperous rural economy.

Reading policy ST11 and its very negative take on “Supporting a prosperous rural economy” with its criterion a) to g) inclusive which all have to be met for development to be acceptable, it is difficult to understand how this is in accordance with the aims, aspirations and guidance in the NPPF. Even rural and heritage housing is covered by the same negative aspects.

Where in ST11 is the facility to grow, innovate, expand etc embodied? There are traces of this in paragraphs 6.5.3, 6.5.4 and 6.5.5 but this does not seem to have transferred into a proactive policy, in fact just the reverse. It appears developers can develop but it has to be rural linked. We do not need a policy that states agriculture and forestry operations should be acceptable in the countryside, that is just common sense. What is needed is some joined up thinking to PROMOTE rural employment other than the provision of employment at a Garden Village which will help residents in the new Garden Village and Worksop but do nothing for employment in the north, south or east of the district.

For this policy to be in accordance with the aims of the NPPF it needs to be considerably more positive and focus on promoting and supporting sound, well based employment opportunities in the rural areas without having to prove any obvious links to agriculture or forestry etc.

This distribution of employment creating opportunities in the countryside would support families in our rural communities, again something that most Neighbourhood Plans appear to support.

This works well in neighbouring authorities particularly Lincolnshire and West Lindsey.

Continue on a separate sheet if necessary

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Revised document in total to be more in tune with NPPF paragraphs 84 and 85 inclusive when it comes to policy ST11.

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Yes, I wish to participate in hearing session(s)

Yes ☒

No, I do not wish to participate in hearing session(s)

No ☐

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Policy ST11 is not in accordance with the NPPF and if allowed to stand will not only restrict rural enterprise but will cause confusion and conflict.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

REF032



[REDACTED]

From: TOWN-PLANNING.CO.UK <mail@town-planning.co.uk>
Sent: 20 October 2021 16:50
To: The Bassetlaw Plan
Subject: Representations on Bassetlaw Local Plan 2020-2037: Publication Version - High Marnham
Attachments: LP Rep Form (High Marnham).docx

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[REDACTED]

Dear [REDACTED]

Representations on Bassetlaw Local Plan 2020-2037: Publication Version

Please find attached a representation made on site EM008: High Marnham Green Energy Hub which is referred to in Policy ST7 and Policy ST8.

I look forward to receiving an acknowledgement to the representation in due course.

Kind regards

[REDACTED]
[REDACTED] *HNCert LA(P), Dip TP, PgDip URP, MA, FGS, ICIQB, MInstLM, MCMI, MRTPI*
Executive Director

TOWN-PLANNING.CO.UK
South View, 16 Hounsfield Way, Sutton on Trent, Newark, Nottinghamshire, NG23 6PX
Tel: 01636 822528

[REDACTED]
Email: mail@town-planning.co.uk
Website: www.town-planning.co.uk

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No ☐

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I confirm my consent for Bassetlaw District Council to share my name/ organisation and comments regarding the Bassetlaw Local Plan including with the Planning Inspectorate.

Yes ☒

No ☐

Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Bassetlaw Local Plan.

I would like to opt in to receive information about the Bassetlaw Local Plan.

Yes ☒

No ☐

Printed Name: 

Signature: 

Date: 20/10/2021

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Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part A- Personal Details

1. Personal Details

Name:

[REDACTED]

Organisation (if applicable):

TOWN-PLANNING.CO.UK

Address:

[REDACTED]

Postcode:

[REDACTED]

Tel:

01636 822528 /

[REDACTED]

Fax:

Email:

mail@town-planning.co.uk

2. Agent Details (if applicable)

Agent:

Organisation (if applicable):

Address:

Postcode:

Tel:

Fax:

Email:

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: TOWN-PLANNING.CO.UK

3. To which part of the Local Plan does your representation relate?

Policy: Policy ST7 – Provision of Land for Employment and Policy ST8: EM008: High Marnham Green Energy Hub

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We object to the proposed allocation of Site EM008: High Marnham Energy Hub contained in the Draft Bassetlaw Local Plan. We consider that it fails all of the tests of soundness.

Employment Need

The Bassetlaw Economic Needs Assessment identifies in Table 15 the future need for employment land. This has been calculated as a future requirement of 63.0 ha with higher need under scenarios subject to strong performance in transport and distribution.

Whilst the Local Plan might want to pursue a growth strategy, policies ST7, ST8 and Policy 9 collectively allocate some 201.4 ha of employment land on general sites alongside 118.7 ha of employment land on a strategic site. Which is some 5.1 times larger than the evidential requirement. The plan suggests that 87.9 ha of this land is available during the plan period which is 4.6 times larger than the evidential requirement.

There is no evidence submitted to demonstrate that there is a need to allocate land that exceeds the need put forward in the Bassetlaw Economic Needs Assessment. In the absence of any cogent or substantive evidence underpinning the Local Plan for the period 2018 to 2037; this does not justify the allocation of inappropriate or unsuitable sites. As such there is no unmet strategic employment need requirement to justify the allocation of site EM008.

Even ignoring the strategic site in Policy ST7; the policy allocates land which far exceeds the identified future requirement of 63.0 ha. Removal of the 38.4 ha site at High Marnham would still leave 130.8 ha under Policy ST7 on general sites which more than meets the future need identified; with the 118.7 ha of land in Policy 9 as additional buffer for strategic inward investment.

The Bassetlaw Economic Needs Assessment identifies in Table 17 that the High Marnham site is *“Not in a commercially attractive location.”* As such the evidence underpinning the draft Local Plan does not support the allocation of this site in terms of quantum or location. In fact the Bassetlaw Economic Needs Assessment concludes the policy recommendation as being: *“Not included in supply.”* Despite this the Local Plan allocates the site.

Paragraph 6.1.16 of the Local Plan states: *“In addition, Policy ST7 makes a positive policy intervention to secure the regeneration of the former power station site at High Marnham for the green energy sector. This is regarded as essential to support local rural communities as well as the wider economic aspirations for the District, in this plan period and the next. A Local Development Order will facilitate delivery in accordance with Policy ST8.”*

However, this statement is misleading, High Marnham power station was decommissioned in 2003 some 18 years ago and the main demolition took place in 2004 and 2006; the cooling towers as the final structures were demolished in 2012 some 9 years ago. According to BBC News the power station only employed 109 people prior to closure and it has provided no employment now for 18 years.

Accessibility

High Marnham represents a poorly accessible location, the power station was sited there for operational reasons needing to be next to the river. Like most of the coal fired power stations it was connected to the rail network which was used for the delivery of coal. It had direct rail connection to most of the collieries in North Nottinghamshire.

Continue on a separate sheet if necessary

The site no longer has a rail connection, although the High Marnham Test Track which houses Network Rail's 'Rail Innovation & Development Centre' (RIDC) runs to the western side of Ragnall Road. The Test Track doesn't connect to the national rail network, although through use of the mineral line for the former Thoresby and Bevercotes Collieries it can connect to the Robin Hood Line at Shirebrook. The former railway trackbed eastwards from the site across the Fledborough viaduct over the River Trent, through Clifton to Doddington & Harby forms an off-road part of National Cycle Route 647 which is part of the National Cycle Network.

The site entrance gate is 3.5km from the A57 along a 'C' classified road; this route takes vehicles through the villages of Fledborough and Ragnall. There is a 6.1km route westwards along a 'C' classified road to the A6075 past the Tuxford Academy but this has a low bridge height limit of 4m. The A1 is 7.9km south of the site entrance along a 'C' classified road; however, this route takes vehicles through the villages of Grassthorne, Sutton on Trent and Carlton on Trent; including a narrow bridge over Grassthorne Beck which is susceptible to regular flooding.

The 'C' classified road both northwards and southwards from the High Marnham site has a poor accident record involving HGVs. Going northwards to the A57 the road has had 1 x Fatal; 2 x Serious; and 1 x Slight injury accidents involving HGVs. Going southwards to the A1 the road has had 2 x Fatal; 4 x Serious; and 13 x Slight injury accidents involving HGVs. The Local Plan includes no proposals to improve the road to the A57, unlike for example when Staythorpe Power Station was rebuilt where an entire new bypass access road was required to be constructed.

The only large settlement within 5 miles of the site is Tuxford, otherwise Retford is around 10 miles away, none of the villages within this part of Bassetlaw provide any sizeable populations; as such it is poorly related to locations where people will live.

The Bassetlaw Economic Needs Assessment discounts sites at Markham Moor which are significantly closer to Tuxford and Retford for being: *"some distance from nearby labour supply."* The proposed allocation is even more remote from the local labour force.

The site cannot be reached by public transport, the nearest bus stop is at Gracefield Lane in Normanton on Trent some 1.7km from the site access and some 2.5km from the centre of the site. This bus stop is only served by the 37A service which provides a school time service only to/from Newark; the 40 service which provides a school time service only to/from Tuxford; and the 339 infrequent daytime service which only links to Tuxford and South Muskham. This latter service does not run at peak hours so is unsuitable for most employment uses.

The site is not within walking and cycling distance of local settlements where any sizeable amount of housing exists. As such employment on this site would be entirely dependent upon the use of private vehicles for employees and the use of HGVs or vans for deliveries etc. As such it is contrary to the spatial principles of sustainable development.

Paragraph 85 of the NPPF sets out a framework for rural employment, it states: *"Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."*

The development will have an unacceptable impact on local roads which are unsuited to HGV use. The proposed allocation includes no proposals to improve sustainable access and the distance away from existing settlements would substantially limit the feasibility of any sustainable transport options being developed. The power station was sited here purely for the locational requirement for access to the river water. This does not make the site automatically suitable for an alternative use.

The proposed allocation therefore does not reflecting the spatial strategy, and undermines the attempts of the spatial strategy to achieve the most sustainable pattern of growth. The Local Plan claims that the focus will be on developing land for major new employment uses in sustainable locations. The proposed High Marnham allocation is in an unsustainable location. The Local Plan through Policy ST7 and Policy ST8 does not propose any measures to improve the accessibility of the site by sustainable modes of transport.

The site could be regenerated as a renewable energy generation hub without the need to locate B1, B2 or B8 businesses. It could also operate for rail related purposes with a short connection to the existing Rail Test Track.

Previously promoted large scale sites in similar remote locations such as the former Bevercotes Colliery (Vertical Park promoted by Gladman) in Bassetlaw and adjacent to the A1 have not attracted any interest and remain vacant. This site despite previously having planning permission appears not to have even been assessed in the Bassetlaw Economic Needs Assessment.

Sustainability Appraisal

The Sustainability Appraisal (SA) in Table A6-58 scores the High Marnham Energy Park as a poor site for employment. Despite this it is still allocated which means that the Local Plan has ignored its own SA. The SA in our judgement still appears to incorrectly assess aspects of the site, the differences between the SA table and our assessment is as follows:

SA Objective	Table A6-58	Our Assessment
1. Biodiversity	--	--
2. Housing	0	0
3. Economy & Skills	++	+/-
4. Regeneration & Social Inclusion	N/A	-
5. Health & Wellbeing	-?	-?
6. Transport	+	--
7. Land Use & Soils	+/-	+/-
8. Water	0	-?
9. Flood Risk	--	--
10. Air Quality	N/A	-?
11. Climate Change	N/A	?
12. Resource Use & Waste	--	--
13. Cultural Heritage	--	--
14. Landscape & Townscape	+/-	-

The site will offer employment but in a location the evidence says is remote from the labour supply as such the economy and skills criterion is over scored. We consider that the proposal has a significant number of negative effects.

In terms of accessibility to public transport the SA incorrectly says that part of the site is within 400m of a bus stop. As identified earlier the nearest bus stop is at Gracefield Lane in Normanton on Trent some 1.7km from the site access and some 2.5km from the centre of the site. This bus stop is only served by school and infrequent daytime services which are unsuited to employee use. As such transport will have a 'significant negative' effect.

In terms of climate change although the site is proposed to generate renewable energy, as an employment location the site is not accessible by public transport or other sustainable means of transport. It will be wholly reliant upon use of the private car and HGVs as such as a location it will result in transport movements that contributes to harm to climate change. Consequently, we consider that the proposal has a 'mixture of positive and negative effects' meaning that the overall position is uncertain.

In terms of landscape the site is prominent being in the Trent valley, it is particularly prominent from South and North Clifton to the east; as well as from High Marnham and Fledborough. The site is highly visible from the National Cycle Route 647 and the Fledborough viaduct over the River Trent. The policy sets out no specific mitigation measures for mitigation from all of these viewpoints as such the allocation would have a 'negative' effect on the landscape.

Conclusion

Consequently, the proposed allocation would fail the tests of soundness as explained earlier and it would not constitute sustainable development.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

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Change Requested

Delete the proposed site EM008: High Marnham Energy Hub for employment. If wanted it could be retained for the siting and production of renewable energy, such as a solar farm without any employment provision.

Continue on a separate sheet if necessary

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes ☒

No, I do not wish to participate in hearing session(s)

No ☐

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To exercise the right to appear and be heard by the Inspector at a hearing session as a person defined in section 20 (6) of the Planning and Compulsory Purchase Act 2004; namely as a person who has made a representation seeking a change to the plan within the deadline set by the LPA for Regulation 19 consultation responses.

To discuss the implication that the impact that the proposed over-delivery of employment land and the allocation in Policies ST7 and ST8 would have on the existing rural character of the River Trent valley.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

REF033



[REDACTED]

From: [REDACTED]
Sent: 20 October 2021 17:51
To: The Bassetlaw Plan
Subject: Publication Plan - Representations - Stone Planning Services Limited
Attachments: ST11 reg-19-form-a-b-12pt.pdf; Facilities Map Final 2D.pdf; Reps Reg 19 - Oct 2021.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

Sir/Madam

I attach representations on behalf of our client Charterpoint (NG22) Limited
This is 5 of 5 representations on behalf of our client

Could you confirm receipt?

[REDACTED]
Paul

[REDACTED]

Director – Stone Planning Services

[REDACTED]



Bassetlaw Local Plan 2020-2037

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Please tick/ delete as appropriate:

Please confirm you have read and understood the terms and conditions relating to GDPR.

Yes ☒ x

No ☐

Please tick as appropriate to confirm your consent for Bassetlaw District Council to publish and share your name/ organisation and comments regarding the Bassetlaw Local Plan.

I confirm my consent for Bassetlaw District Council to share my name/ organisation and comments regarding the Bassetlaw Local Plan including with the Planning Inspectorate.

Yes ☒ x


No ☐

Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Bassetlaw Local Plan.


I would like to opt in to receive information about the Bassetlaw Local Plan.

Yes ☒ x

No ☐

Printed Name: 

Signature: 



Date: 20th October 2021

This form has two parts:

Part A - Personal details – need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part A- Personal Details

1. Personal Details

Name:

[REDACTED]

Organisation (if applicable):

Charterpoint (NG22) Limited

Address:

[REDACTED]

Postcode:

[REDACTED]

Tel:

-

Fax:

-

Email:

[REDACTED]

2. Agent Details (if applicable)

Agent:

[REDACTED]

Organisation (if applicable):

Stone Planning Services Limited

Address:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Fax:

-

Email:

[REDACTED]

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Charterpoint (NG22) Limited

3. To which part of the Local Plan does your representation relate?

1. Policy: Policy ST4 (Site EM009) – Bassetlaw Garden Village

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes x

No ☐

4.(2) Sound

Yes ☐

No x

4.(3) Complies with the Duty to Cooperate

Yes x

No ☐

- 5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.** If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attached Representation

Continue on a separate sheet if necessary

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

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See attached Representation

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes ☒

No, I do not wish to participate in hearing session(s)

No ☐

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

There are numerous documents in the evidence base which are referenced in our representations and feel that and a number of the allocated employment and mixed use sites are not supported by the evidence. Some of the evidence is pre-determined in that it focuses on proposed allocations and does not consider alternatives

The IDP is not sufficiently robust to support deliverability

Furthermore, we consider that the Plan is unsound as it is neither justified nor effective.

We consider that the policy is not supported by the evidence base and feel that we would be able to assist the Inspector better if we attended the Hearing to fully discuss the above.

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Yes ☒ x

No ☐

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No ☐

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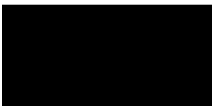
I would like to opt in to receive information about the Bassetlaw Local Plan.

Yes ☒ x

No ☐

Printed Name: 

Signature: 



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[REDACTED]

Organisation (if applicable):

Charterpoint (NG22) Limited

Address:

[REDACTED]

[REDACTED]

[REDACTED]

Tel:

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Fax:

-

Email:

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2. Agent Details (if applicable)

Agent:

[REDACTED]

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Stone Planning Services Limited

Address:

[REDACTED].

Postcode:

[REDACTED]

Tel:

[REDACTED]

Fax:

-

Email:

[REDACTED]

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Charterpoint (NG22) Limited

3. To which part of the Local Plan does your representation relate?

1. Policy: Policy ST6 Cottam Priority Regeneration Area

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes x

No ☐

4.(2) Sound

Yes ☐

No x

4.(3) Complies with the Duty to Cooperate

Yes x

No ☐

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Furthermore, we consider that the Plan is unsound as it is neither justified nor effective.

We consider that the policy is not supported by the evidence base and feel that we would be able to assist the Inspector better if we attended the Hearing to fully discuss the above.

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No ☐

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Yes ☒ x


No ☐


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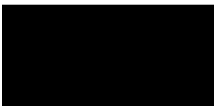
I would like to opt in to receive information about the Bassetlaw Local Plan.

Yes ☒ x

No ☐

Printed Name: 

Signature: 



Date: 20th October 2021

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Part A- Personal Details

1. Personal Details

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[REDACTED]

Organisation (if applicable):

Charterpoint (NG22) Limited

Address:

[REDACTED]

[REDACTED]

[REDACTED]

Tel:

-

Fax:

-

Email:

[REDACTED]k

2. Agent Details (if applicable)

Agent:

[REDACTED]

Organisation (if applicable):

Stone Planning Services Limited

Address:

[REDACTED]

Postcode:

[REDACTED]

[REDACTED]

[REDACTED]

Fax:

-

Email:

[REDACTED]

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Charterpoint (NG22) Limited

3. To which part of the Local Plan does your representation relate?

1. Policy: Policy ST8 /EM008 – High Marnham Green Energy Hub

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes x

No ☐

4.(2) Sound

Yes ☐

No x

4.(3) Complies with the Duty to Cooperate

Yes x

No ☐

- 5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.** If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attached Representation

Continue on a separate sheet if necessary

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes ☒

No, I do not wish to participate in hearing session(s)

No ☐

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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The IDP is not sufficiently robust to support deliverability

Furthermore, we consider that the Plan is unsound as it is neither justified nor effective.

We consider that the policy is not supported by the evidence base and feel that we would be able to assist the Inspector better if we attended the Hearing to fully discuss the above.

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Bassetlaw Local Plan 2020-2037

Publication Version Representation Form September to October 2021

Please submit electronically if possible to thebassetlawplan@bassetlaw.gov.uk

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Please tick/ delete as appropriate:

Please confirm you have read and understood the terms and conditions relating to GDPR.

Yes ☒ x

No ☐

Please tick as appropriate to confirm your consent for Bassetlaw District Council to publish and share your name/ organisation and comments regarding the Bassetlaw Local Plan.

I confirm my consent for Bassetlaw District Council to share my name/ organisation and comments regarding the Bassetlaw Local Plan including with the Planning Inspectorate.

Yes ☒ x


No ☐

Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Bassetlaw Local Plan.

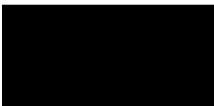
I would like to opt in to receive information about the Bassetlaw Local Plan.

Yes ☒ x

No ☐

Printed Name: 

Signature: 



Date: 20th October 2021

This form has two parts:

Part A - Personal details – need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part A- Personal Details

1. Personal Details

Name:

[REDACTED]

Organisation (if applicable):

Charterpoint (NG22) Limited

Address:

[REDACTED]

[REDACTED]

[REDACTED]

Tel:

-

Fax:

-

Email:

[REDACTED]

2. Agent Details (if applicable)

Agent:

[REDACTED]

Organisation (if applicable):

Stone Planning Services Limited

Address:

[REDACTED].

Postcode:

[REDACTED]

[REDACTED]

[REDACTED]

Fax:

-

Email:

[REDACTED]

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Charterpoint (NG22) Limited

3. To which part of the Local Plan does your representation relate?

1. Policy: Policy SEM001 – Apleyhead Junction

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes x

No ☐

4.(2) Sound

Yes ☐

No x

4.(3) Complies with the Duty to Cooperate

Yes x

No ☐

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See attached Representation

Continue on a separate sheet if necessary

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Yes ☒

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[REDACTED]

Organisation (if applicable):

Charterpoint (NG22) Limited

Address:

[REDACTED]

[REDACTED]

[REDACTED]

Tel:

-

Fax:

-

Email:

[REDACTED]

2. Agent Details (if applicable)

Agent:

[REDACTED]

Organisation (if applicable):

Stone Planning Services Limited

Address:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Fax:

-

Email:

[REDACTED]

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Charterpoint (NG22) Limited

3. To which part of the Local Plan does your representation relate?

1. Policy: Policy ST11 Rural Economic Growth & Economic Growth Outside Employment Areas

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes x
No ☐

4.(2) Sound

Yes ☐
No x

4.(3) Complies with the Duty to Cooperate

Yes x
No ☐

- 5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.** If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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Ref: SPS/0150
Bassetlaw District Council
Planning Policy
Potter Street
Worksop
Nottingham
S80 2AH

Date: 21st October 2021

Dear Sir/Madam,

Regulation 19 Consultation – Publication Version Bassetlaw Local Plan August 2021

Introduction

Stone Planning Services is appointed by Charterpoint (NG22) Limited to consider the Draft Bassetlaw Local Plan Publication Version (August 2021) and the associated evidence base. We have carefully monitored the emergence of the plan over a number of years and have previously submitted representations at the following stages:

- Draft Plan - May 2020
- Regulation 18 - January 2021
- Regulation 18 - Focussed Consultation - July 2021.

We have consistently challenged the veracity of certain elements of the evidence base and particular that relating to a number of the strategic sites and the illogicality of not seriously considering our client's alternative and deliverable site at Markham Moor A1/A57 (Markham South). We consider that the Council's evidence base does not support the allocations and does not support the exclusion of our client's site.

Our representations are focused on the delivery of employment sites and in particular the following policies

1. ST4/EM009- Bassetlaw Garden Village
2. ST6 - Cottam Priority Regeneration Area
3. ST8/EM008 – High Marnham Green Energy Hub
4. SEM001 – Apleyhead Junction
5. ST11 - Rural Economic Growth and Economic Development Growth Outside Employment Areas.

Soundness

Paragraph 35 of the Framework states that a Local Plan is sound if it is:

- a) Positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- (b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

- (c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- (d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

The Bassetlaw Local Plan is not sound and fails to meet the tests of being 'justified' and 'effective'.

Justified

- The local plan content needs to be reasonable
- Markham South is a reasonable alternative and has not been taken fully into account. We see no evidence that it has been adequately considered when considered against the Council's evidence base.
- There is no transparent reasoning for the rejection of land at Markham South.
- Proportionate evidence is not there to justify the Plan's content
- The viability of certain sites has not been demonstrated
- The deliverability of certain sites has not been demonstrated

Effective

- There are fundamental questions of viability as the Infrastructure Delivery Plan is inadequate to support the allocations.
- There are fundamental questions on deliverability, therefore the Plan is not effective
- Consideration of the plan *should not* be restricted to the plan period
- Because the local plan looks to a Garden Village being committed to within the plan period and the associated delivery of housing, other land uses, and importantly infrastructure over the longer period (potentially 3,500 homes being delivered at 160 per annum) then the soundness of the local plan needs to be considered over the period to 2050-2060

The emerging Bassetlaw Local Plan presents an ambitious and longer-term strategic approach over the plan period to 2037 and beyond. The inclusion of the Garden Village at Morton, for example, with 3500 homes anticipated post-2037, means that the delivery of policies and proposals is central to the assessment of whether the plan is effective and sound.

Where the proposals give strategic direction for growth over many decades, - anticipating development possibly to 2050 and beyond - the Inspector would be justified in considering soundness and delivery over the period *beyond* 2037.

Where the Council sees benefit in planning for large scale, longer term growth, then it follows that deliverability is critical to the justification of the Plan's spatial strategy. A body of evidence must support this and critically important will be costs and viability and a robust indication that development is capable of being delivered viably.

That costs are not known with precision or certainty is one thing, but to omit costs at all, compromises the resilience of the planned approach. At the present time, the emerging plan relies upon flexibility, review, annual assessment, dialogue and prioritisation. Many fundamental issues are to be left to the planning application stage rather than being resolved

now. This is not adequate within the ambit of national policy. As drafted, the Bassetlaw Local Plan is not sound, and the evidence base does not justify its content.

Over The Plan Period

The findings of the Inspector in relation to the North Essex Garden Communities EiP are relevant, particularly in relation to the Garden Village component of the Bassetlaw Local Plan. In his post-hearing letter of 15 May 2020, Inspector Mr Roger Clews stated that where a plan is to be deliverable:

"it has to be taken to include the policies and proposals in the plan. It would not make sense only to require that the plan document itself is deliverable, if the policies and proposals it contains are not" (para 27).

In relation to the assessment of effectiveness over the plan period, the Inspector stated at para 28:

"It was suggested that this means that I need not consider whether the GC proposals in the Plan are deliverable beyond the end date of the Plan in 2033. In my view, the Plan could not be considered to be sound if I were to find that the proposed GCs were justified having regard to their ability to provide for strategic development over many decades to come, but reached no finding on whether or not they were deliverable beyond 2033".

In other words, the mere fact that policy provides for a Garden Community, does not mean that the policy or indeed the Garden Community is deliverable.

In support of the above, the August 2021 Bassetlaw Sustainability Appraisal non-technical summary makes clear at para 1, that it relates to the Sustainability Appraisal of the Publication Consultation Bassetlaw Local Plan (August 2021), which sets out the long-term spatial vision and objectives for Bassetlaw as well as the policies that are required to deliver that vision over the period up to 2037. It follows that the appraisal is concerned with the local plan to 2037 and beyond. The test of soundness needs to be applied to that timescale and the elements of the plan that are conceived and started up to 2037 and the delivery of which will endure thereafter.

Consistency

In relation to the wider test of consistency with national policy, there are clear gaps in evidence, and this is not adequate within the terms of the Framework para 31:

"The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

On the basis of gaps in evidence published as recently as August 2021, the evidence base is not sufficiently robust to support the Local Plan and is therefore not adequate.

Evaluation of Alternatives

The Local Plan looks to allocate a major employment site at Apleyhead Junction, and this does not adequately consider the harm to transport infrastructure and the local environment. The Sustainability Appraisal does not demonstrate how the Plan has addressed relevant economic, social and environmental objectives, including opportunities for net gains. We note that the WYG Junction Assessment Report [January 2020] refers to the construction of 6km of dual carriageway which is not factored into the assessment of the site at Apleyhead Junction. This is a particularly important matter where NPPF para 32 states that significant adverse impacts on objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

In concluding that the Plan is not sound we have reviewed the evidence base; the relevant documents are considered in turn.

Infrastructure Delivery Plan (August 2021) and Appendix 1 (Sept 2021) and The Bassetlaw DC Whole Plan and Community Infrastructure Levy Viability Assessment 2019

The Infrastructure Delivery Plan, August 2021 (the 'IDP'), is presented as a 'live' evidence base document (para 1.1.4). Whilst this points to an iterative, review-based approach, there are substantive gaps in cost information which raise fundamental questions of how the Local Plan is to be delivered. In addressing incomplete evidence, there appears a 'loose' framework/process of dialogue, flexibility and prioritisation, with external funding and innovative approaches being alluded to.

Local Plan para 5.1.61 states that

"An Infrastructure Delivery Plan (IDP) has been prepared alongside this Plan, which identifies the key infrastructure requirements, anticipated costs and expected delivery. The Infrastructure Schedule contained within the IDP sets out an overview of the key infrastructure requirements necessary to deliver this Plan."

It appears that the costs of 'important' and 'key' infrastructure are omitted and the IDP is not complete.

Incomplete Costs

In relation to the Bassetlaw Garden Village, the table set out in Appendix 2 (Infrastructure Schedule per Site Allocation) of the IDP is helpful in identifying cost heads and costs. However, the table is not complete and important questions emerge as to how "essential" infrastructure is to be funded and when. The evidence base is not complete. The overall viability picture not robust. The local plan is not sound.

Furthermore, the funding of affordable housing delivery on such a large site needs to be factored into the viability equation.

The overall infrastructure cost total is expressed as being £1,717,900 or £3,435 per dwelling. Para 4.9 makes clear that the Viability Assessment indicates that developer contributions (£3,500 maxima) justify exemption from CIL (see Appendix 1). Although it is unclear whether a level of CIL is anticipated from some commercial elements.

Appendix 2 does not appear to include 'essential' highways and transportation costs. It must follow that essential infrastructure is not expected to be funded through developer contributions and Section 106, despite what the table says because the "cap" of £3,500 per dwelling would be exceeded.

Where large sites are CIL-exempt, this indicates that a large infrastructure funding gap exists and according to para 8.2, this will be higher than £50m.

At paragraph 8.5 it sets out that £73.9m will be needed to deliver transport infrastructure—of those schemes which are costed. Clearly the figure will be higher.

Para 7.6 addresses priority in terms of items being 'essential', 'necessary' or 'desirable'. In relation to Appendix 2 and the Bassetlaw Garden Village, "essential" items of highways/transportation infrastructure are not costed yet are deemed "essential" and in the terms of para 7.6, are pre-requisite, facilitate delivery, and ensure that there is no significant detrimental impact. There is, therefore, an internal inconsistency in that essential infrastructure costs are not included and if £3,500 is a cost ceiling and such sites are CIL-exempt, then how is the funding gap addressed?

Para 1.22 and 6.11 of the Whole Plan & CIL Viability Assessment (NCS, October 2019) states that the results of the strategic site tests make it clear that the significant site specific Section 106 contributions will render the imposition of additional CIL Charges economically unviable, and it is recommended that the 10 strategic sites (including Bassetlaw Garden Village) are treated as zero rated CIL Charging Zones.

The CIL Draft Charging Schedule (August 2021) refers to the IDP at paras 3.3-3.5, with the total cost of infrastructure costing in excess of £89m and justifying the retention and review of CIL across the District. Paras 4.1-4.2 outline the calculus based on £20 per sq m (residential) sufficient to raise £18m. At para 3.15, can be found the rationale for zero levy rates on larger sites relied upon to deliver the Local Plan spatial strategy. Based on CIL generation the infrastructure funding gap can be expressed as £71m.

In addition to the above there are numerous omissions with regard go the Garden Village. Appendix 2 shows no costs are included for the following:

- Sports facilities
- Community centre
- Green infrastructure
- Multi-functional open space
- Affordable housing
- Contribution to improving B6420/A620 junction
- Contribution to improving A614 Blyth Road/A57/A1 junction
- Contribution to delivery of a new railway station on a site
- Contribution to closure of level crossings
- Provision of public transport interchange on site
- Contribution to bus service through the site
- Contributions to improved bus stop infrastructure on the site
- Provision of walking/cycling infrastructure on the site and connections to that in the locality
- Wastewater and water management
- Improvement and realignment of the B6420 Mansfield Road through the site

Where the wider body of Local Plan evidence includes consideration of junctions and highways works, as well as railway station works, then it would be reasonable to have some indicative costs drawn from associated reports.

A separate table in Appendix 2 deals with the site SEM001 (Apleyhead Junction) and this also omits to include costings for:

- Contribution to improve the A57/B6040 roundabout
- Contribution to improving A614 Blyth Road/A57/A1 junction
- Provision of foot/cycle links to nearby development
- Wastewater and water management

The assessment of Site EM008 - High Marnham also sets out a list of essential infrastructure require to ensure deliverability. Contributions to a number of highway improvement schemes are listed but again there are no costings. There are also infrastructure needs relating to utilities and waste management; again not costed.

High Marnham covers some 118 hectares of employment land. If deliverability was to prove unviable then the employment strategy set out in the Plan would also fail. In the absence of viability information it's deliverability cannot be relied upon.

We conclude that the cost evidence to support delivery of strategic sites is inadequate.

WYG Railway Technical Paper and Issues Note (2019) and The WYG New Stations Feasibility Note

The White Young Green Railway Technical Paper and Issues Note (August 2019) points out that the Garden Village will be constructed over a considerable timeframe (para 5.5.1) with implications on the demand and viability of the station. However, the authors caution against the ability to successfully provide a viable station with high standards of frequent service provision is heavily dependent upon the timely delivery of enough housing numbers (para 6.1.3), suggesting that enhanced bus services between Retford and Worksop in the short term, with delivery of the station in the longer term (para 6.1.4).

Policy ST3 relates to Bassetlaw Garden Village and sets out criteria that must be achieved.

At Section 2r (iv) it states:

"provision for an integrated transport hub in accordance with Policy ST54 including a railway station with a platform and necessary supporting infrastructure located to the north of the railway line, public transport interchange, electric vehicle charging hub and cycling hub and supporting infrastructure";

The WYG New Stations Feasibility Note comments:

"The proposed size of the Garden Village is such that sufficient demand could be generated by the completed development to justify the level of investment required to deliver a new station and changes to train timetables and scheduling, and suggested revisions to these demonstrate the possibility to accommodate two trains per hour.

The report also indicates that the railway station will cost in the region of £10m + £1m associated works. It should be accurately costed and used to inform a revised Infrastructure Delivery Plan.

WYG Junctions Assessment 2020

The WYG Junction Assessment Report of 2020 was commissioned by Bassetlaw District Council and is part of the Local Plan evidence base and makes a number of pertinent points which do not feature in the Council's assessment of Apleyhead Junction:

- that without the Apleyhead site, the 2037 design flows for the Garden Village are within and very close to capacity at AM and PM peak respectively (para 9.3.4)
- Apleyhead will lead to a further increase in pressure on the capacity of the A57, further testing and modelling being recommended (para 9.3.5)
- For the A57 to perform satisfactorily additional link capacity would therefore be required which would mean widening the A57 to dual carriageway between the A1 (J6) and the B6034 Netherton Road (J5) over a length of circa 6km (para 10.2.19)
- A corridor improvement plan is recommended taking account of planned growth and other likely sites alongside a credible mechanism for delivery of improvements (para 9.3.6)
- Widening the carriageway of this 6km section of the A57 is likely to cost in the region of £15m to £20m and could have detrimental environmental impacts due to the A57 being bordered by forest over most of this length (para 10.1.30)
- With exclusion of the 'Land off the A57 Apleyhead' employment allocation site and allocation of the Morton Garden Village site the sensitivity test results therefore suggest that widening of the A57 to dual carriageway would not be required (para 10.1.33)
- The results demonstrated that without vehicle trip reductions to reflect trip internalisation at the Garden Villages (i.e. some trips remain internal to the site and therefore do not impact on the wider highway network) the impacts on the wider highway network would be severe (para 10.1.19)

This is a key part of the evidence base, but it has not informed the Plan.

The WYG Junctions Assessment may be concerned with matters of highways engineering, design and cost, elsewhere in the Council's evidence base (particularly the Sustainability Appraisal) that the Apleyhead site is noted as:

- approximately 500m from a SSSI
- a local wildlife site is located within the site (Top Wood/Great Whin Covert).
- entirely within a 5km buffer around the Sherwood Forest ppSPA.
- the HRA identifies that this site could support ppSPA birds.
- constrained by mature trees

The assessment points to significant negative effects which do not apply to the Markham South site. We acknowledge, that there are differences between the sites, but the economic and social benefit applies in the context of critical differences in the impact and delivery of these sites. Markham South is a reasonable alternative to Apleyhead in the context of the significant negative effects revealed by the SA.

Employment Trajectory

We are unable to find a Trajectory for the delivery of employment land within the evidence base.

Appendix 2 of the Plan sets out the Housing Trajectory. The Bassetlaw Garden Village is included and indicates that the first housing delivery will not be until 2030/31. In our view it is unlikely that employment space will be available during the Plan Period. Sites which are deliverable without delay should be allocated now.

An Employment Trajectory should be published as part of the evidence base.

Sustainability Appraisal

Appendix 8 of the SA summarises the basis on which Markham South was not taken forward and why Apleyhead/A57 was. The following is an abstract and certain words have been highlighted for the purpose of comparison:

	SA results as summarised by the Council	Council's reasoned justification for taking site forward for allocation or not
Markham South	<p>Minor negative for biodiversity – within 5Km of Sherwood ppSPA.</p> <p>Significant positive for economy.</p> <p>Significant negative for land use/soils and water (loss of agricultural land and within SPZ3).</p> <p>Significant negative for resource use and waste:</p> <p>This site is within a Mineral Safeguarding Area¹ (Sneinton Gunthorpe Clay). As such, a significant negative effect is likely.</p> <p>Significant negative for heritage:</p> <p>The Council's heritage officer notes that the site is located in the setting of various designated heritage assets, such as Milton Mausoleum (Grade I) and West Markham DMV (scheduled Ancient Monument). The Council's archaeology officer notes that there is no specific site information, but that the site lies close to shrunken medieval settlement of West Markham, a Scheduled Monument.</p> <p>Further information is required² to evaluate the archaeological potential of the site in order to determine an appropriate mitigation strategy as such, a significant negative effect is likely in relation to heritage and archaeology</p>	<p>The site is located adjacent to the A1 and just to the north of Elkesley village and is partly developed for existing employment uses.</p> <p>Although the site is located close to the A1, it is isolated in its location and the Bassetlaw EDNA study identifies it as having good accessibility but is poor in its relation to the local labour supply. In addition, no significant housing growth is being proposed in the area to support a large allocation for employment.</p> <p>The Sheffield City Region Economic evidence base suggest that sites to the south of the District and away from the A1M have not been tested in terms of their commercial attractiveness and therefore reduces their deliverability.</p> <p>The site is identified as being within the setting of some important heritage assets in West Markham and Milton and the development of this could therefore have a negative impact on the setting of those identified heritage assets.</p>
Apleyhead	<p>The site is approximately 500m from a SSSI and a local wildlife site is located within the site option (Top Wood/Great Whin Covert).</p> <p>This assessment site is located entirely within a 5km buffer around the Sherwood Forest ppSPA.</p> <p>The HRA identifies that this site could support ppSPA birds.</p> <p>As such, a significant negative effect is likely.</p> <p>Significant positive for employment.</p>	<p>The policy addresses any potential for an impact on biodiversity by requiring future planning applications to be supported by a project level Habitats Regulations Assessment, including winter bird surveys to ensure there are no adverse impacts upon Clumber Park SSSI and Sherwood Forest ppSPA.</p> <p>The Council is working with Natural England and will seek to agree any mitigation measures accordingly.</p>

	<p>Significant negative for land and soils (loss of grade 3 agricultural land).</p> <p>Significant negative for water (SPZ3).</p>	<p>The site is located on an important transport infrastructure node for the A1/57 and A614.</p> <p>The site is also close to existing large scale employment sites at Manton Wood and the town of Worksop.</p> <p>The frontage of the site is constrained by mature woodland but there is opportunities for this to be largely retained and act as a "screen". Land within this part of the District has significant commercial interest with a recent large employment permission. There is also market interest in the site and therefore</p>
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The appraisal concludes favourably for Apleyhead Junction on the basis that a future application would address adverse impacts. The assessment does not appear to factor-in cumulative impact of the proposed allocation together with highways improvements on the A57 corridor otherwise referred to in the WYG junction assessment report published the same month as the Sustainability Appraisal. The potential widening to dual carriageway along 6km of road would have implications for woodland removal within/adjacent the site.

There is no consideration of the combination of Bassetlaw Garden Village and Apleyhead Junction sites in determining a delivery strategy for those works. Where these costs are unknown (August 2021 IDP refers), it is a leap of faith to suggest that significant adverse effects are resolvable through a planning application. Yet the White Young Green Junction Assessment informs the position.

Mitigation via a planning application can apply to any site. Land at Markham South can address matters of heritage and archaeology via further study associated with an application in a similar manner to Apleyhead. There are no issues relating to access as an access was constructed some years ago

Reference to the Sheffield City Region economic evidence base ignores the well-rounded assessment of Markham South as established by the Local Plan evidence base. It is trite to say that all of the A1 junctions in Bassetlaw are south of the A1(M). To rely on the Sheffield City Region evidence base point would be to negate any economic advantage of the A1 passing through Bassetlaw and south of the A614.

The Council's reasoned justification for not taking Markham South forward for allocation includes reference to the Sheffield City Region Economic evidence base, this suggesting that sites to the south of the District and away from the A1M have not been tested in terms of their commercial attractiveness and therefore reduces their deliverability.

Bassetlaw District Council commissioned GL Hearn to produce an Economic Development Needs Assessment for the District. This considered growth scenarios and potential benefits particularly in terms of a market assessment, informing the Local Plan Sustainability Appraisal. (Economic Development Need Assessment Part 2: Growth Assessment: Part 2, Final Report, January 2019; paras 1.1 and 1.2)

The A1 Corridor Logistics Assessment: Bassetlaw Council, Final Report, Icen Projects Limited August 2021, considers the logistics property market area, a market review, and an examination of the wider market context including reference to the Sheffield City Region and the Nottingham area. The market review considered the A1 corridor from Doncaster to Newark (see para 6.1), including agent feedback and market indicators (see Section 4). This advice was provided in the context of progressing the Bassetlaw Local Plan.

Later, at para 6.4 it states:

"The above messages are useful and develop a clear picture of the enhanced role of the A1 in the logistics market. In a period of fast rising demand responding to structural economic change, the lack of supply and policy constraints on the M1 has shifted focus onto the A1 which is able to provide levels of connectivity and labour sufficient to attract strategic occupiers." [emphasis added]

Turning back to the evidence base analysis commissioned by Bassetlaw DC from GL Hearn, their audit of employment sites includes the Markham South site which is described at para 1.173 as a "commercially attractive location".

Paragraph 4.2 of the Local Plan refers to the economy *capitalising on the District's locational advantage, in terms of proximity to the A1 and the A57 growth corridors*.

The SA identifies the Markham South site as within a Minerals Safeguarding Area (Sneinton Gunthorpe Clay), the now adopted Nottinghamshire Minerals Local Plan (March 2021) states at para 3.84 that:

- (i) not every non-mineral development proposal within or close to a Minerals Safeguarding and Consultation Areas represents a risk to future minerals extraction; and
- (ii) (ii) development which is in accordance with adopted District/Borough Local Plan allocations which took account of minerals sterilisation and where prior extraction is not feasible or appropriate is exempt from both consultation and safeguarding.

We do not consider this to be an impediment to delivery at Markham South

At Apleyhead Junction, significant negative effects are referred to and cumulative negative effects are not factored-in. The conclusion is skewed.

G L Hearn's Economic Development Need Assessments Parts 1-3, January 2019 (also commissioned by BDC)

This considers spatial options and their ranking. Option 3 would include Markham Moor and is ranked in third place behind 'parallel strategies' (Option 8) and 'hybrid of options' (Option 6) in first place

Option 6 includes Option 3: "Focus New Development on A1 Corridor". Allocating some land for economic development and associated housing development along the A1 corridor would allow the Plan to address Bassetlaw's strength in the distribution sector and good access to the strategic road network, without being detrimental to the character of settlements along this corridor."

The highest ranking option would include Markham South on the basis that G L Hearn's assessment sees the allocation of sites for employment uses along the A1 corridor, as it runs through Bassetlaw.

There is a range of potential Brownfield and Greenfield sites across the south of the district including Gamston Airport South and around Markham Moor, the latter amounting to in excess of 40 ha of Greenfield (para 2.36)

The Part 3 assessment indicates that the delivery of a workforce in this area is likely to facilitate strong employment growth. The level of employment demand is likely to be linked in part to the level of housing but is estimated as 10-20ha from a lower level of settlement in the region of 1,000 homes, subject to location (para 2.37)

This can be contrasted with para 3.4 of G L Hearn's economic assessment:

"It is considered unlikely that a garden village will act as a catalyst for a major inward investment attracting higher value sectors not typically represented in the FEMA. However, there should be potential to create an entrepreneurially orientated settlement that can stimulate local business growth and productivity, particularly if public or other investment can support this."

The GL Hearn reports provide further evidence of the attractiveness of the A1 corridor and questions the ability of the Bassetlaw Garden Village site to attract inward investment and hence deliver the Plan's strategy

Nathaniel Lichfield and Partners Employment Land Capacity Study 2010

This was commissioned by the Council. Whilst over 10 years old many of the conclusions are still highly relevant. Much of this is picked up in the more recent GL Hearn Employment Needs Study.

The NLP report did highlight the high employment asset value of the M1 and A1. With regard to the A1 corridor it concluded that there was strong demand for employment uses particularly distribution within the potential for 5-10 hectares of new allocations in the vicinity of Markham Moor/Gamston and/or Blyth.

It assessed individual sites along the A1 corridor. It appraised two sites at the Markham Moor interchange. Land to the South of the A57/A1 Markham Moor (16.7 hectares) was appraised as being of "good quality" with few identified constraints. Its development would complement the growth of a number of services and other employment developments that had taken place around the junction.

Table 23 of the report scored the potential employment sites against a number of criteria

- Strategic Access
- Local Road Access
- Proximity to urban areas, and access to labour & Services
- Compatibility of adjoining uses
- Site characteristics and development constraints
- Market Attractiveness
- Planning/Sustainability Factors

The Markham South site scored highest with a score of 29 (Good) out of a maximum 35. Land (RA2) to the east of the A1/A57 junction scored 24 and the site (RA3) to the west scored 23.

Only one site in the entire District scored higher – Gateford Common in Worksop scored 32.

Clearly the Markham Moor A57/A1 site was assessed as being “good” and from the assessment we see no evidence why the site should not be carried through into the current plan. The quality of the site remains as assessed in 2010. It has not become an average or poor site. It need be noted that Local Plan process is concerned with consideration of reasonable alternatives. The advice the Council sought was particularly favourable in relation to Markham South.

Paragraph 6.50 states:

Areas in the vicinity of Markham Moor interchange and Gamston Airfield are likely to have the strongest level of demand from commercial operators.

At paragraph 8.11 the report states:

"It is understood that there is reasonably strong demand for distribution and general industrial uses along the A1 Corridor, although the broad location is removed from the major settlements (except for Harworth – see below). The two highest scoring sites are to the north and south of Markham Moor Interchange, MM1 and MM2. Whilst both are greenfield sites with no formal designation in the Local Plan that are relatively remote from local services, they are highly accessible and attractive to hauliers. The 'land to the south of A57/A1 Markham Moor' is further advanced with developer interest for general industrial and storage with ancillary office space; however, both would be candidate sites should the Council decide to designate a new 5-10ha allocation along the Corridor".

Against this background we fail to see how sites at the Markham Moor A1 /A57 junction (Markham South) have not been taken forward in the Plan.

Cottam Power Station Headline Transport Issues prepared by WYG

This was commissioned by the Council and at 2.7.2 it states

"The site currently has very poor accessibility by sustainable modes of transport. Whilst opportunities exist to provide improved connections to local villages for walking and cycling these villages offer very few facilities. The nearest settlement providing key services is Retford, approximately 9 miles to the west and this distance effectively rules out walking and cycling to access these services or the nearest railway station which is also in Retford".

It goes on to state at 2.7.5 and 2.7.6

"The site is very poorly served by existing bus services and providing an improved bus connection is likely to require the site promoter/developer to subsidise a bespoke service in perpetuity.

Any development on the site is therefore likely to be heavily reliant on car based trips and would be contrary to national and local transport policies with regards to focussing significant development in locations that are, or can be made to be

sustainable, by reducing the need to travel by car by providing a genuine choice of sustainable transport modes”

The Council has quite correctly not allocated Cottam PRA because of uncertainty of delivery. However, it has “safeguarded” the site for future redevelopment. We fail to see how this can be justified. The Council’s own report highlights the site’s poor sustainability credentials. The site will not become more sustainable over time. The evidence does not support the “safeguarding”.

There are more sustainable sites that are capable of early delivery. Land at Marnham South is one such site.

A1 Corridor Logistics Assessment prepared by Iceni. August 2021 (Doc T1-014)

Bassetlaw District Council commissioned Iceni Projects Ltd to produce an assessment of the logistics market on the A1 corridor in Bassetlaw and the wider property market area although in reality it focused on the proposed allocations.

At paragraph 6.3 it set out the key messages from the study as:

- *the A1 has become significantly more attractive in the last 2 years*
- *Very significant changes in macro trends – ecommerce requirements – leading to demand for bigger units, higher units, bespoke units both logistics and manufacturing, with a significant lack of availability on the M1 corridor north of Castle Donnington to Sheffield.*
- *M1 is very constrained in terms of greenbelt designation, A1 area has greater availability of land and in the current market it is simply a case of available land in the area of search.*
- *People looking further afield than previously from core markets due to labour market availability.*
- *Land on the M1 tends to be controlled by major institutions, whereas the A1 tends to be more flexible and provides new opportunities including for owner occupiers.*
- *The A1 is not as traffic congested whilst the M1 is increasingly problematic for movements.*
- *The A1 is overall a cheaper location for land and rents.*
- *Occupiers willing to look at broader areas, increasing typical search from 25 mile to up to 50 mile – 100 mile radius.*
- *Good connectivity to the M1 via A57.*
- *Rate of take up at iPort has been phenomenal - half of the scheme has gone in 5 years that should have taken 20 years – this is driving the developer / occupier market to search for more land in the sub region.*
- *The market has shifted from 100-150k sq ft buildings to over 500,000 sq ft, with additional land implications and a very significant undersupply of suitable quality sites.*
- *Bassetlaw already has a number of significant warehouses – Wilkos, B&Q, DHL – and is already an established location.*
- *Doncaster is considered to have a reasonable level of supply however Nottinghamshire’s M1 supply is very tight, and this has generated demand pressure into the A1 and M18.*
- *A1 corridor authorities tend to be more pro-growth having not had the historic investment from logistics occupiers.*

The above messages are useful and develop a clear picture of the enhanced role of the A1 in the logistics market. In a period of fast rising demand responding to structural economic change, the lack of supply and policy constraints on the M1 has shifted focus onto the A1 which is able to provide levels of connectivity and labour sufficient to attract strategic occupiers. This is not to negate the role of the M18 and the benefits of forthcoming supply, but rather a manifestation of a supply demand imbalance in the wider area

We are of the view that this most recent study has not been fully considered in assessing alternative sites along the A1 Corridor. The report strongly supports development along this corridor, yet only the site at Apleyhead Junction has been allocated. We have expressed our concerns about delivery at Apleyhead Junction and are consequently surprised that alternative sites such as Markham South have not been given further consideration. The Council is failing to maximise the economic potential that the A1 corridor can generate.

As has been witnessed by both Brexit and COVID 19, customer attitudes can change quite dramatically and rapidly. For example the growth in online shopping has taken the industry by surprise such that new ways of working, particularly in logistics, are evolving rapidly. Other changes, such as the impacts of Artificial Intelligence, will evolve over the life of the Plan and inevitably some of the safeguarded employment sites will no longer be suitable. Hence, coupled with Policy ST11 there needs to be support for the wider employment prospects ie storage and distribution on A1 corridor, sites like Markham South that are infrastructure ready.

A recent Quarterly Report by Deep Insights analyses trends and notes the forthcoming challenges and opportunities to raising economic prosperity. Transitioning to a low-carbon economy. Levelling up. Adapting for a digital age. Solving a housing crisis. Rethinking high streets. Reconfiguring for an ageing population.

It also identifies a number of key areas and trends

"With people returning to workplaces, the offices subsector saw a large bounce in activity in Q2 (2021). However high-street and out-of-town retail remains in the doldrums as Covid-19 cases increase again".

"The warehousing sector has now averaged £500m per month for 6 months as Brexit and the online revolution drive changing behaviour."

Economic focus will transform over the life of the Plan, and it needs to be adaptive to change. We consider that the suitability of some of the protected sites cannot be relied upon to engage in these changes. Other more flexible sites need to be identified.

A recent article in the Independent (October 2021) by Ben Chapman assessed the shortage of logistics space and noted:

A critical shortage of warehouse space risks causing yet further delays to Christmas stock already threatened by a growing backlog at UK container ports and a lack of lorry drivers businesses have warned.

Warehouse operators reported that the industry is "creaking at the seams" and said companies were running "dangerously" low on time to be ready for the busiest period of the year.

Warehouses have filled up rapidly thanks to a boom in online shopping during the pandemic, while businesses have responded to the chaos in global supply chains by building up stocks, putting further pressure on limited space.

Industry leaders say that a cumbersome planning system means they cannot build new warehouse space fast enough to keep up with demand.

The events of recent weeks have brought into focus just how goods are distributed across the country. Production takes up space, as does storage, movement, and storage again and movement. Goods are moved a number of times from production to final destination and facilities are needed at each stage. The production of goods, their storage and their movement is a matter of 'logistics': how space and travel is configured in sequence to link manufacture with demand.

The need for more business space, especially along transport corridors such as the A1 is now.

Policy ST11 Rural Economic Growth and Economic Development Growth Outside Employment Areas.

We generally support the inclusion of Policy ST11 but consider that the preamble in paragraphs 6.5.1 - 6.5.5 should be reviewed. The text recognises that 80% of the district is 'rural' and that existing business will require expansion and new businesses could be introduced. However, it does not recognise that the A1 passes through the district and is a major economic driver in the 'rural' area. This omission does not reflect the Council's own study - The Bassetlaw A1 Logistics Assessment 2021 which recognises the economic value and potential of the A1 corridor.

To assist the Inspector we submit Plan 1 that shows the existing facilities and development at the A1/A57 Markham junction.

We suggest that the preamble text be revised to recognise that the A1 corridor and the potential this has to support economic development within the context of the criteria set out in Policy ST11.

Conclusion

Our concerns extend across a number of policies, notably:

1. ST4/EM009- Bassetlaw Garden Village
2. ST6 - Cottam Priority Regeneration Area
3. ST8/EM008 – High Marnham Green Energy Hub
4. SEM001 – Apleyhead Junction
5. ST11 - Rural Economic Growth and Economic Development Growth Outside Employment Areas.

We consider that the Plan has not fully considered delivery of Apleyhead Junction and the Bassetlaw Garden Village including beyond the plan period.

The Infrastructure Delivery Plan is not robust and is seriously deficient in certain areas such that costs cannot be relied upon. This lack of robustness needs resolution ahead of the allocation of such large strategic sites upon which the Plan is dependent.

Economic reports that form the evidence base all clearly recognise the value of the A1 corridor in attracting investment and jobs to Bassetlaw. The Plan does not maximise these opportunities.

Safeguarding Cottam PRA is not supported by the evidence base. It would only deliver an unsustainable site.

The lack of an Employment Trajectory should be rectified. There is no clear path showing delivery.

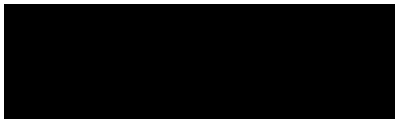
The preamble to Policy ST11 should make reference to the value of the A1. Land in the Rural area adjacent the A1 junctions is very different in context and attracting inward investment compared to more remote rural sites. The Rural area is not homogenous.

We conclude that the Plan is neither justified nor effective and hence not sound for the reasons set out above.

We trust that you will take consideration of our representation.

Should you require any further information then do not hesitate to contact me.

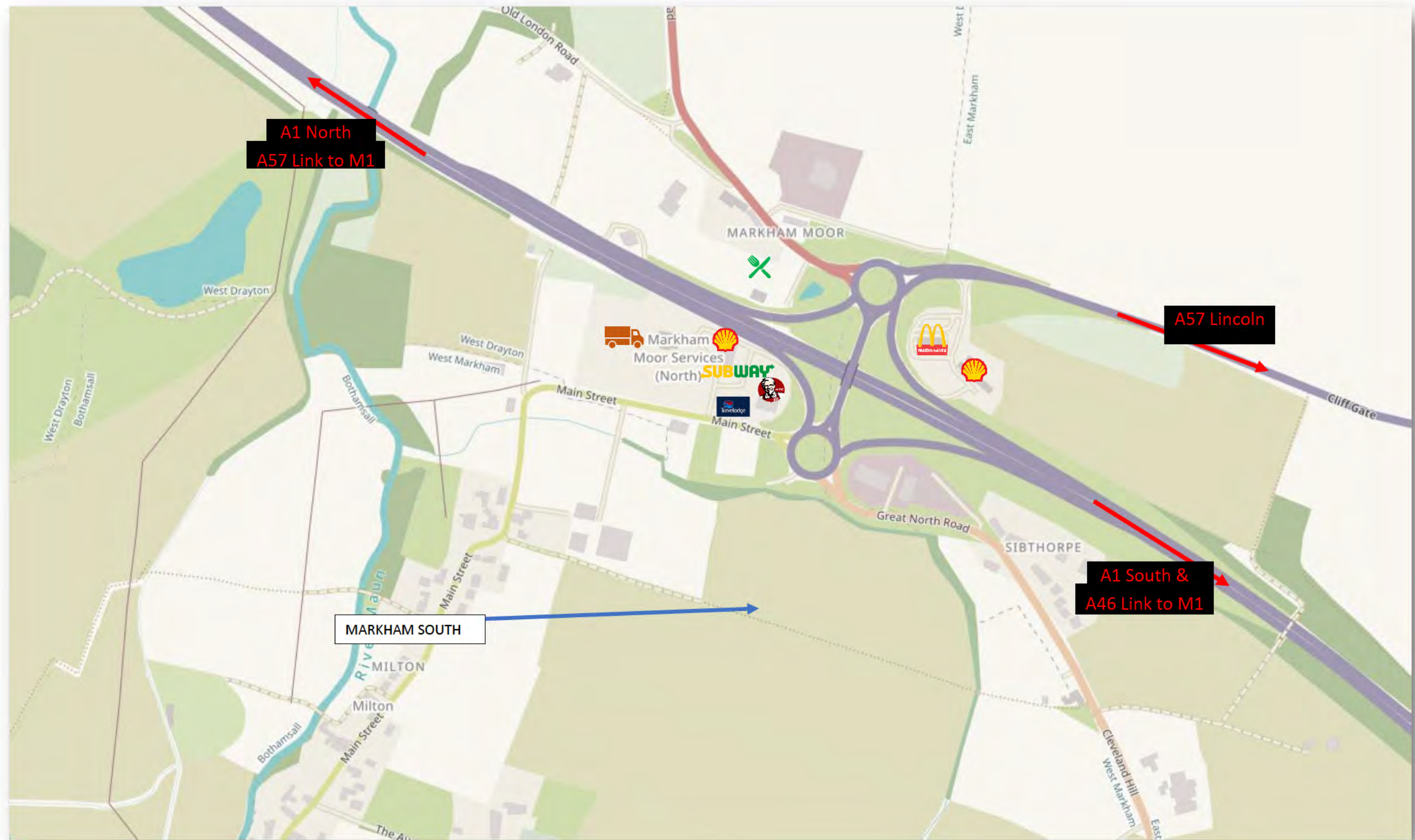
Yours faithfully



Director - Stone Planning Services Limited

Plan 1 – A1/A57 Markham Junction

Plan 1- Markham Moor facilities Map



REF034



From: [REDACTED]
To: The Bassetlaw Plan
Subject: Bassetlaw Local Plan 2020-2037: Publication Version (Albemarle Homes)
Attachments: P0-TP-SPA-RP-P4468-0001-A.pdf; P0-TP-SPA-RP-P4468-0002-A (form).pdf
Importance: High

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

Hi,

Spawforths have been instructed by Albemarle Homes to submit representations to the Bassetlaw Local Plan 2020-2037: Publication Version, for their site at Blyth Road, Blyth/Harworth.

I trust that the representations are duly made and I would be grateful if you could confirm their receipt.

If there are any queries, please do not hesitate to contact me.

Kind regards

[REDACTED]
Associate Director: Chartered Town Planner
BSc (Hons), MSc, PG DIP, MRTPI



£300m Blackpool Central Plans Approved		UNANIMOUS APPROVAL FOR
		NIKAL'S £300M BLACKPOOL CENTRAL
		Spawforths and Nikal's have secured the unanimous approval of a committee of the £300 million Blackpool Central scheme.
		It will be constructed on the site of the former train station of the same name and feature three indoor entertainment centres, public square, bedrooms, bars, restaurants, car parks, hotel, apartments and many new bars and restaurants.
		This is a key moment for boosting up Blackpool's visitor economy GDP and will help transform and futureproof the town's economy.

Junction 41 Business Court, East Ardsley, Leeds, WF3 2AB
Main: 01924 873873 Web: www.spawforths.co.uk
Direct: - Email: [REDACTED]
Mobile: [REDACTED] LinkedIn:



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Bassetlaw Local Plan 2020-2037

Publication Version Representation Form September to October 2021

Please submit electronically if possible to thebassetlawplan@bassetlaw.gov.uk

Please use this form to provide representations on the Bassetlaw Local Plan. Bassetlaw District Council must receive representations by **5pm on 21st October 2021**. Only those representations received within this period have the statutory right to be considered by the inspector at the subsequent examination.

Responses can be submitted via the electronic version of the comment form which can be found on the Council's web site at: www.bassetlaw.gov.uk/BassetlawPlan Alternatively this form can be completed and returned as an e-mail attachment to thebassetlawplan@bassetlaw.gov.uk or by post to **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

Please note:

- Representations must only be made on the basis of the legal compliance, compliance with the Duty to Co-operate and/or soundness of the Plan.

Please read the guidance note, available on the Council's webpage, before you make your representations. The Local Plan and the proposed submission documents, and the evidence base are also available to view and download from the Council's Local Plan webpage:

www.bassetlaw.gov.uk/bassetlawplan

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All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: <https://www.bassetlaw.gov.uk/about-us/data-protection/departmental-privacy-notice/planning-policy-privacy-notice/>

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Please tick/ delete as appropriate:

Please confirm you have read and understood the terms and conditions relating to GDPR.

Yes ☒

No ☐

Please tick as appropriate to confirm your consent for Bassetlaw District Council to publish and share your name/ organisation and comments regarding the Bassetlaw Local Plan.

I confirm my consent for Bassetlaw District Council to share my name/ organisation and comments regarding the Bassetlaw Local Plan including with the Planning Inspectorate.

Yes ☒

No ☐

Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Bassetlaw Local Plan.

I would like to opt in to receive information about the Bassetlaw Local Plan.

Yes ☒

No ☐

Printed Name:

[REDACTED]

Signature:

Date:

20th October 2021

This form has two parts:

Part A - Personal details – need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part A- Personal Details

1. Personal Details

Name:

Organisation (if applicable): Albemarle Homes

Address:

Postcode:

Tel:

Fax:

Email:

2. Agent Details (if applicable)

Agent:

Organisation (if applicable): Spawforths

Address: Junction 41 Business Court, East Ardsley, Leeds,
West Yorkshire

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Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Albemarle Homes

3. To which part of the Local Plan does your representation relate?

Policy: Please see attached representation.

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes ☐

No ☒

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☐

No ☒

- 5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.** If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached representations.

Continue on a separate sheet if necessary

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Please see attached representations.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes ☒

No, I do not wish to participate in hearing session(s)

No ☐

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To address our representations.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

Development Plan Representation

Bassetlaw Local Plan 2020- 2037: Publication Plan

On behalf of Albemarle Homes Ltd

October 2021



I. Introduction

- I.1. Spawforths have been instructed by Albemarle Homes Ltd to submit representations to the Bassetlaw Local Plan 2020-2037: Publication Plan, for their site at Blyth Road, Blyth/Harworth.
- I.2. Albemarle Homes welcomes the opportunity to contribute to the emerging Local Plan for Bassetlaw and is keen to further the role of the District within Nottinghamshire and the Sheffield City Region.
- I.3. Albemarle Homes has significant land interests in the area, which can positively contribute towards the economic and housing growth agenda.
- I.4. Albemarle Homes would like to make comments on the following topics and sections in the Publication Draft Plan:
 - General Comments
 - Vision and Objectives
 - Policy ST1: Spatial Strategy
 - Policy ST2: Residential Growth in Rural Bassetlaw
 - Policy ST15: Provision of Land for Housing
 - Policy ST29: Affordable Housing
 - Policy ST30: Housing Mix
 - Omission Site: Blyth Road, Blyth/Harworth (LAA494)
 - Appendix I: Site Plans
- I.5. In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is found sound.
- I.6. Albemarle Homes welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public.
- I.7. We trust that you will confirm that these representations are duly made and will give due consideration to these comments.
- I.8. Please do not hesitate to contact us to discuss any issues raised in this Representation further.

2. National Planning Policy Context and Tests of Soundness

- 2.1. The Government's core objectives as established through the 2021 National Planning Policy Framework (the Framework) are sustainable development and growth. Paragraph 11 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2021 Framework sets out to boost significantly the supply of homes and that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2021 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes and well-designed places.
- 2.2. In relation to Local Plan formulation, paragraphs 15 to 37 of the Framework state that Local Plans are the key to delivering sustainable development which reflect the vision and aspirations of the local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where. Paragraph 22 is clear that Strategic Policies should look ahead over a minimum 15 year period, and where larger scale development such as new settlements or significant extensions to existing villages and towns form part of the areas strategy, then policies should look ahead over a period of at least 30 years.
- 2.3. In relation to the examination of Local Plans, paragraph 35 of the Framework sets out the tests of soundness and establishes that:
- 2.4. The Local Plan and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant

- 2.5. This document therefore considers the content of the Publication Local Plan consultation document on behalf of Albemarle Homes in light of this planning policy context.

3. General Comments

- 3.1. Albemarle Homes **is concerned** that the evidence base does not reflect national guidance.

Test of Soundness

- 3.2. Albemarle Homes considers that the Local Plan is **unsound**.

Which test of soundness are comments about?			
X	Positively Prepared	X	Effective
X	Justified	X	Consistency with National Policy

Justification

- 3.3. Albemarle Homes **is concerned** that the evidence base which supports the plan appears incomplete. The Framework requires Local Plans to be based on a sound and up-to-date evidence base which identifies a development need and reflects the locational characteristics of a District. It is therefore difficult to comment in depth where there is little supporting information. It is concerning for example that the Housing and Economic Development Needs Assessment is dated November 2020 and utilises inaccurate and out of date base information. This will be further explored in response to Policy ST1.
- 3.4. The locational characteristics of settlements and their appropriate boundaries have not been considered appropriately within the Spatial Strategy, which leads to sites not being assessed similarly within their locational characteristics. This is deeply flawed and will be explored further within these representations.
- 3.5. Furthermore, Albemarle Homes is concerned that the Local Plan period is insufficient. The 2021 Framework indicates that where “larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery”. Albemarle Homes is aware that the Publication Local Plan suggests a 30 year Vision but the Vision within the Plan only goes up to 2037.

Albemarle Homes suggests that the Plan period should fully encompass the proposed delivery of the Garden Village and be extended to at least 2053, which is a minimum of 30 years from the date of adoption.

- 3.6. Albemarle Homes therefore reserve the right to comment further on the Local Plan and policies when this information is updated and provided.

Proposed Change

- 3.7. To overcome the objection and address soundness matters, the Council should:

- Update the evidence base to reflect national policy and guidance.
- Review Spatial Strategy and assessment of sites.
- Amend Plan period.

4. Vision and Objectives

- 4.1. Albemarle Homes is **concerned** that the Vision and Objectives does not reflect national policy and guidance.

Test of Soundness

- 4.2. Albemarle Homes considers that the Local Plan is **unsound**.

Which test of soundness are comments about?			
X	Positively Prepared	X	Effective
X	Justified	X	Consistency with National Policy

Justification

- 4.3. Albemarle Homes is concerned that the Local Plan Vision is only to 2037. The 2021 Framework indicates that where “larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery”. Albemarle Homes is aware that the Publication Local Plan suggests a 30 year Vision within the Garden Village Vision Statement, however this should be contained within the Local Plan, which only goes up to 2037. Albemarle Homes suggests that the Plan period should fully encompass the proposed delivery of the Garden Village and be extended to at least 2053, which is a minimum of 30 years from the date of adoption.
- 4.4. Notwithstanding the above, the Local Plan is unlikely to be adopted until 2023 at the earliest following Examination in Public and therefore the Local Plan period for all other aspects should be a minimum of 15 years from the date of adoption and therefore, at least 2038.

Proposed Change

4.5. To overcome the objection and address soundness matters, the Council should:

- Extend the Local Plan period to reflect the Garden Village and be a minimum of 30 years.

5. Policy ST1: Spatial Strategy

- 5.1. Albemarle Homes is **concerned** with the scale and distribution of housing and that it does not reflect the principles of sustainability and growth.

Test of Soundness

- 5.2. Albemarle Homes considers that the Local Plan is **unsound**.

Which test of soundness are comments about?			
X	Positively Prepared	X	Effective
X	Justified	X	Consistency with National Policy

Justification

- 5.3. The Framework describes the purpose of the planning system to contribute to the achievement of sustainable development. There are three overarching objectives which are central to the achievement of sustainable development: economic, social and environmental. The economic objective is to *“help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”* [Paragraph 8, NPPF, Spawforths emphasis].
- 5.4. Plans are required to be prepared positively and in a way that is aspirational but deliverable, and ensure that strategic policies look ahead over a minimum of 15 years from adoption in order to anticipate and respond to long term requirements and opportunities such as those arising from major improvements in infrastructure. Strategic policies include the scale and quantity of development and making sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development alongside infrastructure and community facilities.
- 5.5. Furthermore, paragraph 22 of the Framework states *“Where larger scale development such as new settlements or significant extensions to existing villages and towns form part of the strategy for*

the area, policies should be set within a vision that looks further ahead (at least 30 years), to take account the likely timescale for delivery". [Paragraph 22, NPPF, Spawforths emphasis].

- 5.6. The Framework is clear that to be considered positively prepared and therefore 'sound' the plan must, as a minimum meet the plans objectively assessed needs [Paragraph 35, NPPF].
- 5.7. The Government is committed to boosting the supply of homes and ensuring that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed [Paragraph 60, NPPF].
- 5.8. The Plan is also expected to create conditions in which businesses can invest, expand and adapt, which requires a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. There should be significant weight on the need to support economic growth and productivity. Plans are required to be flexible enough to accommodate needs that have not been anticipated within the Plan. Critically in relation to housing, the Framework requires growth and investment in infrastructure to be aligned, and that policies "address barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment". Policies are also required to recognise and address the specific locational requirements of different sectors [paragraphs 81, 82 and 83NPPF].
- 5.9. **Albemarle Homes is concerned that the Plan has not been positively prepared having regard to the economic growth aspirations.** Albemarle Homes considers that the scale and growth of the aspirations for Bassetlaw Garden Village and Apleyhead, in particular constitutes a 'Significant extension' for the purposes of Paragraph 22 of the Framework. **As a result Albemarle Homes considers there is a need for the Plan to provide a longer term vision of at least 30 years.** This supports Albemarle Homes' representations that there is a need to ensure that there is a long term framework to support sustainable housing, employment and infrastructure provision in the District to realise the potential of this significant investment, which should be directed around the District.
- 5.10. Notwithstanding the above, Albemarle Homes is concerned that the annual requirement is not consistent with the Framework and Planning Policy Guidance (PPG). The Publication Local Plan identifies an approach which seeks to deliver 591 new homes per year on the basis of the standard methodology and affordable housing uplift. However, Albemarle Homes does not consider the Housing and Economic Development Needs Assessment (HEDNA 2020) fully addresses the scale of employment growth and any potential uplift for housing associated

with it. Albemarle Homes considers the HEDNA 2020 utilises out of date and overly pessimistic forecasts, which will be explored in further detail shortly.

- 5.11. The Framework (paragraph 35) is clear that to be considered positively prepared and therefore ‘sound’. The Plan must, as a minimum, meet the Plan Area’s objectively assessed needs, Footnote 21 confirms for housing, that such needs should be assessed using a clear and justified method.
- 5.12. The Framework, paragraph 61, is clear when determining the ‘minimum’ number of homes strategic policies should be informed by a local housing need assessment, with reference to the standard methodology. However policy and guidance is clear that the standard methodology is a starting point for preparing the housing requirement. The PPG explicitly states that the standard methodology does not produce a housing requirement figure¹. It is also clear that the affordability adjustment within the standard methodology is just to ensure that the minimum housing need starts to address affordability of homes. It therefore does not fully address affordability issues².
- 5.13. PPG goes on to identify the circumstances when it is appropriate to plan for a higher housing need figure than the standard methodology identifies.
- 5.14. *‘The Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes in an area...it does not predict the impact of future government policies, changing economic circumstances or other factors that might have an impact on demographic behaviour. Therefore there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicate.*

This will need to be assessed prior to and separate from considering how much of the overall need can be accommodated. Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

¹ Paragraph 002 Reference ID: 2a-002-20190220.

² Paragraph 006 Reference ID: 2a-006-201902020.

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

There may occasionally be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering if it is appropriate to plan for a higher level of need than the standard model suggests³.

5.15. It is important to recognise that the development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance of housing in an area is necessary for economic growth. This is recognised within the Framework, paragraph 82. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity for Bassetlaw.

5.16. Importantly the HBF released in July 2018 its report on the Economic footprint of house building in England and Wales, which shows that housebuilding in England and Wales was worth £38bn a year, supporting 700,000 jobs. House building activity contributes economically in different ways including providing jobs, tax revenues and contributing funding for local infrastructure and communities. House building supports the economy in a wider sense through being a driver for economic growth; delivering jobs and economic value; supporting

³ Paragraph 010 Reference ID: 2a-010-20190220.

labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land.

- 5.17. An important conclusion of the report and the wider economic benefits is that **a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth.** This relationship is recognised within the regional strategies and the emerging HEY LEP strategy, which notes the importance of attracting and retaining a working age population, and ensuring there is sufficient housing to support the needs of existing residents and new residents.
- 5.18. The Government published the revised standard methodology for assessing local housing need on 16th December 2020. The approach changed partly in response to the Covid-19 pandemic, however the aims of the revisions remain as set out in the ‘changes to the current planning system’. The Government reaffirm their commitment ‘*to the delivery of 300,000 new homes a year, a focus on achieving more appropriate distribution of homes, and targeting more homes in areas where there are affordability challenges*’. The Government has indicated that they are committed to seeing 300,000 homes per year delivered by the mid 2020’s and has reiterated that the local housing need figure ‘**does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area**’. Local authorities remain responsible for determining how many homes to plan for, and this should take account of local circumstances.
- 5.19. Albemarle Homes maintains that there are clear circumstances in Bassetlaw which demonstrate that housing need in Bassetlaw is higher than the figure that results from the ‘Standard methodology’. These include:
- The growth strategy and investment;
 - Infrastructure improvements;
 - Past delivery rates; and
 - Affordable housing need;

Housing Requirement – Economic Growth

- 5.20. There is significant potential for the levels of economic growth, to be exceeded and achieve above trend growth as a result of interventions proposed in the Build Back Better, UK Decarbonisation Strategy, Northern Powerhouse Strategy, Northern Powerhouse Rail, including investment in the Sheffield to Hull and Leeds to Hull line, economic strategies, Goole Town Deal and the recent Freeport decision.
- 5.21. The spending review (November 2020) provided further commitment to the 'levelling up' agenda. This included a £4 billion fund to level up regional infrastructure. Housebuilding was acknowledged to play a key role in economic recovery and keeping the housing market moving was a key focus of the spending review, this comprised a £7.1 billion national home building fund on top of the £12.2 billion affordable homes programme. Chris Pincher⁴ reiterated the need to *'Build, Build, Build' 'because fundamentally we need to build more homes, More homes around the country in places they are needed because demand is high, in places that they are needed because the level of stock is poor, in places they are needed because we need to reimagine our town centres, and our city centres as we emerge through the Covid epidemic'*.
- 5.22. Against this context of further investment in infrastructure, significant employment opportunities within Bassetlaw and a renewed commitment to increasing the supply of new housing there is the evidence that employment growth and its relationship with housing should be increased within the Plan.
- 5.23. The HEDNA 2020 considers Housing Need, based on the Standard methodology, it then goes on to set out the circumstances where housing need may be higher than the Standard methodology. However, the HEDNA prepared in 2020 reflects an out dated position on Covid-19 and the economic recovery considering for example it will take four years for jobs and unemployment to recover to pre-pandemic levels.
- 5.24. The Government is committed to a rebalancing agenda whereby it is seeking to "level up" economic growth and overcome regional disparities in order to allow the North of England to realise its potential. The Industrial Strategy – Building a Britain Fit for the Future, 2017, which aims to create an economy that boost productivity and earning power throughout the UK. The Industrial Strategy establishes Grand Challenges to put the UK at the forefront of

⁴ *Chris Pincher*, Minister of State for Housing, Speech on 23rd November 2020

industry. The Grand Challenges, as updated January 2021, expands upon the Grand Challenges, and develops ambitious missions to tackle the challenges. The first 4 of the Grand Challenges are focused on Global trends which are set to transform the future. These includes Artificial Intelligence and data; ageing society; **clean growth**; future of mobility. The UK Government aims to lead the world in development, **manufacture and use of low carbon technology**.

- 5.25. Bassetlaw lies in a strategically important area of the country in-between the Northern Powerhouse and the East Midlands. It will therefore benefit from growth in Yorkshire and the Midlands and needs to reflect these overarching growth strategies.
- 5.26. The Northern Powerhouse forms part of the Government's Industrial Strategy and has an objective to achieve a sustained increase in productivity across the whole of the North of England. It seeks to drive the transformation of the northern economy equating to 4% increase in productivity, an increase in GVA of almost £100 billion and the creation of up to 850,000 new jobs by 2050, rebalancing the gap in performance relative to southern England. The Northern Powerhouse Strategy seeks to achieve this aim through improvements in connectivity; addressing the disparity in skills; ensuring that the north is an excellent place to start and grow a business; and promoting trade and investment across the north. The economic review of the Northern Powerhouse identified four prime capabilities where the north is highly competitive, including **advanced manufacturing, digital, energy** and health innovation. It also identified a number of enabling capabilities including higher education, **logistics** and financial and professional services, which is a notable alignment with the economic strategies for Bassetlaw.
- 5.27. Furthermore, Bassetlaw is on the edge of the Sheffield City Region which aims **to build** on innovation capacity and capabilities, securing the future of the next generation by nurturing the economy whilst protecting people and the environment, investing in urban centres, building transport infrastructure, investing in zero carbon, making homes and land available for families and businesses to locate and grow and making good jobs that create opportunities.
- 5.28. The SEP vision aims by 2040 to create 33,000 extra people in higher level jobs and an extra £7.6bn growth in Gross Value Added in the economy. The vision also sets out to grow wages and for people to live longer with healthier lifestyles and for a net zero carbon city region.

- 5.29. Bassetlaw District is covered by the D2N2 LEP, which includes Derby, Derbyshire, Nottingham and Nottinghamshire. The Strategic Economic Plan aims to increase the overall value of the economy to £70bn with £9bn being added as a result, prosperity will rise and employment rates will be high and stable. The overall aim being to reduce the gap in economic activity levels between places in D2N2.
- 5.30. Despite its preparation relatively recently in 2020, the HEDNA does not reflect the scale of ambition and substantial employment opportunities within the area. There has been a significant change in circumstances since its preparation, and whilst the HEDNA nods to the potential to some of these changes it is clear that the implications of which are not fully reflected in the overall recommendations and consequently within the Plan.
- 5.31. The Local Plan evidence does not reflect fully on the impacts of Covid-19. It has become clear that the Covid-19 pandemic has not affected all sectors and markets in the same way. Several industry reports show that market activity returned post the first lockdown and that the outlook for the industrial and logistics sector is positive.
- 5.32. The impact of Covid-19 and Brexit has not been restricted to logistics. The UK Industrial Strategy has stressed the importance of manufacturing to the UK economy. Although some areas of manufacturing were affected initially by Covid-19, there are sectors, such as health and medical supplies, which experienced significant growth.
- 5.33. The UK Research and Development Roadmap 2020, updated 2021 is clear that Research and Development is critical to economic and social recovery from the impacts of the Covid-19 Pandemic. Beyond Covid the Roadmap notes that the greatest challenge is to decarbonise economies and build resilience to the impact of climate change, habitat loss and biodiversity. This approach is reflected in the Government's plans to Build Back Better and prioritise Levelling Up.
- 5.34. It is therefore concerning that given this political and strategic aims from a national to a regional and local level that the HEDNA adopts a pessimistic view on the economy and economic growth, which then transcends through to lower housing growth then would have otherwise occurred. This approach can harm the economy.
- 5.35. As stated earlier, paragraph 5.4 states that unemployment will have increased through Covid-19. This statement was already out of date at the time of publication of the report with the

claimant count in September 2020 being 3.9%, which is lower than the East Midlands and GB average.

- 5.36. Furthermore, the jobs growth figures for proposed employment allocations such as Apleyhead appear to be below those suggested by site promoters. The HEDNA suggests jobs of 3,857 to 5,358, whilst site promoters suggest between 6,000 and 7,700 jobs. Similarly, vacancy rates are low in the area at circa 2.98% and there is only 0.34 years supply of employment land. This all points towards the need for further employment land and a balanced market with housing.
- 5.37. However, of concern is that higher jobs growth is considered with higher levels of housing, but this was dismissed with no consideration and only carried forward was low jobs growth at the Apleyhead employment site with a constant commuting ratio. This analysis does not follow and no full explanation is provided. Albemarle Homes considers that further employment growth should and can occur, particularly as the site's own promoters suggest higher jobs growth. **The higher jobs growth at the strategic employment site with a constant commuting ratio suggests a housing need of 646 dwellings per annum.**
- 5.38. Furthermore, the Council can deliver at such levels of growth having recently delivered 693 (2019/20) and 775 (2020/21) new homes in the last couple of years. Such an approach would reflect PPG which indicates that consideration can be given to delivery rates. Where previous delivery exceeds the minimum need it should be considered whether the level of delivery is indicative of greater need.
- 5.39. **There is clear evidence of delivery at a higher rate than the proposed requirement of 591 dwellings, and is indicative of a higher need within Bassetlaw and the capacity within the sector.** Furthermore, the historic delivery rates witnessed do not reflect the changes in economic growth potential for the District as discussed above. Previous delivery rates should therefore be considered when assessing future housing requirements, in accordance with Government guidance.

Plan Period

- 5.40. Albemarle Homes is concerned that the Plan period is insufficient. The Framework is clear that it requires plans to look ahead over **a minimum of 15 years from adoption**. Plans should establish a clear strategy for bringing sufficient land forward, at a sufficient rate, to meet the objectively assessed needs over the Plan period. The Framework states that this

should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.

- 5.41. Albemarle Homes considers that the Plan period should now be revised to reflect the delays in the Plan making process. The Plan is unlikely to be adopted until 2023 at the earliest and therefore Albemarle Homes suggest that **the Plan period be extended to 2038**, to ensure that it looks ahead over a minimum of 15 years from adoption.
- 5.42. Furthermore, as stated earlier in line with paragraph 22 of the Framework Albemarle Homes suggests that the Plan period should fully encompass the proposed delivery of the Garden Village and be extended to **at least 2053, which is a minimum of 30 years** from the date of adoption.

Housing Supply

- 5.43. Albemarle Homes is concerned with anticipated delivery rates and whether the housing requirement is achievable in the Plan period. Albemarle Homes has concerns with regards to the buffer, application of a lapse rate and the deliverability of some of the identified supply. The housing trajectory tables within the appendix to the Plan contain ambitious delivery rates on complex sites. It is unclear from the range and choice of sites how the Council will achieve the delivery of much needed affordable housing.
- 5.44. Furthermore, Albemarle Homes is concerned with the reliance of sites contained within 'made' Neighbourhood Plans, which have not been subject to the same rigour on deliverability as those within a Local Plan. Albemarle Homes is aware of the unavailability and significant constraints of such sites having approached landowners to enquire about developing these sites only for the landowner to indicate that the sites will not be coming forward at this time. Albemarle Homes has the evidence to demonstrate this position. In particular, Albemarle Homes has evidence that the Land to the east of Spital Road (BDC03) for 55 dwellings is not available and therefore should not be allocated. These sites should be reassessed and other appropriate sites considered, such as Albemarle Homes' site at Blyth Road.
- 5.45. The range and choice of new housing within Blyth is also not suitably delivering the range of housing required to address housing needs. A number of recent sites coming forward are proposing very large homes and Self and Custom Build housing, or they are small sites. These sites are not delivering the much needed affordable housing. Albemarle Homes' site at Blyth Road will be policy compliant and deliver affordable housing.

- 5.46. Albemarle Homes would like to emphasise that the Local Plan's strategic policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver the District's housing requirement. This sufficiency of housing supply should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply and achieve Housing Delivery Test performance measurements.
- 5.47. As at 1 April 2020, the Council's overall housing land supply is estimated as 12,198 dwellings between 2020 – 2037 comprising of:
- 775 completed dwellings between April 2020 - March 2021;
 - 6,117 dwellings from existing commitments on small & large sites with outstanding planning permission;
 - 467 dwellings on 'made' Neighbourhood Plan allocations without planning permission;
 - 3,014 dwellings on proposed allocations in the Local Plan;
 - 625 dwellings on proposed allocations in Worksop Central DPD; and
 - 1,200 dwellings from windfall allowance.
- 5.48. Albemarle Homes is concerned that it is unclear from the Council's evidence if a non-implementation lapse rate has been applied to existing commitments and / or allocations, which should be included to accord with national guidance. It is also apparent that there are discrepancies between the Council's figures for new allocations and the Worksop Central DPD. Furthermore, the evidence for the windfall allowance does not fully reflect national policy and guidance and should show that such a quantum will continue for the lifetime of the Plan. It is understood that the windfall allowance is only going to apply to smaller sites and therefore windfalls are likely to reduce in the future.
- 5.49. The Council's overall housing land supply should include a mix of short and long-term sites. It is generally recognised that housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings, including affordable housing, to meet their housing needs. Such an approach provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than

a maximum and provides choice / competition in the land market. Therefore, it is important that Albemarle Homes' site at Blyth Road for circa 52 new homes is considered within that context of a smaller housebuilder, on a smaller non-strategic site that can importantly deliver affordable housing.

- 5.50. It is evident that the housing trajectory within the appendices includes significant housing numbers on large strategic sites. It is critical that an accurate assessment of availability, suitability, achievability and therefore deliverability and viability is undertaken. The Council's assumptions on lead in times and delivery rates should be correct and supported by promoters responsible for the delivery of housing on each individual site.
- 5.51. In relation to viability Albemarle Homes notes concerns with the current viability assessment and it does not appear to fully reflect the Local Plan policy requirements. It therefore cannot be categorically stated that there are not viability concerns with the proposed housing allocations. In accordance with the Framework, viability should be addressed at Local Plan allocation stage therefore Albemarle Homes considers further updated evidence needs to be prepared. In particular it is not apparent that the viability evidence addresses robustly Policy ST29 and First Homes; Policy ST30 and the implications of serviced plots and Policy ST31 and specialist housing proportions.
- 5.52. It is also important that the Council's five year housing land supply is clear at the point of adoption. Albemarle Homes is concerned that the current statement suggests the use of a 5% buffer, whereas best practice is normally to utilise a 10% buffer.
- 5.53. Albemarle Homes conclude that there is a need for further allocations to support the requirement within Policy ST1, and this need is even greater when considering the supply against their view of housing need within Bassetlaw.

Distribution

- 5.54. Albemarle Homes is concerned that the proportion of housing in Harworth & Bircotes has decreased in the Publication Local Plan from earlier iterations. The evidence base and strategic approach suggests that as a regeneration priority area Harworth & Bircotes would accommodate 20% of new homes in the District. However, the Publication Plan shows only 16% of new housing is being located in the settlement. **There is no justification or evidence for this adjusted approach.**

- 5.55. Albemarle Homes considers that there are suitable sites on the edge of Harworth & Bircotes, which can sustainably accommodate further housing within the settlement, such as their site at Blyth Road, and that reasonable alternatives have not been explored.
- 5.56. Furthermore, it is concerning that the Council has not appropriately considered the boundary of settlements in relation to the form and function when assessing potential development sites. Albemarle Homes site on Blyth Road, Blyth is in effect on the edge of Harworth & Bircotes being opposite the new Symmetry Park (EM002) and adjacent to the large new employment site (EM007). The Council considered this site to be a remote rural location, which is inaccurate and incorrect.
- 5.57. It is also arguable that Harworth & Bircotes and Blyth have conjoined and coalesced and have a distinct functional planning relationship, which is also not addressed within the Local Plan. This is further explored later on in these representations.

Summary

- 5.58. The Local Plan will therefore need to substantially increase housing delivery and the choice and number of sites and potential outlets. To achieve the step change in housing delivery, the Council needs to plan for a range and choice in sites. This range and choice will ensure the right conditions for a competitive market and create the outlets needed to achieve the housing requirement.
- 5.59. Albemarle Homes would encourage the Council to review the existing commitments to ensure this is still deliverable, whether there is a housebuilder on board and whether there are any constraints preventing development from coming forward. Albemarle Homes would also ask the Council to look at the proposed delivery of site allocations to determine whether the delivery rates are appropriate and the sites are deliverable in light of the policy obligations proposed in the Local Plan.
- 5.60. Albemarle Homes considers that the Plan period should be extended, the housing requirement be increased and that the appropriate areas and sites to accommodate growth would be:
- Allocate for housing Blyth Road, Blyth/Haworth

- 5.61. A brief summary is provided for this site later on in these representations, which includes an illustrative masterplan. The site is supported by significant technical information which demonstrate that the site is available, suitable and achievable and therefore deliverable in accordance with the Framework and PPG.

Proposed Change

- 5.62. To overcome the objection and address soundness matters, the Council should:
- Increase the housing requirement to reflect the economic growth aspirations for the District and region.
 - Update the evidence base to reflect the current economic growth situation.
 - Extend the Plan period to be at least 15 years from the date of adoption, and potentially for 30 years to reflect the Garden Village proposals.
 - Include a higher buffer of 10%.
 - Review and provide evidence for the windfall allowance.
 - Review delivery rates and trajectory on allocations and commitments.
 - Identify further sites to increase flexibility in the Plan.
 - Allocate for housing Albemarle Homes' site at Blyth Road, Blyth/Harworth

6. Policy ST2: Residential Growth in Rural Bassetlaw

- 6.1. Albemarle Homes **is concerned** with Policy ST2 and that it does not reflect the positive approach of national policy and guidance.

Test of Soundness

- 6.2. Albemarle Homes considers that the Local Plan is **unsound**.

Which test of soundness are comments about?			
X	Positively Prepared	X	Effective
X	Justified	X	Consistency with National Policy

Justification

- 6.3. Albemarle Homes is concerned that this policy is overly restrictive, does not reflect national policy and guidance and is not reflected with appropriate evidence.
- 6.4. This policy states that Large Rural Settlements, such as Blyth, can only grow by 20%. Proposals will be supported where they are allocated in the Local Plan or Neighbourhood Plan. The policy continues with a number of overly onerous and unnecessary criteria such as proposals will be supported where it is located within a settlement boundary, where appropriate; it does not harm the openness or distinctiveness of the countryside; the scheme maintains physical separation of settlements. Given the area is not covered by Green Belt, the policy appears to seek to apply national Green Belt policy to non-Green Belt land in approach and terminology. Albemarle Homes considers this approach should be reviewed and removed.
- 6.5. Albemarle Homes considers that part 3 of the policy is unnecessary and appears to restrict exception cases. However, this does not reflect national policy and guidance and the presumption in favour of sustainable development, especially if there is no five year housing land supply.

- 6.6. Albemarle Homes considers Policy ST2 should be updated to reflect national policy and guidance.

Proposed Change

- 6.7. To overcome the objection and address soundness matters, the Council should:
- Update to reflect national policy and guidance

7. Policy ST15: Provision of Land for Housing

- 7.1. Albemarle Homes **objects** that their site at Blyth Road, Blyth/Harworth is not allocated for housing in the Local Plan.

Test of Soundness

- 7.2. Albemarle Homes considers that the Local Plan is **unsound**.

Which test of soundness are comments about?			
X	Positively Prepared	X	Effective
X	Justified	X	Consistency with National Policy

Justification

- 7.3. As highlighted earlier in response to Policy ST1 Albemarle Homes considers that further land for housing is needed to be identified in the Local Plan.
- 7.4. Albemarle Homes considers that their site at Blyth Road, Blyth which is on the edge of Harworth & Bircotes should be allocated for housing in the Plan period to deliver the economic growth the area aspires for. Further information on the site is provided at the end of these representations.

Proposed Change

- 7.5. To overcome the objection and address soundness matters, the Council should:
- Allocate Albemarle Homes site at Blyth Road, Blyth/Harworth for housing.

8. Policy ST29: Affordable Housing

- 8.1. Albemarle Homes is **concerned** with aspects of Policy ST29 and that its operation lacks clarity and uncertainty.

Test of Soundness

- 8.2. Albemarle Homes considers that the Local Plan is **unsound**.

Which test of soundness are comments about?			
X	Positively Prepared	X	Effective
X	Justified	X	Consistency with National Policy

Justification

- 8.3. Albemarle Homes is generally supportive of the need for affordable housing. However, Albemarle Homes is concerned that the requirement for affordable housing along with all other policy requirements through the emerging Local Plan could require the need for a viability assessment of schemes on a regular basis. Policy ST29 broadly reflects national policy and guidance, however there are a few areas where it lacks clarity.
- 8.4. Albemarle Homes considers that Policy ST29 is consistent with the Government's Written Ministerial Statement requirement for 25% of affordable housing to be First Homes, however it is inconsistent with the Framework that at least 10% of homes will be available for affordable home ownership. Similarly, Policy ST29 is also imprecise regarding the remaining affordable housing tenure mix, which in accordance with the Framework should be clearly written and unambiguous so that a decision maker knows how to react to a development proposal.
- 8.5. Albemarle Homes considers that to be effective, the Council should provide further clarification of its affordable housing tenure mix requirements, which should be justified by supporting evidence. As stated earlier, it is not apparent that the Council has tested the implications of First Homes on viability, furthermore, the Council has only tested a certain

proportion of affordable housing mix within the viability assessment. Therefore, any deviation will not be in accordance with the evidence base.

- 8.6. Albemarle Homes considers the policy and the evidence should be updated to reflect national policy and guidance.

Proposed Change

- 8.7. To overcome the objection and address soundness matters, the Council should:

- Update policy and evidence base to reflect national policy and guidance.

9. Policy ST30: Housing Mix

- 9.1. Albemarle Homes is **concerned** with aspects of Policy ST30 and that its operation lacks clarity and uncertainty.

Test of Soundness

- 9.2. Albemarle Homes considers that the Local Plan is **unsound**.

Which test of soundness are comments about?			
X	Positively Prepared	X	Effective
X	Justified	X	Consistency with National Policy

Justification

- 9.3. Albemarle Homes is supportive of the principle of providing a broad mix of housing; however the Local Plan should not dictate the housing mix across the District. The Local Plan should achieve this housing mix through identifying the level of provision and the broad distribution of new housing.
- 9.4. Although the Housing and Economic Development Needs Assessment can consider the broad issues of housing mix, the Local Plan should not seek to control the housing mix across the District. It is both unnecessary and inflexible to seek to control the housing mix, since it would mean the housing market would be unable to adjust to market movements. Policy ST30 seeks to specifically address the housing mix on sites. This aspect of the policy is onerous and prescriptive, particularly as it is seeking to control size of units, mix and tenure. The policy should be amended to encourage or reflect rather than ensure or require.
- 9.5. Albemarle Homes are supportive of providing a range and choice of homes to meet the needs of the local area. Sites proposed for development by Albemarle Homes always provide a range of house types and sizes based on local market need. This ensures sites deliver an appropriate mix of houses for people who want to live in an area and help create an interesting and varied streetscene.

- 9.6. Albemarle Homes recommend that a flexible approach is taken regarding housing mix, which recognises that need and demand will vary from area to area and site to site, to ensure that the scheme is viable, and provides an appropriate mix for the location. There is a real need to create a housing market in Bassetlaw that will attract investors to the area and provide an element of aspiration to ensure working people and families are retained within the area. Albemarle Homes would urge the Council to ensure greater flexibility within the housing mix policy to meet local, site specific need and ensure a scheme is viable.

Proposed Change

- 9.7. To overcome the objection and address soundness matters, the Council should:
- Increase the number of allocations to create choice and a diverse housing market.
 - Include flexibility in Part I of the policy.

10. Omission Site: Blyth Road, Blyth/Harworth (LAA494)

- 10.1. Albemarle Homes **objects** that the site at Blyth Road (LPXXX) is not allocated.

Test of Soundness

- 10.2. Albemarle Homes considers that the Local Plan is **unsound**.

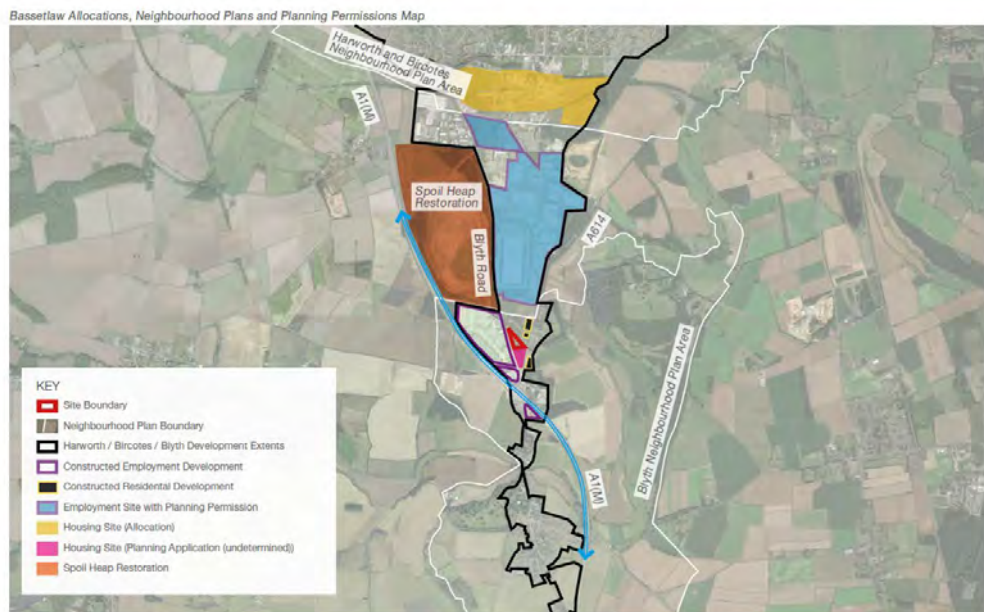
Which test of soundness are comments about?			
X	Positively Prepared	X	Effective
X	Justified	X	Consistency with National Policy

Justification

- 10.3. Albemarle Homes has highlighted **concerns** with the Spatial Strategy, housing requirement and distribution of new housing. Albemarle Homes is also concerned with the level of housing in Harworth & Bircotes.
- 10.4. In response to Policy ST1 Albemarle Homes has set out that the number, distribution and delivery of new housing. The Local Plan will therefore need to substantially increase housing delivery and the choice and number of sites and potential outlets. To achieve the step change in housing delivery, the Council needs to plan for a range and choice in sites. This range and choice will ensure the right conditions for a competitive market and create the outlets needed to achieve the housing requirement.
- 10.5. It is evident from an assessment of the relationship between Harworth & Bircotes and Blyth that the settlements have effectively merged. Harworth & Bircotes has extended southwards along Blyth Road with significant employment development. Harworth & Bircotes settlement boundary now conjoins with Blyth and has extended into the Blyth Neighbourhood Plan area. Harworth & Bircotes has now effectively extended to the A1(M). The assessment of the role

and function of these settlements within the Plan is therefore incorrect and should recognise more the functional relationship between the two settlements and their new physical extent.

- 10.6. Furthermore, the assessment of sites should recognise this southward expansion of Harworth & Bircotes. The assessment of Albemarle Homes' site on Blyth Road appears to consider the site is in a remote location. However, this is incorrect being adjacent to two new employment parks and existing housing. Symmetry Park (EM002) is under construction and part occupied, whilst the Harworth South scheme (EM007) is now under construction.
- 10.7. The site is effectively an expansion of Harworth & Bircotes, which is a higher order settlement. Albemarle Homes considers the site should be reassessed to reflect its actual situation, particularly as the proportion of housing in Harworth & Bircotes has decreased within the current Plan and does not now reflect the aims of the spatial strategy.

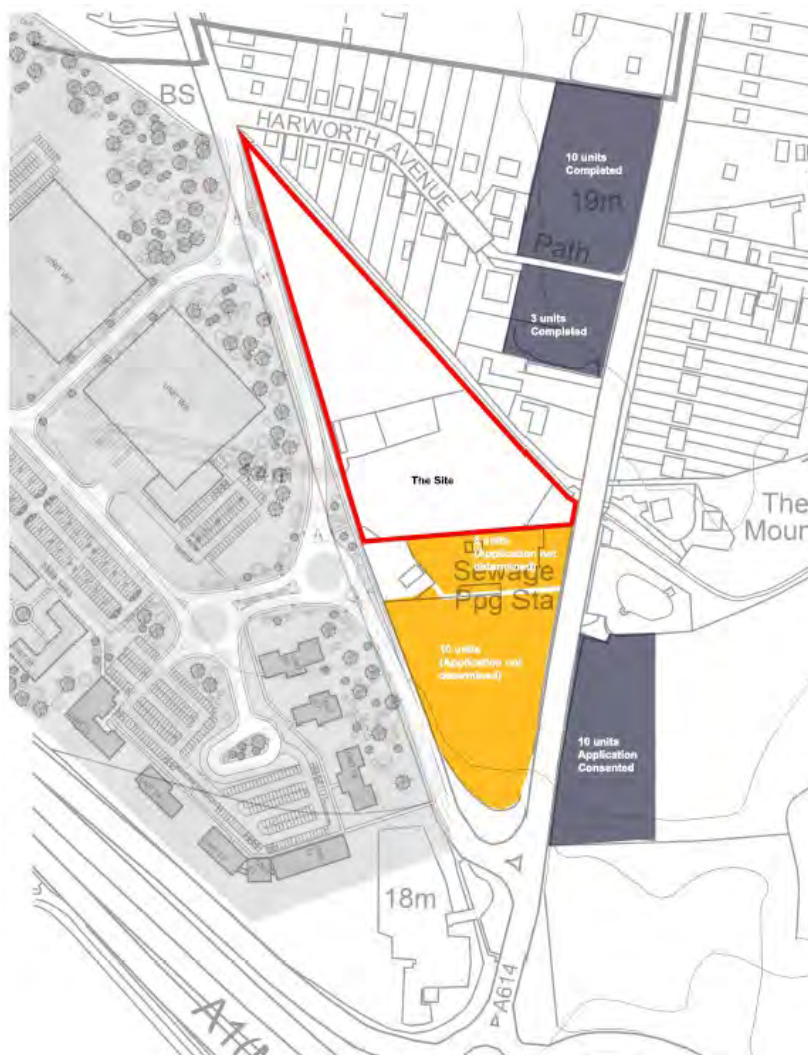


- 10.8. Furthermore, the proposed allocations for settlements should not be considered on artificial boundaries, but on the functional location of a site. The Blyth Road site is not isolated but is within an expanding area close to employment opportunities, services and facilities. It is a very sustainable location for new housing being adjacent to new employment opportunities and being able to co-locate jobs and homes.

- 10.9. Notwithstanding the above, the site also lies within the Blyth Neighbourhood Plan Area, which has recently adopted its Neighbourhood Plan and includes site allocations. However, Albemarle Homes is aware of delivery issues with a number of allocations within the Neighbourhood Plan and considers that these should not simply be rolled forward and accepted within this more senior Local Plan. In particular, Albemarle Homes has evidence that the Land to the East of Spital Road (BDC03) for 55 dwellings is not available and therefore should not be allocated. These sites should be reassessed and other appropriate sites considered, such as Albemarle Homes' site at Blyth Road.
- 10.10. The range and choice of new housing within Blyth is also not suitably delivering the range of housing required to address housing needs. A number of recent sites coming forward are proposing very large homes and Self and Custom Build housing, or they are small sites. For example a site for 10 dwellings at Woodlea, Bawtry Road has been approved and the proposed site plan shows large dwellings ranging from 190m² to 325m². These sites are not delivering the much needed affordable housing. Albemarle Homes' site at Blyth Road will be policy compliant and deliver the affordable housing.
- 10.11. Albemarle Homes considers the proposed site is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term. The site has been promoted in earlier iterations of the Local Plan by the landowner, **Albemarle Homes has prepared an indicative layout which is attached to these representations and informed by technical assessments.**
- 10.12. The deliverability and benefits of the Blyth Road site is as follows:

Overview of Proposals

- 10.13. The site is located on Blyth Road opposite the new Symmetry Park (EM002). To the north lies housing beyond which is the new Harworth South employment scheme (EM007), which is currently under construction, and the town of Harworth & Bircotes. To the east is Bawtry Road and further housing, whilst to the south east is the Moto service station on the A1(M) Motorway. The site is circa 2ha and could accommodate in the region of 52 new homes, which will be a range and mix of housing, including affordable housing.



Deliverability

- 10.14. The site at Blyth Road provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by Albemarle Homes which further demonstrates the site's deliverability within the plan period.

Availability

- 10.15. Albemarle Homes controls the land at Blyth Road. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG).

Suitability

- 10.16. The site is located in a highly sustainable location and has a mixture of employment and residential development to the north, east, west and south. The site is within easy walking distance to a range of services and facilities.
- 10.17. The site is adjacent to existing and proposed employment and is well served by buses providing opportunities for sustainable travel to work in Doncaster, Bawtry and Retford.
- 10.18. The development will provide additional quality development that will benefit Harworth & Bircotes and Blyth and the wider district with economic, environmental and social benefits. It is therefore considered that the development is suitable.

Achievable

- 10.19. A range of technical work is being undertaken and further survey work is ongoing. From the initial assessments there are no technical issues that would prevent development or are insurmountable. Assessments that have been undertaken include Ground Investigation, Flood Risk Assessment and Utilities Survey. The site is therefore considered to be achievable and therefore deliverable in accordance with national guidance. The technical assessments will be submitted in due course and are available upon request.

Effective Use of Land

- 10.20. Although the site is greenfield, the proposed scheme will utilise and enhance existing infrastructure. Although the site is not previously developed it is currently under-utilised. The site is easily accessible and the site can be accessed from Blyth Road. The scheme is therefore making an efficient and effective use of land and infrastructure.

Delivering a Flexible Supply of Housing

- 10.21. The Framework requires Local Planning Authorities to meet their full objectively assessed housing need. Albemarle Homes considers that the site at Blyth Road is deliverable in the short term and will reinforce the housing supply and address the Borough's housing needs in the early periods of the Local Plan. The site is fully capable of being delivered in the next 5 years.

A Positive Response to the Key Objectives of the Framework

10.22. The Framework sets out that the Governments key housing policy goal of boosting significantly the supply of housing and proactively driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. The Framework explains that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as extensions to towns, and creating mixed and sustainable communities with good access to jobs, key services and infrastructure. Sites should also make effective use of land and existing infrastructure.

10.23. In relation to the Framework:

- The proposal responds positively towards national guidance.
- The site is appropriate for accommodating housing growth, being effectively an expansion of an existing settlement.
- The proposed site is accessible to existing local community facilities, infrastructure and services, including public transport.
- The site has been assessed and is available, suitable and achievable for development

Benefits of Blyth Road, Blyth/Harworth & Bircotes

10.24. The development of the site would provide significant benefits. The site would provide housing that would meet the needs of the Blyth and Harworth & Bircotes and wider Bassetlaw housing market. Therefore this site provides a unique opportunity in a sustainable location.

- The site is suitable for housing and can deliver circa 52 new homes.
- The proposal will deliver high quality housing.
- The proposal will deliver affordable housing.
- The proposal can provide a good mix of housing commensurate to the demand and need in the area.
- The scheme uses land efficiently and effectively.
- The proposal is in line with planning for housing objectives.
- The site is within a sustainable location situated in close proximity to facilities and services and also to bus stops for local bus routes.
- The scheme will create direct and indirect job opportunities both during and after construction.

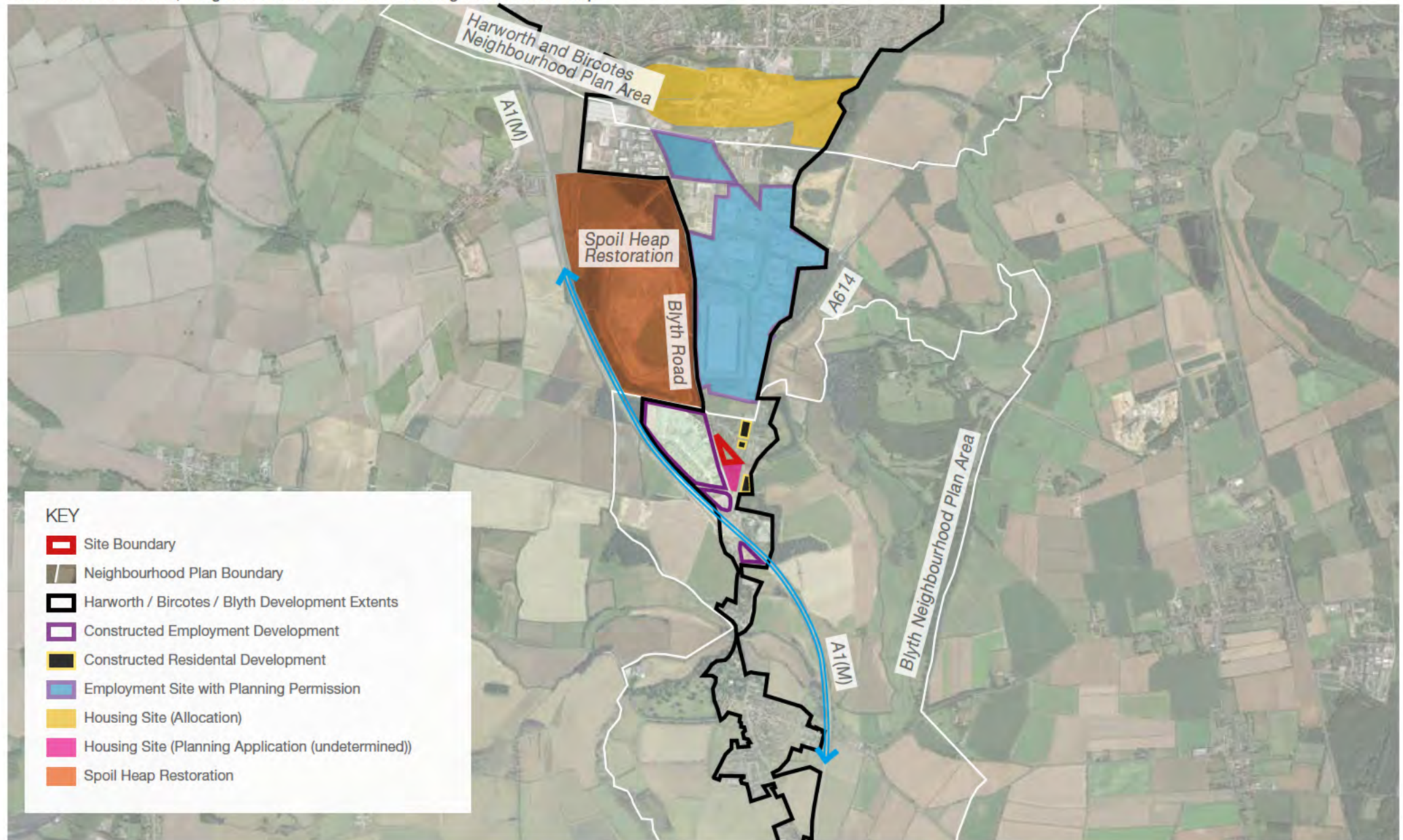
Blyth Road site would assist with this delivery in the short term. The site is situated within a prime location suitable for residential development, adjacent to existing and proposed employment, and as such would facilitate the development of land in a more effective and efficient manner. Development of the site would not harm or undermine the areas wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority.

- 10.27. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework.

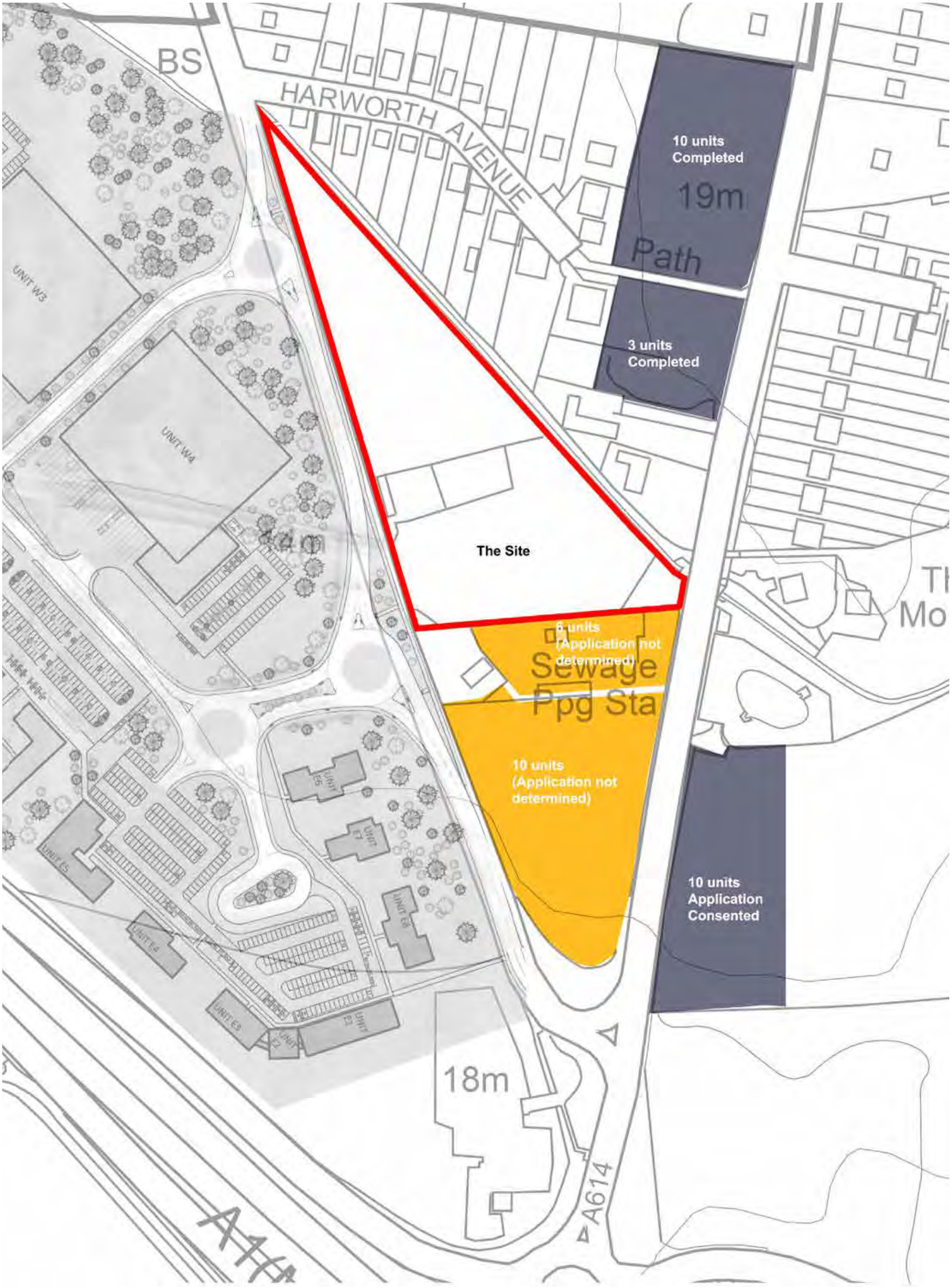
Proposed Change

- 10.28. To overcome the objection and address soundness matters, the Council should:
- Allocate the site at Blyth Road, Blyth/Harworth & Bircotes for housing.
 - Review the site assessment.

Appendix I: Site Plans



Spatial Relationship between Harworth, Bircotes and Blyth



REF035



From:

To:

Subject:

Attachments:

21 October 2021 09:52

The Bassetlaw Plan

Bassetlaw Local Plan pre-submission consultation

Completed HBF Part B Form Bassetlaw LP Policy ST29 21 October 2021.docx;

Completed HBF Part B Form Bassetlaw LP Policy ST30 21 October 2021.docx;

Completed HBF Part B Form Bassetlaw LP Policy ST31 21 October 2021.docx;

Completed HBF Part B Form Bassetlaw LP Policy ST35 21 October 2021.docx;

Completed HBF Part B Form Bassetlaw LP Policy ST40 21 October 2021.docx;

Completed HBF Part B Form Bassetlaw LP Policy ST50 21 October 2021.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

Dear Sir / Madam

For the Council's consideration, please find attached representation forms completed by the HBF in response to the above-mentioned consultation. If any further information or assistance is required, please contact the undersigned.

Yours faithfully

For and on behalf of HBF



Planning Manager – Local Plans

HOME BUILDERS FEDERATION

a: c/o 80 Needlers End Lane, Balsall Common, Warwickshire CV7 7AB



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Bassetlaw Local Plan 2020-2037

Publication Version Representation Form September to October 2021

Please submit electronically if possible to thebassetlawplan@bassetlaw.gov.uk

Please use this form to provide representations on the Bassetlaw Local Plan. Bassetlaw District Council must receive representations by **5pm on 21st October 2021**. Only those representations received within this period have the statutory right to be considered by the inspector at the subsequent examination.

Responses can be submitted via the electronic version of the comment form which can be found on the Council's web site at: www.bassetlaw.gov.uk/BassetlawPlan Alternatively this form can be completed and returned as an e-mail attachment to thebassetlawplan@bassetlaw.gov.uk or by post to **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

Please note:

- Representations must only be made on the basis of the legal compliance, compliance with the Duty to Co-operate and/or soundness of the Plan.

Please read the guidance note, available on the Council's webpage, before you make your representations. The Local Plan and the proposed submission documents, and the evidence base are also available to view and download from the Council's Local Plan webpage:

www.bassetlaw.gov.uk/bassetlawplan

Data Protection Notice:

Under the General Data Protection Regulation 2016 (GDPR) and Data Protection Act 2018 (DPA) Bassetlaw District Council, Queen's Building, Potter Street, Worksop, Notts, S80 2AH is a Data Controller for the information it holds about you. The lawful basis under which the Council uses personal data for this purpose is consent.

All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: <https://www.bassetlaw.gov.uk/about-us/data-protection/departmental-privacy-notices/planning-policy-privacy-notice/>

Due to the Data Protection Act 2018, Bassetlaw District Council now needs your consent to hold your personal data for use within the Local Plan. If you would like the Council to keep you informed about the Bassetlaw Local Plan, we need to hold your data on file. Please tick the box below to confirm if you would like to 'opt in' to receive information about the Bassetlaw Local Plan. Note that choosing to 'opt in' will mean that the Council will hold your information for 2 years from the 'opt in' date. At this time we will contact you to review if you wish to 'opt in' again. You can opt-out at any time by emailing thebassetlawplan@bassetlaw.gov.uk or by calling 01909 533495.

For more information on how Bassetlaw District Council's Planning Policy department processes personal information about you, please see our main privacy notice at <https://www.bassetlaw.gov.uk/about-us/data-protection/departmental-privacy-notice/planning-policy-privacy-notice/>

Please tick/ delete as appropriate:

Please confirm you have read and understood the terms and conditions relating to GDPR.

Yes X ☒

No ☐

Please tick as appropriate to confirm your consent for Bassetlaw District Council to publish and share your name/ organisation and comments regarding the Bassetlaw Local Plan.

I confirm my consent for Bassetlaw District Council to share my name/ organisation and comments regarding the Bassetlaw Local Plan including with the Planning Inspectorate.

Yes X ☒

No ☐

Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Bassetlaw Local Plan.

I would like to opt in to receive information about the Bassetlaw Local Plan.

Yes X ☒

No ☐

Printed Name:

[Redacted]

Signature:

[Redacted]

Date:

21/10/21

This form has two parts:

Part A - Personal details – need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part A- Personal Details

1. Personal Details

Name: [REDACTED]

Organisation (if applicable): HOME BUILDERS FEDERATION (HBF)

Address: c/o 80 NEEDLERS END LANE, BALSALL COMMON

Postcode: CV7 7AB

Tel: [REDACTED]

Fax: NA

Email: [REDACTED]

2. Agent Details (if applicable)

Agent: AS ABOVE

Organisation (if applicable):

Address:

Postcode:

Tel:

Fax:

Email:

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: HBF

3. To which part of the Local Plan does your representation relate?

Policy: Duty to Co-operate

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes X ☐

No ☐

4.(2) Sound

Yes ☐

No X ☐

4.(3) Complies with the Duty to Cooperate

Yes ☐

No X ☐

- 5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.** If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Duty to Co-operate (DtoC)

As set out in the 2021 National Planning Policy Framework (NPPF), the Council is under a DtoC with other Local Planning Authorities (LPA) and prescribed bodies on strategic matters that cross administrative boundaries (para 24). To maximise the effectiveness of plan-making and fully meet the legal requirements of the DtoC, engagement should be constructive, active and on-going. This collaboration should identify the relevant strategic matters to be addressed (para 25). Effective and on-going joint working is integral to the production of a positively prepared and justified strategy (para 26). The Council should demonstrate such working by the preparation and maintenance of one or more Statements of Common Ground (SoCG) identifying the cross-boundary matters to be addressed and the progress of co-operation in addressing these matters. Therefore, as set out in the 2021 NPPF, the Bassetlaw Local Plan should be positively prepared and provide a strategy, which as a minimum seeks to meet the Council's own housing needs in full and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated (para 35a).

The National Planning Practice Guidance (NPPG) explains that a SoCG sets out where effective co-operation is and is not happening throughout the plan-making process. The NPPG confirms that a SoCG is a way of demonstrating that the Local Plan is deliverable over the plan period and based on effective joint working across LPA boundaries. It also forms part of the evidence required to demonstrate compliance with the DtoC (ID 61-010-20190315). At Examination, the Inspector will use all available evidence including SoCG to determine whether the DtoC has been satisfied (ID 61-031-20190315). To provide communities and other stakeholders with a transparent picture of collaboration, the NPPG sets out that authorities should have a SoCG available on their website by the time of publication of their Draft Plan. Once published, the Council will need to ensure that any SoCG continues to reflect the most up-to-date position of joint working (ID 61-020-20190315).

Bassetlaw District adjoins seven other LPAs, which are Bolsover, Doncaster, Mansfield, Newark & Sherwood, North Lincolnshire, Rotherham, and West Lindsey. It has been determined that Bassetlaw is a part of the North Derbyshire & Bassetlaw Housing Market Area (HMA) together with North East Derbyshire, Bolsover and Chesterfield Councils. There is also an identified overlap between this HMA and the Sheffield City Region HMA (including neighbouring authorities of Doncaster & Rotherham) with recognised functional economic links between the two HMAs. Bassetlaw is a full member of the Derbyshire & Nottinghamshire D2N2 Local Enterprise Partnership (LEP). Bassetlaw is also part of the Sheffield City Region Combined Authority but no longer a member of its LEP. The Bassetlaw Local Plan pre-submission consultation is accompanied by six SoCG and a DtoC Compliance Statement dated August 2021, which is not a SoCG. It is understood that the Council is proposing to deliver all its development requirements within its own boundaries and no requests to address the development needs of neighbouring LPAs have been received. However, it is noted that under the revised standard methodology, Sheffield is subject to the 35% Cities & Urban Areas Uplift, which increases housing needs from circa 37,000 dwellings to 50,000 dwellings between 2021 – 2038. This increase may have implications for the wider Sheffield City Region HMA.

Continue on a separate sheet if necessary

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

It is understood that The Council intends to update existing SoCG and agree other SoCG with relevant parties before the Local Plan is submitted for examination. After publication of these updated and additional SoCG, the HBF may submit further representations on the Council's compliance with the DtoC and any implications for the soundness of the Bassetlaw Local Plan in written Examination Hearing Statements or orally during Examination Hearing Sessions.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes X ☒

No, I do not wish to participate in hearing session(s)

No ☐

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership which includes multi-national PLC's, regional developers and small local builders. In any one year, our Members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. The HBF wish to attend the Bassetlaw Local Plan Examination Hearing Sessions to discuss the above representations in greater detail.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.



Bassetlaw Local Plan 2020-2037

Publication Version Representation Form September to October 2021

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Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: HOME BUILDERS FEDERATION (HBF)

3. To which part of the Local Plan does your representation relate?

Policy: Policies ST1, ST2, ST3, ST4, ST15, 16 – 28 & APPENDIX 3 (HLS)

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes X ☐

No ☐

4.(2) Sound

Yes ☐

No X ☐

4.(3) Complies with the Duty to Cooperate

Yes X ☐

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Housing Land Supply (HLS)

The Local Plan's strategic policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver the District's housing requirement. This sufficiency of HLS should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (YHLS) and achieve Housing Delivery Test (HDT) performance measurements.

Policy ST1 : Bassetlaw's Spatial Strategy sets out a 5 tier settlement hierarchy comprising :-

Main Towns(Worksop, Retford and Harworth & Bircotes) ;

Large Rural Settlements (Blyth, Carlton in Lindrick& Costhorpe, Langold Misterton and Tuxford);

Small Rural Settlements (Barnby Moor, Beckingham, Clarborough, Clayworth, Cuckney, Dunham on Trent, East Drayton, East Markham, Elkesley, Everton, Gamston, Gringley on the Hill, Hayton, Laneham, Lound, Mattersey, Misson, Nether Langwith, Normanton on Trent, North Leverton, North & South Wheatley, Rampton, Ranby, Ranskill, Rhodesia, Scrooby, Shireoaks, South Leverton, Styrrup, Sutton cum Lound, Sturton le Steeple, Treswell, Walkeringham and West Stockworth);

New Settlement at Bassetlaw Garden Village ; and
Countryside (all areas not defined above).

Continued on separate sheet below

Continue on a separate sheet if necessary

5. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Before the Bassetlaw Local Plan is submitted for examination, the Council should provide further information on HLS as outlined in the separate sheet below.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes X ☒

No, I do not wish to participate in hearing session(s)

No ☐

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership which includes multi-national PLC's, regional developers and small local builders. In any one year, our Members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. The HBF wish to attend the Bassetlaw Local Plan Examination Hearing Sessions to discuss the above representations in greater detail.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

Housing Land Supply (HLS) continued

In **Policy ST1**, total housing growth of approximately 10,884 dwellings is distributed as follows :-

3,269 dwellings (30%) in Worksop (2,569 dwellings in Worksop Outer Area & 700 dwellings in the Worksop Central DPD (**Policy ST5**)) ;
2,128 dwellings (19.5%) dwellings in Retford ;
1,758 dwellings (16%) in Harworth & Bircotes ;
1,496 dwellings (14%) in Large Rural Settlements ;
1,733 dwellings (16%) in Small Rural Settlements ; and
500 dwellings (4.5%) at the Bassetlaw Garden Village.

Policy ST15 – Provision of Land for Housing allocates land for approximately 3,011 dwellings in the plan period 2020 – 2037 as follows :-

- 5 sites (HS1 to HS5) (**Policies 16 - 20**) in Worksop for approximately 1,255 dwellings ;
- 7 sites (HS7 to HS13) (**Policies 21 - 27**) in Retford for approximately 1,181 dwellings ;
- 1 site (HS14) (**Policy 28**) in Tuxford for 75 dwellings ; and
- Bassetlaw Garden Village (**Policies ST3 & ST4**) for approximately 500 dwellings (and approximately 3,500 dwellings beyond 2037).

Under **Policy ST2 – Residential Growth in Rural Bassetlaw**, in Large Rural Settlements proposals should not exceed the number of dwellings in the settlement by more than 20% individually or in combination with other housing developments with planning permission or Local Plan or Neighbourhood Plan site allocations. In the Small Rural Settlements proposals should not exceed the number of dwellings in the settlement by more than 5% individually or in combination with other housing developments with planning permission or site allocations in Neighbourhood Plan.

As at 1 April 2020, the Council's overall HLS is estimated as 12,198 dwellings between 2020 – 2037 comprising of (see Figure 7) :-

- 775 completed dwellings between April 2020 - March 2021 ;
- 6,117 dwellings from existing commitments on small & large sites with outstanding planning permission ;
- 467 dwellings on “made” Neighbourhood Plan allocations without planning permission ;
- 3,014 dwellings on proposed allocations in the Local Plan ;
- 625 dwellings on proposed allocations in Worksop Central DPD ; and
- 1,200 dwellings from windfall allowance.

From the Council's evidence, it is not clear if a non-implementation lapse rate has been applied to existing commitments and / or allocations, which should be clarified by the Council. It is also noted that there are anomalies in the Council's figures for new allocations and Worksop Central DPD, which should be corrected. The windfall allowance of 1,200 dwellings should be robustly evidenced. National policy only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply.

Using the Council's evidence, overall HLS is above the minimum housing requirement by 951 dwellings (9.5%) excluding the windfall allowance or 2,151 dwellings (21.5%) including the windfall allowance. The HBF supports the inclusion of such headroom. It is acknowledged that there is no numerical formula to determine the appropriate contingency quantum but where a Local Plan is highly dependent upon one or relatively few large strategic sites or settlements / locations then greater numerical flexibility is necessary than in cases where HLS is more diversified. The HBF always suggests as large a contingency as possible for maximum flexibility and to ensure the resilience of the Local Plan in responding to changing circumstances.

The Council's overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market. Under the 2021 NPPF, the Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 69a). 10% of Bassetlaw's housing requirement is 1,000 dwellings however only 5 proposed site allocations (HS2, HS5, HS8, HS10 & HS12) in **Policy ST15** are less than one hectare. The Council should confirm compliance with 2021 NPPF (para 69a).

The 2021 NPPF sets out that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and if appropriate to set out the anticipated rate of development for specific sites (para 74). Appendix 3 – Housing Trajectory sets out for each site expected yearly completions. The HBF have no comments on individual sites set out in the housing trajectory and these representations are submitted without prejudice to any comments made by other parties. However, it is critical that an accurate assessment of availability, suitability, deliverability, developability and viability is undertaken. The Council's assumptions on lead in times and delivery rates should be correct and supported by parties responsible for the delivery of housing on each individual site.

The Council should also provide evidence of its 5 YHLS position on adoption of the Local Plan using 591 dwellings per annum as the basis for the 5 YHLS calculation. A 5 YHLS Statement should demonstrate a 5 YHLS on adoption of the Local Plan, which is maintainable throughout the plan period. It is noted that the Bassetlaw 5 YHLS Report dated October 2020 applies a 5% buffer however if under the 2021 NPPF the Council is seeking to formally fix a 5 YHLS through the Local Plan then a 10% buffer should be applied (para 74b).



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Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: HOME BUILDERS FEDERATION (HBF)

3. To which part of the Local Plan does your representation relate?

Policy: ST1 (Local Housing Need)

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes X ☐

No ☐

4.(2) Sound

Yes X ☐

No ☐

4.(3) Complies with the Duty to Cooperate

Yes X ☐

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Local Housing Needs (LHN) and Housing Requirement

As set out in the 2021 NPPF, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need and any needs that cannot be met within neighbouring areas can be met over the plan period (para 66). The determination of the minimum number of homes needed should be informed by LHN assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 61). The latest NPPG sets out the standard methodology for calculating the LHN figure (ID 2a-004-20201216).

Bassetlaw's minimum LHN is calculated as 288 dwellings per annum between 2020 – 2037. This calculation is based on 2014 Sub National Household Projections (SNHP), 2020 as the current year and 2019 affordability ratio of 6.35. The calculation is mathematically correct. As set out in the NPPG, the LHN is calculated at the start of the plan-making process however this number should be kept under review until the Local Plan is submitted for examination and revised when appropriate (ID 2a-008-20190220). The minimum LHN for Bassetlaw may change as inputs are variable and this should be taken into consideration by the Council.

The Government's standard methodology identifies the minimum annual LHN. It does not produce a housing requirement figure (ID : 2a-002-20190220). LHN assessment is only a minimum starting point. The NPPG explains that "circumstances" may exist to justify a figure higher than the minimum LHN (ID 2a-010-20201216). The "*circumstances*" for increasing the minimum LHN are listed in the NPPG, but the NPPG emphasises that the listed "*circumstances*" are not exhaustive. The listed "*circumstances*" include, but are not limited to, situations where increases in housing need are likely to exceed past trends because of growth strategies, strategic infrastructure improvements, agreeing to meet unmet need from neighbouring authorities or previous levels of housing delivery / assessments of need, which are significantly greater than the outcome from the standard methodology. The Council has considered whether such "*circumstances*" exist in its Housing & Economic Development Needs Assessment (HEDNA) November 2020 by GL Hearn.

The 2021 NPPF seeks to achieve sustainable development by pursuing economic, social and environmental objectives in mutually supportive ways (para 8). The Council should be seeking to support the long-term sustainability of the District by achieving a sustainable balance between employment and housing growth. The Council should also recognise economic benefits of housing development in supporting local communities as highlighted by the HBF's latest publication Building Communities – Making Place A Home (Autumn 2020). The Housing Calculator (available on the HBF website) based on The Economic Footprint of House Building (July 2018) commissioned by the HBF estimates for every additional house built in Bassetlaw, the benefits for the local community include creation of 3 jobs (direct & indirect employment), financial contributions of £27,754 towards affordable housing, £806 towards education, £297 towards open space / leisure, £1,129 extra in Council tax and £26,339 spent in local shops.

Continued on separate sheet below

Continue on a separate sheet if necessary

5. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

The HBF support the Council in planning for more homes than the minimum LHN. **Policy ST1 – Bassetlaw Spatial Strategy** states that there will be provision of land for a minimum of 10,047 dwellings (591 dwellings per annum) between 2020 - 2037. The Council's proposed housing requirement of 591 dwellings per annum for the plan period is justified to meet the housing needs of the population, to support economic growth of the District and to help deliver affordable housing.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes X ☒

No, I do not wish to participate in hearing session(s)

No ☐

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership which includes multi-national PLC's, regional developers and small local builders. In any one year, our Members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. The HBF wish to attend the Bassetlaw Local Plan Examination Hearing Sessions to discuss the above representations in greater detail.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

Local Housing Needs (LHN) and Housing Requirement continued

Over the last decade or more, there is evidence of a strong performance by transport and manufacturing sectors across the District. A market for commercial development along the A1 corridor in the north of the District is also emerging, which will serve a sub-regional market for distribution and industrial land that may exceed historic competitions. The allocation of Apleyhead Junction strategic employment site in Bassetlaw will generate future jobs growth and a need for an increased labour supply to meet increasing employment demand, which will in turn lead to a need for new homes to accommodate the new population. The Council consider that a housing requirement based only on LHN would not support economic growth in the District. Economic growth would be constrained because of a shortage of skilled local labour and increase levels of in-commuting, which would be unsustainable by putting great strain on the transport network. The HEDNA 2020 identifies a minimum housing requirement of 591 dwellings per annum, which will support the full extent of jobs growth (9,735 jobs).

The HEDNA 2020 also identifies an affordable housing need for 214 rented dwellings per annum. The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. As set out in the NPPG, an increase in the total housing figures may be considered where it could help deliver affordable housing (ID 2a-024-20190220). The Council's Whole Plan Viability Assessment identifies that affordable housing provision of only 15% on brownfield sites and 25% on greenfield sites is viable. Whilst it is not possible to deliver the full requirement for affordable housing through contributions from market housing schemes, a higher overall housing requirement to support economic growth will also contribute towards delivery of greater number of affordable homes.

As set out in the NPPG, the Government is committed to ensuring that more homes are built and supports ambitious Councils wanting to plan for growth (ID 2a-010-20190220). The NPPG states that a higher figure "*can be considered sound*" providing it "*adequately reflects current and future demographic trends and market signals*". The HEDNA 2020 demonstrates that "*circumstances*" exist to justify a housing need higher than indicated by the standard methodology. The HBF support the Council in planning for more homes than the minimum LHN. **Policy ST1 – Bassetlaw Spatial Strategy** states that there will be provision of land for a minimum of 10,047 dwellings (591 dwellings per annum) between 2020 - 2037. The Council's proposed housing requirement of 591 dwellings per annum for the plan period is justified to meet the housing needs of the population, to support economic growth of the District and to help deliver affordable housing.



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Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: HOME BUILDERS FEDERATION (HBF)

3. To which part of the Local Plan does your representation relate?

Policy: ST29

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes X ☐

No ☐

4.(2) Sound

Yes ☐

No X ☐

4.(3) Complies with the Duty to Cooperate

Yes X ☐

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy ST29 : Affordable Housing

Under **Policy ST29**, the provision of affordable housing will be sought from developments of 10 or more units to provide :-

15% of dwellings on brownfield sites of which 25% should be First Homes(sold at a minimum discount of 30% below local market value) and any remaining requirement will be social or affordable housing for rent and / or affordable home ownership ; and

25% of dwellings on greenfield sites of which 25% will be for First Homes and any remaining requirement will be social or affordable housing for rent and / or affordable home ownership.

Affordable housing should be provided on site in order to create sustainable, mixed communities. In exceptional circumstances, where it can be demonstrated through an Open Book viability assessment that all or part of the requirement is not viable on site, a financial contribution will be sought, of equivalent value, in lieu of on-site provision to be spent within the settlement / Parish.

The HBF support the Council's differentiated approach to the provision of affordable housing on brownfield and greenfield sites, which is justified by the Council's Viability Assessment.

The proposed affordable housing tenure mix set out in **Policy ST29** is consistent with 24 May 2021 Written Ministerial Statement requirement for 25% of affordable housing to be First Homes however it is inconsistent with the 2021 NPPF expectation that at least 10% of homes will be available for affordable home ownership (para 65). **Policy ST29** is also imprecise regarding the remaining affordable housing tenure mix. The 2021 NPPF states that policies should be clearly written and unambiguous so that a decision maker knows how to react to a development proposal (para 16d). To be effective, the Council should provide further clarification of its affordable housing tenure mix requirements, which should be justified by supporting evidence. The Council's Viability Assessment tested a specific affordable housing tenure mix (50% low cost homeownership / 50% affordable rent), any deviation from this tested mix will impact on viability. Furthermore, the full impacts of First Homes on viability have not been tested (see HBF detailed comments under Viability & Deliverability). Before the Bassetlaw Local Plan is submitted for examination, further viability sensitivity testing work should be undertaken.

Policy ST29 should also be modified to be more flexible regarding on-site and off-site provision of affordable housing. On smaller sites, on-site provision may not be practical for other legitimate reasons besides viability including it is not mathematically possible or no registered provider is willing to manage the new affordable units.

Continue on a separate sheet if necessary

5. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Policy ST29 is unsound because it fails the four tests of soundness defined by the 2021 NPPF (para 35). **Policy ST29** is not positively prepared, justified, effective and consistent with national policy. Before the Bassetlaw Local Plan is submitted for examination, **Policy ST29** should be modified as outlined above.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes X ☒

No, I do not wish to participate in hearing session(s)

No ☐

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership which includes multi-national PLC's, regional developers and small local builders. In any one year, our Members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. The HBF wish to attend the Bassetlaw Local Plan Examination Hearing Sessions to discuss the above representations in greater detail.

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Part B - Your representation

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Name or Organisation: HOME BUILDERS FEDERATION (HBF)

3. To which part of the Local Plan does your representation relate?

Policy: ST30

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes X ☐

No ☐

4.(2) Sound

Yes ☐

No X ☐

4.(3) Complies with the Duty to Cooperate

Yes X ☐

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy ST30 – Housing Mix

Self & Custom Build

The Council should ensure that the Local Plan provides a wide range of different self & custom build housing opportunities. Policy mechanisms should ensure a reliable and sufficient provision of self & custom build opportunities across the District including allocation of small and medium scale sites specifically for self & custom build housing and permitting self & custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form. Therefore, the HBF is supportive of the Council's policy approach towards self & custom build as set out in **Policy ST30 :-**

Bullet Point 2 - the Council will support proposals for self-build & custom build housing that help meet the needs of those on the Self Build & Custom Housebuilding Register, provided they are compliant with other Local Plan policies ; and

Bullet Point 4 - Neighbourhood Plans will be expected to consider the local need for self-build housing and where appropriate identify allocations for self-build & custom housing.

However, it is unlikely that self & custom build serviced plots on residential sites of more than 100 dwellings will appeal to those wishing to build their own home. Therefore the HBF is not supportive of **Policy ST30 Bullet Point 3**, which states that :-

On housing allocations of 100 or more dwellings, 2% of the proportion of developable plots should be set aside for self-build & custom housebuilding. Serviced plots should be made available to households on the self-build register for a period of 12 months. If after that time plots have not been purchased or reserved by households on the Self Build Register, they may Either remain on the open market as self-build or be built out by the developer as market housing.

There is no legislative or national policy basis for imposing an obligation on landowners or developers of sites of more than 100 dwellings to set aside 2% of plots for self & custom build housing. Under the Self Build & Custom Housebuilding Act 2015 and 2021 NPPF (para 62), it is the responsibility of the Council, not landowners or developers, to ensure that sufficient permissions are given to meet demand. The Council are not empowered to restrict the use of land to deliver self & custom build housing. The NPPG sets out ways in which the Council should consider supporting self & custom build by "*engaging*" with developers and landowners and "*encouraging*" them to consider self & custom build "*where they are interested*" (ID 57-025-201760728).

Continued on separate sheet below

Continue on a separate sheet if necessary

5. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Policy ST30 Bullet Point 3 is unsound because it fails the four tests of soundness defined by the 2021 NPPF (para 35). **Policy ST30 Bullet Point 3** is not positively prepared, justified, effective and consistent with national policy. Before the Bassetlaw Local Plan is submitted for examination, **Policy ST30 Bullet Point 3** should be deleted.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes X ☒

No, I do not wish to participate in hearing session(s)

No ☐

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Policy ST30 – Housing Mix. Self & Custom Build continued

The Council have provided no evidence to justify the proposed 100 or more dwellings site threshold. As set out in the NPPG, the Council should use their Self Build Register and additional data from secondary sources to understand and consider future need for this type of housing (ID 57-011-20210208). In Bassetlaw, there is a minimal demand for self & custom build housing. As of October 2020, the Council had only 91 entries on its Self Build Register (see para 7.18.8). A simple reference to the headline number of entries on the Council's Register may over-estimate actual demand. The Register may indicate a level of expression of interest in self & custom build but cannot be reliably translated into actual demand should plots be made available because entries may have insufficient financial resources to undertake a project, be registered in more than one LPA area and have specific preferences. Furthermore, in the past three years, planning permission for self & custom build properties granted have exceeded the number of registrations on the Self Build Register (see para 7.18.8).

The provision of self & custom build plots on sites of more than 100 dwellings adds to the complexity and logistics of developing these sites. It is difficult to co-ordinate the provision of self & custom build plots with the development of the wider site. Often there are multiple contractors and large machinery operating on-site, the development of single plots by individuals operating alongside this construction activity raises both practical and health & safety concerns. Any differential between the lead-in times / build out rates of self & custom build plots and the wider site may lead to construction work outside of specified working hours, building materials stored outside of designated compound areas and unfinished plots next to completed / occupied dwellings, which results in consumer dissatisfaction.

It is important that unsold plots are not left empty to the detriment of neighbouring dwellings or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible because the consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. The proposed availability of serviced plots to households on the Council's Self Build Register for a period of 12 months is too long.

As well as on-site impracticalities, impacts on viability should be tested. The Council's Viability Assessment fails to consider these impacts (see HBF detailed comments under Viability & Deliverability). Further viability sensitivity testing work should be undertaken before the Bassetlaw Local Plan is submitted for examination.



Bassetlaw Local Plan 2020-2037

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Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: HOME BUILDERS FEDERATION (HBF)

3. To which part of the Local Plan does your representation relate?

Policy: ST31

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes X ☐

No ☐

4.(2) Sound

Yes ☐

No X ☐

4.(3) Complies with the Duty to Cooperate

Yes X ☐

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy ST31 – Specialist Housing

Under **Policy ST31 Bullet Point 3**, proposals for residential market housing in Class C3 should be designed to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations.

If the Council wishes to adopt the optional standards for accessible & adaptable dwellings, then this should only be done in accordance with the 2021 NPPF (para 130f & Footnote 49) and the latest NPPG. Footnote 49 states *“that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing where this would address an identified need for such properties”*. As set out in the 2021 NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). A policy requirement for M4(2) dwellings must be justified by credible and robust evidence. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in the NPPG (ID 56-005-20150327 to 56-011-20150327).

The Council’s evidence is set out in the HEDNA November 2020 by GL Hearn. This evidence does not justify the Council’s proposed policy requirements for M4(2). This evidence does not identify any local circumstances, which demonstrate that the needs of Bassetlaw differ substantially to those across the East Midlands or England. If the Government had intended that evidence of an ageing population alone justified adoption of optional standards, then such standards would have been incorporated as mandatory in the Building Regulations, which is not currently the case.

All new homes are built to M4(1) “visitable dwelling” standards. These standards include level approach routes, accessible front door thresholds, wider internal doorway and corridor widths, switches and sockets at accessible heights and downstairs toilet facilities usable by wheelchair users. M4(1) standards are not usually available in the older existing housing stock. These standards benefit less able-bodied occupants and are likely to be suitable for most residents.

Furthermore, as the Council is aware not all health issues affect housing needs. Many older people already live in the District and are unlikely to move home. No evidence is presented to suggest that households already housed would be prepared to leave their existing homes to move into new dwellings constructed to M4(2) standards. Those who do move may not choose to live in a new dwelling. Recent research by Savills “Delivering New Homes Resiliently” published in October 2020 shows that over 60’s households *“are less inclined to buy a new home than a second-hand one, with only 7% doing so”*. The District’s existing housing stock is significantly larger than its new build component, therefore adaption of existing stock will form an important part of the solution.

Continued on separate sheet below

Continue on a separate sheet if necessary

5. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Policy ST31 Bullet Point 3 is unsound because it fails the four tests of soundness defined by the 2021 NPPF (para 35). **Policy ST31 Bullet Point 3** is not positively prepared, justified, effective and consistent with national policy. Before the Bassetlaw Local Plan is submitted for examination, **Policy ST31 Bullet Point 3** should be deleted or modified as outlined above.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes X ☒

No, I do not wish to participate in hearing session(s)

No ☐

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Policy ST31 – Specialist Housing continued

The 2021 NPPF confirms that Local Plans should avoid unnecessary duplication (para 16f). The Council's proposed policy approach will be unnecessary if the Government implements proposed changes to Part M of the Building Regulations as set out in the "Raising Accessibility Standards for New Homes" consultation, which closed on 1 December 2020. In the meantime, if the requirements for M4(2) are carried forward, the NPPG specifies that *"Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied."* (ID 56-008-20160519).

The Council's Viability Assessment under-estimates the extra over costs of **Policy ST31 Bullet Point 3** (see HBF detailed comments under Viability & Deliverability). Before the Bassetlaw Local Plan is submitted for examination, further viability sensitivity testing work should be undertaken.



Bassetlaw Local Plan 2020-2037

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Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: HOME BUILDERS FEDERATION (HBF)

3. To which part of the Local Plan does your representation relate?

Policy: ST35

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes X ☐

No ☐

4.(2) Sound

Yes ☐

No X ☐

4.(3) Complies with the Duty to Cooperate

Yes X ☐

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy ST35 - Design Quality

Under **Policy ST35, Bullet Point (q)** states “... *that accords with the most up-to-date Nottinghamshire Parking Standards*”. This policy wording should not be interpreted by the Council’s Development Management Officers as conveying the weight of a Development Plan Document onto this guidance, which has not been subject to examination and does not form part of the Local plan. The Town and Country Planning (Local Planning) (England) Regulations 2012 are clear that development management policies, which are intended to guide the determination of applications for planning permission should be set out in policy in the Local Plan. To ensure a policy is effective, it should be clearly written and unambiguous so it is evident how a decision maker should react to development proposals. The Council’s requirements should be set out in sufficient detail to determine a planning application without relying on, other criteria or guidelines set out in separate guidance.

Continue on a separate sheet if necessary

5. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Policy ST31 Bullet Point (q) is unsound because it fails the four tests of soundness defined by the 2021 NPPF (para 35). **Policy ST31 Bullet Point (q)** is not positively prepared, justified, effective and consistent with national policy. Before the Bassetlaw Local Plan is submitted for examination, **Policy ST31 Bullet Point (q)** should be modified as outlined above.

Continue on a separate sheet if necessary

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6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes X ☒

No, I do not wish to participate in hearing session(s)

No ☐

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Name or Organisation: HOME BUILDERS FEDERATION (HBF)

3. To which part of the Local Plan does your representation relate?

Policy: ST40

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes X ☐

No ☐

4.(2) Sound

Yes ☐

No X ☐

4.(3) Complies with the Duty to Cooperate

Yes X ☐

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy ST40 – Biodiversity & Geodiversity

Under **Policy ST40 Bullet Point 3**, all new development should make provision for at least 10% net biodiversity gain on site, or where it can be demonstrated that for design reasons this is not practicable, off site through an equivalent financial contribution.

It is the HBF's opinion that the Council should not deviate from the Government's proposals on biodiversity gain as set out in the Environment Bill. This legislation will require development to achieve a 10% net gain for biodiversity. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. 10% will be a mandatory national requirement, but it is not a cap on the aspirations of developers who want to voluntarily go further. The Government will use the DEFRA Biodiversity Metric to measure changes to biodiversity under net gain requirements established in the Environment Bill. The mandatory requirement offers developers a level playing field nationally and reduced risks of unexpected costs and delays. The Council should not specify a requirement above 10%. The prefix "*at least*" should be deleted from **Policy ST40 Bullet Point 3**.

The Council should not require "*all development*" to deliver biodiversity net gain. The Council should apply proportionality in their application of planning policy. Sites without reasonable opportunities to achieve biodiversity net gain should not face risks of delay through rigid or prescriptive requirements. As set out in the Environment Bill, the Government will introduce exemptions applicable to the most constrained types of development. Sites not containing habitats to start with (e.g. those entirely comprising buildings and sealed surfaces) will not be required to deliver compensatory habitats through biodiversity net gain, but may be required to incorporate some green infrastructure through wider planning policy. There will be a targeted exemption for brownfield sites that meet certain criteria including that they (i) do not contain priority habitats and (ii) face genuine difficulties in delivering viable development, which will address concerns about the cost sensitivity of the redevelopment of post-industrial developed land. These exemptions will be set out in secondary legislation. The Government will also consider whether minor (less than 10 dwellings) residential developments should be subject to longer transition arrangements or a lower net gain requirement than other types of development. A simplified process for minor residential developments will be introduced to ensure that such schemes do not face additional new survey requirements. This simplified assessment will not include a condition assessment, so users will only need to state what habitats are present and the area that these habitats occupy to define their baseline for net gain. **Policy ST40 Bullet Point 3** should be amended to remove the reference to "*all development*".

Continued on separate sheet below

Continue on a separate sheet if necessary

5. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

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Policy ST40 Bullet Point 3 is unsound because it fails the four tests of soundness defined by the 2021 NPPF (para 35). **Policy ST40 Bullet Point 3** is not positively prepared, justified, effective and consistent with national policy. Before the Bassetlaw Local Plan is submitted for examination, **Policy ST40 Bullet Point 3** should be modified as outlined above.

Continue on a separate sheet if necessary

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6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes X ☒

No, I do not wish to participate in hearing session(s)

No ☐

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Policy ST40 – Biodiversity & Geodiversity continued

In the Environment Bill, the Government also makes provision for a transition period of two years. The Government will work with stakeholders on the specifics of this transition period, including accounting for sites with outline planning permission, and will provide clear and timely guidance on understanding what will be required and when. Transitional arrangements should be incorporated into **Policy ST40 Bullet Point 3**.

The Council's Viability Assessment only includes a cost £500 per dwelling for **Policy ST40 Bullet Point 3** (see HBF detailed comments under Viability & Deliverability). Before the Bassetlaw Local Plan is submitted for examination, further viability sensitivity testing work should be undertaken.



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Part B - Your representation

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Name or Organisation: HOME BUILDERS FEDERATION (HBF)

3. To which part of the Local Plan does your representation relate?

Policy: ST50

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes X ☐

No ☐

4.(2) Sound

Yes ☐

No X ☐

4.(3) Complies with the Duty to Cooperate

Yes X ☐

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy ST50 – Reducing Carbon Emissions Climate Change Mitigation & Adaption

Under **Policy ST50 Bullet Point 1**, all proposals should seek to reduce carbon and energy impacts in their design and construction in accordance with Policy ST35. Proposals should incorporate measures that address issues of climate change mitigation by :-

- d) requiring compliance with relevant national building standards ; and
- g) ensuring that major development makes an appropriate financial contribution to the Bassetlaw carbon offsetting fund.

Bullet Point 1(d) is ambiguous. The Council should clarify that “*relevant national building standards*” means the Building Regulations.

Today’s new homes are already very energy efficient with lower heating bills for residents in comparison to older existing homes. Energy performance data has shown that 8 out of 10 new build dwellings have an A or B energy efficiency rating, compared to only 3% of existing properties. In November 2019, the average new build buyer in England saved £442.32 every year on heating costs compared to owners of existing dwellings. Nevertheless, the HBF recognise the need to move towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable. The Government Response to The Future Homes Standard : 2019 Consultation on changes to Part L (conservation of fuel & power) and Part F (ventilation) of the Building Regulations for new dwellings dated January 2021 provides an implementation roadmap for achieving the Government’s aim for greater energy efficiency. The interim Part L (Conservation of fuel and power), Part F (Ventilation) & Overheating Regulations will be regulated for in late 2021 and to come into effect in 2022. The 2021 interim uplift will deliver homes that are expected to produce 31% less CO2 emissions compared to current standards. To ensure as many homes as possible are built in line with new energy efficiency standards, transitional arrangements will apply to individual homes rather than an entire development and the transitional period will be one year. This approach will support successful implementation of the 2021 Interim Uplift and the wider implementation timeline for the Future Homes Standard from 2025. The Future Homes Standard will ensure that new homes will produce at least 75% lower CO2 emissions than one built to current energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.

Continued on separate sheet below

Continue on a separate sheet if necessary

5. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Policy ST50 Bullet Points 1(d), 1(f), 1(g) & 2(d) are unsound and fail the four tests of soundness defined by the 2021 NPPF (para 35). **Policy ST50 Bullet Points 1(d), 1(f), 1(g) & 2(d)** are not positively prepared, justified, effective and consistent with national policy. Before the Bassetlaw Local Plan is submitted for examination, **Policy ST50 Bullet Points 1(d), 1(f), 1(g) & 2(d)** should be deleted or modified as outlined above.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes X ☒

No, I do not wish to participate in hearing session(s)

No ☐

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Policy ST50 – Reducing Carbon Emissions Climate Change Mitigation & Adaption continued

The HBF support the Government's approach to the Future Homes Standard but there are difficulties and risks to housing delivery, which include :-

- the immaturity of the supply chain for the production / installation of heat pumps ; and
- the additional load that would be placed on local electricity networks in combination with Government proposals for the installation of EVCPs in new homes under changes to Part S of the Building Regulations and the Council's own requirements under **Policy ST50 Bullet Point 1(f)**.

In autumn 2020, the HBF established a Future Homes Task Force to develop workable solutions for the delivery of the home building industry's contribution to meeting national environmental targets and objectives on Net Zero. Early collaborative work is focussed on tackling the challenges of implementing the 2021 and 2025 changes to Building Regulations successfully and cost-effectively as well as providing information, advice and support for Small Medium Enterprise (SME) developers and putting the customer at the centre of thinking. On 27 July 2021, the Future Homes Delivery Plan – Summary of the goals, the shared roadmap & the Future Homes Delivery Hub was published. To drive and oversee the plan, a new delivery Hub supported by involvement from Government was launched in September. The Hub will help facilitate a sector-wide approach to identifying metrics, more detailed targets (where necessary), methods and innovations to meet the goals and collaborations required with supply chains and other sectors. It will incorporate the needs of all parties including the public and private sector and consumers, so that they can all play their part in delivering environmentally conscious homes that people want to live in.

Bullet Points 1(g) is also ambiguous and its inter-relationship with **Bullet Point 1(d)**, 2021 Part L Interim Uplift and the Future Homes Standards is unclear. Financial contributions to a carbon offsetting fund should not be necessary.

Furthermore, the Council's Viability Assessment excludes any costs for 2021 Part L Interim Uplift, 2025 Future Homes Standard or financial contributions to carbon offsetting (see HBF detailed comments under Viability & Deliverability). Before the Bassetlaw Local Plan is submitted for examination, further viability sensitivity testing work should be undertaken.

Under **Policy ST50 Bullet Point 1(f)**, all proposals should seek to reduce carbon and energy impacts by providing for electric vehicle charging capability and charging infrastructure in new development.

The HBF recognise that electric vehicles will be part of the solution to transitioning to a low carbon future. As set out in the Department of Transport consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019), the Government's preferred option is the introduction of a new requirement for EVCPs under Part S of the Building Regulations. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCPs in new buildings across the country and supersede the Council's policy approach.

Until the introduction of proposed changes to Part S of the Building Regulations, the HBF consider that the physical installation of active EVCPs is inappropriate. The evolution of automotive technology is moving quickly therefore a passive cable and duct approach is a more sensible and future proofed solution, which negates the potential for obsolete technology being experienced by householders. A passive cable and duct approach means that the householder

can later arrange and install a physical EVCP suitable for their vehicle and in line with the latest technologies.

The 2021 NPPF states that policies should be clearly written and unambiguous so that a decision maker knows how to react to a development proposal (para 16d). It is noted that there is an inconsistency between **Policy ST50 Bullet Point 1(f)** and the Nottinghamshire Parking Standards 2020 (Document EX-010) Table T4.1.4 requirement for 1 fast charge socket per dwelling for houses / apartments with allocated parking. **Policy ST50 Bullet Point 1(f)** should be clearer in specifying a passive cable & duct approach and not the installation of active EVCPs.

The HBF and its Members have serious concerns about the capacity of the existing electrical network in the UK. The supply from the power grid is already constrained in many areas across the country. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard. These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery. The Council's Viability Assessment excludes any costs for **Policy ST50 Bullet Point 1(f)** (see HBF detailed comments under Viability & Deliverability). Before the Bassetlaw Local Plan is submitted for examination, further viability sensitivity work should be undertaken.

Policy ST50 Bullet Point 2(d) promotes water efficiency by requiring residential development to meet the tighter Building Regulations optional requirement of 110 litres per person per day.

Under Building Regulations, all new dwellings must achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day then the Council should justify doing so by applying the criteria set out in the NPPG. The NPPG states that where there is a "*clear local need, LPA can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day*" (ID 56-014-20150327). The NPPG also states the "*it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement*" (ID 56-015-20150327).

The Council's own evidence states that areas in Bassetlaw covered by Severn Trent Water are not classed as water stressed. Bassetlaw District is only partially in the area covered by Anglian Water classed as an area of serious water stress. A clear local need has not been demonstrated.

Furthermore, the Council's Viability Assessment excludes any costs for **Policy ST50 Bullet Point 2(d)** (see HBF detailed comments under Viability & Deliverability). Before the Bassetlaw Local Plan is submitted for examination, further viability sensitivity work should be undertaken.



Bassetlaw Local Plan 2020-2037

Publication Version Representation Form September to October 2021

Please submit electronically if possible to thebassetlawplan@bassetlaw.gov.uk

This form has two parts:

Part A - Personal details – need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: HOME BUILDERS FEDERATION (HBF)

3. To which part of the Local Plan does your representation relate?

Policy: ST57

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes X ☐

No ☐

4.(2) Sound

Yes ☐

No X ☐

4.(3) Complies with the Duty to Cooperate

Yes X ☐

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy ST57 – Digital Infrastructure

Under **Policy ST57 (Bullet Points 1 - 3)**, all proposals should enable full fibre broadband connection to the premises or any other technology as they become available on an open access basis on first occupation. Where this is not practicable or viable, then alternative technologies such as superfast fibre and/or community-based networks should be provided.

The HBF recognise that new residential development should have infrastructure to facilitate access to high-speed broadband connections. However, the Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations. In the Budget (11th March 2020), the Government confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband. The Government will amend Part R “Physical Infrastructure for High-Speed Electronic Communications Networks” of the Building Regulations to place obligations on housing developers to work with network operators to install gigabit broadband, where this can be done within a commercial cost cap. The Department for Culture, Media and Sport (DCMS) has outlined its intentions on the practical workings of this policy, which will apply to all to new builds. Any type of technology may be used, which is able to provide speeds of over 1000 Mbps. All new build developments will be equipped with the physical infrastructure to support gigabit-capable connections from more than one network operator. The Council should also recognise that full fibre broadband connection is reliant on a third-party contractor over which a developer is unlikely to have any control and therefore cannot confirm availability at first occupation. **Policy ST57 (Bullet Points 1 – 3)** are unnecessary and repetitious of Part R of the Building Regulations.

Furthermore, the Council’s Viability Assessment excludes any costs for **Policy ST50 (Bullet Points 1 – 3)** (see HBF detailed comments under Viability & Deliverability). Before the Bassetlaw Local Plan is submitted for examination, further viability sensitivity work should be undertaken.

Continue on a separate sheet if necessary

5. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Policy ST57 (Bullet Points 1 – 3) are unsound and fail the four tests of soundness defined by the 2021 NPPF (para 35). **Policy ST57 (Bullet Points 1 – 3)** are not positively prepared, justified, effective and consistent with national policy. Before the Bassetlaw Local Plan is submitted for examination, **Policy ST57 (Bullet Points 1 – 3)** should be deleted.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes X ☒

No, I do not wish to participate in hearing session(s)

No ☐

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership which includes multi-national PLC's, regional developers and small local builders. In any one year, our Members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. The HBF wish to attend the Bassetlaw Local Plan Examination Hearing Sessions to discuss the above representations in greater detail.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.



Bassetlaw Local Plan 2020-2037

Publication Version Representation Form September to October 2021

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Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: HOME BUILDERS FEDERATION (HBF)

3. To which part of the Local Plan does your representation relate?

Policy: ST29, ST30, ST31, ST40, ST50 & ST57 (VIABILITY)

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes X ☐

No ☐

4.(2) Sound

Yes ☐

No X ☐

4.(3) Complies with the Duty to Cooperate

Yes X ☐

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Viability and Deliverability

In plan-making, viability is inseparable from the deliverability of development. At Examination, viability will be a key issue in determining the soundness of the Bassetlaw Local Plan. The viability of individual developments and plan policies should be tested at the plan making stage. The Council's viability evidence is set out in Bassetlaw District Council Whole Plan & Community Infrastructure Levy (CIL) Viability Assessment by Nationwide CIL Services (NCS) dated August 2021. This Viability Assessment tests the cumulative impact of proposed policies on five generic typologies and eight Strategic Sites. As set out in the 2021 NPPF, the contributions expected from development including the level & types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. should be set out in the Local Plan (para 34). As stated in the 2021 NPPF, development should not be subject to such a scale of obligations that the deliverability of the Local Plan is threatened (para 34). Viability assessment should not be conducted on the margins of viability especially in the aftermath of uncertainties caused by the Covid-19 pandemic and Brexit. Without a robust approach to viability assessment, the Bassetlaw Local Plan will be unsound, land will be withheld from the market and housing delivery targets will not be achieved.

continued on separate sheet below

Continue on a separate sheet if necessary

5. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Before the Bassetlaw Local Plan is submitted for examination, further viability sensitivity testing work should be undertaken.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes X ☒

No, I do not wish to participate in hearing session(s)

No ☐

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Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

Viability and Deliverability continued

The Council's Viability Assessment is based on the following assumptions :-

- Sales Values of £2,000 per sqm for apartments & £2,250 - £2,400 per sqm for houses ;
- Threshold Land Values of £771,553 per hectare for greenfield & £974,253 per hectare for brownfield ;
- Construction Costs prepared by Gleeds of £1,631 per sqm for apartments & £1,112 per sqm for houses ;
- 3% (para 4.21) or 5% (para 4.43) for contingencies ;
- No abnormal costs ;
- 20% developer profit for market housing but only 6% contractors margin for affordable housing ;
- 8% for professional fees, 0.5% for legal fees & 2% for sales & marketing costs ;
- CIL of £0 for Strategic Sites & £20 per sqm for non-strategic residential sites ;
- S106 contribution of £3,000 per dwelling ;
- Affordable housing provision of 15% on brownfield sites & 25% on greenfield sites with a tenure mix of 50% low cost home ownership & 50% affordable rent ;
- £500 per dwelling for biodiversity net gain based on DEFRA cost of £17,757 per hectare ;
- £3 per sqm for accessible & adaptable homes standards (based on a cost of £11 per sqm but assuming only applicable to 30% of dwellings) ; and
- No allowance for water efficiency standards.

Viability assessment is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact. The HBF submits the following comments of the above assumptions :-

- The exclusion of any abnormal costs suppresses the impact of policy compliant requirements, which are based on a percentage increase of build costs. The exclusion of all abnormal costs also implies that all abnormal costs should be fully deducted from the assumed Benchmark Land Value (BLV). The reduction of BLV to account for site-specific abnormal costs is only valid where that reduction maintains a sufficient incentive for the landowner to sell as required by the NPPG (ID 10-013-20190509), which states that the BLV should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The NPPG confirms that the premium above the Existing Use Value (EUV) should provide a reasonable incentive for the landowner to sell. Whilst the NPPG (ID 10-014-20190509) requires the BLV to reflect the implication of abnormal costs and site-specific infrastructure costs, this reflection is not equitable to full deduction because this may result in insufficient incentive for a landowner to sell, which will stagnate land supply as landowners will not bring land forward for development. The HBF acknowledge that BLV should reflect the implications of abnormal costs in accordance with NPPG, however, there is a tipping point beyond which the land value cannot fall as the landowner will not be sufficiently incentivised to release their site for development ;
- **Policy ST29 – Affordable Housing.** The full impacts of First Homes on viability have not been considered. There will be an increased cost to developers selling First Homes in terms of marketing plus an increased risk as they will not be able to sell First Homes in bulk to a Registered Provider thus obtaining a more reliable up front revenue stream. This increased risk is not reflected in the 6% contractor's margin assumed for affordable housing because there is no longer a guaranteed, known end value. Furthermore, First Homes may impact on the ability of developers to sell similarly sized open market units. First Homes may dampen the appetite of first-time buyers for 1, 2 & 3 bedroomed open market dwellings as some households, which would have opted to purchase a home on the open market will use the discounted First Homes route instead. This may result in slow sales of similar open

market units, increased sales risk and additional planning costs (if sites have to be re-planned with an alternative housing mix) ;

- **Policy ST30 – Housing Mix.** The impacts of the provision of 2% serviced plots for self & custom build on sites of more than 100 dwellings have not been viability tested. This policy requirement will have a bearing on the development economics of these schemes. It is unlikely that up front site promotion costs (including planning & acquisition costs) and fixed site externals, site overheads and enabling infrastructure costs will be recouped because the plot price a self & custom builder is able to pay may be constrained by much higher build costs for self-builders. There are also impacts of not recouping profit otherwise obtainable if the dwelling was built and sold on the open market by the site developer, disruption caused by building unsold plots out of sequence from the build programme of the wider site and a worst-case scenario of unsold plots remaining undeveloped.
- **Policy ST31 – Specialist Housing.** The derivation of the extra over cost of £11 per sqm for M4(2) standard is unexplained. The DCLG Housing Standards Review, Final Implementation Impact Assessment, March 2015 Table 45 identified a cost of £521 per unit for 3 bed semi-detached house and £907 - £940 per unit for apartments. £521 per dwelling is also based on 2015 costs, which are somewhat out of date and less than alternative estimates. The Government's consultation "Raising Accessibility Standards for New Homes" (ended on 1st December 2020) estimates the additional cost per new dwelling, which would not already meet M4(2), is approximately £1,400. M4(2) compliant dwellings are also larger than NDSS (see DCLG Housing Standards Review Illustrative Technical Standards Developed by the Working Groups August 2013), therefore larger sizes should be used when calculating additional build costs for M4(2) and any other input based on square meterage except sales values, which are unlikely to generate additional value for enlarged sizes. The Viability Assessment tests £3 per sqm assuming only 30% of dwellings are required to meet M4(2) standard but the policy requires all dwellings to meet M4(2) standards ;
- **Policy ST40 – Biodiversity & Geodiversity.** The costs of providing 10% biodiversity net gain are significant. The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that biodiversity net gain does not prevent, delay or reduce housing delivery. The Council's cost assumption of £500 per dwelling is less than £1,011 per unit for greenfield development cost set out as the East Midlands regional cost (central estimate based on 2017 prices) in the Net Gain Delivery Cost Tables 16 & 17 in the DEFRA Biodiversity Net Gain & Local Nature Recovery Strategies Impact Assessment 15/10/2019. Furthermore, costs increase significantly for off-site delivery under Scenario C to £3,545 per dwelling for greenfield. The under-estimation of costs for greenfield sites is concerning given that 76% of HLS is greenfield. As written **Bullet Point 3** states "at least" therefore biodiversity net gain of more than 10% may be sought, which would increase costs. There may also be an impact on the ratio of gross to net site acreage ;
- **Policy ST50 – Reducing Carbon Emissions Climate Change Mitigation & Adaption (Bullet Points 1(d) & 1(g)).** The Gleeds construction costs are based on current Building Regulations. The costs for the 2021 Part L Interim Uplift and Future Homes Standard are excluded. The Government's Future Homes Standard : 2019 Consultation on changes to Part L (conservation of fuel & power) and Part F (ventilation) of the Building Regulations for new dwellings estimated the cost of the Interim Uplift as £4,615 per unit. The Future Homes Standard 2025 will add further extra-over costs. These costs should be included in the Council's viability testing. There are no costs for EVCPs required under **Policy ST50 (Bullet Point 1(f))**. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated a cost of £976 per EVCP plus an automatic levy for upgrading networks capped at £3,600. These costs should be included in the Council's viability testing. The cost for the optional water efficiency standard is excluded despite the requirement under **Policy ST50 (Bullet Point 2(d))**. The Department of Communities and Local Government Housing Standards Review Cost Impact, September 2014 by EC Harris estimated an extra-over allowance of £10 per unit. However, this figure

is somewhat dated and should be increased to reflect 2021 prices. This cost should be included in the Council's viability testing ; and

- **Policy ST57 – Digital Infrastructure.** If this policy requires provision above Part R of the Building Regulations, an extra-over cost allowance should be added.

Most sites should be deliverable at planning application stage without further viability assessment negotiations. Viability negotiations should occur occasionally rather than routinely. Trade-offs between policy requirements, affordable housing and infrastructure provision should not be necessary. However, if the viability of sites is overstated, policy requirements will be set at unrealistic levels. Landowners and developers will have to submit site-specific assessments to challenge assumptions in the Council's Viability Assessment. Such negotiations at planning application stage cause uncertainty for both the Council and developers, which may result in significant delay to housing delivery or even non-delivery.

REF036



From:

To:

Subject:

Attachments:

21 October 2021 14:55

The Bassetlaw Plan

Bassetlaw Local Plan, Regulation 19 Consultation, August 2021 (Representations) [SHMA-ACTIVE.FID3358676]

1. Vistry Group - Reg 19 Representations - Land at Tiln Lane Retford FINAL.pdf; Vistry Group - Reg 19 - Part A (FINAL).pdf; Vistry Group - Reg 19 - Part B - (Sustainability Assessment) (FINAL).pdf; Vistry Group - Reg 19 - Part B - Policy ST1 (Spatial Strategy) (FINAL).pdf; Vistry Group - Reg 19 - Part B - Policy ST15 (Land Provision) (FINAL).pdf; Vistry Group - Reg 19 - Part B - Section 5 Para 5.1.19-5.1.21 (Spatial Strategy) (FINAL).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 or Madam,

I am pleased to submit representations in connection with the above consultation.

The comments are submitted by Marrons Planning on behalf of our client, Vistry Group.

The following documents are attached to this e-mail:

- Representations (Vistry Group)
- Form – Part A – Personal Details
- Form – Part B – Policy ST1 (Spatial Strategy)
- Form – Part B – Section 5 Para 5.1.19-5.1.21 (Spatial Strategy)
- Form – Part B – Policy ST15 (Land Provision)
- Form – Part B – Sustainability Assessment

Due to file sizes, the following appendices will follow separately:

- Appendix 1 – Site Location Plan
- Appendix 2 – Concept Masterplan
- Appendix 3 – Vision Document
- Appendix 4 – Landscape Overview
- Appendix 5 – Transport & Access Appraisal
- Appendix 6 – Ecological Assessment
- Appendix 7 – Heritage Setting Report
- Appendix 8 – Flood Risk and Drainage

If you have any queries please contact me.

Kind regards

Associate Director

Main T 01789 416 400 ext 1308

[REDACTED]

From:

[REDACTED]
21 October 2021 10:33

To:

The Bassetlaw Plan

Subject:

Bassetlaw Local Plan, Regulation 19 Consultation, November 2020 (Vistry Group)

Attachments:

image002.png; Mimecast Large File Send Instructions

I'm using Mimecast to share large files with you. Please see the attached instructions.

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- Form – Part A – Personal Details
- Form – Part B – Policy ST1 (Spatial Strategy)
- Form – Part B – Section 5 Para 5.1.19-5.1.21 (Spatial Strategy)
- Form – Part B – Policy ST15 (Land Provision)
- Form – Part B – Sustainability Appraisal
- Representations (Vistry Group) and Appendices:
 - Appendix 1 – Site Location Plan
 - Appendix 2 – Concept Masterplan
 - Appendix 3 – Vision Document
 - Appendix 4 – Landscape Overview
 - Appendix 5 – Transport & Access Appraisal
 - Appendix 6 – Ecological Assessment
 - Appendix 7 – Heritage Setting Report
 - Appendix 8 – Flood Risk and Drainage

The documents are being sent as a Large File Transfer. If you have any difficulties downloading these, please contact me using the contact details below.

I would be grateful if you could confirm safe receipt of this e-mail and its attachments.

Kind regards

[REDACTED]
Associate Director

[REDACTED]
Main T 01789 416 400 ext 1308



Bassetlaw Local Plan 2020-2037

Publication Version Representation Form September to October 2021

Please submit electronically if possible to thebassetlawplan@bassetlaw.gov.uk

Please use this form to provide representations on the Bassetlaw Local Plan. Bassetlaw District Council must receive representations by **5pm on 21st October 2021**. Only those representations received within this period have the statutory right to be considered by the inspector at the subsequent examination.

Responses can be submitted via the electronic version of the comment form which can be found on the Council's web site at: www.bassetlaw.gov.uk/BassetlawPlan Alternatively this form can be completed and returned as an e-mail attachment to thebassetlawplan@bassetlaw.gov.uk or by post to **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

Please note:

- Representations must only be made on the basis of the legal compliance, compliance with the Duty to Co-operate and/or soundness of the Plan.

Please read the guidance note, available on the Council's webpage, before you make your representations. The Local Plan and the proposed submission documents, and the evidence base are also available to view and download from the Council's Local Plan webpage:

www.bassetlaw.gov.uk/bassetlawplan

Data Protection Notice:

Under the General Data Protection Regulation 2016 (GDPR) and Data Protection Act 2018 (DPA) Bassetlaw District Council, Queen's Building, Potter Street, Worksop, Notts, S80 2AH is a Data Controller for the information it holds about you. The lawful basis under which the Council uses personal data for this purpose is consent.

All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: <https://www.bassetlaw.gov.uk/about-us/data-protection/departmental-privacy-notices/planning-policy-privacy-notice/>

Due to the Data Protection Act 2018, Bassetlaw District Council now needs your consent to hold your personal data for use within the Local Plan. If you would like the Council to keep you informed about the Bassetlaw Local Plan, we need to hold your data on file. Please tick the box below to confirm if you would like to 'opt in' to receive information about the Bassetlaw Local Plan. Note that choosing to 'opt in' will mean that the Council will hold your information for 2 years from the 'opt in' date. At this time we will contact you to review if you wish to 'opt in' again. You can opt-out at any time by emailing thebassetlawplan@bassetlaw.gov.uk or by calling 01909 533495.

For more information on how Bassetlaw District Council's Planning Policy department processes personal information about you, please see our main privacy notice at <https://www.bassetlaw.gov.uk/about-us/data-protection/departamental-privacy-notice/planning-policy-privacy-notice/>

Please tick/ delete as appropriate:

Please confirm you have read and understood the terms and conditions relating to GDPR.

Yes ☒

No ☐

Please tick as appropriate to confirm your consent for Bassetlaw District Council to publish and share your name/ organisation and comments regarding the Bassetlaw Local Plan.

I confirm my consent for Bassetlaw District Council to share my name/ organisation and comments regarding the Bassetlaw Local Plan including with the Planning Inspectorate.

Yes ☒

No ☐

Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Bassetlaw Local Plan.

I would like to opt in to receive information about the Bassetlaw Local Plan.

Yes ☒

No ☐

Printed Name:

[Redacted Name]

Signature:

[Redacted Signature]

Date:

21/10/2021

This form has two parts:

Part A - Personal details – need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part A- Personal Details

1. Personal Details

Name: [REDACTED]

Organisation (if applicable): Vistry Group

Address: Cleeve Hall, Bishops Cleeve, Cheltenham, Gloucestershire

Postcode: GL52 8GD

Tel: 01242 388264

Fax: N/A

Email: [REDACTED]

2. Agent Details (if applicable)

Agent: [REDACTED]

Organisation (if applicable): Marrons Planning

Address: Bridgeway House, Bridgeway, Stratford upon Avon

Postcode: CV37 6YX

Tel: [REDACTED]

[REDACTED] [REDACTED]

Email: [REDACTED]



Bassetlaw Local Plan 2020-2037

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Part B - Your representation

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Name or Organisation: Vistry Group

3. To which part of the Local Plan does your representation relate?

Policy: Local Plan Section 5.0 (A Spatial Strategy for Bassetlaw)

Paragraph: 5.1.19-5.1.21

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached paper.

Continue on a separate sheet if necessary

5. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

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Please see attached paper.

Continue on a separate sheet if necessary

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6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes ☒

No, I do not wish to participate in hearing session(s)

No ☐

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.



Bassetlaw Local Plan 2020-2037

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Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part B - Your representation

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Name or Organisation: Vistry Group

3. To which part of the Local Plan does your representation relate?

Policy: ST1 (Bassetlaw's Spatial Strategy)

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached paper.

Continue on a separate sheet if necessary

5. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Please see attached paper.

Continue on a separate sheet if necessary

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After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes ☒

No, I do not wish to participate in hearing session(s)

No ☐

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.



Bassetlaw Local Plan 2020-2037

Publication Version Representation Form September to October 2021

Please submit electronically if possible to thebassetlawplan@bassetlaw.gov.uk

This form has two parts:

Part A - Personal details – need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Vistry Group

3. To which part of the Local Plan does your representation relate?

Policy: ST15 (Provision of Land for Housing)

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached paper.

Continue on a separate sheet if necessary

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Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Vistry Group

3. To which part of the Local Plan does your representation relate?

Policy: Sustainability Assessment

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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Representations – Land at Tiln Lane, Retford

Bassetlaw Local Plan - Draft Submission Plan

Vistry Group Limited

October 2021





1. The following representations are made in response to the Bassetlaw Local Plan 2020-2037 Publication Version (August 2021) on behalf of Vistry Group in respect of their land interests at Tiln Lane, Retford. These representations should be read alongside the completed Representation Forms.

Policy ST1 (Bassetlaw's Spatial Strategy)

Question 5

2. The Spatial Strategy promotes managed sustainable development and growth, appropriate to the size of each settlement, to meet the evidenced need for new homes and jobs, regenerate town centres, and support necessary improvements to infrastructure, services and facilities.
3. The draft Plan promotes development at sustainable locations, unless there are overriding amenity, biodiversity or heritage considerations. The use of Grade 1-3 agricultural land is to be minimised. There is an emphasis on development in sustainable locations, in close proximity to transport hubs and key public transport nodes.
4. A continuation of the five-tier settlement hierarchy is proposed, to be comprised of 'Main Towns', 'Large Rural Settlements', 'Small Rural Settlements', a 'New Settlement' (Bassetlaw Garden Village) and then 'Countryside'. Retford is a 'Main Town' in the hierarchy, along with Worksop and Harworth & Bircotes.
5. Combined, the Main Towns will accommodate 7,155 dwellings over the plan period. The majority (3,269 dwellings) will be provided at Worksop, 2,128 at Retford, and 1,758 at Harworth & Bircotes. Retford is a sustainable location for new development and its position as a Main Town is supported. However, it will only accommodate 29.7% of the dwellings that are to be provided at the Main Towns.
6. Despite being the second largest town in the District, the Large and Small Rural Settlements, Other Villages and Countryside, will contribute more dwellings than Retford (at 3,343 dwellings, or 27.4% of the total provision). Retford could, and should, be providing more towards meeting the housing needs of the District than what are acknowledged to be less accessible locations.



7. Paragraph 5.1.43 of the Local Plan confirms that Retford is a sustainable location for growth, highlighting its ability to maximise opportunities for sustainable and public transport choices. It is important that Retford contribute to housing supply over the plan period to maintain the important role it plays in the settlement hierarchy, and support sustainable development in the District.

Question 6

8. Retford is a sustainable location for additional growth and should contribute more to meeting the housing needs of the District. It is a sustainable settlement within the top tier of the settlement hierarchy. The number of units to be provided at Retford should be increased.

Section 5.0 (A Spatial Strategy for Bassetlaw)

Paragraph 5.1.19 – 5.1.21

Question 5

9. The housing requirement is not sound, as it is not positively prepared, justified, effective or consistent with national policy for the following reasons.

Plan Period

10. Although plan preparation is continuing in accordance with the most up to date Local Development Scheme (effective June 2021), the timetable envisages the Local Plan being adopted in December 2022. The risk of delay at the Examination stage cannot be discounted and should be factored into the Plan.
11. National policies expect a plan period of a minimum of 15 years from the point of adoption (NPPF, para. 22), and so the Plan period should run to 2038, in the event it is not adopted until 2023, rather than 2037. The housing requirement should therefore be increased by circa 600 homes and the Council should identify further housing allocations in sustainable locations to meet this additional requirement.



Local Housing Need

12. The minimum Local Housing Need (LHN) has been calculated using the standard method, which is now well established and is not disputed by these submissions. The standard methodology calculates a minimum housing requirement of 288 dwellings per annum for the period 2020-2037.
13. The standard method calculation is the starting point for housing delivery. The LHN in the Plan is subject to an uplift of 303 dwellings per annum to 591 dwellings, in order to support growth of 9,735 jobs over the plan period. The total housing requirement is therefore 10,047 dwellings for the 17-year period 2020-2037.

Affordability Uplift

14. The housing requirement should also be increased to take account of affordability within the Borough, consistent with national guidance (paragraph 2a-024-20190220 of the PPG) which states, *“An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”*
15. The identified affordable housing need is 214 homes per annum (Bassetlaw HEDNA para 6.58). The Plan seeks affordable homes from housing schemes of 10 units or more, or 0.5ha, with 15% sought on previously developed sites and 25% of greenfield sites. The maximum gain is therefore 25% on any given scheme. Even if it were assumed that all of the LHN (591 dwellings per annum) could contribute 25% affordable housing, it would amount to only 148 affordable homes per annum.
16. The 148 dwelling figure is substantially less than the 214 affordable homes figure evidence identifies is required. The housing requirement should therefore be increased to reflect the levels of affordability and need for affordable housing in the District.



Question 6

17. The plan period should be extended to 2038, to mitigate the risk that the plan will not be adopted before 2023. The housing requirement should be increased accordingly.
18. The housing requirement should also be increased to take account of affordability within the Borough and ensure sufficient affordable homes will be delivered to meet the evidenced need during the plan period.
19. The Council should allocate additional sites in sustainable locations to cater for the additional housing requirement.

Policy ST15 (Provision of Land for Housing)

Supply over the Plan Period

20. The Local Plan states that to meet Bassetlaw's housing requirement of 10,047 dwellings, housing delivery needs to remain at the 'high levels' experienced over the last few years. It notes that this has averaged 584 dwellings per annum over the last five years (Local Plan Para 5.1.21).
21. However, there has been a significant uplift in completions over the previous five-year period and completions in the preceding five year period were much lower. The average was just 272 dwellings per year between 2011/12 - 2014/15. The Council must ensure the higher rate of delivery achieved in recent years is maintained for the housing need to be met, which is best achieved by through a reliable and varied portfolio of housing sites.

Existing Commitments

22. The housing trajectory identifies that at April 2021, almost 50% of the housing requirement was accounted for through committed sites with extant planning permission and 4% via Neighbourhood Plans allocations without planning permission. This represents the majority of the housing supply over the Plan period.



23. The housing trajectory does not envisage any completions from the Local Plan or Neighbourhood Plan allocations in the first five years of the plan period, with completions only beginning in 2025/26.
24. Before then, housing supply will come from the existing commitments, which comprises sites under construction (2,109 dwellings out of the 2,339 total to be delivered over the plan period); sites with full planning permission but not commenced (769 out of 1,493 total); and sites with outline permission (209 out of 2,186 total).
25. The Local Plan does not provide any evidence that those sites with outline planning permission for major housing development will come forward during the plan period. Without clear evidence, these sites cannot be considered deliverable in accordance with the Framework. The Council should closely monitor housing delivery to be confident the existing commitments will come forward in a timely manner.
26. Whilst the table at 5.1.41 of the draft Local Plan includes supply from windfall sites, it does not include a lapse rate for existing commitments. A lapse rate should be included in case not all of the sites are developed, or in the case of those with outline permission, deliver fewer dwellings are provided than currently anticipated. This may result in the need to allocate additional sites to meet the identified need.

Windfalls

27. The Council assumes a windfall allowance of 100 dwellings per annum, from Year 6 of the Plan onwards, which equates to 1,200 dwellings during the plan period (approaching 10% of the total supply). The Housing Background Paper sets out the Council's justification for the windfall allowance.
28. The calculation of windfall sites appears to be based on smaller sites, which were too small to be allocated, equating to 115 dwellings per annum. However, there is no certainty that past sources of windfall housing supply will continue. It is noted that the LAA was comprehensive and assessed sources of supply as low as five dwellings on any given site (LAA, paragraph 1.23).



29. The reliance on windfall sites acknowledges that in recent years, all of the dwellings delivered in Bassetlaw have been on unallocated sites. This is because the current Core Strategy (adopted 2011) did not allocate sites for residential development and the planned Site Allocations document was not progressed.
30. It is therefore difficult to rely on past trend averages to establish the number of homes that can be expected on windfall sites. As the Framework states, the evidence that windfalls can be relied upon should be compelling for them to be included in the housing supply figures.

Proposed Allocations

31. Policy ST15 (Provision of Land for Housing) states that in addition to completions from the first year of the plan period and commitments, land for approximately 3,011 new dwellings will be allocated during the plan period. This does not appear to correspond with the figure in the table at para 5.1.41, which states that 3,639 Local Plan site allocations will be made.
32. The Local Plan identifies housing supply of 12,198 dwellings, which provides a headroom of 2,151 dwellings (or 21.4% against the housing requirement). Whilst the Plan seeks to ensure flexibility in the figures, housing delivery is reliant upon larger strategic sites within the District. The two sustainable urban extensions and the Bassetlaw Garden Village proposal will provide for 2,300 dwellings (76.4%) of the 3,011 dwellings that are expected to come from allocated sites.
33. Of the Local Plan allocations, two (HS1: Peaks Farm, Worksop for 1,000 dwellings; and HS 13: Ordsall South, Retford for 800 dwellings) will extend into the next plan period, as will the new settlement at Bassetlaw Garden Village (500 dwellings). The focus on a limited number of sites means that market absorption rates will be a factor at these locations, and could limit the ability to increase the pace of supply were the sites to be delayed. This would result in a loss of housing completions from the plan period.



34. Land is safeguarded under policy ST56 for an east-west distributor link road between Blyth Road and Carlton Road at Peaks Hill Farm, to support the delivery of Site HS1. This is a significant piece of infrastructure. A number of junction improvements are also required to deliver site HS13, as follows, funded through Section 106 agreements:
- Junction at A620 Babworth Road / B6420 Mansfield Road / A620 Straight Mile / Sutton Lane
 - Improvements to the Ordsall Road / A620 Babworth Road
 - Improvements to London Road / Whinney Moor Land / Bracken Lane
 - Improvements to London Road / Whitehouses Road
35. The respective Local Plan policies indicate that contributions will also be sought towards these improvements from housing sites HS7, HS9 and HS10 in Retford. However, the Ordsall Road site would be the main contributor meaning that any delay in its delivery could affect the ability to deliver the other Retford allocations. The Vistry land at Tiln Lane in Retford (see Site Location Plan, Appendix 1) is located on the northern side of the town and its delivery is not reliant on these infrastructure improvements.

Bassetlaw Garden Village

36. This site is part of a long-term sustainable growth plan for the District, beyond the lifetime of the Plan. It is assumed that 500 dwellings will be provided by the end of the Plan period in 2037, with a view to providing greater flexibility in the housing supply through increased choice and competition. The delivery of the Garden Village is potentially subject to lengthy lead-in times that have not yet been quantified. There is currently no certainty as to timescales for that the site, and no certainty it will contribute to housing supply during the plan period.

Site Selection

37. Locating new housing at Retford is justified because it is a sustainable settlement and a focus for local employment growth (LP para 5.1.42 and Policy ST7 – Provision of Land for Employment Development).



38. Retford is the second largest town in the District and it has a wide range of services, shops and employment opportunities, and good public transport links. Development here provides an opportunity to maximise sustainable transport choices such as the East Coast Mainline Railway Station (LP para 5.1.46 refers).
39. New allocations at Retford will provide for about 1,194 dwellings. However, there is a particular reliance upon housing allocations HS7 (Trinity Road, 244 dwellings) and, more so, HS13 (Ordsall South, 800 dwellings) to meet the housing needs of the town. As noted above, any delay in these sites coming forward will affect the ability to meet the housing needs locally and the District as a whole, and undermine the important role that Retford plays within the settlement hierarchy.
40. The housing trajectory shows that development at site HS13 (Ordsall South) is not expected to start until at least 2027 and is dependent on off-site junction improvements. As it extends beyond the plan period, any delay in this site coming forward would affect housing delivery later in the plan period. Allocating additional land for development at Retford would provide an appropriate buffer and certainty that housing needs will be met.
41. A balanced portfolio of sites is needed to ensure the identified housing requirement is met. The Council should consider allocating additional sites to protect against possible delivery issues at the larger sites, and which can make an early contribution to housing supply, helping to maintain the momentum that has been achieved in housing delivery in recent years and achieve the high levels of delivery that are required.

Land at Tiln Lane, Retford

42. The Vistry land at Tiln Lane represents a continuation of an existing commitment under construction and could make an early contribution to housing supply. It represents a clear opportunity to protect against potential delays in housing supply delivery.



43. The site has a capacity for circa 120 dwellings and is immediately adjacent to the 175 dwellings currently under construction at Tiln Lane (planning permission reference 14/00503/OUT). Both sites are controlled by Vistry Homes. The additional land could form a further phase of development, utilising existing and proposed improvements to infrastructure locally.
44. The Land Availability Assessment (LAA) (January 2020) did not identify any significant physical or environmental constraints to development at the site (which was given site reference LAA071), but identified concerns regarding the relationship to the established settlement boundary and landscape impact. The potential impact on non-designated heritage assets (Bolham Manor and the Bolham Water Pumping Station) were also identified as potential constraints.
45. Technical work and environmental assessments have been undertaken to address these issues. This includes a detailed Heritage Setting Assessment; a detailed Landscape Assessment; a Transport and Accessibility Appraisal; a Utilities Constraints Assessment; a Flood Risk Assessment and Drainage Strategy; and an Ecological and Biodiversity Net Gain Assessment. The findings were submitted to the Council to as part of the December 2020 Regulation 18 Local Plan consultation.
46. The technical and environmental assessments establish there should be no 'in principle' objection to the Tiln Lane site being allocated for development, and that the areas of concern can be addressed through careful masterplanning. The assessments informed the preparation of a landscape-led masterplan for a sustainable development that takes into consideration the site's constraints and opportunities.
47. The updated LAA (August 2021), published alongside the Regulation 19 draft Local Plan, now takes the information submitted for the site into account. Regarding heritage matters, the updated assessment states, *"BDC Conservation have reviewed the additional evidence / a design solution submitted by the landowner. It is considered that, with an appropriate design which incorporates open space and landscape buffers, it is likely that the site may be suitable for residential development."*



48. The LAA's overall conclusion, with the benefit of the additional evidence provided, is that, *"The remainder of the site could be suitable for additional dwellings subject to a scheme which is landscape led. BDC Conservation considers that it is potentially possible to appropriately address any harm through sensitive design."*
49. The current submission includes an updated Transport & Access Appraisal by Optima (dated September 2021), which provides an assessment of the site's potential for development in relation to access, the suitability of the surrounding highway network and its accessibility by non-car modes. The highways work undertaken indicates the existing site accesses off Tiln Lane, provided for the development under construction, can accommodate a further phase of development, with significant spare capacity.
50. The Appraisal reinforces the site is a sustainable location for housing, and that a number of key facilities accessible from the site by foot (see paragraph 2.4.3). They include bus stops along Tiln Lane (with services connecting to Retford Bus Station), the Car Hill Primary School and The Elizabethan Academy, a local convenience store, existing and proposed children's play areas and, further afield, the retail and employment opportunities within Retford Town Centre. All of these facilities are also within cycling distance, along with Retford Railway Station.
51. Recognising that a significant financial contribution was made as part of the Section 106 Agreement for the existing commitment under construction, the continuation of development on land to the north could secure additional funds to improve public transport services and bus stop infrastructure locally. A proportionate transport contribution would be made as part of any future planning application.
52. The Transport & Access appraisal has particular regard to the transport considerations associated with recent applications for residential development at 'Land North of Bigsby Road, Retford'. This site is near to the Vistry land. Outline planning applications for housing were refused in 2018 and in 2019. The 2019 proposal, for 170 dwellings, was subsequently dismissed at appeal in 2021.



53. The reasons for refusal set out on the Council's Decision Notice cited the impact on the surrounding road network, especially the Tiln Lane / Moorgate junction south of the site, and highway safety along Tiln Lane due to increased traffic volume. The Council also raised concerns about the site specific access arrangements. The Council's reasons for refusal were subsequently upheld during the planning appeal.
54. The Appraisal report confirms it would be necessary, as part of any forthcoming planning application, to model the interaction between the A620/Moorgate/Tiln lane and A610 Amcott Way/A638 Arlington Way junctions, to identify proportionate mitigation proposals. However, there are opportunities to reduce vehicle trips associated with the site to ensure development can be adequately accommodated on the local highway network (paragraph 4.7.2). The capacity of the additional land is less than the 170 dwellings proposed at Bigsby Road.
55. With regards to highway safety, the Appraisal reports the findings of a comprehensive review of traffic calming along Tiln Lane and sets out options to complement and improve the existing traffic calming. The measures would reduce vehicle speeds to mitigate any adverse impacts of increased traffic volume, and provide safe crossing points linked to established desire lines.
56. The improvements include the provision of 2 no. raised table pedestrian crossing points with tactile paving and a level crossing surface; associated minor amendments to the existing bus stop tapers; the potential widening of footways between the school entrance and the proposed crossing point; the provision of 'SLOW' markings on approach to the existing 30/40mph gateway features; and refreshing the existing gateway speed limit road markings.
57. The Appraisals concludes that the enhancements summarised above will complement and improve the existing traffic calming measures along this corridor.
58. Although the Sustainability Appraisal continues to state that additional levels of growth in Retford could impact on flooding, the historic environment and prevailing character, and cultural heritage and landscape and townscape, the technical assessments reference above show that these matters can be addressed through detailed design at the Tiln Lane site.



59. The SA was concerned that a higher level of growth could also contribute towards increased traffic congestion and construction traffic leading to a minor negative effect for transport, air quality and climate change.

Question 6

60. The housing requirement should be amended to take account of likely lapse rates in housing delivery from those sites without detailed planning permission. The housing supply should be justified with evidence, and assumptions in relation to windfalls updated and kept under review.
61. The Local Plan should allocate additional sites to achieve a balance in the portfolio of development sites. Policy ST15 should be amended to include land west of Tiln Lane, Retford, which is a sustainable location for housing development where the potential adverse impacts of development can be mitigated.
62. The technical information provided with these representations demonstrate the site:
- a. is deliverable, available and achievable;
 - b. can be delivered without unacceptable harm to the setting of the Grade II listed Bolham Hall, designated Bolham Hall Park and Garden to the north east, and non-designated heritage assets including the Pumping Station to the north, and Bolham Manor to the west.
 - c. would not have a material adverse landscape and visual effect, through the provision of structural planting to the north eastern and eastern boundaries, and the setting back of development.
 - d. is at very low risk of flooding from all sources, with the exception of groundwater flooding, which could be easily addressed through raised floor levels. There are no flood risk constraints that would prevent the development of the site, and surface water can be managed using sustainable urban drainage systems.



- e. would not affect any wildlife designations, and provides opportunities for ecological enhancement and Biodiversity Net Gain.
 - f. is within walking distance of local public transport facilities, retail, employment, health and education facilities.
63. The technical information addresses the points raised in the SA about flood risk and impact on designated wildlife sites from additional development at Retford generally. The SA states that allocating additional land at Retford would have a positive impact on SA objectives on housing, economy and skills. Allocating the land at Tiln Lane for development provides an opportunity to secure those benefits without adverse impacts.
64. To support these representations, an illustrative masterplan and technical notes on ecology, heritage, landscape and highways and access are included to demonstrate the deliverability of the site.

Sustainability Assessment

Question 5

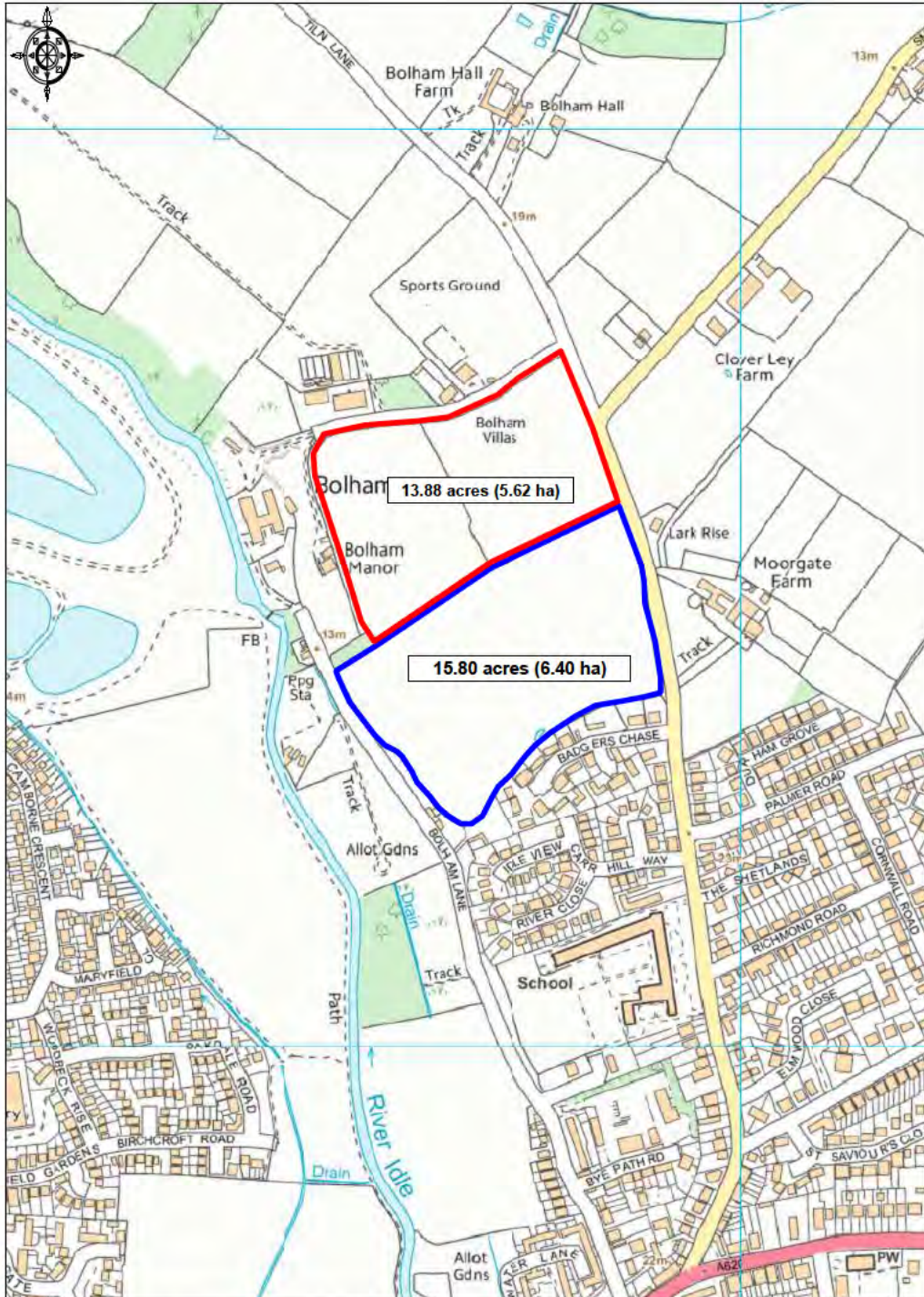
65. Although the Sustainability Appraisal (SA) continues to state that additional levels of growth in Retford could affect flooding, the historic environment and prevailing character, and cultural heritage and landscape and townscape, the site assessments within the Land Availability Assessment (LAA) dated January 2021 indicate that development could be undertaken at certain locations without causing harm in these respects.
66. In particular, the submissions made to promote the Vistry land at Tiln Lane, Retford (site reference LAA071), indicate that this land could be developed without harm to these features, provided a landscape-led masterplan is taken forward.



67. Specifically, the LAA states: *“BDC Conservation have reviewed the additional evidence / a design solution submitted by the landowner. It is considered that, with an appropriate design which incorporates open space and landscape buffers, it is likely that the site may be suitable for residential development.”*
68. The technical information submitted for the Tiln Lane site address the concerns raised in the SA about flood risk and impact on designated wildlife sites. Meanwhile, allocating additional land at Retford would have a positive impact on SA objectives on housing, economy and skills. Allocating the land at Tiln Lane for development provides an opportunity to secure those benefits without adverse impacts.
69. The SA was concerned that a higher level of growth could also contribute towards increased traffic congestion and construction traffic leading to a minor negative effect for transport, air quality and climate change. However, this conclusion is not site specific, and would apply to all locations in the event a higher level of growth were sought.

Question 6

70. The Sustainability Assessment should acknowledge that Retford is able to accommodate additional development without adverse harm to features of the natural and built environment. The Vistry land at Tiln Lane is a suitable location for additional development and can be delivered without adverse impacts.





Site Boundary: 5.88ha

Proposed residential area: 2.9ha
Up to 120 new homes

Proposed primary vehicular access points

Proposed pedestrian link

Consented pedestrian link to Bolham Lane

Pedestrian route between the Site and Bolham Lane

Public Rights of Way

Potential recreational routes

Existing vegetation to be retained where appropriate

Public open space to serve the new development

Children's play area incorporating natural play

Proposed sustainable drainage basin (SuDS)

Proposed wildlife ponds

Proposed orchard tree planting

Above ground local HV Electricity supply

Existing BT apparatus

Existing STW Rising Main (6m easement)

Existing STW Combined Sewer (6m easement)

Existing Water Main (6m easement)

Proposed foul pump station (15m offset required)

Proposed surface water pump station

Listed Buildings

Non designated heritage asset

Non designated Park and Garden

B	19.01.21	SB	BNG.
Rev	Date	By	Description
<div><div><div>CSA</div><div>environmental</div></div><div><div>01462 743447</div><div>01462 743447</div><div>01462 743447</div></div></div>			
Project	Land west of Tilt Lane, Retford		
Title	Concept Masterplan		
Client	Vistry Group		
Scale	1:2500 @ A3	Drawn	SB
Date	Jan 2021	Checked	RR
Drawing No.	CSA/5209/104	Rev	B



VISION DOCUMENT

LAND WEST OF TILN LANE
RETFORD

JANUARY 2021

Prepared by:



Office Address:

CSA Environmental
Dixie's Barns High Street Ashwell Hertfordshire SG7 5NT

Office Telephone Number:

01462 743 647

On behalf of:

Vistry Group

Disclaimer

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	Date	Prepared by	Authorised by	File reference
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VISION STATEMENT



PREFACE

The Vision Document promotes the development of Land West of Tiln Lane, Retford (the Site). It demonstrates how the Site could be brought forward as a comprehensively planned development to deliver a high quality, exciting and sustainable new neighbourhood for around 120 new homes, including 20% affordable housing. The proposals shown are set within a connected network of green infrastructure, to include new landscaping and habitat creation, children's play provision and the creation of new recreational routes, which allow the new development to successfully integrate into the wider community. The proposed development can deliver a minimum of 10% biodiversity net gain in accordance with proposed policy.



01. INTRODUCING THE SITE



01. INTRODUCING THE SITE

This Vision Document supports the promotion of Land West of Tiln Lane, Retford for around 120 new homes.

1.1 INTRODUCTION

Vistry Group are working with the landowners of Land West of Tiln Lane, Retford (the Site), to promote the Site for residential development. The 5.88 hectare Site presents an exciting opportunity to create a sustainable new neighbourhood to address the future housing need of both Retford and the wider District of Bassetlaw.

Bassetlaw District Council are currently preparing their new Local Plan, which upon adoption, will replace the 2011 Core Strategy and Development Management Policies Development Plan Document. The new Local Plan will include strategic policies to guide development, as well as proposed site allocations for housing opportunities. The purpose of this Vision Document is, therefore, to demonstrate that the Site represents a logical and sustainable residential development opportunity which should be allocated for new housing in the new Bassetlaw Local Plan.

The Vision Document shows that there are no technical impediments which would preclude the development at Land West of Tiln Lane, Retford. It also demonstrates how environmental matters such as ecology, landscape and heritage could be mitigated at the detailed design stage. Vistry has undertaken a comprehensive suite of technical and environmental assessments to understand fully the Site's constraints and opportunities and to ensure the masterplan for the proposed development is deliverable and sustainable.

Vistry Group now welcome further discussion with Bassetlaw District Council and local stakeholders, as we look to realise this exciting development opportunity, and secure the delivery of a housing site that can readily provide further homes during the emerging Local Plan period.

The Vision Document articulates the development potential of the Site, describes the Site's characteristics and technical considerations, and assesses its sustainability performance. The document covers the following:

- **Planning Policy Context** – Describes the current planning position in Bassetlaw District Council.
- **Site and Surroundings** – Sets out the Site's context and describes how Retford represents a sustainable location for development.
- **Opportunities and Constraints** – Identifies the opportunities and constraints that will shape the Site's development.
- **The Vision** – Outlines the overall Site vision and the Site's delivery potential

1.2 PLANNING POLICY CONTEXT

Bassetlaw Council is currently reviewing its Local Plan in order to guide development up to the year 2037. Land to the west of Tiln Lane was identified as a potential development site in January 2019, in representations made to the draft Part 1 Strategic Plan.

The December 2020 draft Local Plan recognises that not all of the District's development needs can be met on previously developed land or within existing settlement boundaries. There is therefore a need to allocate additional greenfield site to meet housing and employment needs.

The Local Plan seeks to distribute development in accordance with the established settlement hierarchy. Retford is a Main Town at the top of the hierarchy and is a suitable location for new development. The land at Tiln Lane is in a sustainable location adjacent to the built up area of Retford and could contribute to meeting the identified housing needs of the Town and District, consistent with sustainable development principles.



1.3 REGIONAL CONTEXT

Retford is located in the heart of the District of Bassetlaw and is the second largest town in the District with a population of 22,013 people (ONS, 2019). It lies 3.5 miles (5.6km) to the east of the A1 and 3.2 miles (5.1km) to the north of the A57. Nottingham is located 27 miles (44km) to the south west and Lincoln is located 18 miles (30km) to the south east.

Retford has a wide range of services, shops, employment opportunities and good public transport links, including a railway station which acts as an important interchange between the East Coast Main Line, with trains taking around two hours to London King's Cross, and the Sheffield to Lincoln Line, which provides links to Sheffield, Lincoln Gainsborough, Worksop, Grimsby and Cleethorpes.

The Draft Bassetlaw Local Plan (November 2020) recognises that Retford is a sustainable location for both housing and employment growth due to its ability to maximise opportunities for sustainable and public transport choices. The Draft Bassetlaw Local Plan (November 2020) sets out that there is a requirement to allocate land for around 1,800# dwellings in Retford to meet local needs over the plan period.

The Site is located on the northern edge of Retford. Immediately to the south of the Site is a consented residential development of 175 new homes which is currently being built by Linden Homes (part of the Vistry Group). Tiln Lane bounds the Site to the east and Bolham Way abuts the Site to the north.



Figure 1.1: Regional Context Plan

1.4 INTRODUCING VISTRY – WHO WE ARE

Formed in January 2020, Vistry Group is made up of Vistry Housebuilding – featuring the Bovis Homes and Linden Homes brands - and Vistry Partnerships, which is the partnerships and regeneration section of the business. With a heritage that can be traced back to 1885, we are modern and forward-thinking and focused on delivering high quality new homes for our customers in landscape led communities that support a healthy and active lifestyle.

With developments from Northumberland to Cornwall and Cheshire to Norfolk, Vistry Group is one of the top five housebuilders in the UK by volume. A real powerhouse of a business, creating fantastic opportunities for our customers, clients and communities.



Vistry House design:

Vistry Group is one of the country's leading housebuilders, with well-known brands that have an established reputation for quality that runs through their homes' design, build, specification and customer service. The range of properties across the Linden and Bovis Homes brands is wide and flexible - with designs that can be adapted to the changing needs of the market, the customer and the environment in which we build.

We build homes based on the following key design principles:

- **Arrival:** from designing external elevations and creating attractive street scenes through to maximising the flow and size of the rooms to meet modern lifestyle needs, we aim to create well-designed places that are functional, accessible and sustainable;
- **Proportion:** the relocation of cloakrooms and kitchens has enabled deeper windows to be used on the property fronts creating well-proportioned, balanced elevations that maximise solar gain;
- **Light:** the size, positioning and number of windows has created bright and airy homes which relate positively to the private and public spaces around them;
- **Movement:** careful consideration has been given to the flow and layout of new homes to accommodate today's lifestyles and facilitate flexibility in the way rooms can be used;
- **Quality:** the homes have been created to embrace modern design and styling, whilst retaining the classic architectural traditions on which Vistry, through Bovis Homes and Linden Homes, has built its heritage and brand since 1885.



Vistry Building Sustainability:

We've improved the thermal efficiency of the walls, windows, and roofs by refining our designs and using proven, effective materials

We've used the latest energy efficient heating and hot water systems that will reduce CO2 emissions

We've introduced some of the latest features designed to encourage lower water consumption







02. A SUSTAINABLE LOCATION

02. A SUSTAINABLE LOCATION

An assessment of the Site's context has been undertaken to assess the Site and Retford's sustainability in terms of its location.




















2.1 SETTLEMENT CONTEXT

Retford is located on the River Idle. It was first settled on the western side of a ford that crossed the river, although as it grew it also occupied the land on the eastern side of the ford, which eventually became the more important part of the town, resulting in Retford's official name of East Retford. The historical importance of the eastern part of the town is evident with the location of the town centre immediately to the east of the River Idle. A defining feature of Retford is its large market square, which is overlooked by the impressive Town Hall with its central domed roof, clock tower and arched windows. Retford was granted a Royal Charter by Henry III in 1246 allowing a market to be held each Thursday. In 1275 Edward I extended the charter to allow a Saturday market as well. This tradition still continues today, along with a further market on a Friday.

Retford is a thriving town and has a range of shops, services and facilities, with the town centre a particular focus for offices, leisure, entertainment, arts and cultural activities. Retford also has a number of employment areas, including Randall Way, Hallcroft Industrial Estate, Thrumpton Goods Yard, Thrumpton Lane and West Carr Industrial Estate, which together provide a good range of employment opportunities.

Figure 2.1 opposite illustrates the range of services, facilities and employment opportunities Retford has to offer. The nearest bus stop to the Site is located adjacent to Carr Hill Primary School, approximately 600 metres from the centre of the Site to the south. This bus stop is served by service no. 123, which connects to the centre of Retford, including the town's bus station. Retford Railway Station provides regular connections to a number of destinations, including London King's Cross, York, Newcastle and Edinburgh via the East Coast Main Line, and Sheffield, Lincoln, Leeds, Gainsborough, Grimsby and Cleethorpes via the Sheffield to Lincoln Line.



-  Site Boundary
-  Residential development under construction by Linden Homes (Vistry Group)
-  **Town Centre**
Facilities Include: retail facilities, banks, restaurant, pharmacies, theatre, museum, gallery, parking, market, sports facilities, Public Open Space, takeaways
-  Railway line and station
-  Existing roads and bus stops
-  Public Footpath
-  Bridleway
-  Canal/river
-  Educational facilities
-  Religious facilities
-  Post Office
-  Healthcare facilities
-  Grocery/retail facilities
-  Sporting facilities
-  Public open space & sports pitches
-  Cemetery
-  Public House/restaurant/ takeaway
-  Petrol station
-  Business park

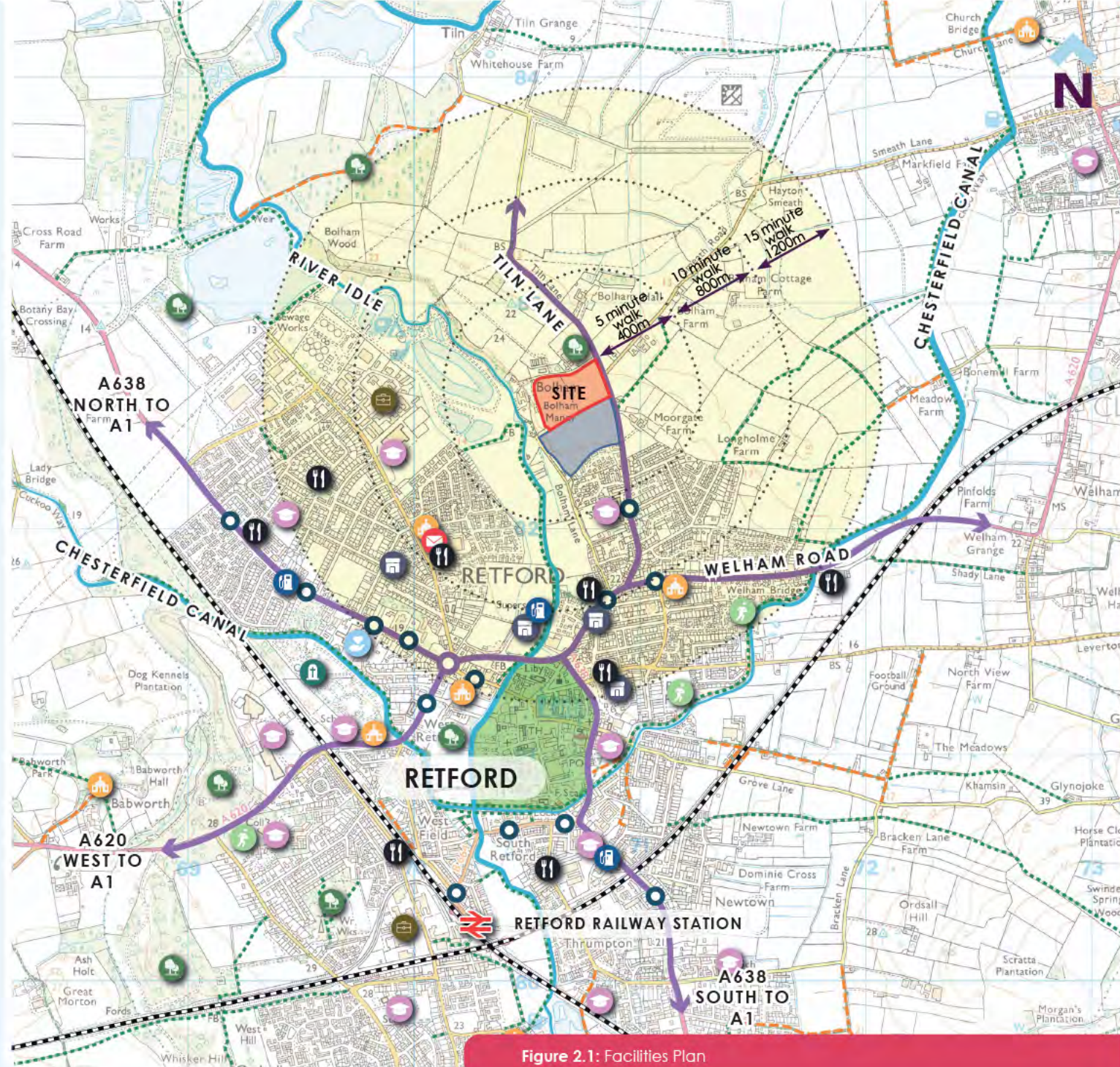


Figure 2.1: Facilities Plan

2.3 THE SITE AND ITS IMMEDIATE CONTEXT

The Site comprises two arable fields located to the south of Bolham Way and to the west of Tiln Lane. The two fields are separated by a north-south aligned hedgerow, which has some gaps, and a mature oak of balanced form within the hedgerow at the northern end.

The Site's northern boundary is formed of a hedgerow and several hedgerow trees along Bolham Way. Its eastern boundary is similarly formed of a hedgerow along Tiln Lane with several gaps for farm access.

The Site's southern boundary runs adjacent to the aforementioned new residential development currently under construction to the south. The southern boundary of the western field is presently undefined on the ground due to its temporary use as part of the construction site. Along the southern edge of the eastern field, there is a line of trees, of varying maturity and species. The Site's western boundary is formed of mature trees and a trimmed, continuous hedgerow that follows the curtilage of Bolham Manor.

The curtilage of Bolham Manor extends along the majority of the length of the Site's western boundary. The rear elevation of Bolham Manor overlooks the Site and a number of the manor's associated outbuildings also sit close to the Site's western boundary. Bolham Lane is located west of the manor with Clumber Court Care Home located off the northern end of the lane, to the north west of Bolham Manor. The River Idle lies west of Bolham Lane running south to north. The floodplain of the river is largely free from development and forms a grassland corridor extending southwards towards the centre of Retford.

Residential development extends to the south of the adjacent construction site. Carr Lane Primary School is located within this residential area, some 575 metres from the Site. Built development continues southwards with the town centre of Retford located approximately 0.78 miles (1.25km) to the south of the Site.

To the north of the Site is Bolham Way, which comprises a narrow lane leading westward from Tiln Lane. Bolham Villas (residential properties), Retford Amateur Boxing Club, together with a disused playing field (overgrown at the time of our site visits) and a disused pumping station are located north of this road. At the time of our visits it was unclear if the Boxing Club was still in use due to it being padlocked and overgrown in areas around the building. However, it is noted that the playing field is identified on the Local Plan Policies Map of the Draft Bassetlaw Local Plan as a sport and recreational facility, with Policy ST49 (Promoting Sport and Recreation) setting out such facilities should be protected from their loss, and where appropriate, enhanced to encourage healthier and more active lifestyles. The access into Bolham Manor is located at the western end of the lane. Mixed arable and pastoral farmland extends north of these properties and is scattered with blocks of woodland.

The Site is bound to the east by Tiln Lane along which is a hedgerow with some gaps for field access. East of Tiln Lane is Smeath Lane which continues north eastwards to the village of Claborough. Bolham Farm is located a short distance east of the Site along Smeath Lane. Moorgate Farm is located immediately south east of Tiln Lane adjacent to the new residential development under construction to the south of the Site.



The Site is well positioned to accommodate further residential development to contribute to the District's future housing needs. It is located immediately to the north of a new residential development and benefits from convenient connections to the rest of Retford, including Carr Lane Primary School, which is located within walking distance of the Site.

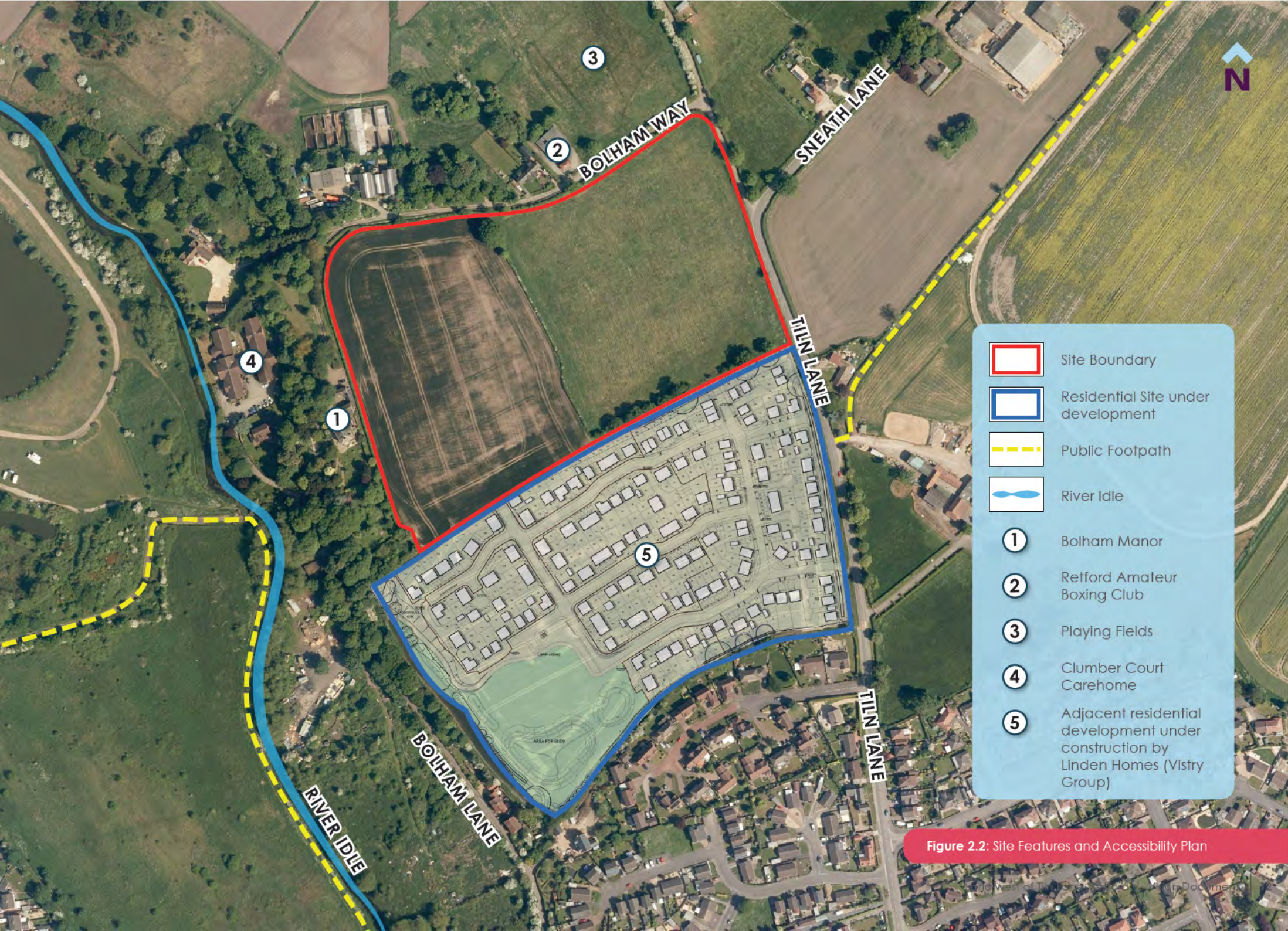


Figure 2.2: Site Features and Accessibility Plan



Photo of Bolham Manor viewed from the Site



03. SITE OPPORTUNITIES & CONSTRAINTS

03. SITE OPPORTUNITIES AND CONSTRAINTS

An assessment of the Site and its context has been undertaken to inform the masterplanning process.

3.1 TECHNICAL STUDIES

As part of any future development proposals, a specialist team of consultants will undertake a series of detailed surveys and appraisals of the Site and its surroundings. These technical studies will assess the Site's ability to accommodate a sustainable residential development, taking into account landscape, ecology, heritage, drainage, and highways. Their initial findings have not identified any issues that would prevent a successful, high quality proposal from coming forward in this location.

3.2 LANDSCAPE AND VISIBILITY CONSIDERATIONS

Public Rights of Way

The Site is not publicly accessible and there are no public rights of way located crossing it or along its boundaries.

Tree Preservation Orders

The Site contains no trees covered by Tree Preservation Orders. This was confirmed via email from the planning department at Bassetlaw District Council on 23rd November 2020.

Topography

The Site is generally flat, falling away slightly to the north east and west. The highest points of the Site are in the north western corner and the central southern part of the Site, which both lie at approximately 23m Above Ordnance Datum (AOD). The lowest point of the Site is located at the north eastern corner, which lies at approximately 19m AOD.

To the west of the Site, the landform falls to 13m AOD, forming a cliff feature along the eastern edge of Bolham Lane, a locally designated geological

site. The fisheries to the west are located at a similar elevation between 13 and 14m AOD. To the north of the Site, the land lies at approximately 22m AOD before descending gently to the north of Bolham Hall to 9m AOD near to Guns Beck solar farm, approximately 0.93 miles (1.5km) north of the Site.

East of the Site, the land continues to plateau until just beyond Moorgate Farm, north of which it descends gently downwards to the base of the valley, near the Chesterfield Canal, which lies at approximately 11m AOD. East of Clarborough, the land rises again to high points of 67m AOD near Howbeck Lane and 90m AOD at Schrog Hill.

Visibility and Suitability To Accommodate Development

The Site is not covered by any designations for landscape character or quality. The Site is bound by various hedgerows which are in good condition, together with a mature oak tree within the central hedgerow near to the northern boundary which is an attractive landscape feature. The Site's existing landscape features are worthy of retention.

The adjacent residential development to the south, which is under construction, exerts an urbanising influence over the Site's character which will increase once it is complete. Overall, the Site is assessed as being of medium landscape quality and value, with the surroundings similarly assessed as being of medium landscape quality and value. The Site is considered to have a good ability to accommodate residential development, and is assessed as being of medium landscape sensitivity.

The landscape appraisal of the Site found that a sensitively designed proposed development could be brought forward which would respect the amenity and have regard to the setting of the adjacent Bolham Manor. To respect the character of the approach into Retford from Smeath and Tiln Lanes, the appraisal recommends that the proposals include structural planting to the north eastern and eastern boundaries of the Site with the new homes set back from these boundaries.

Furthermore, no new vehicular accesses from Tiln Lane are proposed because the development could be brought forward utilising existing access points from the development to the south. This would further limit any effects on the character of the lane. This will create a strong, green northern edge to Retford which would also restrict further development to the north or east, and aid in assimilating the new homes into the townscape in the limited number of instances where it is visible to the east.

As such, the landscape appraisal concluded that a sensitively designed proposed development would not result in material adverse landscape and visual effects than on the Site and its immediate vicinity.

-  Site Boundary
-  Adjacent residential development under construction by Linden Homes (Vistry Group)
-  Conservation Areas
 1. Retford
 2. Retford Station & West Fields
 3. Retford South
-  Ancient Woodland
-  Ancient Replanted Woodland
-  Local Nature Reserve (LNR)
-  Site of Special Scientific Interest (SSSI)
-  Registered Parks and Gardens (REG)
-  Grade II* Listed Buildings & Structures within 1.5km
 1. Church of St Michael the Archangel
 2. Retford War Memorial
 3. 25, Grove Street
 4. Amcott House
 5. Parish Church of St Swithun
 6. Sloswick's Hospital Almshouses
-  Grade II Listed Buildings & Structures within 1.5km (Outside Conservation Areas)
 7. Moorgate House
 8. Bolham Hall
 9. Group of 3: Former Stables to 19 Welham Road; Moorgate Villa; 25 and 27, Welham Road
 10. Group of 2: St Saviour's Church; The Old Vicarage
 11. Group of 2: 55, Moorgate; 53, Moorgate
 12. Grove Mill
 13. Chesterfield Canal, Whitsunday Pie Lock Bridge 60

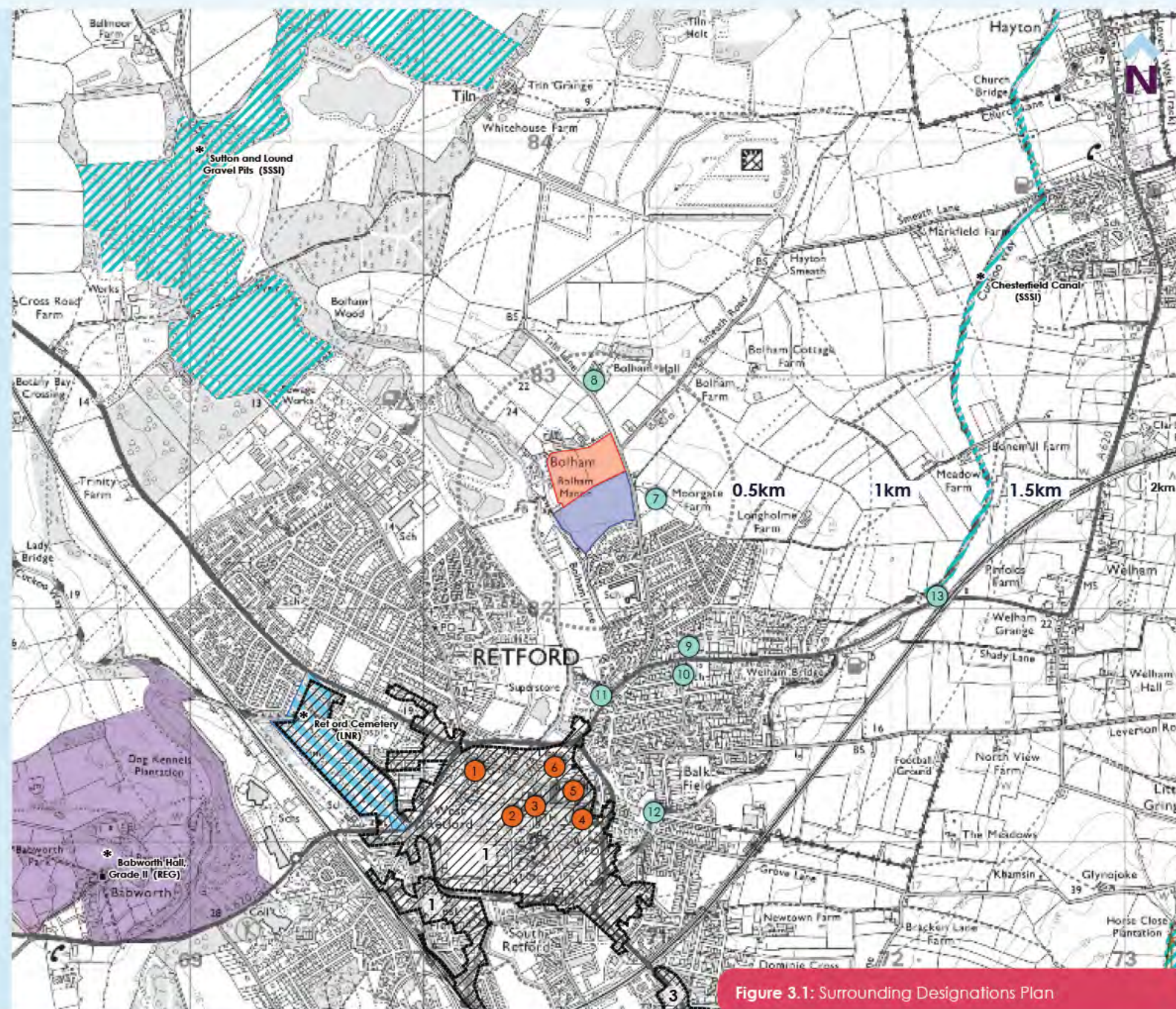


Figure 3.1: Surrounding Designations Plan

3.3 HERITAGE

The Site is within the historic agricultural landholding of the Grade II listed Bolham Hall. There are glimpsed views to the Listed Building from the eastern area of the Site and there will be filtered views of this area of the Site from Bolham Hall. Formulation of design plans have taken into account the proximity of Bolham Hall and include for open space in the north eastern area of the Site, as well as enhanced boundary planting to offset built form and further filter views. With these measures in place any harm to the significance of Bolham Hall through the alteration of part of its wider agricultural landscape would be negligible, that is to say less than substantial harm at the lowermost end of this harm spectrum. The HER records a non-designated Park and Garden surrounding Bolham Hall east of the Site. Any harm to the significance of the non-designated Bolham Hall Park and Garden would be negligible at most. Development of the Site would not adversely impact any other designated heritage assets.

The Site is located immediately south of a non-designated Water Pumping Station first recorded on 1920s Ordnance Survey mapping. Current design plans include for open space at the northern/north western edge of the Site, allowing for the retention of views to the pumping station from adjacent areas. Any harm resulting from the loss of adjacent agricultural land and non-key views would be negligible at most.



Bolham Manor

The Site is located to the rear of the non-designated Bolham Manor, a mid-19th century mill owner's/manager's house. Bolham Manor is located within a designed wooded plot, above the former mill site. The principal elevation looks west, and Bolham Manor is designed to be viewed from the west, not from within the Site. Formulation of design plans have taken into account the proximity of Bolham Manor and utilise open space to offset built form. Any harm as a result of the loss of non-key views and alteration of adjacent agricultural land would be minimal. The key setting of Bolham Manor, i.e. its surrounding wooded plot, will be retained.

Archaeology

Previous geophysical survey did not record any anomalies of likely archaeological interest within the Site. Trial trench evaluation to the south of the Site recorded a limited number of undated features, but no significant remains. There is no evidence to suggest significant archaeological remains are likely to be present within the Site.

3.4 HIGHWAYS AND ACCESS

Vehicular access into the Site will be taken from the adjacent residential development currently under construction by extending the two streets into the Site which currently terminate adjacent to the Site's southern boundary. 2.0m wide footways to either side of the carriageways will also be extended into the Site. It is noted that when complete, the new housing development to the south will facilitate a link to the existing public footpath to the south west, which provides connections to Bolham Lane and areas of Retford to the west, together with a traffic-free pedestrian route which runs alongside the River Idle to the centre of Retford.

In order to maximise integration with the Site's wider context, it is considered the opportunity may exist to provide a pedestrian connection onto Bolham Way, to facilitate convenient access to the adjacent playing field.



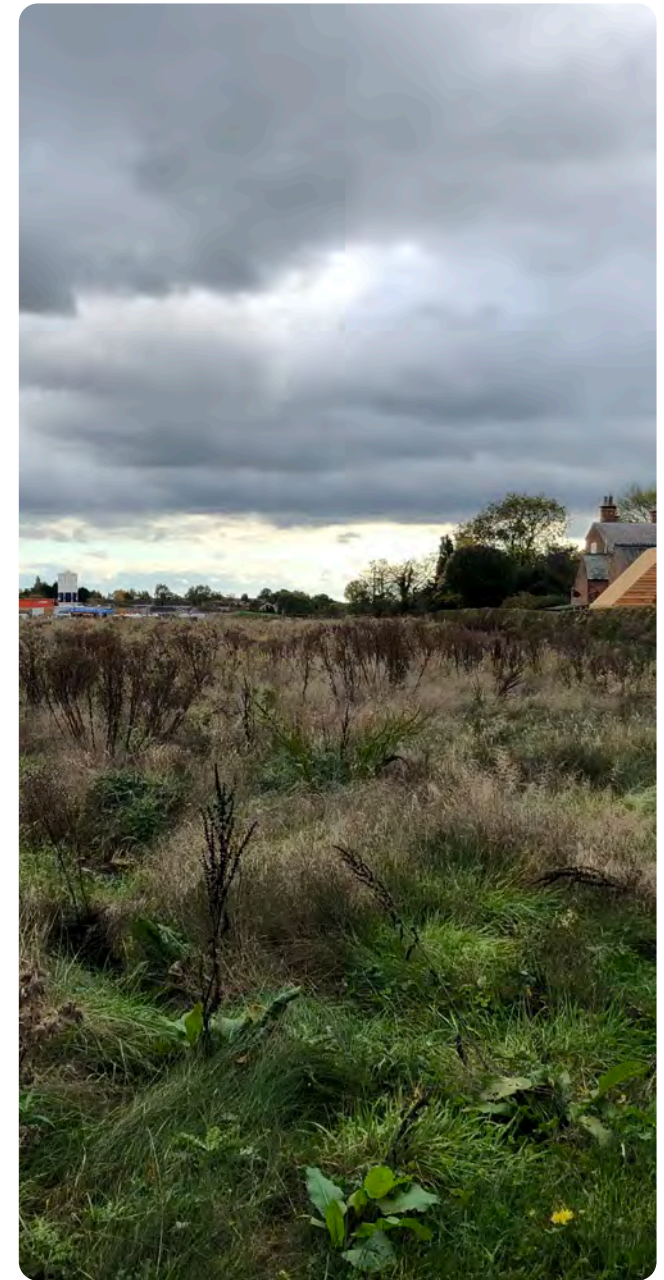
Southern vehicular access point from Tiln Lane serving the adjacent Linden Homes development.

3.5 FLOOD RISK AND DRAINAGE

The Environment Agency mapping shows that the Site is located in Flood Zone 1 (low probability of fluvial flooding) and that the risk of Surface water flooding is Very Low. Any future planning application would be accompanied by a Flood Risk Assessment (FRA). The Assessment would demonstrate that the proposed development would be safe from flood risk and would not increase flood risk elsewhere, for the lifetime of the development. The Assessment would also present a surface water drainage scheme based on Sustainable Drainage Systems (SuDS) principles, in accordance with planning policy and relevant technical guidance. Technical work undertaken to date has demonstrated that SUDS facilities could be incorporated into the proposed development and that sufficient space could be provided within the land available.

3.6 UTILITIES

An underground foul sewer runs along the southern boundary of the Site; to the east it runs within the adjacent new housing development within the rear gardens of the new homes. The sewer would remain in-situ either within rear gardens or open space, with maintenance easements provided as required. A potable water supply pipe runs adjacent to the east, west and northern boundaries of the Site. Where the pipe is located within the Site, it will be located within an area of open space. Again, the necessary maintenance easements would be provided.



View looking south across the western field of the Site.

3.7 SUMMARY OF SITE'S OPPORTUNITIES AND CONSTRAINTS

The specific features and characteristics of the Site described in the preceding pages have been drawn together to prepare an initial Opportunities and Constraints Plan for the Site. These are illustrated in Figure 3.2 on Page 23, and are summarised below:

OPPORTUNITIES

- To provide high quality, sustainable and sensitively designed new market and affordable homes.
- Sustainable location given access to centre of Retford (including railway station) and nearby bus stops.
- Contribute towards the District's housing figures.
- Creation of a locally distinctive development which draws upon the local vernacular.
- The Site represents a logical extension to Retford, being well-contained in physical terms by the existing settlement edge to the south, Tiln Lane to the east, Bolham Way to the north and existing built development and Bolham Lane to the west.
- Access to be taken from the new housing development to the south – no need for access to be taken from Tiln Lane.
- To provide a potential pedestrian connection to the playing field to the north of Bolham Way – the opportunity may also exist to provide contributions to assist with the improvements of the playing field.
- To significantly enhance the existing hedgerows and trees through infill and buffer planting to increase habitat connectivity and species diversity.
- To provide a range of ecological enhancement measures in order to maximise the Site's biodiversity value and biodiversity net gain.
- To provide a children's play area located within the north eastern part of the Site to maximise its accessibility for the new residents.
- To provide a sustainable drainage basin (SuDS) located in the lower part of the Site, which can form an integral part of the development's green infrastructure, providing ecological benefits and habitat creation.

CONSTRAINTS

- An underground 90mm diameter potable water pipe runs through the Site adjacent to the Site's western boundary. It is to remain in-situ within an area of open space.
- An underground 315mm diameter rising main runs through a small section of the Site, adjacent to the western section of the Site's southern boundary. It is to remain in-situ either within rear gardens or open space.
- The Site lies within the wider setting of the Grade II listed Bolham Hall, a designated heritage asset, and adjacent to the area of non-designated Park and Garden. Harm can be reduced through locating open space/screening planting in the northern parts of the Site to avoid the introduction of views between the proposed new homes and Bolham Hall and the park and garden.
- The non-designated Bolham Manor is located adjacent to the Site's western boundary. Harm can be minimised through the use of open space and planting within the western part of the Site to offset and soften the appearance of the new built form.
- The new homes currently under construction to the south back onto the Site's southern boundary. Equally, the mature trees along the eastern section of the Site's southern boundary should be retained. Therefore, careful consideration should be given to respect the amenity of the new dwellings, while retaining the existing trees and hedgerows in this location.



The development has the potential to create a locally distinctive development which draws upon the local vernacular





Figure 3.2: Opportunities and Constraints Plan



Site Boundary: **5.88ha**

CONNECTIONS



Potential primary vehicular access points



Potential pedestrian link



Consented pedestrian link to Bolham Lane



Pedestrian route between the Site and Bolham Lane



Public Rights of Way



Potential recreational routes

OPPORTUNITIES



Potential residential developable area



Potential dwelling frontages to create an outward looking development



Existing vegetation to be retained where appropriate



Potential open space and new landscaping



Opportunity for green corridors to be enhanced with new tree and hedgerow planting



Potential open space and new landscaping



Potential wildlife ponds



Potential orchard tree planting



New homes to form a logical extension to consented scheme



Opportunity to create large areas of open space and set back residential edge from heritage assets

CONSTRAINTS



Potential location for sustainable drainage basin (SuDS)



Above ground local HV Electricity supply



Existing BT apparatus



Existing STW Rising Main (6m easement)



Existing STW Combined Sewer (6m easement)



Existing Water Main (6m easement)



Potential foul pump station (15m offset will be required)



Potential surface water pump station



Listed Buildings



Non-designated heritage asset



Non-designated Park and Garden



The background of the page is a faded aerial photograph of a landscape. Overlaid on this are various planning and design elements: a dashed yellow line representing a path or boundary in the upper left; a solid red line running diagonally across the middle; a large, thick red arrow with a white outline pointing towards the bottom left; and several white rectangular blocks representing buildings or plots, some with small numbers like 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000.

04. CONCEPT DESIGN AND VISION

04. CONCEPT MASTERPLAN

The Concept Masterplan demonstrates the general design principles for the Site.

4.1 INITIAL CONCEPT MASTERPLAN

The vision for the proposed development of the Site is to form a logical extension of the new housing development to the south, building upon the new community which is already being established by Linden Homes who are part of the Vistry Group.

A mix of housing types and tenures, including first time buyer homes and family homes, will be provided to assist in creating a sustainable and inclusive community

Drawing on the assessment of the Site's Opportunities and Constraints, an initial Concept Masterplan has been prepared to illustrate how a sustainable, high quality new neighbourhood can be readily assimilated into the existing community of Retford.

Land Use and Density

The Site is anticipated to accommodate circa 2.9 hectares of residential development, which equates to approximately 120 new homes. 20% of these homes will be affordable. The new homes will be located within a framework of carefully located green spaces, to respond to the Site's context with regards to respecting nearby heritage assets and mitigating landscape impact. The green spaces will also provide space to significantly increase the level of hedgerow and tree planting on the Site and help to deliver a range of biodiversity improvements.

Connectivity

Vehicular access to the Site will be from the adjacent residential development by extending northwards the new streets which have been designed to terminate at the Site's northern boundary. 2.0m wide footways to either side of the carriageways will also be extended into the Site.

In order to maximise integration with the Site's wider context, the Concept Masterplan shows how a potential pedestrian connection onto Bolham Way could be provided to facilitate convenient access to the adjacent playing field.

-  Site Boundary: **5.88ha**
-  Proposed residential area: **2.9ha**
Around 120 new homes
-  Proposed primary vehicular access points
-  Proposed pedestrian link
-  Proposed potential pedestrian link to Bolham Lane
-  Pedestrian route between the Site and Bolham Lane
-  Public Rights of Way
-  Potential recreational routes
-  Existing vegetation to be retained where appropriate
-  Public open space to serve the new development
-  Children's play area incorporating natural play
-  Proposed sustainable drainage basin (SuDS)
-  Proposed wildlife ponds
-  Proposed orchard tree planting
-  Above ground local HV Electricity supply
-  Existing BT apparatus
-  Existing STW Rising Main
-  Existing STW Combined Sewer
-  Existing Water Main
-  Proposed Foul Pump Station
-  Proposed Surface Water Pump Station
-  Listed Buildings
-  Non-designated heritage asset
-  Non-designated Park and Garden



Figure 4.1: Concept Masterplan

Green Infrastructure

The Concept Masterplan shows a connected and accessible network of green open spaces. These green spaces will comprise a range of functions and characters as follows:

- A widened area of open space and new landscaping located adjacent to the Bolham Manor will offset and soften the appearance of the proposed new homes from the non-designated heritage asset.
- Open space and new landscaping within the northern part of the Site will avoid the introduction of views between the proposed new homes and the Grade II Listed Bolham Hall and its non-designated garden.
- Open space and new landscaping within the north eastern part of the Site and alongside Tiln Lane will assist in creating a soft, well-landscaped edge with the countryside beyond and assist in maintaining a green gateway to Retford from the northerly approach from Tiln Lane and the north easterly approach from Smeath Lane.
- The recreational routes running through the green corridors present the opportunity to incorporate trim trail stations to support active lifestyles and, therefore, a greater sense of health and wellbeing.
- New native planting throughout the open spaces, including specimen trees, thicket planting and wildflower grassland, will build upon the Site's existing hedgerow network and contribute to the development's green infrastructure.



The amount of open space would meet the standards of Policy ST48 (Delivering Quality, Accessible Open Space) of the Draft Bassetlaw Local Plan as follows:

Type of Space	Quantity Standard	Quantity required for around 120 new homes	Quantity proposed within the new development
Parks	0.61 ha per 1,000 people within 1,000m walk of a park	0.18ha	0.75ha provided on-site
Children's play space	0.14ha per 1,000 children within a 10 minute walk	0.01ha	0.01ha play area provided on-site
Amenity open space	1.03ha of amenity greenspace per 1,000 people within a 10 minute walk	0.30ha	0.58ha provided on-site
Natural and Semi-Natural Greenspace	2.40ha per 1,000 people within a 15 minute walk	0.69ha	1.61ha provided on-site (includes SuDS features)
Allotments	0.28 ha per 1,000 people	0.08ha	Contribution towards off-site provision
Local Nature Reserve	1 ha per 1,000 people	0.29ha	Contribution towards off-site provision

In addition to the delivery of the above open space typologies, the opportunity may exist to also make a financial contribution towards assisting with the improvements of the playing field to the north of Bolham Way.



The development will provide new areas of open space which are rich in biodiversity, attractively landscaped and designed to provide opportunities for social interaction and physical activity.



05. SUSTAINABLE DEVELOPMENT

The opportunity for this new neighbourhood at Retford represents a sustainable and deliverable solution to meet Bassetlaw District Council's housing needs. The new neighbourhood has the potential to generate significant economic, social and environmental benefits, whilst supplying a wide range and mix of market and affordable homes. Any future development would comply with the Framework's Core Planning Principles, and the three strands of sustainable development.

5.1 SOCIAL OBJECTIVE

- The delivery of around 120 market and affordable homes (20%) will deliver a wide range of tenure and dwelling types to address both the District's and Retford's future housing needs.
- Opportunity to provide a potential pedestrian connection onto Bolham Way to facilitate convenient access to the adjacent playing field will help to encourage physical activity. The opportunity may also exist to provide contributions to assist with the improvements of the playing field.
- The provision of a high-quality residential development that has the potential to create an attractive and well-designed place in which to live.
- The delivery of informal and formal on-site green space, including a children's play area, routes for walking and trim trail stations, to provide opportunities for recreation, and to support the creation of a healthy and vibrant community, which promotes a strong sense of health and wellbeing.

5.2 ECONOMIC OBJECTIVE

- Support for existing businesses and opportunities for the creation of new enterprises, by attracting and retaining staff in the local area.
- Support for local construction firms and material suppliers during the construction phase of the development.
- Increased spending power and patronage to support existing services and facilities in Retford and the wider surrounding area.

5.3 ENVIRONMENTAL OBJECTIVE

- The delivery of a range of green spaces and the creation of a high-quality landscape framework that has the potential to greatly diversify the existing range of on-site habitats and secure net-biodiversity gains.
- The provision of SuDS features will be used to avoid any adverse impacts in terms of flood risk and have the potential to create new habitats and ecosystems.
- At the detailed design stage, the new homes will be designed to meet national and local targets in respect of reducing energy demand, carbon emissions and energy efficiency.





06. DELIVERY

Vistry Group believe that Land West of Tiln Lane, Retford provides a viable, realistic and logical opportunity to help the Council fulfil its housing needs over the Local Plan period. It is considered, therefore, that the Site should be allocated for new housing in the new Local Plan for Bassetlaw District Council.

- This Vision Document comprehensively demonstrates how the Site has the potential to support a sustainable neighbourhood for around 120 dwellings, of which 20% will be affordable.
- The Site is within the control of Vistry, a national housebuilder with an established reputation and the experience and expertise to successfully guide a proposal through to implementation. Vistry is committed to delivering a viable and sustainable development as soon as possible.
- The Site is sustainably located in relation to Retford's many services and facilities, including Carr Hill Primary School, which is located to the south of the Site on Tiln Lane.
- There are no technical impediments or environmental constraints that could not be addressed through a sensitive and successful design, to deliver a high-quality proposal in this location.

Vistry Group would now welcome further discussions with the Council's officers as we look to realise this exciting development opportunity, and deliver a carefully integrated and sustainable neighbourhood for Retford, which builds upon the new community currently being established by Linden Homes (part of the Vistry Group) immediately to the south of the Site.

VISION STATEMENT

Land West of Tiln Lane, Retford represents an exciting opportunity to create a vibrant, well-integrated and sustainable new neighbourhood for Retford. Our proposals for the Site have carefully considered the economic, social and environmental dimensions set out in the NPPF, and respond to the technical opportunities and constraints of the Site.

Our vision for the Site is to deliver the housing requirement to support the sustainable growth of Retford without negatively impacting on the surrounding character. This will deliver high quality, mixed tenure homes in a sustainable and well-connected location to help meet the housing requirements of Bassetlaw District Council.

Around half of the Site will remain as open space and green infrastructure and will include a children's play area, new recreational routes and space for new landscaping and ecological enhancements. The proposed development can deliver a minimum of 10% biodiversity net gain in accordance with proposed policy.

Land West of Tiln Lane, Retford offers a key opportunity to deliver a proportionate and well-integrated housing development for Retford.



Land west of Tiln Lane, Retford

Landscape and Visual Overview

Prepared by
CSA Environmental

on behalf of
Vistry Group

Report No: CSA/5209/02

January 2021

Report Reference	Revision	Date	Prepared by	Approved by	Comments
CSA/5209/02	-	27/11/2020	PH	JJ	Draft Issue
	A	14/01/2021	PH	JJ	Amended to proposed layout



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Appendices

Appendix A: Site Location Plan

Appendix B: Aerial Photograph

Appendix C: Photosheets

Appendix D: MAGIC Map and Local Plan Extract

Appendix E: Extract from Bassetlaw Landscape Character Assessment

Appendix F: Concept Masterplan

Appendix G: Methodology for Landscape and Visual Assessment

1.0 INTRODUCTION

- 1.1 CSA Environmental has been appointed by Vistry Group to undertake a landscape and visual overview of land west of Tiln Lane, Retford (the 'Site'). The Site is being promoted through the Local Plan process for residential development. The report is being submitted as part of representations to Bassetlaw District Council.
- 1.2 The Site comprises two rectangular arable fields. The Site lies within the administrative area of Bassetlaw District Council. The Site comprises two fields which have been left fallow. Part of the western field of the Site is currently being used for temporary construction compound and spoil heaps associated with an adjacent residential development which is under construction (application ref. 14/00503). The development, once complete, will comprise 175 new dwellings, access from Tiln Lane and associated public open space. The location and extent of the Site is shown on the Location Plan at **Appendix A** and on the Aerial Photograph at **Appendix B**.
- 1.3 This assessment describes the existing landscape character and quality of the Site and the surrounding area. The report then goes on to discuss the suitability of the Site to accommodate the development proposals, and the potential landscape and visual effects on the wider area.
- 1.4 A Concept Masterplan (contained in **Appendix F**) has been developed for the Site, which form the basis of the consideration of the potential landscape and visual effects. The proposals comprise residential development of up to 138 dwellings, access from the adjacent residential development and public open space.

Methodology

- 1.5 This assessment is based on a site visit undertaken by a suitably qualified and experienced Landscape Architect in November 2020. The weather conditions at the time were sunny turning to cloudy in the afternoon. Visibility was very good for the duration of the visit.
- 1.6 In landscape and visual impact assessments, a distinction is drawn between landscape effects (i.e. effects on the character or quality of the landscape irrespective of whether there are any views of the landscape, or viewers to see them) and visual effects (i.e. effects on people's views of the landscape from public vantage points, including public rights of way and other areas with general public access, as well as effects from any residential properties). This report therefore considers the potential impact of the development on both landscape character and visibility. The methodology for the landscape and visual assessment utilised in this report is contained in **Appendices G**.

- 1.7 Photographs contained within this document (**Appendix C**) were taken using a digital camera with a lens focal length approximating to 50mm, to give a similar depth of vision to the human eye. In some instances images have been combined to create a panorama.

2.0 LANDSCAPE POLICY CONTEXT AND CHARACTER STUDIES

Local Policy Context

Bassetlaw District Core Strategy & Development Management Policies DPD

- 2.1 The Site lies within the administrative area Bassetlaw District Council. Adopted policy relating to the District comprises the Core Strategy which was adopted in 2011.
- 2.2 Policies of relevance to the Site and the landscape include:
- Policy CS3: Retford
 - Policy DM3: General Development in the Countryside
 - Policy DM4: Design and Character
 - Policy DM9: Green Infrastructure, Biodiversity & Geodiversity, Landscape, Open Space & Sports Facilities.
- 2.3 The emerging Draft Bassetlaw Local Plan 2020 for the District was published for consultation between January and February 2020. An updated draft was published for consultation in November 2020. Policies of relevance to the Site and the landscape include:
- Draft Policy ST37: Design Quality
 - Draft Policy ST39: Landscape Character. This policy specifies, among other things, that landscape proposals contribute towards the conservation of the natural features identified within the relevant Policy Zone of the Bassetlaw Landscape Assessment.
 - Draft Policy ST41: Green and Blue Infrastructure
 - Draft Policy ST42: Biodiversity and Geodiversity
 - Draft Policy ST43: Trees, Woodlands and Hedgerows
 - Draft Policy ST44: The Historic Environment
 - Draft Policy 45: Heritage Assets
 - Draft Policy ST48: Delivering Quality, Accessible Open Space
 - Draft Policy 50: Protecting Amenity.

Landscape Character Assessments

Bassetlaw Landscape Character Assessment (Extract in **Appendix F**)

- 2.4 The Bassetlaw Landscape Character Assessment forms part of the evidence base for Bassetlaw District Local Plan. It divides the District into a series of landscape types, within which smaller, finer grain landscape policy zones are defined. The Site is identified as lying within the Idle Lowlands landscape type and within the southern part of landscape policy zone (LCZ) 08: Retford.
- 2.5 As set out within the study (extract in **Appendix F**), LCZ 08 wraps around the north east and east of Retford between the Chesterfield Canal on its eastern boundary and the River Idle and Sutton in the west. The study describes that most of the policy zone is a low lying river valley floor which rises slightly towards Retford which lies immediately south. It also notes that views are more restricted in the south due to high hedges lining roads and field boundaries. The characteristic features of the Retford LCZ 08 are as follows:
- *“Mixed open farmland divided by drainage ditches and well maintained hedgerow with occasional trees. Individual trees are evident within the fields;*
 - *Low lying river valley floor;*
 - *Bolham Hall and Manor;*
 - *Includes recreational facilities;*
 - *Isolated red brick farmsteads;*
 - *Lincoln to Sheffield railway corridor.”*
- 2.6 The landscape action for the LCZ is to ‘conserve’ the landscape, and it includes a series of management strategies for landscape features and built features.
- 2.7 With regard to landscape features, and with relevance to the Site, the actions include:
- *“Conserve and enhance tree cover and landscape planting generally to improve visual unity and habitat across the Policy Zone;*
 - *Conserve the ecological diversity and setting of the designated SINC, seeking to enhance where appropriate;*

- *Conserve the historic field pattern, maintain existing strong hedgerow structure, restore and reinforce poor hedgerow boundaries where necessary and reinforce with additional hedgerow trees as appropriate; and*
- *Conserve network of drainage ditches."*

2.8 With regard to built features, and with relevance to the Site, the actions include:

- *"Conserve the open rural character of the landscape by concentrating new development around the north-eastern fringe of Retford;*
- *Conserve and be sympathetic towards the local architectural style in any new development;*
- *Conserve and respect the character, setting and historic integrity of Bolham Hall and Manor House;*
- *Contain new development within existing field boundaries; and*
- *Create woodland areas to contain and soften built development, preferably in advance of new development."*

Bassetlaw Site Allocations: Landscape Study 2019 and Addendum 2020

2.9 The Council produced this study in support of the emerging Local Plan and it examines a total of 27 potential site allocations. An addendum to the study was prepared in September 2020. The Site is not included in this study.

Summary

2.10 From our own assessment of the Site and immediate surroundings, we broadly concur with the findings of the Bassetlaw Landscape Character Assessment. The Site's hedgerows and trees are characteristic of the wider landscape, and Bolham Manor and Hall lie in proximity to the Site. These elements will need to be respected when designing a layout for development of the Site. From observations on Site, we note that the Site is relatively well contained from the wider landscape by trees and hedgerows on its boundaries and the adjacent wooded corridor along the River Idle, Bolham Lane and the western end of Bolham Way. The vast majority of views into the Site are restricted to the landscape local to the Site with only some middle and longer distance views from the landscape near to Claborough, to the east. In addition, the Site's character is influenced by the adjoining settlement and most notably

the new residential development to the immediate south which is under construction.

3.0 SITE CONTEXT AND DESCRIPTION

Site Context

- 3.1 The Site is located south of Bolham Way (a cul-de-sac off Tiln Lane) on the northern built edge of Retford, approximately 6km east of the A1. It comprises two arable fields, both of which have been left fallow. To the immediate south is a consented residential scheme which is currently under construction (application reference: 14/00503). Part of the western field of the Site is currently in temporary use for the construction compound and spoil heaps associated with the construction of the adjacent development.
- 3.2 Residential development extends to the south of the construction site. Carr Lane Primary School is located within this residential area. Built development continues southwards with the centre of Retford located approximately 1.25km south of the Site.
- 3.3 To the west of the Site is Bolham Manor, the curtilage of which extends along the majority of the length of the Site's western boundary. Bolham Lane is located west of the manor with Clumber Court Care Home located off the northern end of the lane, to the north west of Bolham Manor. The River Idle lies west of Bolham Lane running south to north. The floodplain of the river is largely free from development and forms a grassland corridor extending southwards towards the centre of Retford. Beyond the river to the north west is Hallcroft Fishery and Caravan Park. An area of large warehouse buildings and the secondary school, Elizabethan Academy, is located west of the fisheries together with further residential development within Retford.
- 3.4 North of the Site is Bolham Way; a single lane cul-de-sac. Bolham Villas (residential properties), Retford Amateur Boxing Club, together with a disused playing field (it was overgrown at the time of the site visit) and a disused pumping station are located north of this road. At the time of the visit it was unclear if the Boxing Club was still in use due to it being padlocked and some areas outside the building being overgrown. The access into Bolham Manor is located at the western end of the road. Mixed arable and pastoral farmland extends north of these properties and is scattered with blocks of woodland.
- 3.5 The Site is bound to the east by Tiln Lane along which is a hedgerow with some gaps for field access. East of Tiln Lane is Smeath Lane which continues north eastwards to the village of Clarborough. Bolham Farm is located a short distance east of the Site along Smeath Lane. Moorgate Farm is located immediately south east of Tiln Lane adjacent to the new residential development under construction to the south of the Site.

Farmland extends east of Moorgate Farm across a low-lying, wide valley bottom. At the base of the valley is the Chesterfield Canal together with the Sheffield-Lincoln railway line. Clarborough is located on the eastern side of this valley.

Designations and Heritage Assets

- 3.6 The Multi Agency Geographic Information for the Countryside Map ('MAGIC') and the Local Adopted Policies Maps indicate that the Site is not covered by any statutory or non-statutory designations for landscape character or quality (please refer to MAGIC Map and Local Plan Extract in **Appendix D**).
- 3.7 No designated heritage assets are located within or adjacent to the Site. Those in the vicinity of the Site include: Grade II Listed Moorgate House approximately 190m south east of the Site; Grade II Listed Bolham Hall approximately 250m north of the Site. Those further afield include the Grade II* Listed churches of St. Swithun's and St. Michael Archangel in the centre of Retford, within the Conservation Area.
- 3.8 There are various non-designated heritage assets adjacent to the Site which include Bolham Manor, immediate to the west and the Mill site immediately east of the manor; the pumping station (disused) immediately north of the Site; and Bolham Hall Park and Garden which extends from the Hall southwards covering the land immediately north east of Tiln Lane and Smeath Lane. More information on these assets is provided in the Heritage Note also prepared for these representations by CSA Environmental.
- 3.9 The Site contains no trees covered by Tree Preservation Orders. This was confirmed via email from the planning department at Bassetlaw District Council on 23rd November 2020.

Topography

- 3.10 The Site is generally flat, falling away slightly to the north east and west. The highest points of the Site are in the north western corner and the central southern part of the Site which both lie at approximately 23m Above Ordnance Datum (AOD). The lowest point of the Site is located at the north eastern corner which lies at approximately 19m AOD.
- 3.11 To the west of the Site, the landform falls to 13m AOD, forming a cliff feature along the eastern edge of Bolham Lane, a locally designated geological site. The fisheries to the west are located at a similar elevation between 13 and 14m AOD. To the north of the Site, the land lies at approximately 22m AOD before descending gently to the north of

Bolham Hall to 9m AOD near to Guns Beck solar farm, approximately 1.5km north of the Site.

- 3.12 East of the Site, the land continues to plateau until just beyond Moorgate Farm, north of which it descends gently downwards to the base of the valley near the Chesterfield Canal which lies at approximately 11m AOD. East of Clarborough, the land rises again to high points of 67m AOD near Howbeck Lane and 90m AOD at Schrog Hill.

Site Description

- 3.13 The Site comprises two rectangular fields. At the time of the site visit, both fields were fallow with approximately half of the western field in temporary use as a construction compound and spoil heap for the adjacent residential development to the south that is under construction. The two fields are separated by a hedgerow, which has some gaps, and a mature, oak tree of balanced form within the hedgerow at the northern end.
- 3.14 The Site's northern boundary is formed of a hedgerow and several hedgerow trees along Bolham Way. The Site's eastern boundary is similarly formed of a hedgerow along Tiln Lane with several gaps for farm access.
- 3.15 The Site's southern boundary runs adjacent to the new residential development under construction to the south. The southern boundary of the western field is currently undefined on the ground due to its use as part of the construction site. Along the southern edge of the eastern field, there is a line of trees, of varying maturity and species.
- 3.16 The Site's western boundary is formed of mature trees and a trimmed, continuous hedgerow that follows the curtilage of Bolham Manor.

Visibility

- 3.17 The Site is relatively well contained in views from the wider landscape, with the eastern field being slightly more visible than the western field. Views of the Site are mostly limited to those from the immediate surroundings, with some partial middle and longer distance views possible from the areas nearby to Clarborough where the land rises east of the Chesterfield Canal. A selection of representative views from these locations can be seen on the photographs in **Appendix C**.

Views from within the Site

- 3.18 Views from within the Site are not publicly available. There are some glimpsed views of the top of the tower of Church of St. Swithun's within Retford town centre available from across the Site (**photographs 01** and

06). There are some limited instances where the spire of the Church of St Michael the Archangel and the Town Hall, also within the town, is visible from the easternmost part of the Site. It is however anticipated that these will become screened by the adjacent residential development when it is complete.

- 3.19 There is a glimpsed view towards Bolham Hall (Grade II Listed) from the north eastern part of the Site (**photograph 11**). Bolham Manor and the old pumping station to the north west of the Site (both non-designated heritage assets) are visible from within the Site (**photographs 02, 08 and 10**).
- 3.20 There are some heavily filtered views westwards through the vegetation in the curtilage of Bolham Manor towards the school and warehouse buildings west of the River Idle and the rising land to the west of Retford (**photograph 09**). However, due to the density of the vegetation adjacent to the Site, there are no distant reciprocated views of the Site from the west.
- 3.21 There are views eastwards above the hedgerow field boundaries to the rising land east of Clarborough, including a view of the mast at Shrog Hill (**photograph 04**).

North

- 3.22 There are filtered views into the Site available from Bolham Way, adjacent to the northern Site boundary (**photographs 12 to 14**). The residential properties along Bolham Way, have views from upper storey windows into both areas of the Site. Views from lower storeys are filtered by the hedgerow on the northern Site boundary (reciprocal view shown in **photograph 03**).
- 3.23 From Tiln Lane, north of the Site, the majority of views are screened by intervening hedgerow and tree vegetation. However, there are a few instances for glimpsed views of the trees on the boundaries of the Site, where gaps in this vegetation allow (**photograph 15**). Further north along the lane past Bolham Hall, the land descends slightly screening views of the Site. Views from the sports field north of the Site (which was very overgrown at the time of the site visit) look southwards over the hedgerow on Bolham Way to the buildings on Bolham Way and trees on Site (**photograph 16**).
- 3.24 There are partial views of the eastern part of the Site from the upper storeys of Bolham Hall (reciprocal view **photograph 11**). Views from lower storeys are heavily filtered by intervening vegetation.

West

- 3.25 The residential property, Bolham Manor, has direct views across the Site from upper storey windows. Views from ground floor windows are heavily filtered by the dense hedgerow and trees on the curtilage of the property (reciprocal view shown in **photograph 07** and **10**).
- 3.26 From along Bolham Lane, west of the Site, there are views of the cliff-like landform to the east of the lane. Above this landform there are some glimpsed views into the construction site south of the Site, but views into the Site are screened by the intervening vegetation (**photographs 26** and **27**).
- 3.27 From the footpath west Bolham Lane and the River Idle, there are heavily filtered, partial views of the Site behind the dense vegetation and trees which surround Clumber Court Care Home and Bolham Manor (**photograph 29**). From the footpath alongside the River Idle, there are heavily filtered views of the Site and construction equipment south of the Site is visible (**photograph 26**).

South

- 3.28 Views from Tiln Lane, south of the Site, are screened by the intervening built form within Retford and the houses currently under construction south of the Site (**photographs 17 – 20**).
- 3.29 Views from the residential properties on Badgers Chase and Idle View, located south of the construction site, currently have some partial views of the western part of the Site, but these will become screened by the new housing south of the Site once the development is complete.
- 3.30 The residential properties on Matilda Drive, within the new development to the south, will have direct views north into the Site from upper and lower storeys, once the development is complete (reciprocal views shown in **photograph 01**).

East

- 3.31 There are views of the hedgerow on the eastern Site boundary, upper storeys of Bolham Manor and the spoil heap on the Site, from Tiln Lane to the east of the Site, near to the junction with Smeath Lane (**photograph 22**). Further east, along Smeath Lane, there are partial views of the hedgerow on the eastern Site boundary (**photograph 23** and **24**). These are then progressively filtered and screened by intervening landform as the road descends further north east. Residential properties located a short distance east of the Site on Smeath Lane have partial views towards the Site and the adjacent residential development (under construction) from upper and lower storeys.

- 3.32 Users of the footpath north of Moorgate Farm have very limited views towards the Site because of the intervening hedgerow and because the topography descends further north east of the Site. However, where gaps in the hedgerow allow there are limited glimpses of the existing properties on Bolham Way north of the Site (**photograph 25**).
- 3.33 Views from Moorgate Farmhouse are screened by the intervening residential development (under construction) to the south of the Site and the existing bungalow west of Tiln Lane (reciprocal view shown on **photograph 01**).
- 3.34 Further east, there are middle distance views from the Cuckoo Way (a recreational route), near Clarborough, which runs alongside the Chesterfield Canal. The majority of these views are screened by virtue of the hedgerow and trees which grow alongside the path. However, there are instances where middle distance views back towards Retford are possible. The crane and new roofs of the houses in the residential development south of the Site are visible on the horizon in these views (**photograph 30**).
- 3.35 Similarly, the new residential development to the south of the Site is visible from Bonemill Lane and the nearby footpaths to it, south west of Clarborough (**photograph 31**). From here, and the Cuckoo Way, it is worth noting that the Site is not readily discernible and forms a very small part of these views.
- 3.36 There are also wide-ranging panoramic views possible from footpaths at Shrog Hill and Howbeck Lane, east and south east of Clarborough (**photographs 32 and 33**). There is also potential for similar views from footpaths nearby to Grove, further south from Clarborough. This is another local highpoint in the landscape. However, at the time of the site visit, these footpaths were inaccessible due to livestock in fields, so the quality and character of the views could not be confirmed. The Site forms a very small part of these wider views and is similarly not immediately discernible from neighbouring existing development within Retford.

Landscape Quality, Value and Sensitivity

- 3.37 The Site is not covered by any statutory or non-statutory designations for landscape quality or value. The Site comprises two rectangular fields, which are ordinary in character. At the time of the visit part of the western field was in temporary use as a construction compound and location for a spoil heap with the remainder of the Site left fallow. When considering the Site without these temporary uses, the Site is not considered to be out of the ordinary and is not of any architectural or historic value, or interest. The hedgerows on the western, northern and

eastern Site boundaries, and between the two fields of the Site are good landscape features of medium quality. The mature oak tree towards the northern end of the hedgerow in the centre of the Site is considered to be an attractive landscape feature of medium to high landscape quality. Overall, the Site is considered to be of medium landscape quality.

- 3.38 The Site lies adjacent to two non-designated heritage assets: Bolham Manor to the west and the Water Pumping Station to the north. There is intervisibility between the Site and both assets, both of which have attractive frontages. There are also partial views of the eastern part of the Site from the upper storeys of Bolham Hall (Grade II Listed) to the north east off Tilm Lane. The aforementioned mature oak tree within the hedgerow in the centre of the Site is considered to be a feature of medium landscape value. The Site is not publicly accessible and there are no public rights of way located crossing it or along its boundaries. Overall, the Site is considered to be of medium landscape value and is not considered to form part of a valued landscape for the purposes of NPPF paragraph 170.
- 3.39 The adjacent residential development to the south, which is under construction, exerts an urbanising influence over the Site's character which will increase once it is complete. Overall, the Site is assessed as being of medium landscape quality and value, with the surroundings similarly assessed as being of medium landscape quality and value. The Site is considered to have a good ability to accommodate residential development, and is assessed as being of medium landscape sensitivity.

4.0 SUITABILITY OF THE SITE TO ACCOMMODATE DEVELOPMENT

- 4.1 This section provides a brief appraisal of the suitability of the Site to accommodate residential development, in terms of the landscape and visual constraints and potential effects.
- 4.2 As shown on the Concept Masterplan in **Appendix F**, the Site could be developed for up to 140 new dwellings, public open space and access from the adjacent residential development. The key layout and design principles shown on the Concept Masterplan, include:
- Vehicular access from adjacent residential development to the south;
 - New homes will be a maximum of 2 storeys in height;
 - Retention of an area of open space adjacent to Bolham Manor and Bolham Way to respect the amenity of the building and to retain the more rural character of Bolham Way;
 - Offset the proposed built form from the mature oak tree in the central hedgerow on the Site so that it is retained and its setting incorporated into an open space; and
 - Incorporation of new wooded belt along the eastern boundary and north eastern corner of the Site to help screen views from Tiln Lane and from Bolham Hall. This will also help to mitigate effects on the approach into Retford as experienced along Tiln Lane and Smeath Lane.

Relationship to Settlement

- 4.3 The proposed development will lie adjacent to the existing houses in the adjoining residential development, and in close proximity to Bolham Manor and Bolham Villas to the west and north. The proposed development would be well contained by the existing vegetation and buildings to the south, west and north, with the existing hedgerow and proposed structural vegetation on the eastern boundary and north eastern corner adding to this containment.
- 4.4 The proposed development can be sensitively designed to create an attractive, inward facing development edge by utilising the existing accesses off Tiln Lane from the development to the south. The existing vegetation to the west and north, combined with the proposed vegetation to the east and north east, will create a strong and green northern edge to Retford. The new recreational footways within the

open space would link to the development to the south and ultimately to the town. There is also an opportunity to link them to Bolham Lane via the development to the south which would provide connectivity to the wider recreational network further west and along the River Idle.

Visual Effects

- 4.5 As set out in Section 3, the Site is relatively well contained in views from the wider landscape, with the eastern field being slightly more visible than the western one. Views of the Site are mostly limited to those from the immediate surroundings, with some partial middle and longer distance views possible from the areas nearby to Clarborough where the land rises slightly east of the Chesterfield Canal. The following section summarises the potential visual effects of the development from representative vantage points in the immediate and wider areas to the Site.

North

- 4.6 There will be filtered views of the new housing available from Bolham Way through the retained hedgerow and proposed wooded belt along the north eastern and eastern boundaries. Residential properties along Bolham Way will have similar views from lower and upper storeys.
- 4.7 From further north, along Tiln Lane, there will be glimpsed, filtered views towards the new housing where gaps in intervening hedgerows allow. From Bolham Hall, there will be partial views of the new houses in the eastern part of the Site. Once established these views will become filtered by the new woodland planting.

West

- 4.8 Bolham Manor will have direct views of the new homes set back behind an area of public open space which will be planted with trees which will soften views as they mature.
- 4.9 Further west, from along Bolham Lane, there will be filtered views of the upper portions of the new homes from certain locations where the vegetation is less dense. Similar views will be available from the footpaths west of Bolham Lane and along the River Idle. In these views the new homes will be seen set back behind the existing trees to the west of the Site and in conjunction with Bolham Manor and Clumber Court Care Home, which are also visible in these views.

South

- 4.10 Views from Tiln Lane, south of the Site, will be screened by the intervening built form within Retford and that which is currently under construction immediately to the south of the Site.
- 4.11 The residential properties on Matilda Drive, within the new development to the south, will have direct views of the new homes and public open spaces once they are complete. There will be some tree planting along the southern Site boundary between the two developments which will help to soften views over time, but views from Matilda Drive will remain along the connecting roads.

East

- 4.12 From Tiln Lane, directly east of the Site, there will be filtered views of the new homes through the retained hedgerow along the road and the proposed structural planting along the eastern Site boundary. Similar views will be available from Smeath Lane but these will diminish in extent and will be increasingly screened from further east due to intervening vegetation and the descending landform.
- 4.13 Residential properties located a short distance east of the Site on Smeath Lane, will have filtered views of the new homes in the eastern part of the Site seen through the retained and proposed planting on the eastern Site boundary.
- 4.14 Users of the footpath north of Moorgate Farm will have occasional filtered views towards the new homes on the Site where gaps in the hedgerow adjacent to the path allow.
- 4.15 All these near distance views from the east are anticipated to become more heavily filtered as the proposed structural planting on the eastern boundary matures.
- 4.16 From further east, there will be distant, occasional, glimpsed views of the northern edge of Retford from certain locations along the Cuckoo Way, where gaps in intervening vegetation allow. The roofs of the new homes on the Site will be seen in conjunction with other existing development adjacent to the Site.
- 4.17 Similar views will also be available from Bonemill Lane near Clarborough and the surrounding footpaths nearby. It is anticipated that as the proposed structural planting on the eastern Site boundary matures, views of the new homes will become heavily filtered, such that they will not be readily discernible from the neighbouring development in Retford.

- 4.18 From high points east of Clarborough (for example, footpaths at Shrog Hill and Howbeck Lane) the new homes will be visible in the distance but are unlikely to be immediately discernible from neighbouring development. The effects on these views will further decrease as the proposed structural planting on the eastern Site boundary matures which will filter views once it is mature.

Summary

- 4.19 The visual effects of the proposed development are anticipated to largely be limited to receptors within the immediate vicinity of the Site, with the effects on limited middle and longer distance views expected to be limited and increasingly filtered as the proposed planting establishes.

Landscape Effects

- 4.20 As set out in Section 3, the Site is assessed as being of medium landscape quality, medium landscape value and medium landscape sensitivity. The proposed development would be contained by the existing development to the south, west and north, with views similarly contained to the local vicinity of the Site. The proposed structural vegetation to the north east and east will provide further containment as it establishes. The Concept Masterplan shows how a development could come forward, which can be sensitively designed to respect the amenity and setting of the adjoining Bolham Manor, while connecting to the development to the south.
- 4.21 To respect the character of the approach into Retford from Smeath and Tiln Lanes the proposals include structural planting to the north eastern and eastern boundaries of the Site with the new homes set back from these boundaries. Furthermore, no new vehicular accesses from Tiln Lane are proposed because the development could be brought forward utilising existing access points from the development to the south. This would further limit effects on the character of the road, and would create a strong, green northern edge to Retford which would also restrict further development to the north or east.
- 4.22 The proposals are capable of being well designed in terms of its layout and architectural style to reflect the vernacular of the neighbouring development to ensure character continuity. The proposed housing would be set back behind public open space on the western side of the development to respect the amenity of Bolham Manor, and provide open space for the new residents. New habitats and ecological mitigation areas could be incorporated within the open space, and the proposals would allow for an increase in native tree and structural vegetation cover. It could also provide new recreational and walking

opportunities which could connect to the wider recreational network to the west of Bolham Lane.

- 4.23 While the character of the Site would change from fallow arable fields to residential development, it would not be incongruous with the neighbouring residential land uses or character. As the Site is largely well contained, both physically and visually, the proposed development would not have a material effect on the wider townscape or countryside. The proposed structural vegetation along the eastern and north eastern boundary would ensure the creation of a strong, well defined edge to the settlement at this location, and would also aid in assimilating the new development into the existing landscape and townscape, in the instances where it is visible from the east and west.

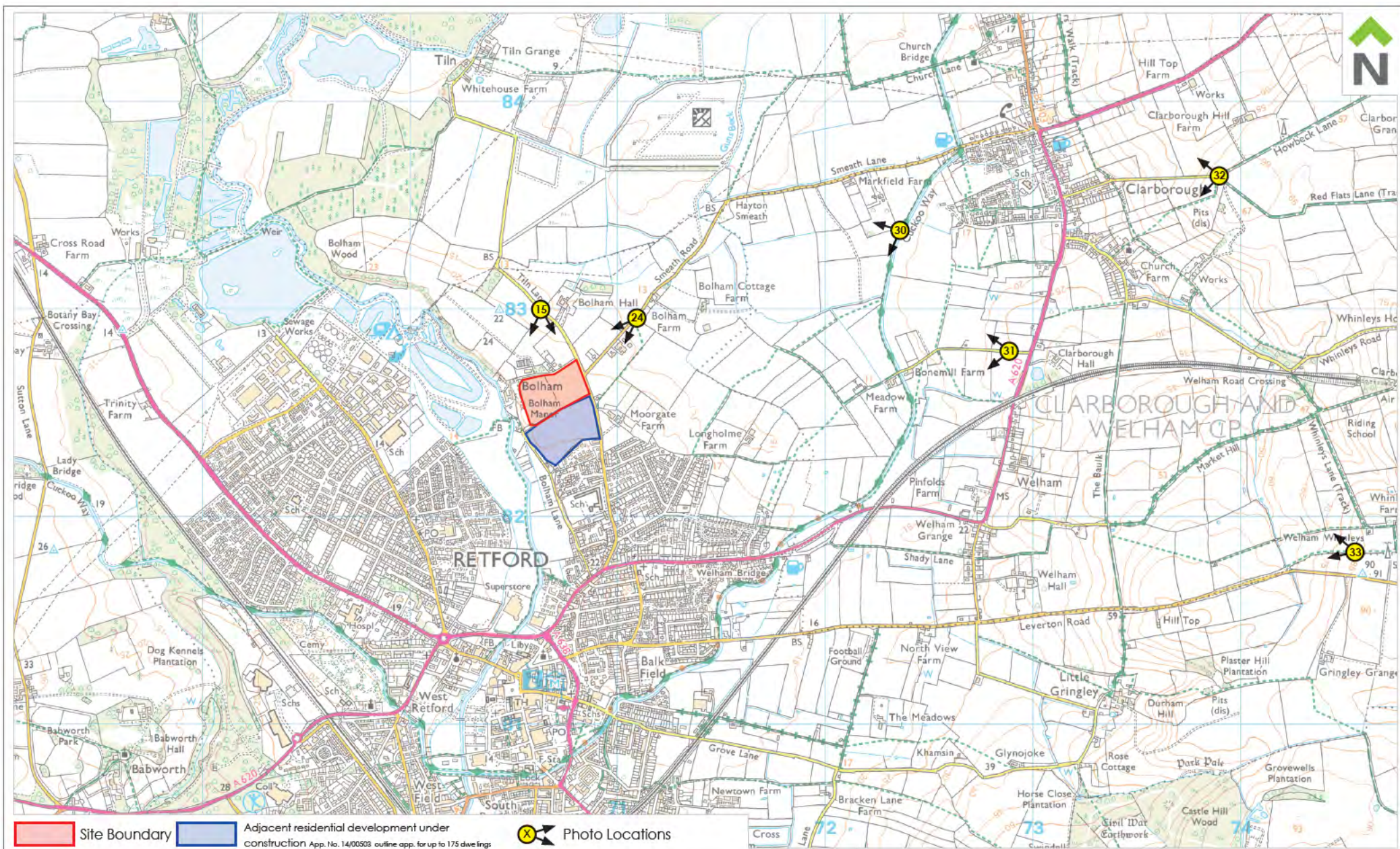
5.0 CONCLUSION

- 5.1 The Site, to the west of Tiln Lane, Retford, is being promoted for residential development. It comprises two rectangular arable fields which have been left fallow. Part of the western field of the Site is currently in use for the temporary construction compound and spoil heaps associated with an adjacent residential development which is under construction (application ref. 14/00503). The development to the south of the Site, once complete, will comprise 175 new dwellings, access from Tiln Lane and associated public open space.
- 5.2 To the west of the Site, is Bolham Manor and its associated curtilage beyond which is a cliff feature which drops sharply to Bolham Lane where Clumber Court Care Home is located. Further west is the River Idle and its associated valley bottom, the majority of which is undeveloped. North of the Site is Bolham Way; a single lane cul-de-sac. Bolham Villas (residential properties), Retford Amateur Boxing Club, together with an overgrown playing field and a disused pumping station are located north of this road. The access into Bolham Manor is located at the western end of the road. Mixed arable and pastoral farmland extends north of these properties and is scattered with blocks of woodland. To the east of the Site is Tiln Lane, which continues northwards and southwards, with Smeath Lane continuing off it to the north east. Beyond this is a large expanse of mixed farmland which descends to a flat and wide valley with the Chesterfield Canal and Sheffield – Lincoln Railway line at the bottom of the valley.
- 5.3 The Site is not covered by any designations for landscape character or quality. It is bound by various hedgerows which are in good condition together with a mature oak tree within the central hedgerow near to the northern boundary which is an attractive landscape feature. There are no listed buildings within or on the boundaries of the Site. The nearest listed buildings are Bolham Hall which is located approximately 250m north of the Site, and Moorgate Farmhouse approximately 190m east of the Site. There are various non-designated heritage assets adjacent to the Site which include Bolham Manor, immediately to the west and the Mill site immediately east of the manor; the pumping station (disused) immediately north of the Site; and Bolham Hall Park and Garden which extends from the Hall southwards covering the land immediately north east of Tiln Lane and Smeath Lane. The Site is not publicly accessible. Overall, the Site is assessed as being of medium landscape quality, value and sensitivity to residential development.
- 5.4 As shown on the Concept Masterplan on **Appendix F**, the Site could be developed for around 138 dwellings.

- 5.5 The appraisal shows that a sensitively designed proposed development could be brought forward which would respect the amenity and have regard to the setting of the adjacent Bolham Manor. To respect the character of the approach into Retford from Smeath and Tiln Lanes the proposals include structural planting to the north eastern and eastern boundaries of the Site with the new homes set back from these boundaries. Furthermore, no new vehicular accesses from Tiln Lane are proposed because the development could be brought forward utilising existing access points from the development to the south. This would further limit any effects on the character of the road. This will create a strong, green northern edge to Retford which would also restrict further development to the north or east, and aid in assimilating the new homes into the townscape in the limited number of instances where it is visible to the east.
- 5.6 As such, it is considered that a sensitively designed proposed development would not result in material adverse landscape and visual effects wider than the Site and its immediate vicinity.

Appendix A

Site Location Plan



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Drawing Title Site Location Plan
Client Vistry Group

Date November 2020

Drawing No. CSA/5209/100

Scale @ A4 NTS

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Appendix B

Aerial Photograph



 Site Boundary  Photo Locations  Adjacent residential development under construction App. No. 14/00503 out ne app. for up to 175 dwellings



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Appendix C

Photosheets

New residential development south of
Site

St. Swithun's Church



View from within Site, looking south. **Photograph 01**

Bolham Manor



View from within Site, looking west. **Photograph 02**



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Residential properties on Bolham Way

Retford Boxing Club on Bolham Way

Trees surrounding Bolham Hall



View from within Site, looking north. **Photograph 03**

Residential properties off Smeath Road

Mast at Shrog Hill



View from within Site, looking east. **Photograph 04**

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Construction compound and bund on Site



View from within Site, looking east. **Photograph 05**

Construction compound and bund on Site

St. Swithun's Church

Bolham Manor



View from within Site, looking south. **Photograph 06**



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Bolham Manor



View from within Site, looking west. **Photograph 07**

Disused sewage works north of Site



View from within Site, looking north. **Photograph 08**



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Large warehouse buildings west of River
Idle



Construction compound within Site

View from within Site, looking west. **Photograph 09**
Bolham Manor



View from within Site, looking south. **Photograph 10**



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Retford Boxing Club
Residential properties on Bolham Way

Bolham Hall



View from within Site, looking north west. **Photograph 11**

Hedgerow on northern Site boundary



View from Bolham Way, looking south east across Site. **Photograph 12**

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New residential development south of Site

Site

Construction compound and bund on Site

Site



View from Bolham Way, looking south across Site. **Photograph 13**

New residential development south of Site

Approximate extent of Site



View from Tiln Lane, looking south west towards Site. **Photograph 14**

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Bolham Hall

Trees on southern Site boundary



Approximate extent of Site
Residential properties on Bolham Way
Retford Boxing Club

View from Tiln Lane, looking south towards Site. **Photograph 15**
Disused football referee huts



View from disused sports field north of Bolham Way, looking south towards Site. **Photograph 16**

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New residential development south of
Site



View from Tiln Lane, looking north west towards Site. **Photograph 17**

New residential development south of
Site

Moorgate Farm



View from Tiln Lane, looking north west towards Site. **Photograph 18**



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New residential development south of Site



View from Tiln Lane, looking north west towards Site. **Photograph 19**

New residential development south of Site

Site



View from Tiln Lane, looking north west towards Site. **Photograph 20**



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View from Tiln Lane, looking north west towards Site. **Photograph 21**



View from Tiln Lane, looking west towards Site. **Photograph 22**



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View from Smeath Lane, looking south west towards Site. **Photograph 23**



View from Smeath Lane, looking south west towards Site. **Photograph 24**

New residential development to south of Site

Approximate extent of Site

Residential properties on Bolham Way



View from public footpath east of Tiln Lane, looking west towards Site. **Photograph 25**

Development site to south of Site



View from Bolham Lane, looking east towards Site. Site obscured by development to the south. **Photograph 26**

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Curtilage of Bolham Manor



View from public footpath west of Bolham Lane, looking east towards Site. **Photograph 27**

Construction equipment south of Site



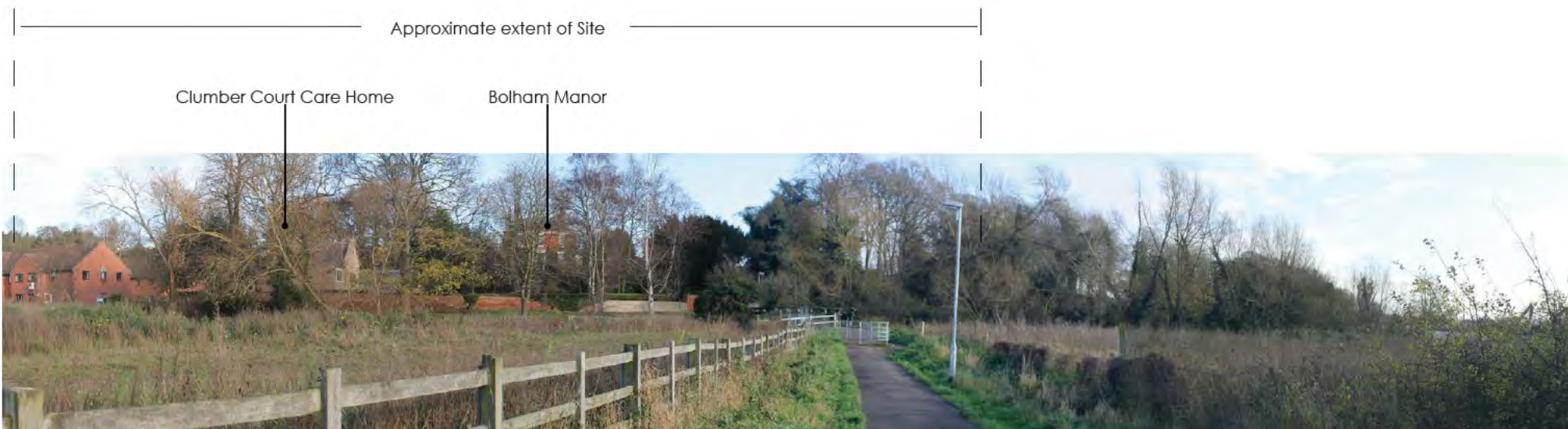
View from public footpath along River Idle, looking north east towards Site. **Photograph 28**



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View from public footpath west of Bolham Lane, looking east towards Site. **Photograph 29**



View from Cuckoo Way, looking south west towards Site. **Photograph 30**



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New residential development south of Site



View from Bonemill Lane, looking west towards Site. **Photograph 31**
Approximate location of Site



View from Howbeck Lane, looking west. **Photograph 32**



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Approximate location of Site



View from public footpath at Shrog Hill, looking west. **Photograph 33**



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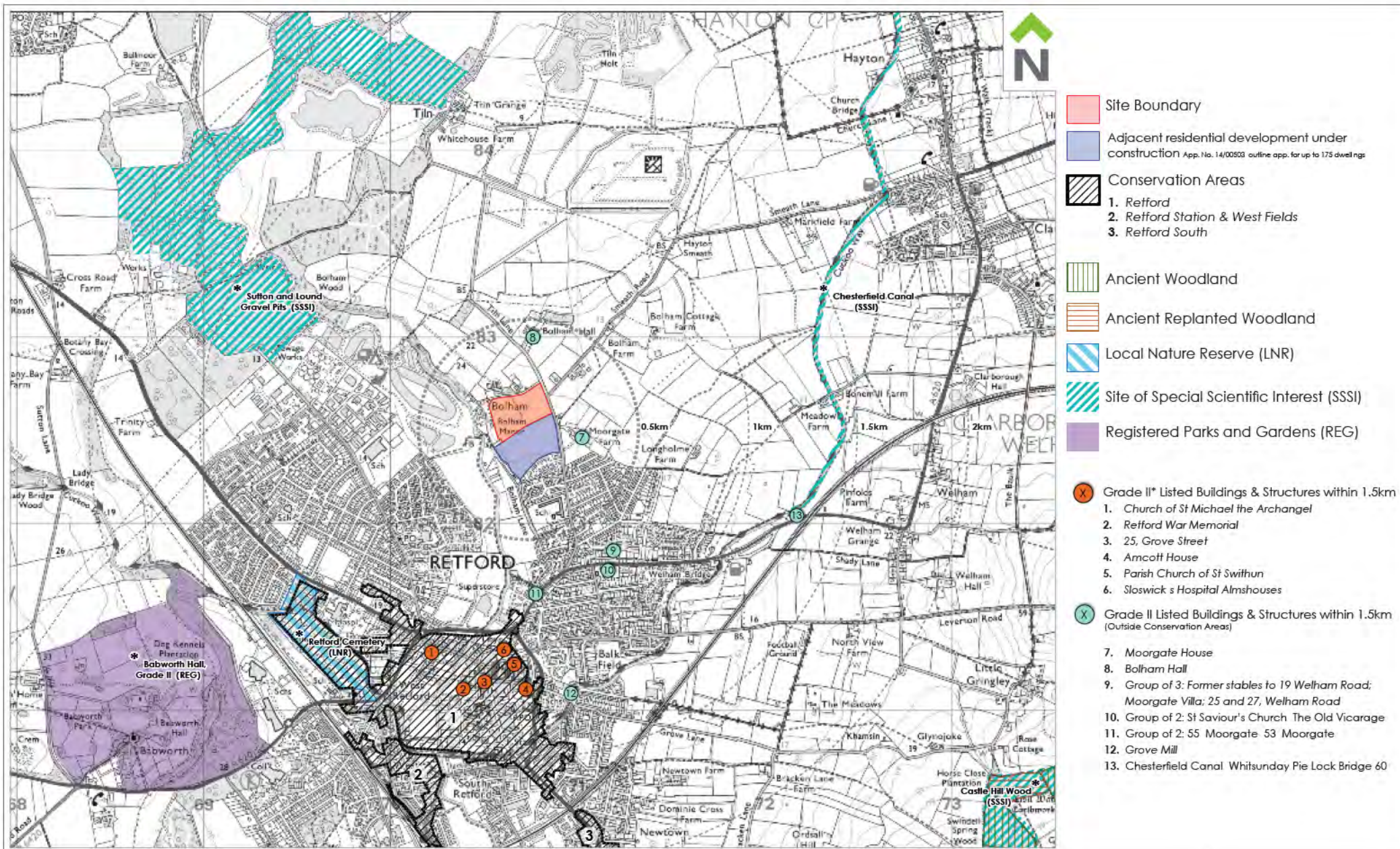
Date November 2020

Drawn SP

Checked PH

Appendix D

MAGIC map and Local Plan Extract



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Project Land west of Tilt Lane Retford

Drawing Title MAGIC Map and Local Plan Extract

Client Vistry Group

Date November 2020 **Drawing No.** CSA/5209/103

Scale @ A4 NTS **Rev** -

Drawn PH **Checked** CA

Appendix E

Extract from Bassetlaw Landscape Character Assessment

Bassetlaw Landscape Character Assessment
Idle Lowlands: IL PZ 08

Idle Lowlands

Policy Zone 08: Retford

POLICY: CONSERVE

Character Summary

The area wraps around the north-east and east of Retford between the Chesterfield Canal, which forms much of the eastern boundary before traversing south-west through the Policy Zone, and the River Idle and Sutton and Lound Gravel Pits [SSSI/SINC] in the west. Hayton village and Clarborough are located east of the area.

Generally the Policy Zone is a low lying river valley floor rising slightly towards Retford which sits on higher ground immediately south. Views are quite open towards higher ground in the north becoming more restricted in the south due to high hedges lining roads and field boundaries.

Arable farmland extends across the landscape with some rough grazing, pastoral is particularly apparent in the west. The Lincoln to Sheffield railway line runs through the eastern section of the area. Isolated farmsteads are a feature within the south and south-west of the Policy Zone, in the vicinity of Retford. Recreational facilities are available at Bolham, which encompasses Bolham Hall and Manor, and further south, closer to Retford.

Drainage ditches are common field boundaries, though hedgerows are more prominent centrally and further west where ditches are mostly along roadsides. Hedgerows are generally well maintained, they have been allowed to grow quite tall in some areas and encompass occasional trees. Woodland cover is quite fragmented, with scattered trees being apparent across the open farmland.

Idle Lowlands – Policy Zone 08: Retford

PHOTOGRAPH



CHARACTERISTIC FEATURES

- Mixed open farmland divided by drainage ditches and well maintained hedgerows with occasional trees. Individual trees are evident within the fields.
- Low lying river valley floor.
- Bolham Hall and Manor; includes recreational facilities.
- Isolated red brick farmsteads.
- Lincoln to Sheffield railway corridor.

LANDSCAPE ANALYSIS

Condition

The landscape condition is very good. There is a unified pattern of elements with some detracting features within the Policy Zone, including the A620, Smeah Road and pylons. Although outside the area, a commercial development located at the edge of Retford is also considered a detracting feature. Overall the area is **visually unified**.

There is evidence of the historic field pattern throughout the Policy Zone, hedgerows are strong with occasional willow and ash trees. Fields are also divided by a network of ditches. Built development is limited and largely vernacular comprising large houses i.e. Bolham Hall, red brick farmhouses with a mix of traditional and modern farm buildings and few residential dwellings. Mixed farmland is dominant with an area of pig farming and some rough grazing, the livestock are enclosed by fencing. The overall cultural integrity is **good**.

Through tree cover is low there is a relatively good green infrastructure provided by tree belts interlocking with hedgerows and several isolated woodland blocks and plantations of Scots Pine throughout the Policy Zone. Scattered oak trees are also evident across the farmland. Ecological designations include four SINC's. The ecological integrity is **moderate** which gives a **strong** habitat for wildlife/functional integrity overall. A **visually unified** area combined with a **strong** functional integrity gives a **very good landscape condition** overall.

Sensitivity

Features which give the area local distinctiveness are **characteristic** of the Idle Lowlands region and the continuity/time depth is **historic** [post 1600] resulting in a **moderate** sense of place.

Moderate visibility is afforded due to views generally being contained within the Policy Zone, and the landform is considered **apparent**. A **moderate** sense of place with **moderate** visibility results in **moderate** landscape sensitivity overall.

LANDSCAPE ACTIONS

Conserve

Landscape Features

- **Conserve** permanent pasture and seek opportunities to restore arable farmland to pastoral.
- **Conserve** and enhance tree cover and landscape planting generally to improve visual unity and habitat across the Policy Zone.
- **Conserve** the ecological diversity and setting of the designated SINC's, seeking to enhance where appropriate.
- **Conserve** the historic field pattern, maintain existing strong hedgerow structure, restore and reinforce poor hedgerow boundaries where necessary and reinforce with additional hedgerow trees as appropriate.
- **Conserve** network of drainage ditches.

Built Features

- **Conserve** the open rural character of the landscape by concentrating new development around the north-eastern fringe of Retford.
- **Conserve** and be sympathetic towards the local architectural style in any new development.
- **Conserve** and respect the character, setting and historic integrity of Bolham Hall and Manor House.
- Contain new development within existing field boundaries.
- Create woodland areas to contain and soften built development, preferably in advance of new development.

CONTEXT

Policy Zone: IL PZ 08
Land Cover Parcel[s]: IL28, IL29, IL30

Condition

Good	REINFORCE	CONSERVE & REINFORCE	CONSERVE
Moderate	CREATE & REINFORCE	CONSERVE & CREATE	CONSERVE & RESTORE
Poor	CREATE	RESTORE & CREATE	RESTORE

Low Moderate High
Sensitivity

SUMMARY OF ANALYSIS

Condition

Very Good

Pattern of Elements:	Unified
Detracting Features:	Some
Visual Unity:	Unified
Ecological Integrity:	Moderate
Cultural Integrity:	Good
Functional Integrity:	Strong

Sensitivity

Moderate

Distinctiveness:	Characteristic
Continuity:	Historic
Sense of Place:	Moderate
Landform:	Apparent
Extent of Tree Cover:	Intermittent
Visibility:	Moderate










FIGURE 2
Policy Zones - All Areas within Bassetlaw

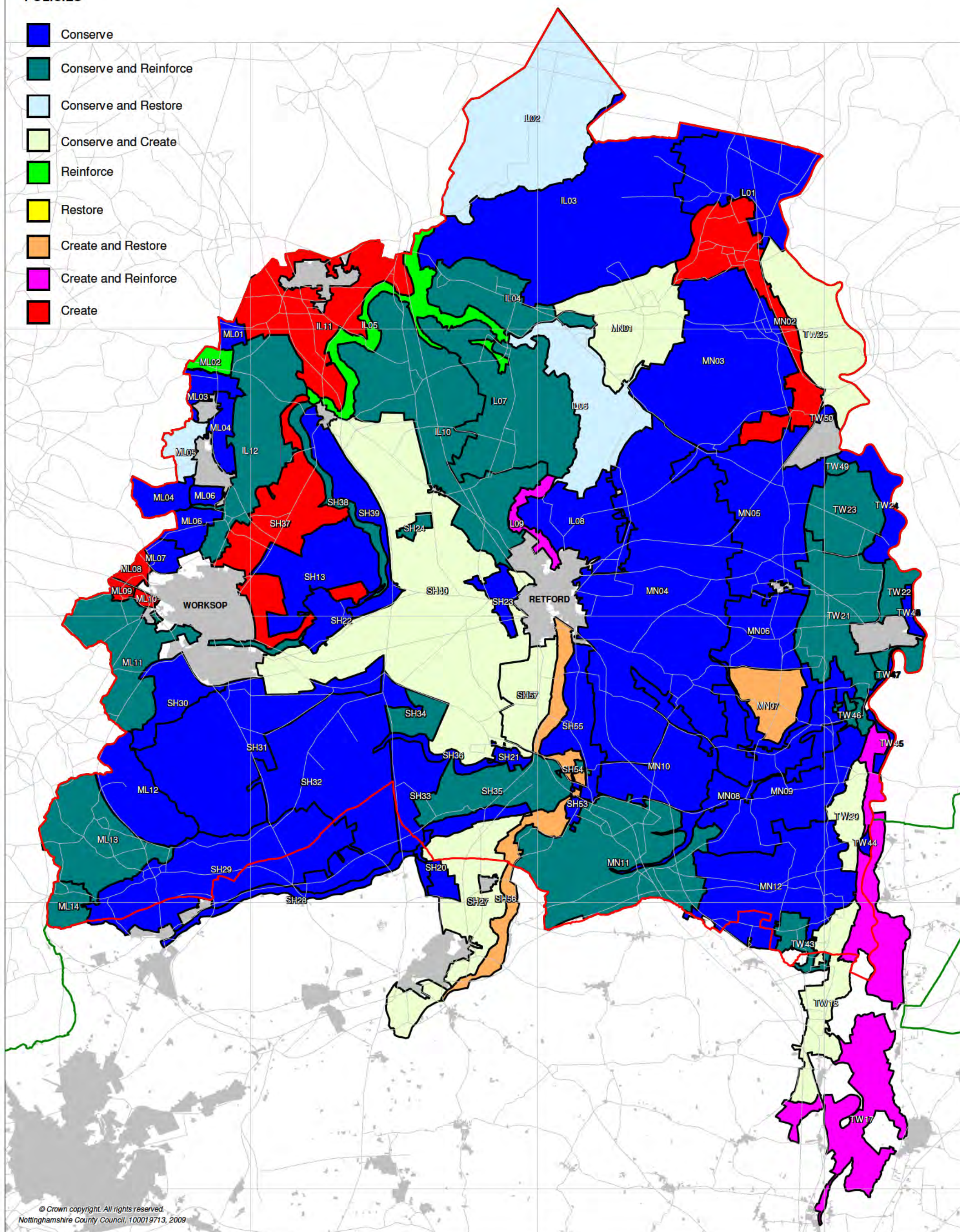


Key

- Nottinghamshire County boundary
 Bassetlaw District boundary

POLICIES

-
-  Conserve
 Conserve and Reinforce
 Conserve and Restore
 Conserve and Create
 Reinforce
 Restore
 Create and Restore
 Create and Reinforce
 Create



Appendix F

Concept Masterplan



Rev	Date	By	Description
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Project	Land west of Tilt Lane, Retford		
Title	Concept Masterplan		
Client	Vistry Group		
Scale	1:2500 @ A3	Drawn	SB
Date	Jan 2021	Checked	RR
Drawing No.	CSA/5209/104	Rev	-

Appendix G

Methodology for Landscape and Visual Assessment

METHODOLOGY FOR LANDSCAPE AND VISUAL OVERVIEW

- M1 In landscape and visual impact assessment, a distinction is normally drawn between **landscape/townscape effects** (i.e. effects on the character or quality of the landscape (or townscape), irrespective of whether there are any views of the landscape, or viewers to see them) and **visual effects** (i.e. effects on people's views of the landscape, principally from public rights of way and areas with public access, but also private views from residential properties). Thus, a development may have extensive landscape effects but few visual effects if, for example, there are no properties or public viewpoints nearby. Or alternatively, few landscape effects but substantial visual effects if, for example, the landscape is already degraded or the development is not out of character with it, but can clearly be seen from many residential properties and/or public areas.
- M2 The assessment of landscape & visual effects is less amenable to scientific or statistical analysis than some environmental topics and inherently contains an element of subjectivity. However, the assessment should still be undertaken in a logical, consistent and rigorous manner, based on experience and judgement, and any conclusions should be able to demonstrate a clear rationale. To this end, various guidelines have been published, the most relevant of which, for assessments of the effects of a development, rather than of the character or quality of the landscape itself, form the basis of the assessment and are as follows:
- 'Guidelines for Landscape & Visual Impact Assessment', produced jointly by the Institute of Environmental Assessment and the Landscape Institute (GLVIA 3rd edition 2013); and
 - 'An Approach to Landscape Character Assessment', October 2014 (Christine Tudor, Natural England) to which reference is also made. This stresses the need for a holistic assessment of landscape character, including physical, biological and social factors.

LANDSCAPE/TOWNSCAPE EFFECTS

- M3 Landscape/townscape quality is a subjective judgement based on the condition and characteristics of a landscape/townscape. It will often be informed by national, regional or local designations made upon it in respect of its quality e.g. AONB. Sensitivity relates to the inherent value placed on a landscape / townscape and the ability of that landscape/townscape to accommodate change.

Landscape sensitivity can vary with:

- (i) *existing land uses;*
- (ii) *the pattern and scale of the landscape;*
- (iii) *visual enclosure/openness of views, and distribution of visual receptors;*
- (iv) *susceptibility to change;*
- (v) *the scope for mitigation, which would be in character with the existing landscape; and*
- (vi) *the condition and value placed on the landscape.*

- M4 The concept of landscape/townscape value is considered in order to avoid consideration only of how scenically attractive an area may be, and thus to avoid undervaluing areas of strong character but little scenic beauty. In the process of

making this assessment, the following factors, among others, are considered with relevance to the site in question: landscape quality (condition), scenic quality, rarity, representativeness, conservation interest, recreation value, perceptual aspects and associations.

- M5 Nationally valued landscapes are recognised by designation, such as National Parks and Areas of Outstanding Natural Beauty ('AONB') which have particular planning policies applied to them. Nationally valued townscape are typically those covered by a Conservation Area or similar designation. Paragraph 170 of the current NPPF outlines that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes '*...in a manner commensurate with their statutory status or identified quality in the development plan*'.
- M6 There is a strong inter-relationship between landscape/township quality, value and sensitivity as high quality/value landscapes/townships usually have a low ability to accommodate change.
- M7 For the purpose of our assessment, landscape/township quality, value and sensitivity is assessed using the criteria in Tables LE1 and LE2. Typically, landscapes/townships which carry a quality designation and which are otherwise attractive or unspoilt will in general be more sensitive, while those which are less attractive or already affected by significant visual detractors and disturbance will be generally less sensitive.
- M8 The magnitude of change is the scale, extent and duration of change to a landscape arising from the proposed development and was assessed using the criteria in Table LE3.
- M9 Landscape/township effects were assessed in terms of the interaction between the magnitude of the change brought about by the development and the quality, value & sensitivity of the landscape resource affected. The landscape/township effects can be either beneficial, adverse or neutral. Landscape effects can be direct (i.e. impact on physical features, e.g. landform, vegetation, watercourses etc.), or indirect (i.e. impact on landscape character as a result of the introduction of new elements within the landscape). Direct visual effects result from changes to existing views.
- M10 In this way, landscapes/townships of the highest sensitivity, when subjected to a high magnitude of change from the proposed development, are likely to give rise to 'substantial' landscape/township effects which can be either adverse or beneficial. Conversely, landscapes of low sensitivity, when subjected to a low magnitude of change from the proposed development, are likely to give rise to only 'slight' or neutral landscape effects. Beneficial landscape effects may arise from such things as the creation of new landscape features, changes to management practices and improved public access. For the purpose of this assessment the landscape/township effects have been judged at completion of the development and in year 15. This approach acknowledges that landscape/township effects can reduce as new planting/mitigation measures become established and achieve their intended objectives.

VISUAL EFFECTS

- M11 Visual effects are concerned with people's views of the landscape/township and the change that will occur. Like landscape effects, viewers or receptors are categorised by their sensitivity. For example, views from private dwellings are generally of a higher sensitivity than those from places of work.
- M12 In describing the content of a view the following terms are used:
- No view - no views of the development;
 - Glimpse - a fleeting or distant view of the development, often in the context of wider views of the landscape;

- Partial - a clear view of part of the development only;
- Filtered - views to the development which are partially screened, usually by intervening vegetation - the degree of filtering may change with the seasons;
- Open - a clear view to the development.

- M13 The sensitivity of the receptor varies according to its susceptibility to a particular type of change, or the value placed on it (e.g. views from a recognised beauty spot will have a greater sensitivity). Visual sensitivity was assessed using the criteria in Table VE1.
- M14 The magnitude of change is the degree in which the view(s) may be altered as a result of the proposed development and will generally decrease with distance from its source, until a point is reached where there is no discernible change. The magnitude of change in regard to the views was assessed using the criteria in Table VE2.
- M15 Visual effects were then assessed in terms of the interaction between the magnitude of the change brought about by the development and also the sensitivity of the visual receptor affected.
- M16 As with landscape effects, a high sensitivity receptor, when subjected to a high magnitude of change from the proposed development, is likely to experience 'substantial' visual effects which can be either adverse or beneficial. Conversely, receptors of low sensitivity, when subjected to a slight magnitude of change from the proposed development, are likely to experience only 'slight' or neutral visual effects, which can be either beneficial or adverse.
- M17 Unless specific slab levels of buildings have been specified, the assessment has assumed that slab levels will be within 750mm of existing ground level.

MITIGATION AND RESIDUAL EFFECTS

- M18 Mitigation measures are described as those measures, including any process or activity, designed to avoid, reduce and compensate for adverse landscape and/or visual effects resulting from the proposed development.
- M19 In situations where proposed mitigation measures are likely to change over time, as with planting to screen a development, it is important to make a distinction between any likely effects that will arise in the short-term and those that will occur in the long-term or 'residual effects' once mitigation measures have established. In this assessment, the visual effects of the development have been considered at completion of the entire project and at 15 years thereafter.
- M20 Mitigation measures can have a residual, positive impact on the effects arising from a development, whereas the short-term impact may be adverse.

ASSESSMENT OF EFFECTS

- M21 The assessment concisely considers and describes the main landscape/townscape and visual effects resulting from the proposed development. The narrative text demonstrates the reasoning behind judgements concerning the landscape and visual effects of the proposals.

CUMULATIVE EFFECTS

- M22 Cumulative effects are *'the additional changes caused by a proposed development in conjunction with other similar developments or as the combined effect of a set of developments, taken together.'*

M23 In carrying out landscape assessment it is for the author to form a judgement on whether or not it is necessary to consider any planned developments and to form a judgement on how these could potentially affect a project.

Table LE 1

LANDSCAPE / TOWNSCAPE QUALITY AND VALUE

	Very High	High	Medium	Low
Description of Landscape/Townscape Quality and Value	<p>Landscape Quality: Intact and very attractive landscape which may be nationally recognised/designated for its scenic beauty. e.g. National Park, Area of Outstanding Natural Beauty or World Heritage Site.</p> <p>Townscape Quality: A townscape of very high quality which is unique in its character and recognised nationally/internationally e.g. World Heritage Site</p> <p>Value: Very high quality landscape or townscape with Statutory Designation for landscape/townscape quality/value e.g. National Park, World Heritage Site, Registered Park or Garden. Contains rare elements or significant cultural/historical associations.</p>	<p>Landscape Quality: A landscape usually combining varied topography, historic features and few visual detractors. A landscape known and cherished by many people from across the region. e.g. County Landscape Site such as a Special Landscape Area.</p> <p>Townscape Quality: A well designed townscape of high quality with a locally recognised and distinctive character e.g. Conservation Area</p> <p>Value: High quality landscape/townscape or lower quality landscape with un-fettered public access (e.g. commons, public park) or with strong cultural associations. May have important views out to landmarks/designated landscapes and few detracting features. May possess perceptual qualities of tranquility or wildness.</p>	<p>Landscape Quality: Non-designated landscape area generally pleasant but with no distinctive features often displaying relatively ordinary characteristics. May have detracting features.</p> <p>Townscape Quality: A typical pleasant townscape with a coherent urban form but with no distinguishing features or designation for quality.</p> <p>Value: An ordinary landscape/townscape of local value which may have some detracting features. No recognised statutory designations for landscape/townscape quality. A landscape which may have limited public access and/or have pleasant views out or be visible in public views.</p>	<p>Landscape / Townscape Quality: Unattractive or degraded landscape/townscape affected by numerous detracting elements e.g. industrial areas, infrastructure routes and un-restored mineral extractions.</p> <p>Value: Landscape/townscape generally of lower quality. A landscape with limited public access, no designations or recognised cultural significance. Limited public views.</p>

Table LE 2

LANDSCAPE / TOWNSCAPE SENSITIVITY

	Very High	High	Medium	Low
Description of Sensitivity	<p>A landscape/townscape with a very low ability to accommodate change such as a nationally designated landscape.</p> <p>A landscape/townscape with limited ability to accommodate change because such change may lead to some loss of valuable features or elements. Development of the type proposed could potentially be discordant with the character of the landscape/townscape.</p> <p>A landscape/townscape with reasonable ability to accommodate change. Change may lead to a limited loss of some features or characteristics. Development of the type proposed would not be discordant with the character of the landscape/townscape.</p> <p>A landscape/townscape with good ability to accommodate change. Change would not lead to a significant loss of features or characteristics and there would be no significant loss of character or quality. Development of the type proposed would not be discordant with the landscape/townscape in which it is set and may result in a beneficial change.</p>			

Table LE 3 LANDSCAPE / TOWNSCAPE MAGNITUDE OF CHANGE

	Substantial	Moderate	Slight	Negligible	Neutral
Description of the Change predicted	Total loss of or significant impact on key characteristics features or elements				
		Partial loss of or impact on key characteristics features or elements			
			Minor loss of or alteration to one or more key landscape/ townscape characteristics features or elements		
				Very minor loss or alteration to one or more key landscape/ townscape characteristics features or elements	
					No loss or alteration of key landscape/ townscape characteristics features or elements

Table LE 4 LANDSCAPE / TOWNSCAPE EFFECTS

	Substantial	Moderate	Slight	Negligible	Neutral
Description of the Effect	<p>The proposals will alter the landscape/ townscape in that they:</p> <ul style="list-style-type: none"> • will result in substantial change in the character landform scale and pattern of the landscape/townscape • are visually intrusive and would disrupt important views • are likely to impact on the integrity of a range of characteristic features and elements and their setting • will impact a high quality or highly vulnerable landscape • cannot be adequately mitigated. 	<p>The proposals:</p> <ul style="list-style-type: none"> • noticeably change the character scale and pattern of the landscape/townscape • may have some impacts on a landscape/townscape of recognised quality or on vulnerable and important characteristic features or elements. • are a noticeable element in key views • not possible to fully mitigate. 	<p>The proposals:</p> <ul style="list-style-type: none"> • do not quite fit the landform and scale of the landscape/townscape and will result in relatively minor changes to existing landscape character • will impact on certain views into and across the area • mitigation will reduce the impact of the proposals but some minor residual effects will remain. 	<p>The proposals:</p> <ul style="list-style-type: none"> • complement the scale landform and pattern of the landscape/townscape • development may occupy only a relatively small part of the Site • maintain the majority of landscape features • incorporates measures for mitigation to ensure the scheme will blend in well with the landscape/townscape and mitigates any loss of vegetation. 	<p>The proposals:</p> <ul style="list-style-type: none"> • maintain existing landscape/townscape character • has no impact on landscape features such as trees hedgerows watercourses etc. • utilises a highly degraded landscape or brownfield site.

Footnote:

1. Each level (other than neutral) of change identified can be either regarded as 'beneficial' or 'adverse'. The above table relates to adverse landscape effects however where proposals complement or enhance landscape character these will have a comparable range of beneficial landscape effects.

Table VE 1

VISUAL SENSITIVITY

	High	Medium	Low
Description of the Receptor	<p>Residential properties with predominantly open views from windows garden or curtilage. Views will normally be from ground and first floors and from two or more windows of rooms mainly in use during the day.</p> <p>Users of Public Rights of Way in sensitive or generally unspoilt areas.</p> <p>Predominantly non-motorised users of minor or unclassified roads in the countryside.</p> <p>Views from within an Area of Outstanding Natural Beauty National Park World Heritage Site or Conservation Area and views for visitors to recognised viewpoints or beauty spots.</p> <p>Users of outdoor recreational facilities with predominantly open views where the purpose of that recreation is enjoyment of the countryside - e.g. Country Parks National Trust or other access land etc.</p>	<p>Residential properties with partial views from windows garden or curtilage. Views will normally be from first floor windows only or an oblique view from one ground floor window or may be partially obscured by garden or other intervening vegetation.</p> <p>Users of Public Rights of Way in less sensitive areas or where there are significant existing intrusive features.</p> <p>Users of outdoor recreational facilities with restricted views or where the purpose of that recreation is incidental to the view e.g. sports fields.</p> <p>Schools and other institutional buildings and their outdoor areas.</p> <p>Users of minor or unclassified roads in the countryside whether motorised or not.</p>	<p>People in their place of work.</p> <p>Users of main roads or passengers in public transport on main routes.</p> <p>Users of outdoor recreational facilities with restricted views and where the purpose of that recreation is unrelated to the view e.g. go-karting track.</p>

Table VE 2

VISUAL MAGNITUDE OF CHANGE

	Substantial	Moderate	Slight	Negligible	Neutral
Description of the Change predicted	Large and dominating changes which affect a substantial part of the view.				
		Clearly perceptible and noticable changes within a significant proportion of the view.			
			Small changes to existing views either as a minor component of a wider view or smaller changes over a larger proportion of the view(s).		
				Very minor changes over a small proportion of the view(s).	
					No discernible change to the view(s).

Table VE 3

VISUAL EFFECTS

	Substantial	Moderate	Slight	Negligible	Neutral
Description of the Effects	The proposals would have a significant impact on a view from a receptor of medium sensitivity or less damage (or improvement) to a view from a highly sensitive receptor and would be an obvious or dominant element in the view.				
		The proposals would impact on a view from a medium sensitive receptor or less harm (or improvement) to a view from a more sensitive receptor and would be a readily discernible element in the view.			
			The proposals would have a limited effect on a view from a medium sensitive receptor but would still be a visible element within the view or a greater effect on a view from a receptor of lower sensitivity.		
				The proposals would result in a negligible change to the view but would still be discernible.	
					No change in the view.

Footnote:

1. Each level (other than neutral) of change identified can be either regarded as 'beneficial' or 'adverse'.



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**Tiln Lane, Retford
Proposed Residential Development
Transport & Access Appraisal**

September 2021 (Rev 2)

Prepared on behalf of
Vistry Group

Quality Management

Tiln Lane, Retford – Transport & Access Appraisal Project No: 21003				
File reference	O:\Tiln Lane, Retford\TEXT\REPORTS\210128 Tiln Lane, Retford Transport & Access Appraisal rev 2.docx			
Issue/revision	Initial Issue	Revision 1	Revision 2	Revision 3
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Date	19 th January 2021	20 th January 2021	28 th September 2021	
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Signature				
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APPENDICES

Appendix A Personal Injury Collision Data

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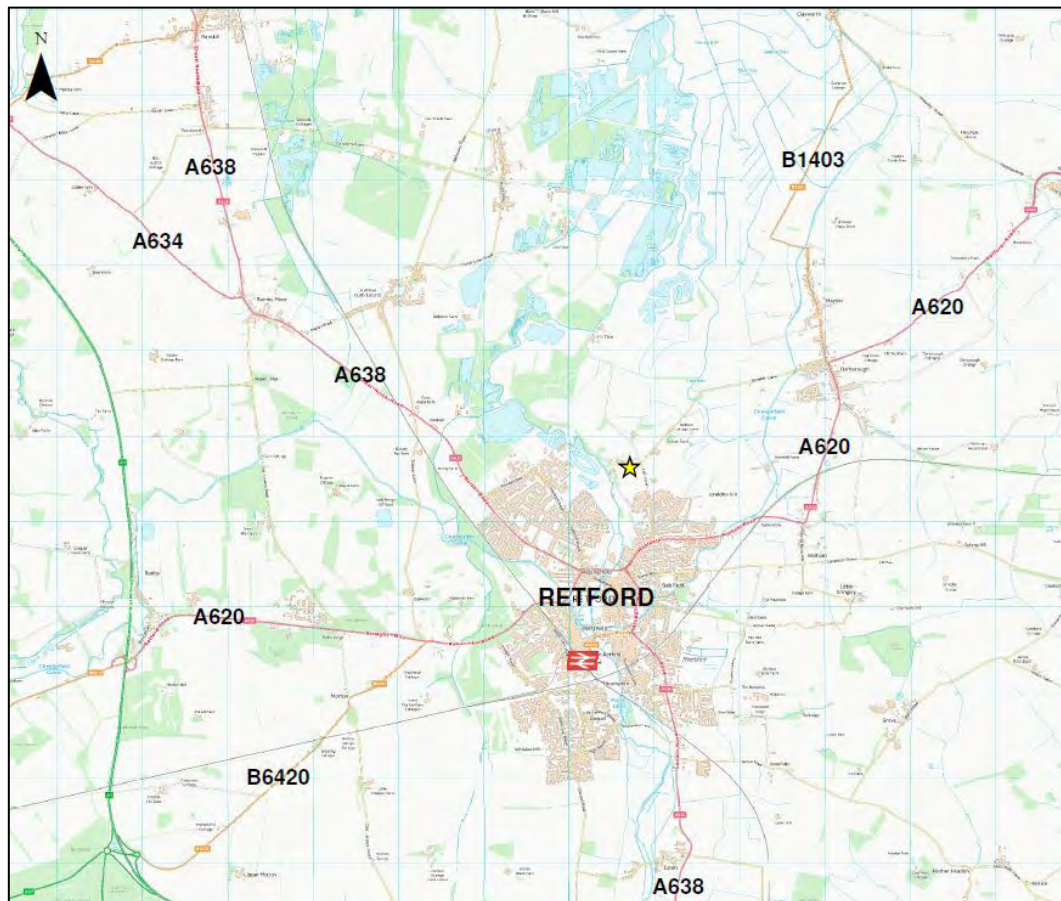


1. Introduction

1.1.1 Optima have been appointed by the Vistry Group to produce this Transport & Access Appraisal in support of the allocation of land to the west of Tiln Lane, Retford ("the Site") for residential purposes, as part of the emerging Bassetlaw District Council Local Plan.

1.1.2 The Site has an area of 5.88 hectares and is expected to accommodate circa 120 dwellings. The location of the Site is indicated on Image 1.1.

Image 1.1 Site Location Plan



1.2 PLANNING HISTORY

1.2.1 The Local Highway Authority is Nottinghamshire County Council (NCC) and the Local Planning Authority is Bassetlaw District Council (BDC).

1.2.2 The Site is located to the north of the existing Vistry Group (Linden Homes) development, known as Treswell Gardens, which is currently under construction. The proposed residential allocation is agricultural land and has no relevant planning history.

1.2.3 The relevant planning applications associated with land to the south of the Site are summarised below:

- 14/00503/OUT - Erection of 175 units;
- 18/01445/RES - Phase 1 (68 units); and
- 19/01477/RES - Phase 2 (107 units).



1.2.4 Two separate accesses have been provided to serve the Treswell Gardens development and the approved housing layout includes two spurs along the northern boundary to facilitate access to the proposed allocation. Full details of the proposed access strategy are described in detail within Chapter 3 of this report.

1.3 LAND NORTH OF BIGSBY ROAD, RETFORD

1.3.1 Optima are aware of a recent application for residential development known as 'Land North of Bigsby Road, Retford'. Outline planning applications were refused in 2018, 2019 and subsequently dismissed at Appeal in 2021.

1.3.2 Given the nature of the proposals and the applications proximity to the proposed land allocation, the details of the application have been reviewed and are summarised below.

1.3.3 Outline approval was initially sought for 170 residential dwellings at Land North of Bigsby Road, with all matters reserved aside from access, under application reference no. 19/01360/OUT (resubmission of 18/01625/OUT). Access was sought via Palmer Road and Bisby Road, both of which are existing residential streets connecting to Tiln Lane to the west.

1.3.4 Nottinghamshire County Council as Local Highway Authority did not object to the development, however the application was refused with the Council citing, amongst others, the following highway related reason within the decision notice (dated 10/06/20):

"Policy DM4 of the Bassetlaw Local Development Framework states that permission will only be granted for residential development that is of no detriment to highway safety. Similar advice is contained in paragraph 109 of Part 9 of the National Planning Policy Framework, which states that development should be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

The submitted Transport Statement demonstrates that the traffic generated by the development of 170 dwellings in combination with other planned major development in Retford would cumulatively have a significant impact upon the surrounding road network especially at the Tiln Lane / Moorgate junction that would operate over capacity should this development be approved.

The Department for Transport National Travel Survey 2018 sets out the number of trips made by car per household on average in 2018 is 986 resulting in excess of 340,000 car journeys being generated by the site and the committed development of 175 dwellings on Tiln Lane. Tiln Lane serves Carr Hill Primary School and provides an alternative route to Gainsborough avoiding a low bridge. The impact of the development on the Tiln lane / Moorgate junction and the increased volume of traffic using Tiln Lane would result in an unacceptable detriment to highway safety of both motorists and pedestrians.

The vehicular access to the development would be from Bigsby Road and Palmer Road. It is considered that Bigsby Road would not provide a safe and suitable means of access to the site by reason of the carriageway width and unrestricted parking for ,existing residential properties would result in conflict between vehicles travelling in opposite directions.

Accordingly, such development would have an adverse impact on highway safety and conflict with the provisions and aims of Policy DM4 of the Bassetlaw Local Development Framework and Paragraphs 108 and 109 of the NPPF".



1.3.5 The application was subsequently dismissed at Appeal under reference no. APP/A3010/W/20/3265803. The appointed Planning Inspector (Mr A McCormack Bsc (Hons) MRTPI) concluded that:

“From my assessment of the evidence in terms of harm, the appeal scheme in conjunction with traffic generated by other new developments, would result in a severe cumulative impact on traffic levels at key junctions in the local area and on the free flow of traffic on the local highway network generally. This would result in junction capacity at the Tiln Lane/Moorgate junction being exceeded and parts of the local highway network being blocked at busy periods of the day. The additional traffic generated by the scheme would also have a significant unacceptable effect on highway safety on Tiln Lane and on the safe and suitable means of access to the site along Bigsby Road. As such, I have found that the scheme conflicts with Policy DM4 of the CSDMP and Paragraphs 108 and 109 of the Framework. I attach significant weight to the harm identified to both traffic flow and highway safety”.

1.3.6 The above planning context has been considered during the preparation of this report.

1.4 DOCUMENT STRUCTURE

1.4.1 This Transport & Access Appraisal has been produced to assess the Site’s potential for development in relation to access, the suitability of the surrounding highway network and its accessibility by non-car modes.

1.4.2 The document structure is as follows:

- Chapter 2 – describes the Site and the existing highway conditions and assesses the sustainable nature of the Site;
- Chapter 3 – defines the development proposals and access strategy;
- Chapter 4 – summarises the trip generations and traffic impact of the development; and
- Chapter 5 – summarises and concludes the report.



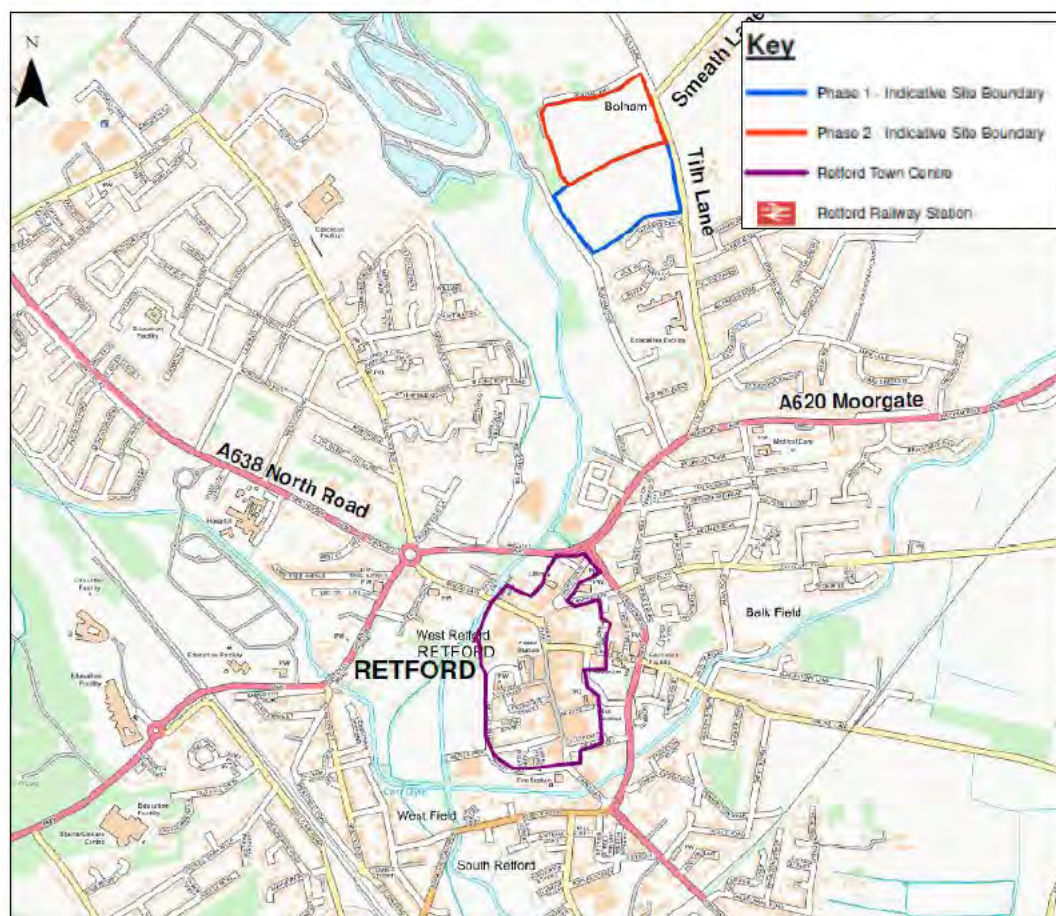
2. Existing Site Conditions and Accessibility

2.1 EXISTING SITE

2.1.1 The Site comprises of two arable fields located on land to the west of Tiln Lane and south of Bolham Way, in Retford.

2.1.2 The location of the Treswell Gardens development (Phase 1) and proposed allocation (Phase 2) are shown on Figure 2, an extract of which is provided within Image 2.1.

Image 2.1 Site Location



2.1.3 The Site is bound by the new Treswell Gardens development to the south, Tiln Lane to the east, Bolham Way to the north and Bolham Manor and a care home to the west.

2.1.4 The Site benefits from a single vehicular access, which is taken from Tiln Lane to the south eastern corner of the Site. This access is for use by agricultural vehicles.

2.2 LOCAL HIGHWAY NETWORK

2.2.1 Tiln Lane is predominantly residential in nature to the south of the Site, however becomes more rural on the approach to the Site, with a posted speed limit of 40mph.

2.2.2 Tiln Lane meets Smeath Lane approximately mid-way along its frontage. Tiln Lane continues to the north toward Tiln Farm, forming the minor arm of its junction with Smeath Lane. There are advanced warning signs notifying road users of the junction and the bend on both the northbound



and westbound approaches and there are also chevron signs and 'slow' markings on the carriageway on both approaches.

2.2.3 Combined, Tiln Lane and Smeath Lane provide a route between Retford and the village of Clarborough, and offer an alternative route to the A620, which has a height restriction due to the bridge under the railway line to the east.

2.2.4 To the south of the Site, Tiln Lane meets the A620 Moorgate. In this location, the A620 forms part of a bypass around the northern part of Retford Town Centre. At the junction, good levels of visibility are afforded along the A620 in both directions from Tiln Lane due to the location of the side arm on the outside of a bend and presence of wide footways/build outs.

2.2.5 Directly east of this junction, there is a sign confirming that there is a height limit along the A620 further east. As a result, Tiln Lane is signposted as an alternative route to Gainsborough, avoiding the low bridge.

2.2.6 To the west, the A620 joins the A638 Arlington Way at a traffic signal controlled junction. The A638 Arlington Way forms the main route around the eastern side of Retford Town Centre. Further west, the A620 joins the A638 North Road, A620 Hospital Road, Hallcroft Road and Bridgette at a five arm roundabout. In this location, the A620(S) arm forms the western bypass around Retford Town Centre.

2.3 PUBLIC RIGHTS OF WAY

2.3.1 There are no public rights of way within or abutting the Site. Public footpath (East Retford FP21) is located to the east of the Site and runs between Tiln Lane and Smeath Lane over a distance of 0.5km.

2.3.2 Public footpath East Retford FP20 is located to the west of the Site and runs between Fallby Close and Bridgegate alongside the River Idle over a distance of approximately 1.1km.

2.3.3 A footpath link to Bolham Lane has been secured as part of the Linden Homes development to provide access to footpath FP20, which provides a traffic free route to Retford Town Centre.

2.4 ACCESSIBILITY ON FOOT

2.4.1 It is generally considered that an acceptable maximum walking distance from home to a place of work is 2km. The CIHT document 'Guidelines for Providing for Journeys on Foot' recommends various thresholds for desired, acceptable and preferred maximum distances to various services as shown in Table 2.1.

Table 2.1 Accessibility by Foot

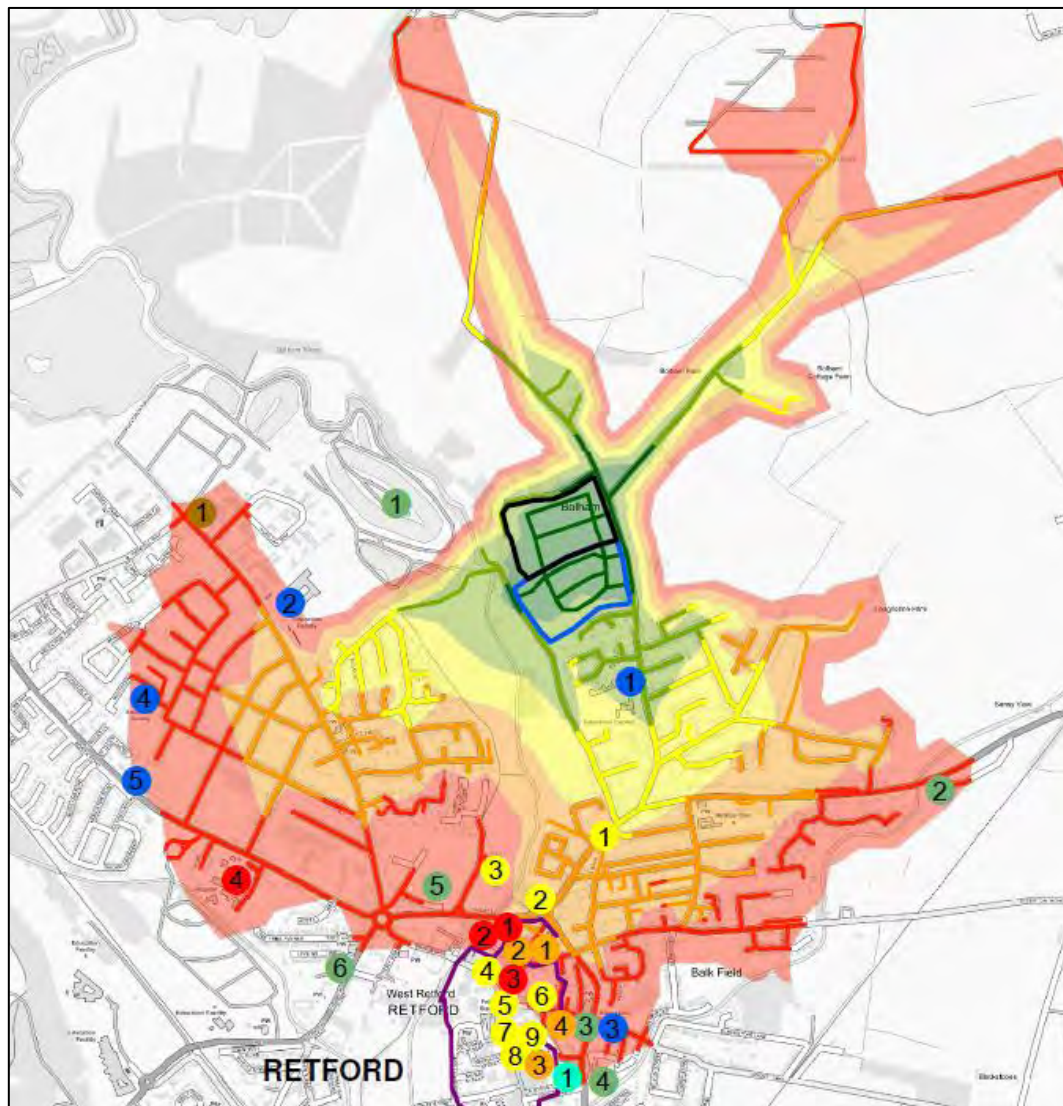
	Town Centres (m)	School/Work (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1,000	800
Preferred Maximum	800	2,000	1,200

Source – Table 3.2 'Guidelines for Providing for Journeys on Foot' published by CIHT

2.4.2 Using GIS Network Analyst software, typical walk times (up to 25 mins equating to 2km) have been plotted from the centre of the proposed development which are shown on Figure 3. An extract of Figure 3 is provided as Image 2.2.



Image 2.2 Pedestrian Accessibility



2.4.3 The following key facilities can be accessed on foot:

- The existing children's play area to the north is within a 5 minute walk;
- A proposed children's play area within the Site is within a 5 minute walk;
- Bus stops along Tiln Lane are within a 10 minute walk;
- Carr Hill Primary School is well within a 10 minute walk from the Site;
- A local convenience store is less than 15 minutes walk from the Site.
- The Elizabethan Academy can be walked to within 20 to 25 minutes from the Site;
- Retail and employment opportunities within Retford Town centre can be walked to in 25 minutes; and

2.4.4 The Site is within walking distance of local public transport facilities, retail, employment, health and education facilities. It is therefore concluded that the Site is accessible on foot.



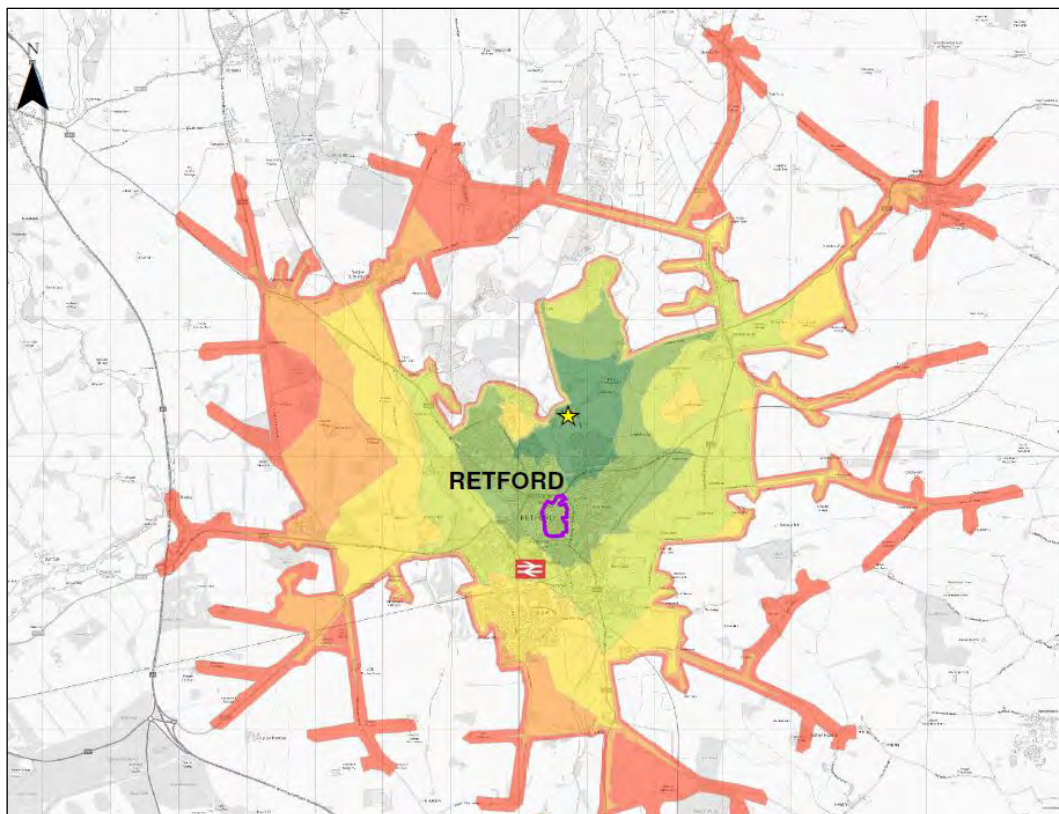
2.5 ACCESSIBILITY BY CYCLE

2.5.1 An acceptable and comfortable distance for general cycling trips is considered to be up to 5km, as referred to in Local Transport Note 2/08 (published by the DfT). However, the same guidance also refers to commuting cycle trips up to 8km.

2.5.2 Whilst LTN 1/20, Cycle Infrastructure Design published in July 2020, has replaced LTN 2/08, LTN 1/20 does not contain definitive recommended maximum cycling distances and therefore there is no reason to suggest that these distances are not still applicable.

2.5.3 Figure 4 illustrates an 8km (30 minute) cycle distance produced using Network Analyst software. An extract of Figure 4 is shown in Image 2.3.

Image 2.3 Cycle Accessibility



2.5.4 From the Site, an 8km catchment area encompasses the whole of Retford Town Centre and all surrounding villages.

2.5.5 Retford Town centre is within a 10 minute cycle journey and Retford Railway Station is within a 15 minute cycle journey.



2.6 ACCESSIBILITY BY PUBLIC TRANSPORT

2.6.1 The closest bus services to the Site are located on Tiln Lane, 650m from the centre of the Site. The stop has timetable information and a flag.

2.6.2 A summary of the existing services within the vicinity of the Site can be found in Table 2.2.

Table 2.2 Bus Service Summary

Service	Route	Days of Operation	Frequency
123	Retford Circular	Monday – Friday	3 per day (Thursday only)
		Saturday	3 per day
		Sunday	-

2.6.3 The Retford Circular bus service also allows residents to be able to interchange with further services in Retford, via a connection at the Bus Station.

2.6.4 As part of the adjacent Treswell Gardens development the internal road layout has been designed to accommodate bus penetration via a loop road. A contribution of £143,200,00 was also provided toward the provision of improved public transport.

2.6.5 As the proposed allocation is within 400m of the loop system within Treswell Gardens, the development offers the potential to provide a further proportionate contribution to either extend or increase the frequency of services and provide improved bus service provision in the local area.

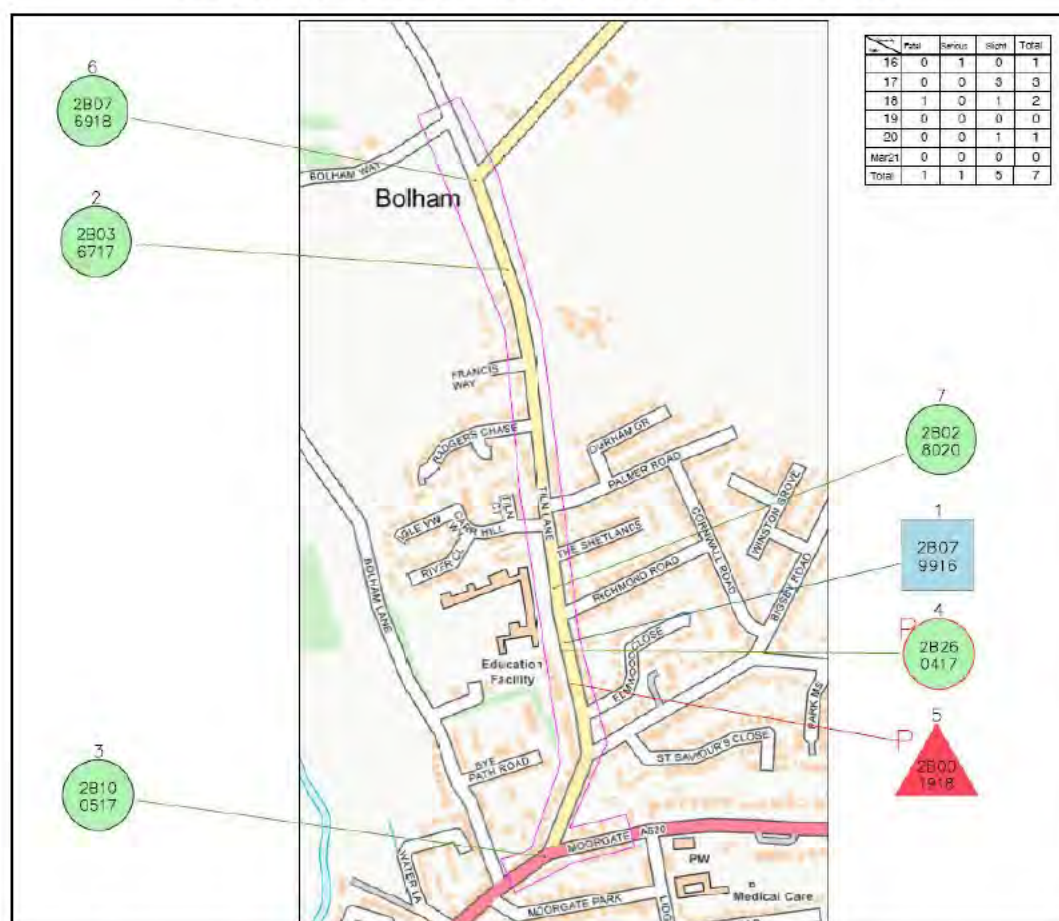
2.6.6 In summary it is concluded that the proposed development Site provides appropriate accessibility by foot, cycle and public transport and as such is in a sustainable location.



2.7 PERSONAL INJURY COLLISION DATA

2.7.1 Personal injury collision data has been obtained for the highway network in the vicinity of the Site for the five-year period between 31st March 2016 and 31st March 2021. The study area, which is highlighted on VIA drawing number DR4670 contained at Appendix A, includes Tiln Lane between, and including, its junctions with Bolham Way and the A620 Moorgate. An extract of the collision plot diagram contained at Appendix A is shown at Image 2.4.

Image 2.4 Collision Study Area (VIA drawing number DR4670)



2.7.2 Within the assessment period a total of 7 collisions were recorded, five of which were classed as slight in severity, with one serious and one fatal collision.

2.7.3 Full details of the collisions are contained at Appendix A and a summary is provided within Tables 2.3 and 2.4.

Table 2.3 Personal Injury Collision Analysis – Severity

Severity	No of accidents	Percentage
Slight	5	70%
Serious	1	15%
Fatal	1	15%
Total	7	100%



Table 2.4 Personal Injury Collision Analysis – Severity by Year

Severity	2016	2017	2018	2019	2020	Total
Slight	0	3	1	0	1	5
Serious	1	0	0	0	0	1
Fatal	0	0	1	0	0	1
Total	1	3	2	0	1	7

2.7.4 A full assessment has been carried out of the circumstances behind each collision that has occurred in order to ascertain whether there are any underlying contributing factors relating to junction design / layout as set out in Table 2.5.

Table 2.5 Study Area - Personal Injury Collision Assessment

Collision Ref	Date / Time	Severity	Vulnerable Road User	Location	Details
2B079916	16/03/2016 18:53	Serious	Pedal Cycle	Tiln Lane (approx. 26m south of Tiln Lane/Richmond Road Junction)	Car collides with cyclist while both are traveling northbound along Tiln Lane. Cyclist sustains serious injuries.
2B036717	25/02/2017 12:50	Slight	-	Tiln Lane (approx. 114m south of Smeath Lane)	Car collides with on-coming van when turning right into farm access. Slight injuries sustained by both drivers.
2B100517	10/06/21 18:50	Slight	Motorcycle	A620 Moorgate/Tiln Lane Junction	Car collides with motorcyclist when turning right out of Tiln Lane. Motorcyclist sustains slight injuries.
2B260417	01/12/2017 15:45	Slight	Pedestrian	Tiln Lane (approx. 36m south of Tiln Lane/Richmond Road Junction)	Car collides with a pedestrian (adult collecting pupil) when reversing out of private drive onto Tiln Lane. Pedestrian sustains slight injuries.
2B001918	15/01/2018 15:47	Fatal	Pedestrian	Tiln Lane (Approx. 35m north of Tiln Lane/Elmwood Close Junction)	A child of school age was fatally injured by a car reversing on the footway which had been taking a pupil to/from school.
2B076918	09/03/2018 18:23	Slight	-	Tiln Lane/Smeath Road junction	Head on collision between two cars traveling in opposite directions around bend which forms part of the Tiln Lane/Smeath Road Junction. Collision results in a slight injuries.
2B028020	14/02/20 15:30	Slight	-	Tiln Lane (approx. 50m south of Tiln Lane/The Shetlands Junction)	Van collides with 2 un-lit, parked vehicles along Tiln Lane. Initial collision causes parked car to collide with additional vehicle traveling northbound along Tiln Lane. Driver of van sustains slight injuries.

2.7.5 A summary of the assessment can be found below:

- Total of 7 collisions over 5 years;



- Average of 1.4 collisions per year;
- 70% slight accidents;
- 1 serious collision, which involved a cyclist was recorded; and
- 2 pedestrian collisions were recorded, one of which involved a child fatality.

2.7.6 Following an assessment of the collision records, no collision clusters or trends have been identified within the study area, however a fatal collision involving a child has been recorded in the vicinity of the school, which involved a vehicle reversing on the footway. A similar collision was recorded with a vehicle reversing out of a private drive into an adult taking a pupil to school.



3. Development Proposals & Access Strategy

3.1 INTRODUCTION

3.1.1 This section of the report provides details of the proposed development including the proposed access arrangements.

3.2 DEVELOPMENT PROPOSALS

3.2.1 The development proposals can be summarised as follows:

- Up to circa 120 residential dwellings; and
- Associated access, parking, landscaping and infrastructure.

3.2.2 An indicative Masterplan is provided at Appendix B, an extract of which is provided within Image 3.1.

Image 3.1 Indicative Site Masterplan



3.2.3 The Masterplan identifies a potential pedestrian connection to the north (subject to land ownership), on to Bolham Way to allow a direct access to the playing fields. Recreational pathways and a play area are also included within the proposed Masterplan therefore allowing the residents to be able to exercise without the need for a vehicular journey.



3.3 PROPOSED ACCESS STRATEGY

3.3.1 The Masterplan shows how the two spurs from the Treswell Gardens development will be extended into the development site, allowing the boundary with Tiln Lane which includes existing hedgerows and trees to be maintained.

3.3.2 The Treswell Gardens development is under the control of Vistry Group (Linden Homes) and therefore have ownership/control of the land necessary to connect to the public highway (Tiln Lane).

3.3.3 The Treswell Gardens development benefits from two points of access onto Tiln Lane as shown on drawing E3861/705/C contained at Appendix C.

3.3.4 Both junctions indicate visibility splays of 2.4m x 120m at their junctions with Tiln Lane. This is in accordance with the 40mph posted speed limit. 10m kerb radii are provided at both junctions. The geometry of the approved junctions are suitable to accommodate the proposed allocation.

3.3.5 The development proposals for the Treswell Gardens scheme also included a 3m wide shared pedestrian and cycle path along the Tiln Lane frontage of the development, which extend into the development.

3.4 PROPOSED TRAFFIC CALMING ENHANCEMENT SCHEME

3.4.1 Tiln Lane extends north from A620 Moorgate and provides access to a number of residential estates and Car Hill Primary School. Over its initial 700m length, Tiln Lane is subject to a 30mph speed limit and benefits from a number of traffic calming features and traffic regulation orders (TROs). A 20mph zone is provided in the approach to the school, which is in force during school drop off and pick up times.

3.4.2 As explained within Section 1.3, a recent application for residential development at Land North of Bigsby Road was refused in 2018, 2019, and then dismissed at Appeal in 2020. The reason for refusal and Inspectors decision states that the development of 170 dwellings would have a significant unacceptable effect on highway safety along Tiln Lane and references the fatality involving a school child along with incidents associated with the primary school.

3.4.3 Detailed personal injury collision analysis has been provided within Section 2.7 and the drawing contained at Appendix D identifies the locations of the collisions in the vicinity of Carr Hill Primary School. Drawing 21003/IN/01 (Appendix D) also illustrates the current highway layout, including details of existing collisions recorded, traffic calming features and TROs along Tiln Lane.

3.4.4 In light of the concerns raised a comprehensive review of the existing traffic calming along Tiln Lane has been undertaken and a potential enhancement scheme is shown on Drawing 21003/GA/01, contained at Appendix E.

3.4.5 The scheme aims to reduce vehicle speeds along Tiln lane and to provide formal crossing points along key desire lines to/from Carr Hill Primary School. The main improvements include:

- Provision of 2no. raised table pedestrian crossing points with tactile paving and a level crossing surface;
- Minor amendments to existing bus stop tapers to accommodate the crossings;
- Potential widening of footway connection between school entrance and proposed crossing point to 3m;
- Provision of 3no. slow markings on approach to existing 30/40mph gateway features; and



- Refreshing of existing 30/40mph gateway road markings.

3.4.6 The proposed enhancements are considered to complement and improve the existing traffic calming along this corridor in order to reduce vehicle speeds past the school, whilst also provide improved crossings on key desire lines.

3.4.7 In addition to the above the existing parking restrictions can be reviewed in order to identify whether additional areas would could be protected to minimise or formalise on footway parking.

3.5 PUBLIC TRANSPORT IMPROVEMENTS

3.5.1 It is acknowledged that a £143,200 Public Transport Contribution was made as part of the S106 agreement for the approved Linden Homes development to the south of the Site. As part of the agreement £13,200 is earmarked for the bus stop improvements/new bus stops in the vicinity of the Site, with the remain £130,000 contribution intended to improved public transport provision.

3.5.2 The Linden Homes development layout has also been designed with a view to accommodating a potential bus service, through the provision of a 6m wide spine road and the provision of initial bus stop infrastructure.

3.5.3 A proportionate public transport contribution will be made as part of any forthcoming planning application, in order to further improve and enhance access to public transport.



4. Trip Generation & Impacts

4.1 INTRODUCTION

4.1.1 In order to demonstrate that the approved access arrangements onto Tiln Lane are suitable to accommodate the additional traffic generated by the allocation, a capacity exercise has been undertaken using the agreed methodology associated with the Treswell Gardens applications, as described below.

4.2 TRAFFIC SURVEYS

4.2.1 For consistency with the Treswell Gardens development, the 2014 traffic flows from the approved BWB Transport Assessment (dated 22/04/2014) have been utilised for assessment purposes.

4.2.2 The 2014 traffic flows from this report are shown in Figures 10 and 11.

4.3 DEVELOPMENT TRAFFIC

4.3.1 The agreed trip rates for the Treswell Gardens development have been utilised to calculate the level of trips generated by a development of 120 dwellings.

4.3.2 Table 4.1 shows the agreed trip rates per dwelling contained within the BWB Transport Assessment.

Table 4.1 Approved Vehicular Trip Rates (BWB TA Table 2)

Time Period	Total Vehicular Trip Rates (per dwelling)		
	Arrivals	Departures	Total
AM Peak 08:00-09:00	0.187	0.440	0.627
PM Peak 17:00-18:00	0.413	0.213	0.626

4.3.3 Table 4.2 shows the level of trips generated by 120 dwellings.

Table 4.2 Proposed Development Traffic Generation

Time Period	Total Vehicular Trips – 120 dwellings		
	Arrivals	Departures	Total
AM Peak 08:00-09:00	22	53	75
PM Peak 17:00-18:00	50	26	76

4.3.4 As can be seen from Table 4.2, the allocation is predicted to generate in the region of 75-76 two-way trips during network peak hours. This equates to just over 1 vehicle per minute on average, which is highly unlikely to be perceived from day to day fluctuations along Tiln Lane.

4.4 TRIP DISTRIBUTION

4.4.1 Given that the trip distribution was agreed with officers at NCC for the development immediately to the south of the proposed Site, for consistency the agreed distribution methodology has been applied.



4.4.2 The approved AM and PM peak residential traffic distribution is shown in Figure 12.

4.4.3 The approved trip generation for the 175 dwellings approved within the Treswell Gardens development are shown in Figures 13 (AM Peak) and Figure 14 (PM Peak).

4.4.4 For the assessment of the additional 120 units, it has been assumed for robustness that all traffic would use the northern access on to Tiln Lane only as a worst case. It may be the case that some traffic will use the southern access for trips to the south, if they are from the western sector of the Site. This approach was also agreed associated with the Treswell Gardens BWB Transport Assessment.

4.4.5 Figures 17 and 18 show the additional traffic generated by 120 dwellings, applying the agreed trip rates and traffic distribution.

4.5 TRAFFIC GROWTH

4.5.1 Traffic growth is based on a combination of proposed future developments, car ownership and changing attitudes in the way people use and have access to their vehicles.

4.5.2 Assuming a build out rate of between 35 and 40 dwellings per year, the proposed development could be completed and occupied within approximately 3-4 years. However, for a robust assessment a design year of 2026 (5 years) has been selected.

4.5.3 The TEMPro v7.2 rates between 2014 and 2026 have been calculated using the Bassetlaw 005 area as summarised below.

- AM Peak Hour 2014-2026 - 1.196; and
- PM Peak Hour 2014-2026 - 1.198.

4.5.4 The future year base flows for 2026 are shown in Figures 15 and 16, which include background traffic growth and the phase 1 Treswell Gardens development.

4.5.5 The development traffic is then added to the 2026 base flows to produce the 2026 design flows as shown on Figure 19 and 20.

4.6 OPERATIONAL ASSESSMENT

4.6.1 This approved northern access of the Treswell Gardens development on to Tiln Lane takes the form of a priority junction. This junction has been modelled using the PICADY function within JUNCTIONS 9 software using the agreed geometrical parameters and the 2026 design year flows. The results of the assessment are shown in Table 4.3 Full model outputs are contained in Appendix D.

Table 4.3 Tiln Lane/Site Access 2026 Design

Movement/Arm	AM Peak (07:45-08:45)			PM Peak (16:30-17:30)		
	RFC	Delay (s)	Q (PCU)	RFC	Delay (s)	Q (PCU)
Site Access LT	0.02	8	0.0	0.01	7	0.0
Site Access RT	0.40	15	0.7	0.20	11	0.2
Tiln Lane	0.01	5	0.0	0.02	5	0.0

4.6.2 A Ratio of Flow to Capacity (RFC) value below 0.85 indicates that a junction or arm operates within its predicted capacity. An RFC value between 0.85 and 1.00 indicates that there may be



occasions during the period modelled when queues will develop and delays will occur. An RFC value greater than 1.00 indicates that the junction or arm operates beyond its theoretical capacity.

4.6.3 As can be seen from Table 4.3, the junction operates with signification spare capacity at a design year of 2026 incorporating traffic growth, the Treswell Gardens development and 120 proposed dwellings.

4.6.4 As discussed above, this is a robust assessment assuming that all additional development (from both Treswell Gardens and the proposed allocation) utilise only the northern access onto Tiln Lane.

4.6.5 It can therefore be concluded that the approved accesses onto Tiln Lane are suitable to accommodate the proposed allocation.

4.7 IMPACT ON THE LOCAL AND STRATEGIC ROAD NETWORK

4.7.1 Based on the scale of the development any forthcoming planning application would be supported by a Transport Assessment (TA) which will include a detailed capacity analysis of the local highway network, as well as a Travel Plan (TP) in order to minimise single occupancy vehicle trips.

4.7.2 The TA and TP will highlight any potential mitigation measures required in order to reduce vehicle trips and to ensure the development can be adequately accommodated on the local highway network.

4.7.3 Signalisation of the Tiln Lane/A260 Moorgate junction is secured by condition associated with the Linden Homes development. The proposals are understood to be well advanced and should be implemented following the completion of the 110th dwellings.

4.7.4 As described within Section 1.3, at Appeal the Inspector referenced junction capacity issues at both the A620 Moorgate/Tiln Lane and A610 Amcott Way/A638 Arlington Way junctions. As such any forthcoming application will be required to accurately model the interaction between these junction and either identify proportionate mitigation or identify a suitable contribution towards capacity improvements based on the cumulative impact of developments within Retford.



5. Summary and Conclusions

5.1.1 Optima Highways have been appointed by the Vistry Group to prepare this Transport & Access Appraisal in support of their proposed residential allocation on land off Tiln Lane, Retford.

5.1.2 The Site has an estimated capacity of some 120 dwellings.

5.1.3 The Site is located directly to the north of an existing residential development that is presently being built out known as Treswell Gardens.

5.1.4 This report has provided a commentary on the existing Site and its conditions. It has demonstrated that with that the Site is in a sustainable location that is accessible with appropriate public transport and pedestrian links. This provision provides future residents with opportunities to travel via alternative modes of transport and minimise trips by the private car.

5.1.5 The development provides an opportunity to secure further funding for public transport improvements in the local area, in addition to the funding already secured for Treswell Gardens.

5.1.6 A review of the personal injury collision data has been undertaken for the study area, which has identified a fatal collision in the vicinity of the primary school.

5.1.7 A road safety enhancement scheme has been identified in order to reduce vehicle speeds and provide formal crossings along Tiln Lane. The proposed works are considered to mitigate the impact of the additional trips generated by the proposed allocation.

5.1.8 It has been demonstrated that a safe and efficient access can be achieved via the approved accesses onto Tiln Lane.

5.1.9 The Site access has been modelled in the design year of 2026 incorporating traffic growth and traffic generated by Treswell Gardens, which demonstrates that approved access arrangements are suitable to serve the additional development, with significant spare capacity.

5.1.10 The impact on the local highway network will be considered in detail at the future planning application stage as part of a comprehensive Transport Assessment and Travel Plan. The Transport Assessment will include detailed capacity analysis of the local highway network and identify suitable mitigation.

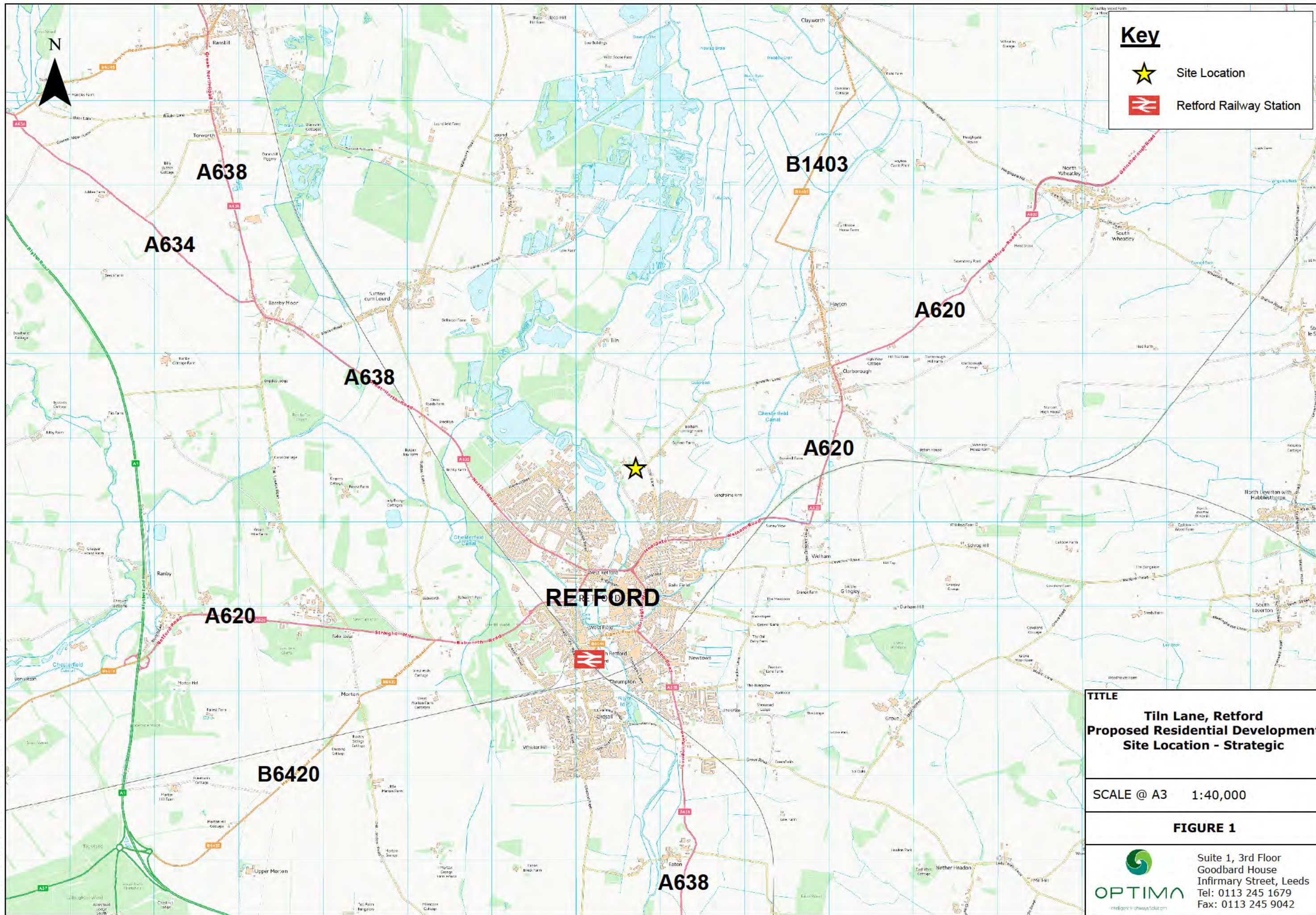
5.1.11 The precise impact of the allocation on the local highway network can only be confirmed following collection of traffic survey data, detailed junction capacity assessment and discussions with Highway Officers at the planning application stage, however based on the modest level of trips generated by the development is it not considered to represent a severe impact on the operation of the local highway network and is of a scale that can be satisfactorily mitigated if required.

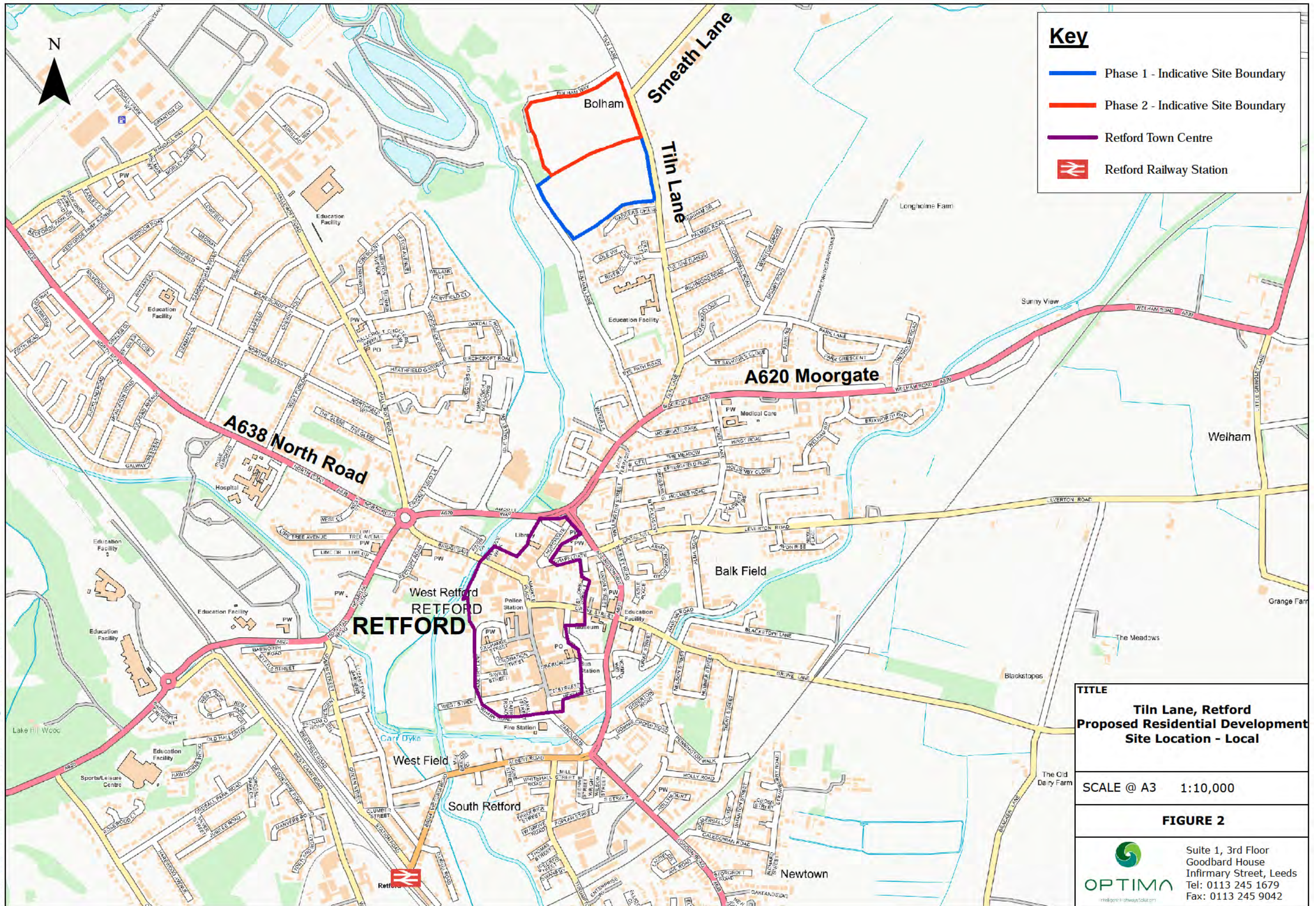
5.1.12 From the work undertaken it is concluded that there are no reasons on highways or transport grounds why the development Site should not be allocated for residential purposes.



Figures







Key

- Phase 1 - Indicative Site Boundary
- Phase 2 - Indicative Site Boundary
- Retford Town Centre

Pedestrian Accessibility

(Walk Speed 4.8kph)

- 0 - 5 Minutes
- 5 - 10 Minutes
- 10 - 15 Minutes
- 15 - 20 Minutes
- 20 - 25 Minutes

Education

- 1 Carr Hill Primary School
- 2 The Elizabethan Academy
- 3 St. Swithums C of E Primary School
- 4 Hallcroft Infant & Nursery School
- 5 Claremont House Nursery School

Retail

- 1 Convenience Store
- 2 Home Bargains Discount Store
- 3 Morrisons Supermarket
- 4 Argos
- 5 Bank
- 6 Takeaway
- 7 Costa Coffee
- 8 Superdrug
- 9 Iceland Food Store

Health

- 1 Riverside Health Centre
- 2 Jhoots Pharmacy
- 3 Opticians
- 4 Retford Hospital

Services & PoW

- 1 St. Swithum's Church
- 2 Library
- 3 Retford Post Office
- 4 Discount Cycle Store

Recreation

- 1 Hallcroft Fishery
- 2 The Hop Pole Pub
- 3 Bassetlaw Museum
- 4 Spa Common
- 5 Cricket Club
- 6 Retford Tennis Club

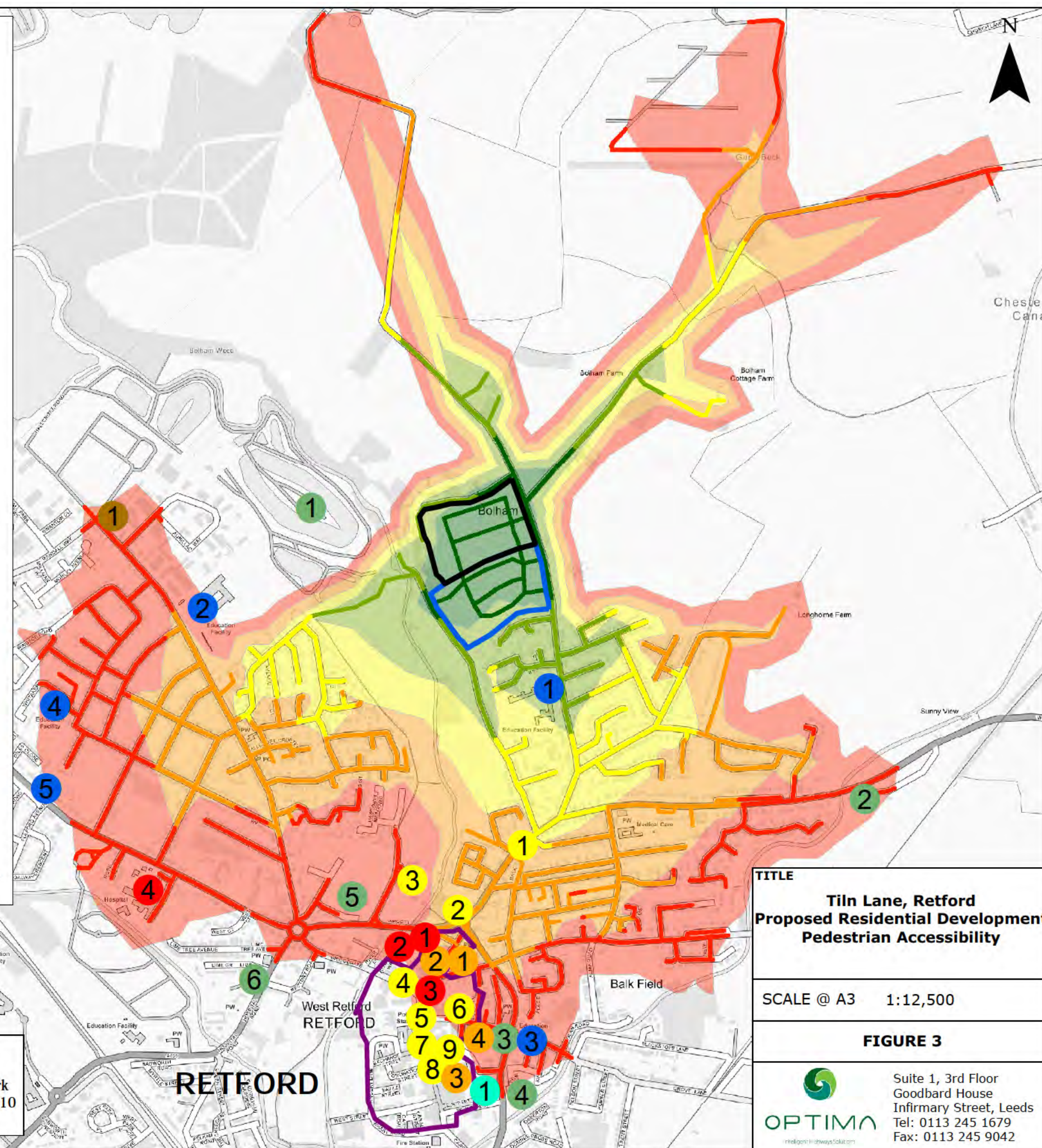
Public Transport

- 1 Retford Bus Station

Employment

- 1 Hallcroft Industrial Estate

*25 mins (2km) = IHT Standard in 'Providing for Journeys on Foot'
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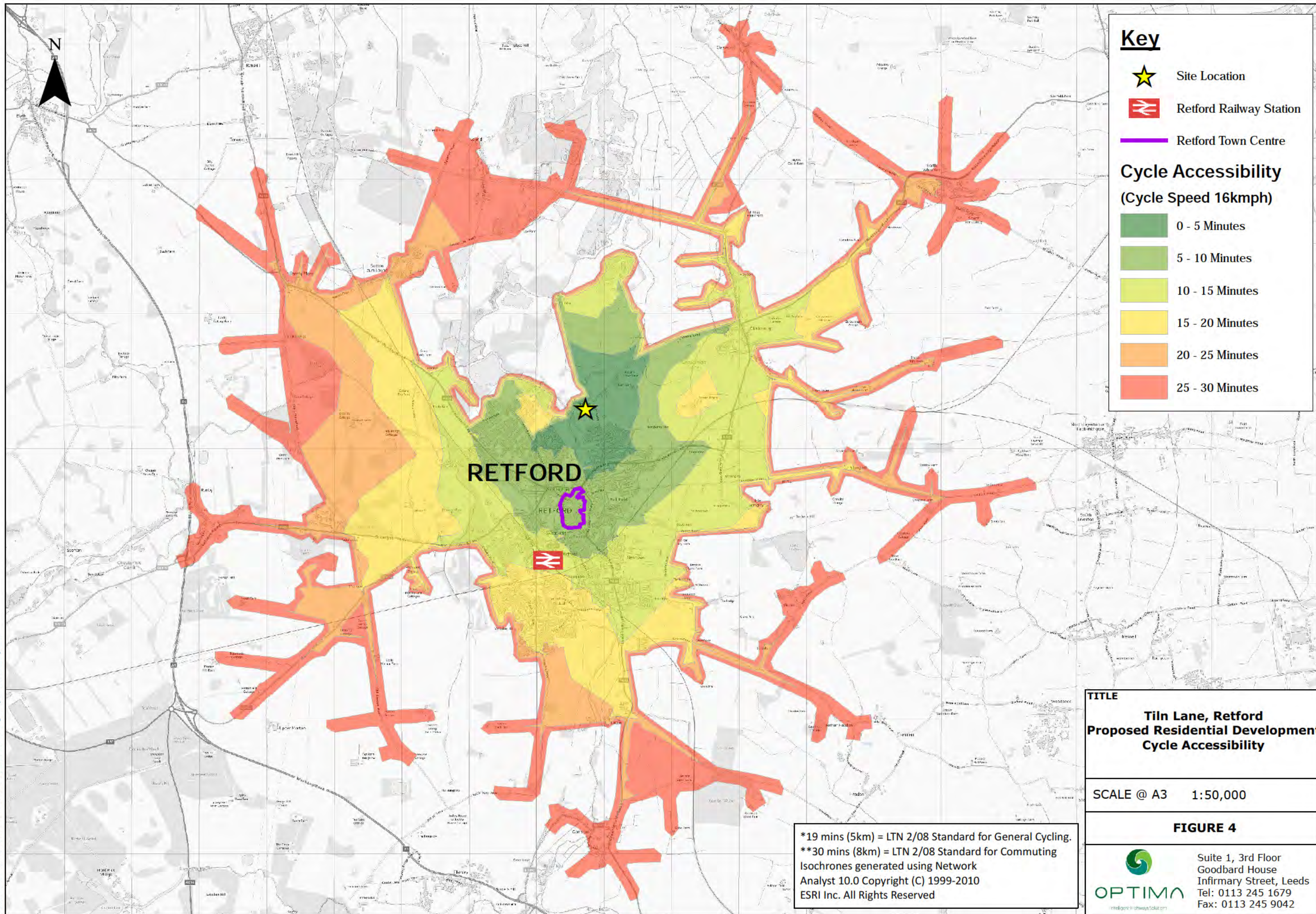


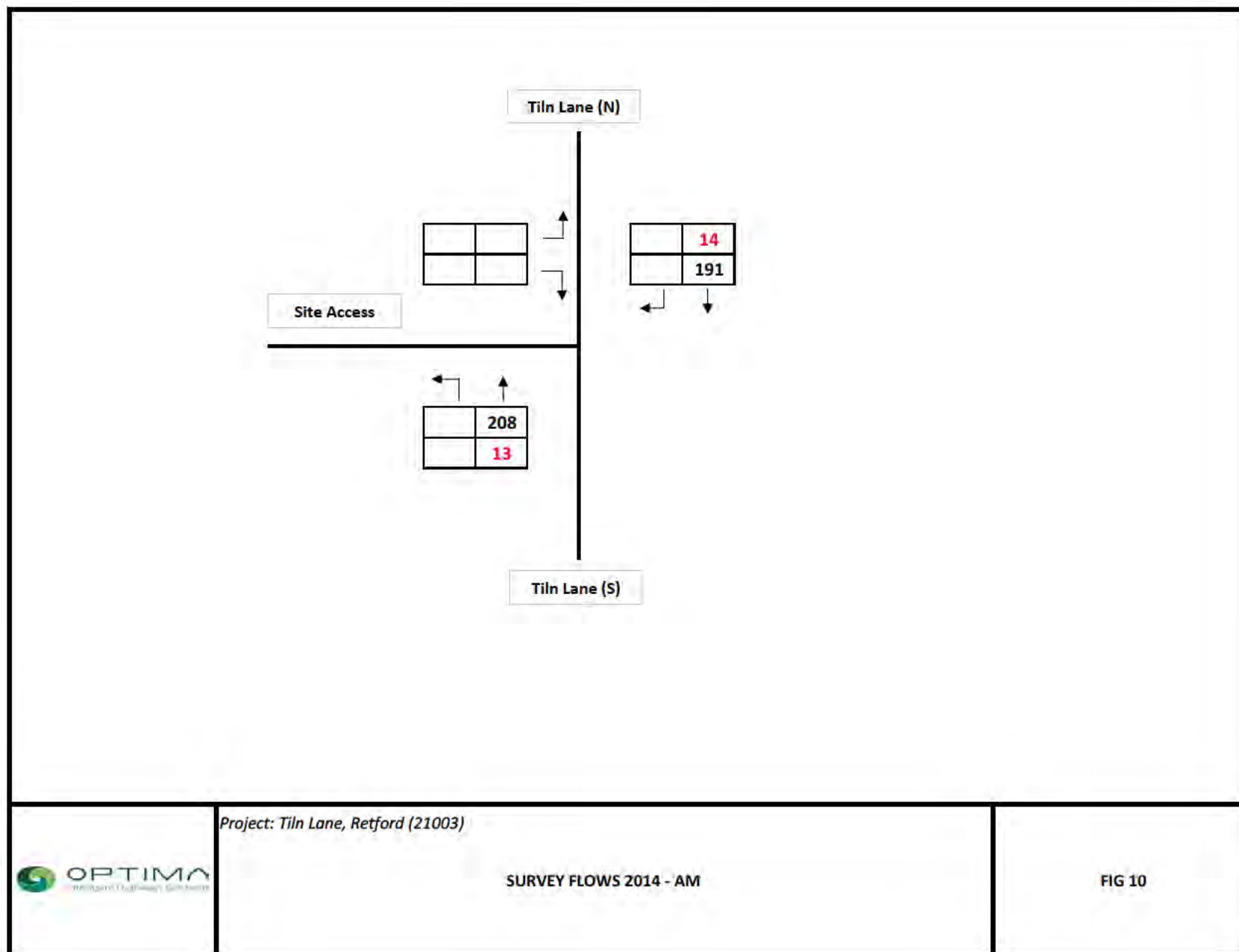
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Proposed Residential Development
Pedestrian Accessibility

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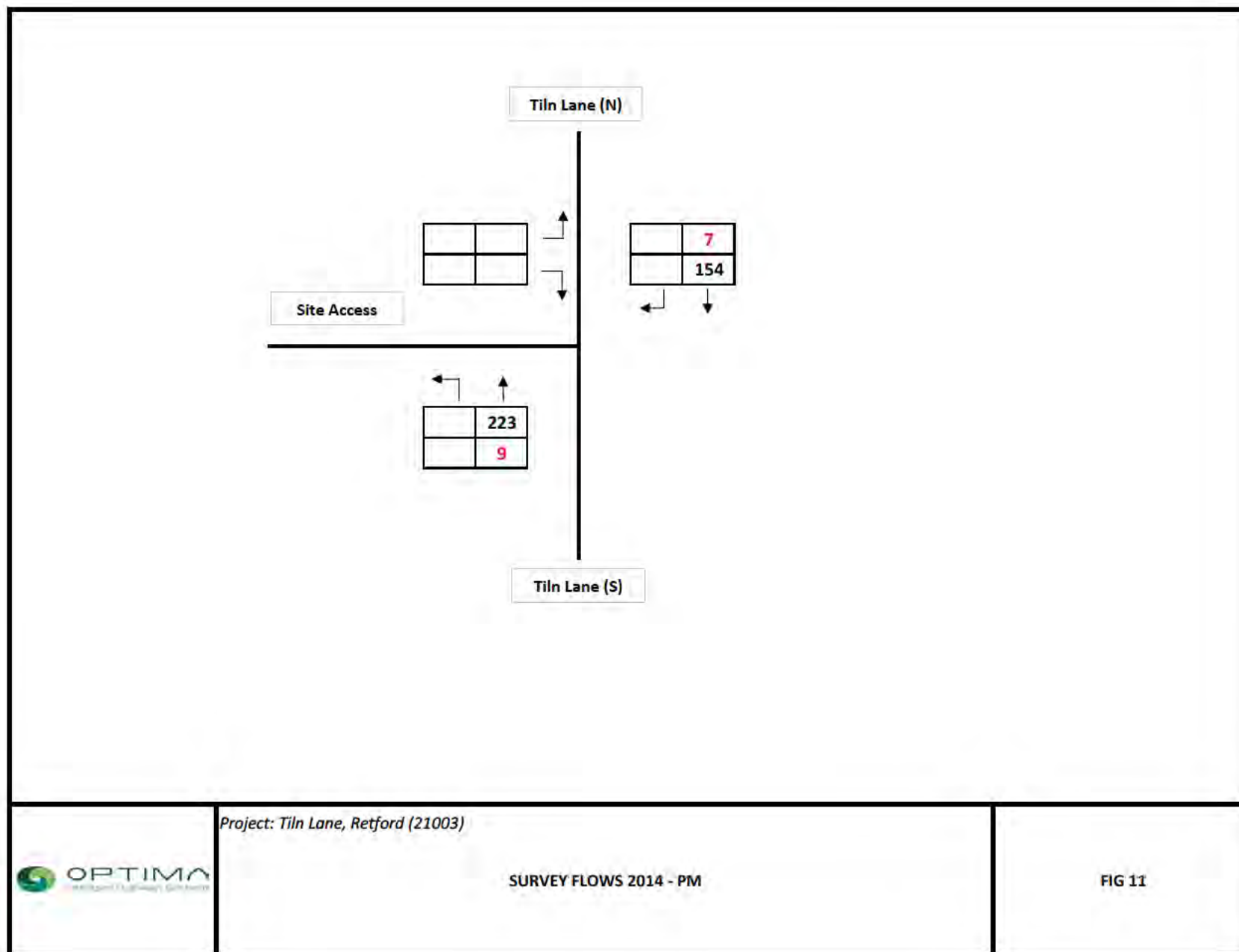
FIGURE 3

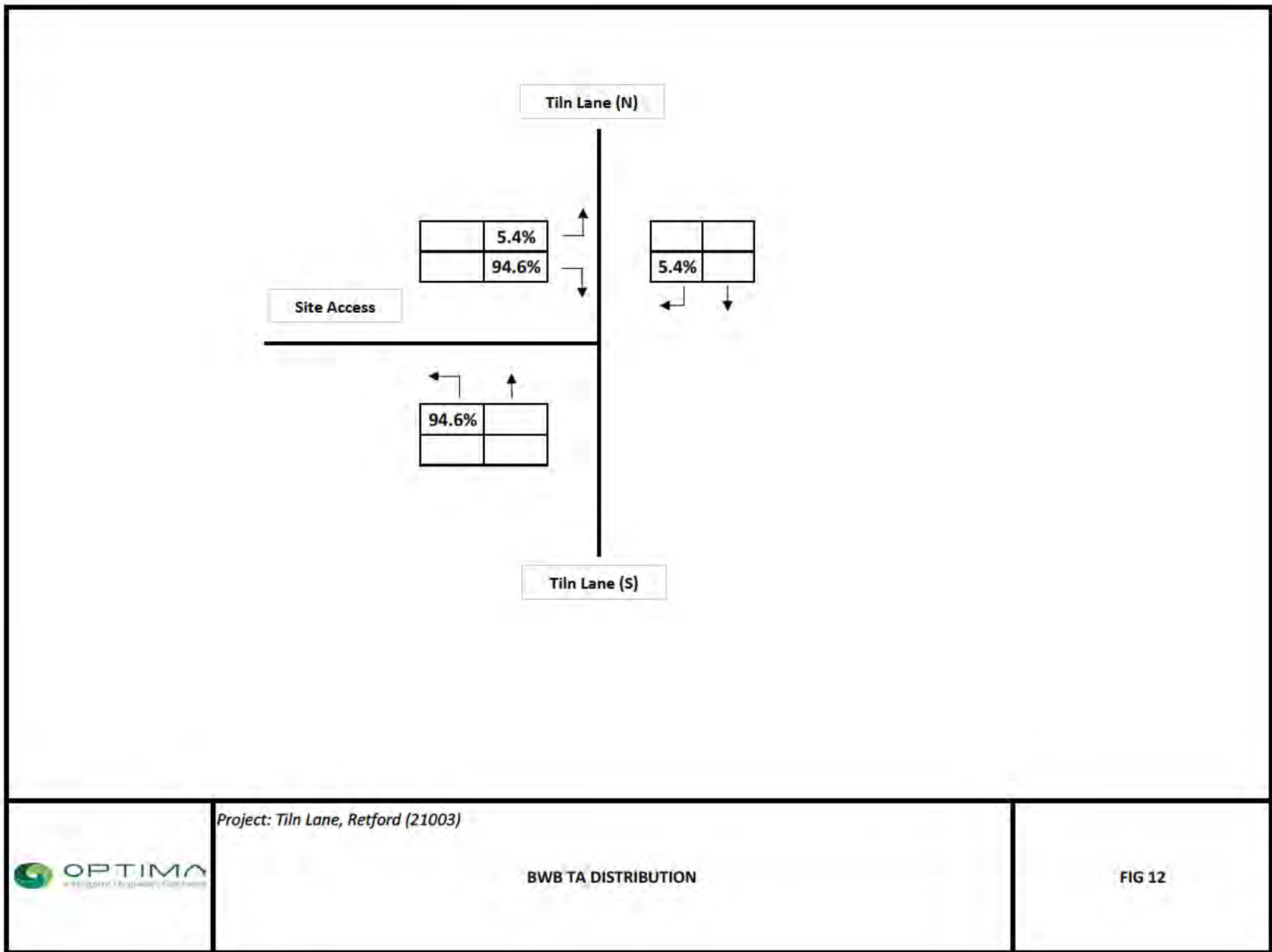
OPTIMA
Suite 1, 3rd Floor
Goodbard House
Infirmary Street, Leeds
Tel: 0113 245 1679
Fax: 0113 245 9042

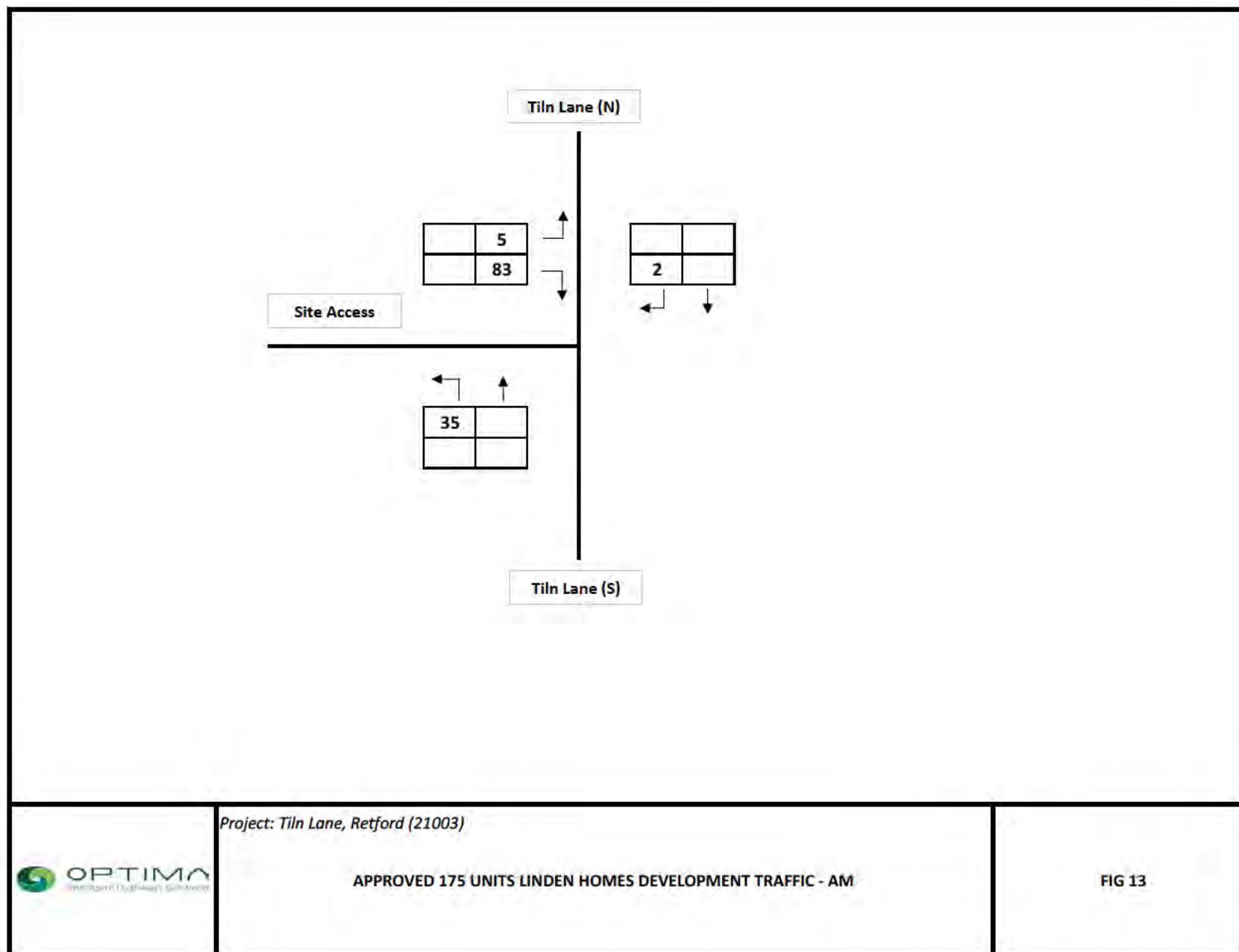


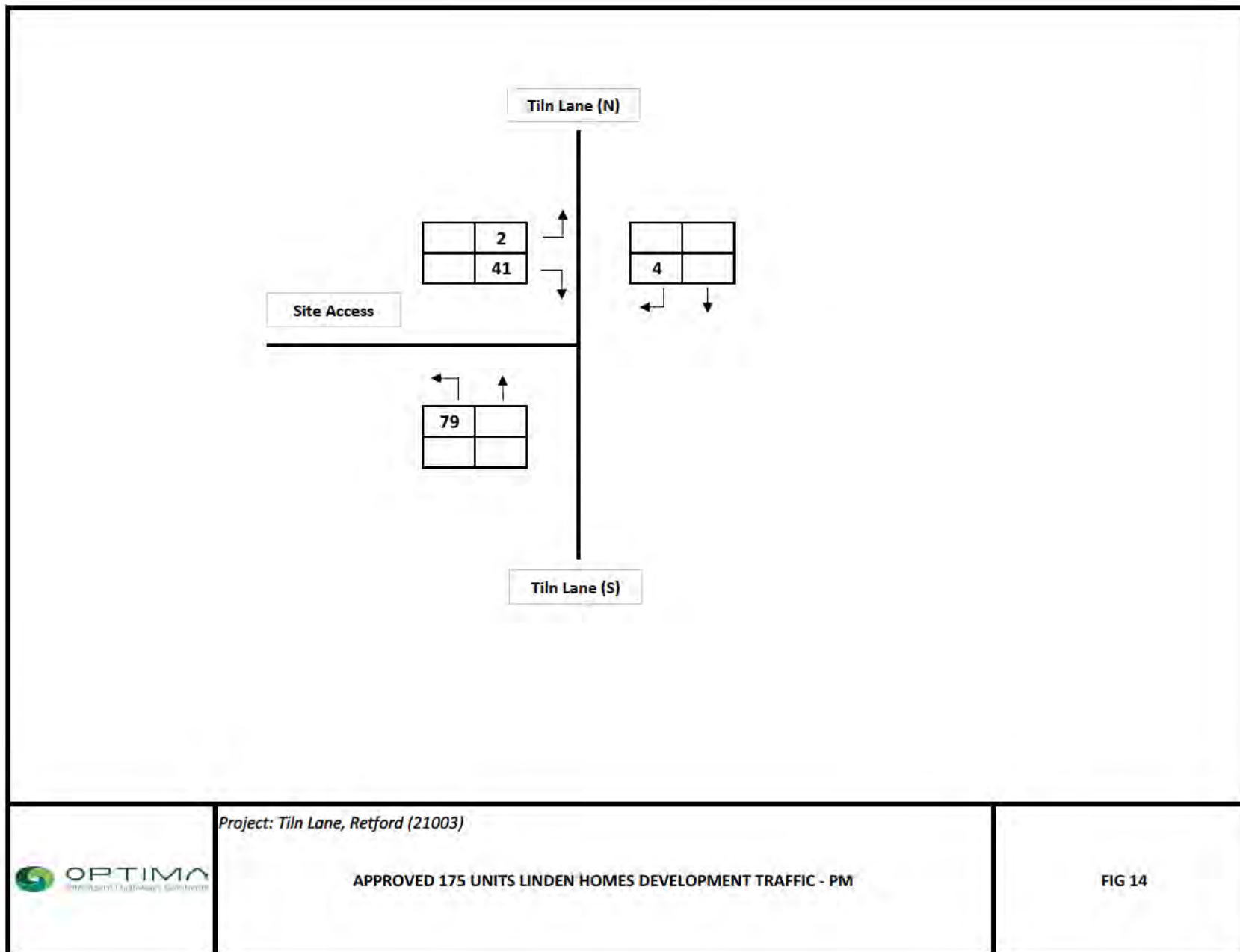


Project: Tiln Lane, Retford (21003)









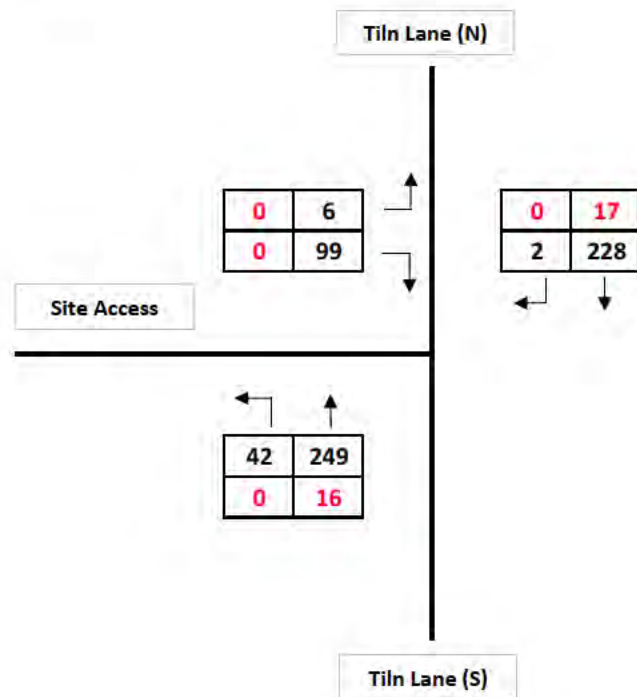
Project: Tiln Lane, Retford (21003)



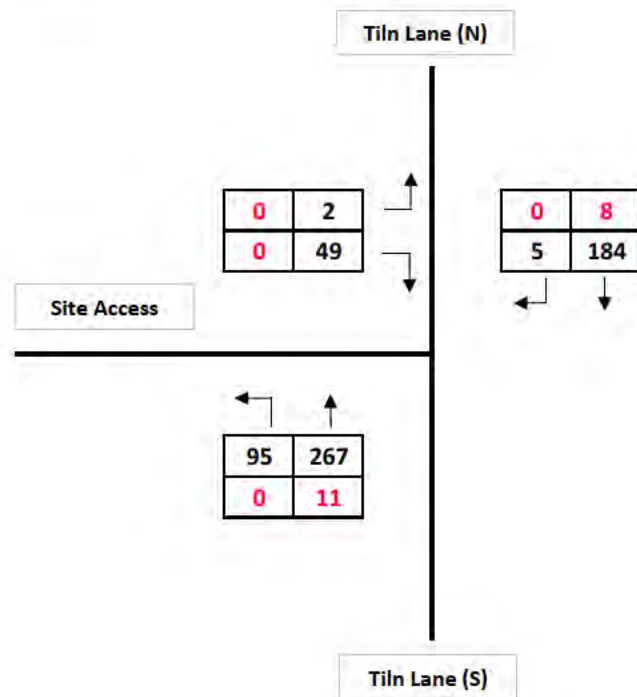
APPROVED 175 UNITS LINDEN HOMES DEVELOPMENT TRAFFIC - PM

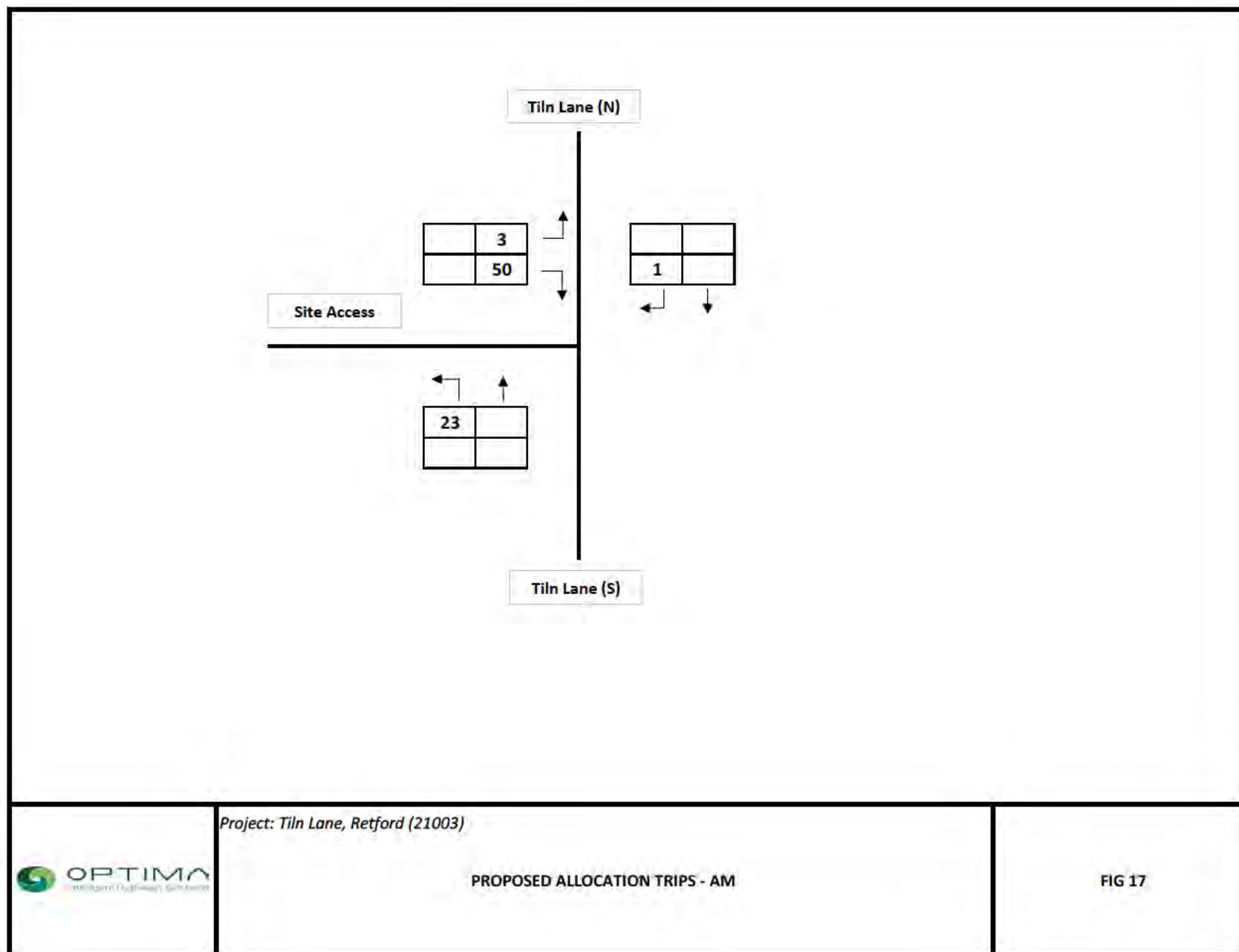
FIG 14

TEMPO GROWTH RATE 1.196

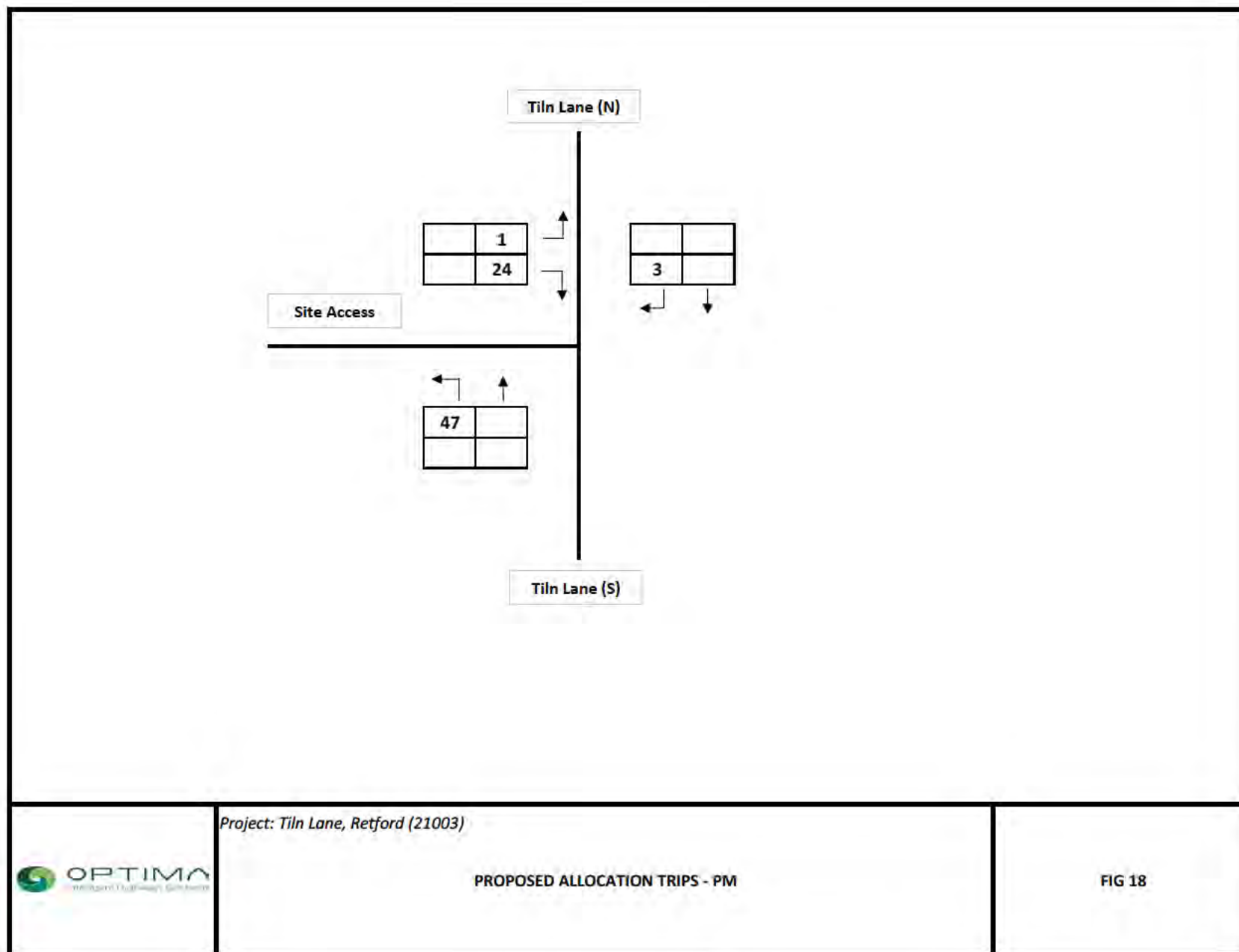


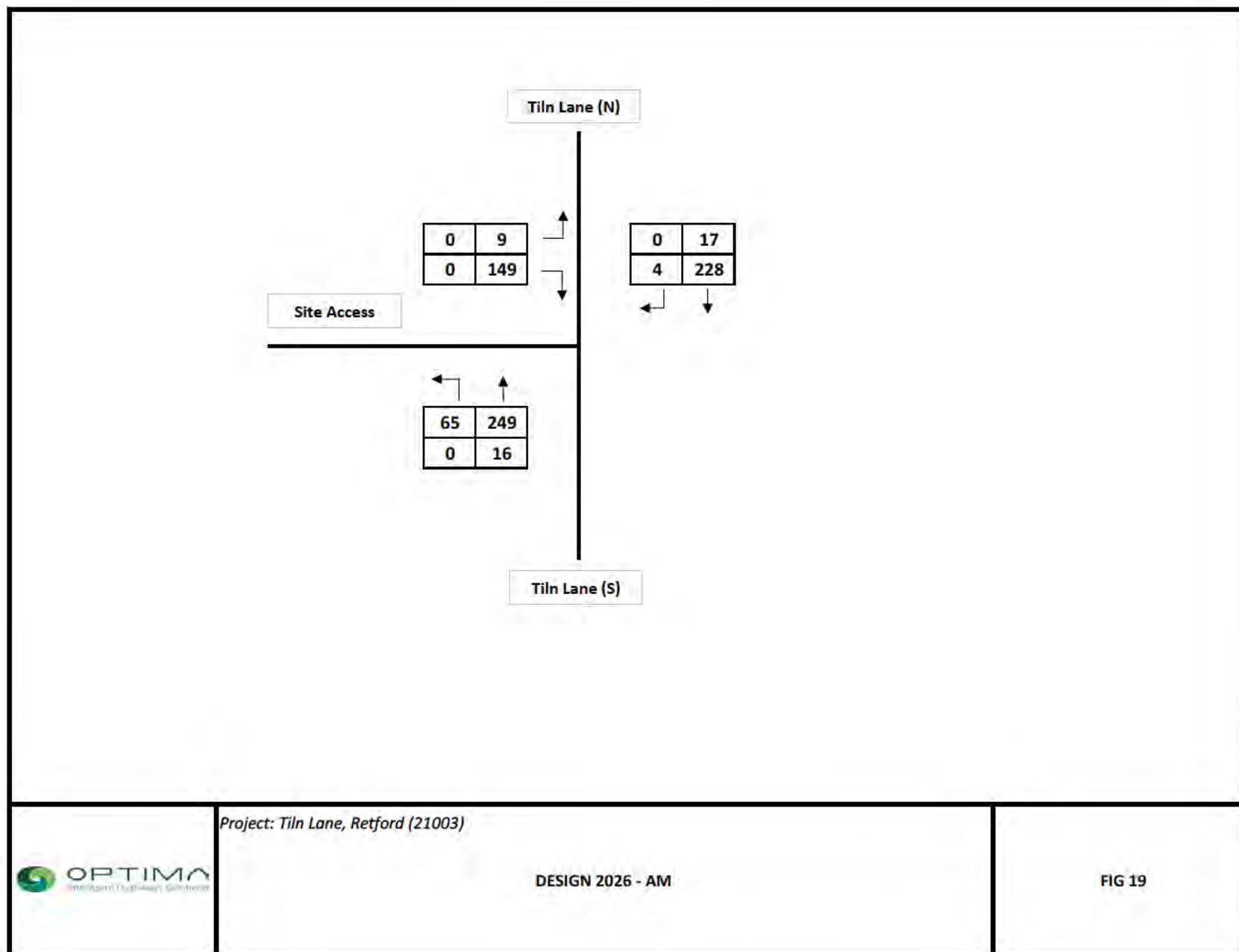
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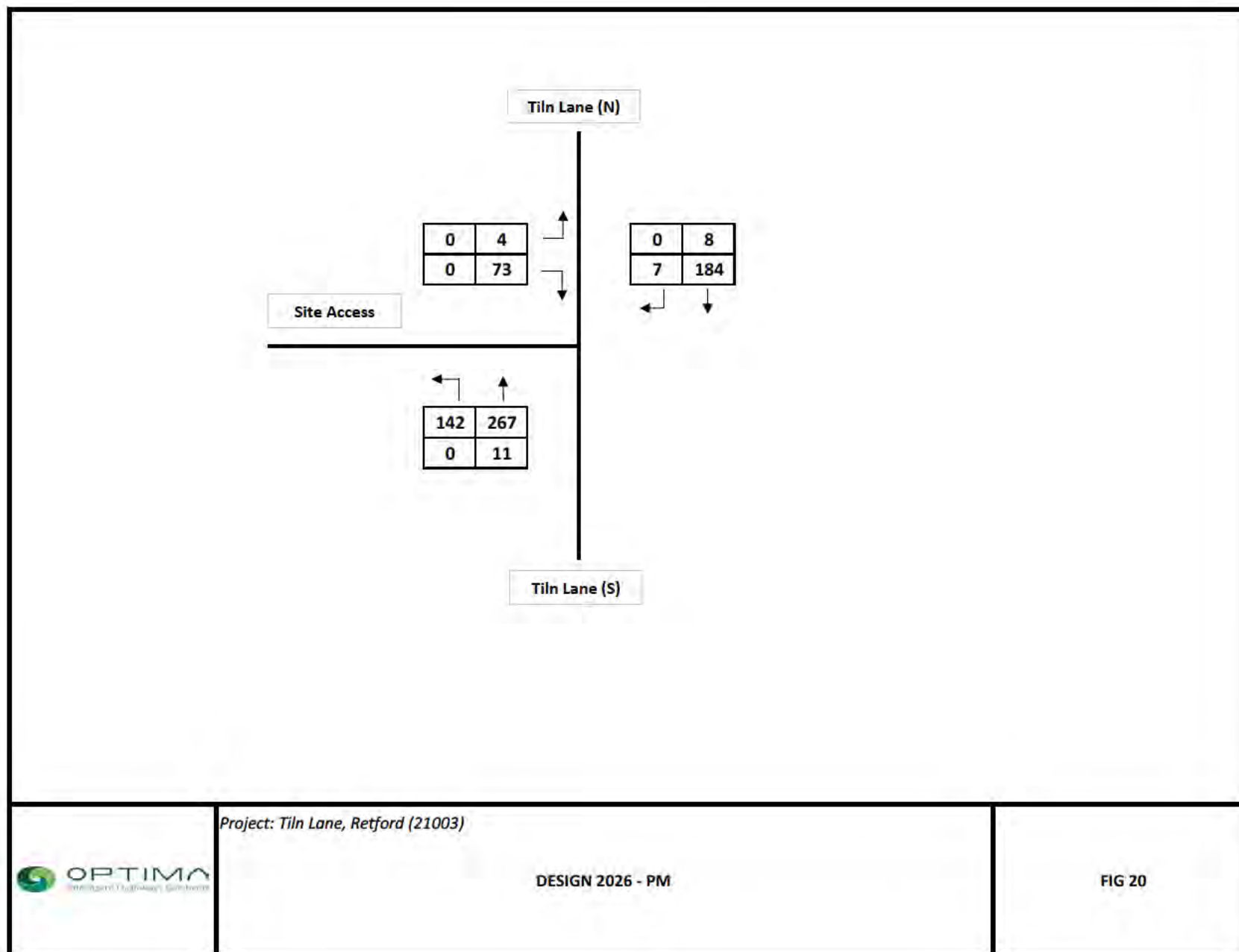


Project: Tiln Lane, Retford (21003)





Project: Tiln Lane, Retford (21003)



Appendices



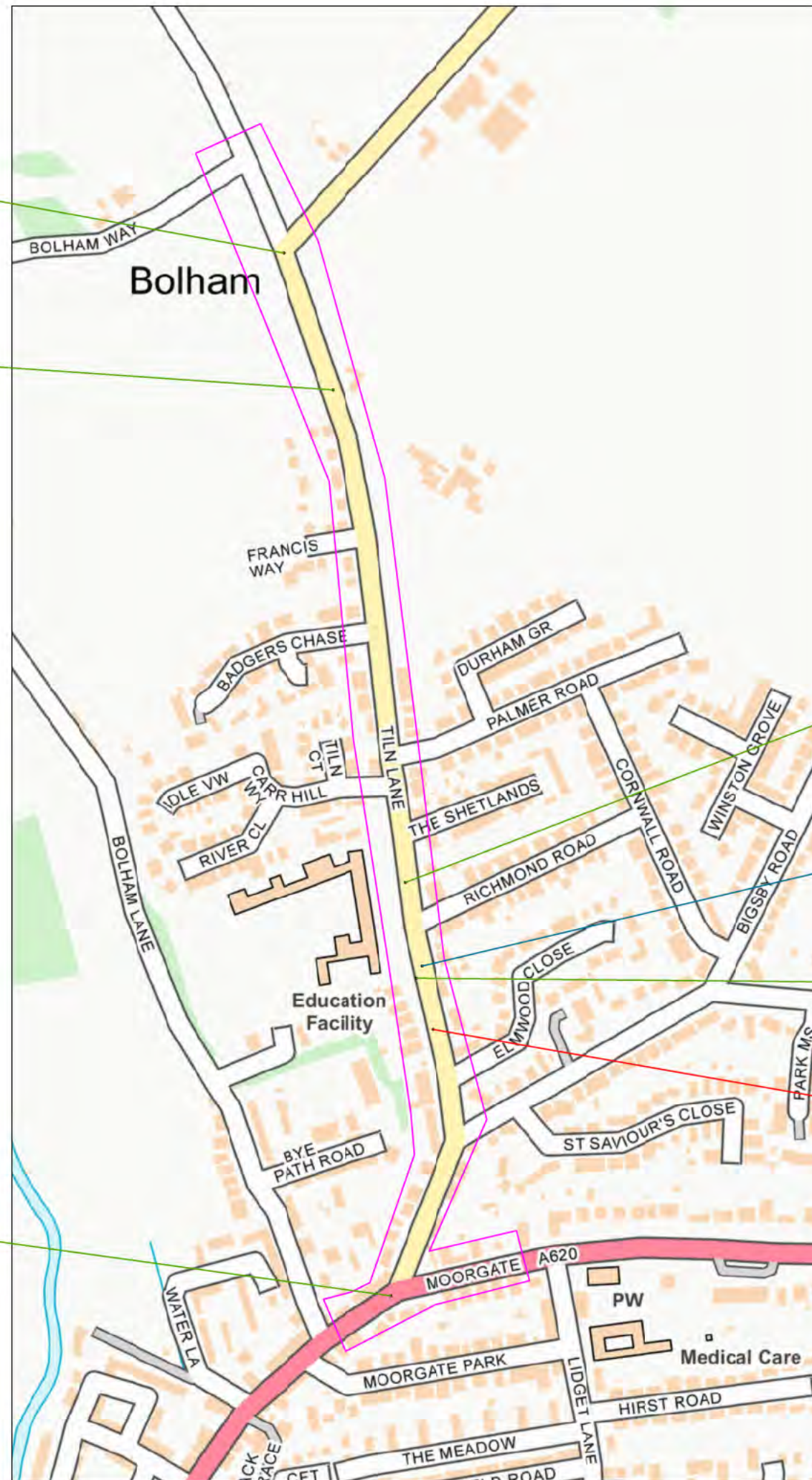
Appendix A Personal Injury Collision Data



6
2B07
6918

2
2B03
6717

3
2B10
0517



Severity Year	Fatal	Serious	Slight	Total
16	0	1	0	1
17	0	0	3	3
18	1	0	1	2
19	0	0	0	0
20	0	0	1	1
Mar21	0	0	0	0
Total	1	1	5	7

Key



Slight



Slight

involving pedestrian



Serious



Fatal

Last two digits of the accident number refers to the year of the accident

Rev	Status	Description	Drawn	Chkd	Auth	Date
Tiln Lane, Retford						
Property No.	Project No. PO/Ref: 21003 DR4670					
Title Collision Severity Plot Period 31-3-16 to 31-3-21 For Optima Highways						
Scale	Drawn	PG	Date	15-7-21		
N.T.S.	Chkd		Date			
	Auth		Traced			
Drawing No.	Rev					
DR4670						
www.viaem.co.uk Tel 01623 873873 Bilthorpe Depot, Bilthorpe Business Park, Bilthorpe, Nottinghamshire NG22 8ST						



Accident Details Report

Tiln Lane Retford - Period 31-3-16 to 31-3-21 DR4670

Total number of reports = **7**

Total number of pages (including this page) = **9**

ROAD TRAFFIC INJURY ACCIDENT RECORDS - DISCLAIMER

These details are a record of the personal injury accidents reported to the Police. Every endeavour is made to ensure the accuracy and completeness of these records, which have been transcribed from the original Police Reports. The data is then entered and held on computer.

Occasions may arise when information from the Police, relevant to a particular accident, may not be available for several months and will therefore not be included.

No. 1	District Bassetlaw	Accident Details	VRUs	Grid Reference 470968 / 382041
SEVERITY SERIOUS	Ref.No 2B079916		Pedal Cycle	Police Officer Attend: Yes
Date 16/03/2016 Day Wednesday	ROAD U	LOCATION Unclassified Road TILN LANE at House Number 60, (APPROX) 26 metres south of RICHMOND ROAD, RETFORD		
Time 18:53				
Weather Fine				
Road Surface Dry				
Street Lighting Dark/lights lit				
Speed Limit 30 MPH	SITE DETAILS	SPECIAL SITE CONDITIONS		
Carriageway Single c'way		None		
Lane markings Centre/hazard line				
Junction Detail Not at or within 20m of junction		CARRIAGEWAY HAZARDS		
Junction Control		None		
2nd Road Number				
Pedestrian Facilities No Human control within 50m and No crossing facility within 50m				
VEHICLES INVOLVED 2		CASUALTIES INVOLVED 1		
Veh.No. 1 Vehicle type Pedal Cycle Manoeuvre Going ahead other Direction from South to North Towing? No Skidded No Veh location at impact (restricted lane) On main carriageway Junct. location of veh. at 1st impact Not at junction Veh left carriageway? Did not leave c'way Hit object in c'way? None Hit object off c'way? None First point of impact Front Drivers age 60 yrs Sex Female Other veh.hit (ref.) 2 Hit and run No Foreign vehicle Not foreign Breath test Not applicable Journey purpose		Cas No 1 Cas Class Driver or Rider Veh ref No 1 Severity SERIOUS Age 60 yrs Sex Female Car Passenger? No PSV Passenger? No Ped Movement Not a pedestrian Ped location Not a pedestrian Ped Direction to Not a pedestrian School Pupil Other Roadworker injured No		
Veh.No. 2 Vehicle type Car Manoeuvre Going ahead other Direction from South to North Towing? No Skidded No Veh location at impact (restricted lane) On main carriageway Junct. location of veh. at 1st impact Not at junction Veh left carriageway? Did not leave c'way Hit object in c'way? None Hit object off c'way? None First point of impact Front Drivers age 56 yrs Sex Female Other veh.hit (ref.) 1 Hit and run No Foreign vehicle Not foreign Breath test Negative Journey purpose Other/Not known				

No. 2	District Bassetlaw	Accident Details	VRUs	Grid Reference 470888 / 382558
SEVERITY SLIGHT	Ref.No 2B036717		Police Officer Attend: Yes	
Date 25/02/2017 Day Saturday	ROAD U	LOCATION Unclassified Road TILN LANE, at its Junction with Unclassified Road 'LARK RISE' COTTAGE ENT, (APPROX) 114M STH EAST /SMEATH LANE, RETFORD		
Time 12:50				
Weather Fine				
Road Surface Wet				
Street Lighting Daylight				
Speed Limit 60 MPH	SITE DETAILS	SPECIAL SITE CONDITIONS		
Carriageway Single c'way		None		
Lane markings Centre/hazard line				
Junction Detail Using private drive or entrance				
Junction Control Give way sign or uncontrolled		CARRIAGEWAY HAZARDS		
2nd Road Number U		None		
Pedestrian Facilities No Human control within 50m and No crossing facility within 50m				
VEHICLES INVOLVED 2		CASUALTIES INVOLVED 2		
Veh.No. 1 Vehicle type Van/Goods < 3.5t Manoeuvre O/T moving vehicle on its O/S Direction from South to North west Towing? No Skidded No Veh location at impact (restricted lane) On main carriageway Junct. location of veh. at 1st impact Mid junction Veh left carriageway? Left c'way Offside Hit object in c'way? None Hit object off c'way? None First point of impact Front Drivers age 17 yrs Sex Male Other veh.hit (ref.) 2 Hit and run No Foreign vehicle Not foreign Breath test Negative Journey purpose		Cas No 1 Cas Class Passenger Veh ref No 2 Severity SLIGHT Age 51 yrs Sex Female Car Passenger? Front PSV Passenger? No Ped Movement Not a pedestrian Ped location Not a pedestrian Ped Direction to Not a pedestrian School Pupil Other Roadworker injured No		
Veh.No. 2 Vehicle type Car Manoeuvre Turning right Direction from South to East Towing? No Skidded No Veh location at impact (restricted lane) On main carriageway Junct. location of veh. at 1st impact Leaving main road Veh left carriageway? Did not leave c'way Hit object in c'way? None Hit object off c'way? None First point of impact Offside Drivers age 57 yrs Sex Male Other veh.hit (ref.) 1 Hit and run No Foreign vehicle Not foreign Breath test Negative Journey purpose		Cas No 2 Cas Class Driver or Rider Veh ref No 2 Severity SLIGHT Age 57 yrs Sex Male Car Passenger? No PSV Passenger? No Ped Movement Not a pedestrian Ped location Not a pedestrian Ped Direction to Not a pedestrian School Pupil Other Roadworker injured No		

No. 3	District Bassetlaw	Accident Details		VRUs Motorcycle	Grid Reference 470940 / 381745
SEVERITY SLIGHT	Ref.No 2B100517			Police Officer Attend: Yes	
Date 10/06/2017 Day Saturday	ROAD A620	LOCATION A620 MOORGATE, at its Junction with Unclassified Road TILN LANE, RETFORD			
Time 18:50					
Weather Fine					
Road Surface Dry					
Street Lighting Daylight					
Speed Limit 30 MPH	SITE DETAILS	SPECIAL SITE CONDITIONS			
Carriageway Single c'way		None			
Lane markings Centre/hazard line					
Junction Detail T or Staggered junction					
Junction Control Give way sign or uncontrolled		CARRIAGEWAY HAZARDS			
2nd Road Number U		None			
Pedestrian Facilities No Human control within 50m and No crossing facility within 50m					
VEHICLES INVOLVED 2			CASUALTIES INVOLVED 1		
Veh.No. 1 Vehicle type Car Manoeuvre Turning right Direction from North to South west Towing? No Skidded No Veh location at impact (restricted lane) On main carriageway Junct. location of veh. at 1st impact Entering main road Veh left carriageway? Did not leave c'way Hit object in c'way? None Hit object off c'way? None First point of impact Offside Drivers age 23 yrs Sex Male Other veh.hit (ref.) 2 Hit and run No Foreign vehicle Not foreign Breath test Negative Journey purpose Other/Not known			Cas No 1 Cas Class Driver or Rider Veh ref No 2 Severity SLIGHT Age 48 yrs Sex Male Car Passenger? No PSV Passenger? No Ped Movement Not a pedestrian Ped location Not a pedestrian Ped Direction to Not a pedestrian School Pupil Other Roadworker injured No		
Veh.No. 2 Vehicle type M/cycle > 500cc Manoeuvre Going ahead right hand bend Direction from South west to East Towing? No Skidded No Veh location at impact (restricted lane) On main carriageway Junct. location of veh. at 1st impact Mid junction Veh left carriageway? Did not leave c'way Hit object in c'way? None Hit object off c'way? None First point of impact Front Drivers age 48 yrs Sex Male Other veh.hit (ref.) 1 Hit and run No Foreign vehicle Not foreign Breath test Negative Journey purpose Other/Not known					

No. 4	District Bassetlaw	Accident Details		VRUs	Grid Reference 470963 / 382030
SEVERITY SLIGHT	Ref.No 2B260417			Pedestrian	Police Officer Attend: Yes
Date 01/12/2017 Day Friday	ROAD U	LOCATION TILN LANE at House Number 53, at its Junction with U/C PTE ENTRANCE ,(APPROX) 36M S /RICHMOND RD, RETFORD			
Time 15:45					
Weather Fine					
Road Surface Dry					
Street Lighting Daylight					
Speed Limit 30 MPH	SITE DETAILS	SPECIAL SITE CONDITIONS None			
Carriageway Single c'way					
Lane markings Centre/hazard line		CARRIAGEWAY HAZARDS None			
Junction Detail Using private drive or entrance					
Junction Control Give way sign or uncontrolled					
2nd Road Number U					
Pedestrian Facilities No Human control within 50m and No crossing facility within 50m					
VEHICLES INVOLVED 1			CASUALTIES INVOLVED 1		
Veh.No. 1 Vehicle type Car Manoeuvre Reversing Direction from West to East Towing? No Skidded No Veh location at impact (restricted lane) Footway Junct. location of veh. at 1st impact Entering main road Veh left carriageway? Did not leave c'way Hit object in c'way? None Hit object off c'way? None First point of impact Front Drivers age 70 yrs Sex Male Other veh.hit (ref.) 0 Hit and run Yes Foreign vehicle Not foreign Breath test Not contacted Journey purpose Taking pupil to/from school			Cas No 1 Cas Class Pedestrian Veh ref No 1 Severity SLIGHT Age 33 yrs Sex Male Car Passenger? No PSV Passenger? No Ped Movement Unknown or other Ped location On footway or verge Ped Direction to North School Pupil Other Roadworker injured No		

No. 5	District Bassetlaw	Accident Details		VRUs	Grid Reference 470978 / 381984
SEVERITY FATAL	Ref.No 2B001918			Pedestrian	Police Officer Attend: Yes
Date 15/01/2018 Day Monday	ROAD U	LOCATION U/C TILN LANE at House Number 45, 35 metres north of ELMWOOD CLOSE, RETFORD			
Time 15:47					
Weather Rain					
Road Surface Wet					
Street Lighting Daylight					
Speed Limit 30 MPH	SITE DETAILS	SPECIAL SITE CONDITIONS			
Carriageway Single c'way		None			
Lane markings Centre/hazard line					
Junction Detail Not at or within 20m of junction		CARRIAGEWAY HAZARDS			
Junction Control		None			
2nd Road Number					
Pedestrian Facilities No Human control within 50m and No crossing facility within 50m					
VEHICLES INVOLVED 1			CASUALTIES INVOLVED 1		
Veh.No. 1 Vehicle type Car	Manoeuvre Reversing Direction from East to West Towing? No Skidded No Veh location at impact (restricted lane) Footway Junct. location of veh. at 1st impact Not at junction Veh left carriageway? Left c'way near-side Hit object in c'way? None Hit object off c'way? None First point of impact Back Drivers age 76 yrs Sex Male Other veh.hit (ref.) 0 Hit and run No Foreign vehicle Not foreign Breath test Negative Journey purpose Taking pupil to/from school		Cas No 1 Cas Class Pedestrian Veh ref No 1		
Severity FATAL			Age 10 yrs Sex Male		
Car Passenger? No			PSV Passenger? No		
Ped Movement Unknown or other					
Ped location On footway or verge					
Ped Direction to South					
School Pupil Yes on way to or from school					
Roadworker injured No					

No. 6	District Bassetlaw	Accident Details		VRUs	Grid Reference 470844 / 382681
SEVERITY SLIGHT	Ref.No 2B076918			Police Officer Attend: Yes	
Date 09/03/2018 Day Friday	ROAD U	LOCATION U/C SMEATH ROAD, (BEND) at its Junction with U/C TILN LANE, RETFORD			
Time 18:23					
Weather Rain					
Road Surface Wet					
Street Lighting Dark/no lights					
Speed Limit 60 MPH	SITE DETAILS	SPECIAL SITE CONDITIONS None			
Carriageway Single c'way					
Lane markings Centre/hazard line		CARRIAGEWAY HAZARDS None			
Junction Detail T or Staggered junction					
Junction Control Give way sign or uncontrolled					
2nd Road Number U					
Pedestrian Facilities No Human control within 50m and No crossing facility within 50m					
VEHICLES INVOLVED 2			CASUALTIES INVOLVED 1		
Veh.No. 1 Vehicle type Car Manoeuvre Going ahead left hand bend Direction from North east to South east Towing? No Skidded No Veh location at impact (restricted lane) On main carriageway Junct. location of veh. at 1st impact Mid junction Veh left carriageway? Did not leave c'way Hit object in c'way? None Hit object off c'way? None First point of impact Offside Drivers age 28 yrs Sex Male Other veh.hit (ref.) 2 Hit and run No Foreign vehicle Not foreign Breath test Not requested Journey purpose			Cas No 1 Cas Class Driver or Rider Veh ref No 1 Severity SLIGHT Age 28 yrs Sex Male Car Passenger? No PSV Passenger? No Ped Movement Not a pedestrian Ped location Not a pedestrian Ped Direction to Not a pedestrian School Pupil Other Roadworker injured No		
Veh.No. 2 Vehicle type Car Manoeuvre Going ahead right hand bend Direction from South east to North east Towing? No Skidded No Veh location at impact (restricted lane) On main carriageway Junct. location of veh. at 1st impact Mid junction Veh left carriageway? Did not leave c'way Hit object in c'way? None Hit object off c'way? None First point of impact Offside Drivers age 79 yrs Sex Male Other veh.hit (ref.) 1 Hit and run No Foreign vehicle Not foreign Breath test Not requested Journey purpose Other/Not known					

No. 7	District Bassetlaw	Accident Details		VRUs	Grid Reference 470953 / 382116
SEVERITY SLIGHT	Ref.No 2B028020			Police Officer Attend: Yes	
Date 14/02/2020 Day Friday	ROAD U	LOCATION U/C TILN LANE, 49 metres south of THE SHETLANDS, RETFORD			
Time 15:30					
Weather Fine					
Road Surface Dry					
Street Lighting Daylight					
Speed Limit 30 MPH	SITE DETAILS	SPECIAL SITE CONDITIONS			
Carriageway Single c'way		None			
Lane markings Centre/hazard line					
Junction Detail Not at or within 20m of junction		CARRIAGEWAY HAZARDS			
Junction Control		None			
2nd Road Number					
Pedestrian Facilities Controlled by SXP and No crossing facility within 50m					
VEHICLES INVOLVED 5			CASUALTIES INVOLVED 1		
Veh.No. 1 Vehicle type Van/Goods < 3.5t Manoeuvre Going ahead other Direction from South to North Towing? No Skidded No Veh location at impact (restricted lane) On main carriageway Junct. location of veh. at 1st impact Not at junction Veh left carriageway? Did not leave c'way Hit object in c'way? Parked vehicle unlit Hit object off c'way? None First point of impact Front Drivers age 64 yrs Sex Male Other veh.hit (ref.) 2 Hit and run No Foreign vehicle Not foreign Breath test Not provided Journey purpose Journey as part of work			Cas No 1 Cas Class Driver or Rider Veh ref No 3 Severity SLIGHT Age 35 yrs Sex Female Car Passenger? No PSV Passenger? No Ped Movement Not a pedestrian Ped location Not a pedestrian Ped Direction to Not a pedestrian School Pupil Other Roadworker injured No		
Veh.No. 2 Vehicle type Car Manoeuvre Parked Direction from South Towing? No Skidded No Veh location at impact (restricted lane) On main carriageway Junct. location of veh. at 1st impact Not at junction Veh left carriageway? Did not leave c'way Hit object in c'way? None Hit object off c'way? None First point of impact Back Drivers age 21 yrs Sex Male Other veh.hit (ref.) 1 Hit and run No Foreign vehicle Not foreign Breath test Negative Journey purpose Taking pupil to/from school					

Veh.No. 3	Vehicle type	Car
Manoeuvre	Parked	
Direction from North		Towing? No
Skidded	No	
Veh location at impact (restricted lane)	On main carriageway	
Junct. location of veh. at 1st impact	Not at junction	
Veh left carriageway?	Did not leave c'way	
Hit object in c'way?	None	
Hit object off c'way?	None	
First point of impact	Front	
Drivers age 35 yrs	Sex Female	Other veh.hit (ref.) 1
Foreign vehicle	Not foreign	Hit and run No
Journey purpose	Taking pupil to/from school	Breath test Negative

Veh.No. 4	Vehicle type	Car
Manoeuvre	Parked	
Direction from South		Towing? No
Skidded	No	
Veh location at impact (restricted lane)	On main carriageway	
Junct. location of veh. at 1st impact	Not at junction	
Veh left carriageway?	Did not leave c'way	
Hit object in c'way?	None	
Hit object off c'way?	None	
First point of impact	Back	
Drivers age 55 yrs	Sex Male	Other veh.hit (ref.) 1
Foreign vehicle	Not foreign	Hit and run No
Journey purpose	Taking pupil to/from school	Breath test Negative

Veh.No. 5	Vehicle type	Car
Manoeuvre	Going ahead other	
Direction from North to South		Towing? No
Skidded	No	
Veh location at impact (restricted lane)	On main carriageway	
Junct. location of veh. at 1st impact	Not at junction	
Veh left carriageway?	Did not leave c'way	
Hit object in c'way?	None	
Hit object off c'way?	None	
First point of impact	Front	
Drivers age 30 yrs	Sex Female	Other veh.hit (ref.) 1
Foreign vehicle	Not foreign	Hit and run No
Journey purpose	Taking pupil to/from school	Breath test Negative

Appendix B Site Masterplan





Site Boundary: 5.88ha

Proposed residential area: 2.9ha
Up to 120 new homes

Proposed primary vehicular access points

Proposed pedestrian link

Consented pedestrian link to Bolham Lane

Pedestrian route between the Site and Bolham Lane

Public Rights of Way

Potential recreational routes

Existing vegetation to be retained where appropriate

Public open space to serve the new development

Children's play area incorporating natural play

Proposed sustainable drainage basin (SuDS)

Proposed wildlife ponds

Proposed orchard tree planting

Above ground local HV Electricity supply

Existing BT apparatus

Existing STW Rising Main (6m easement)

Existing STW Combined Sewer (6m easement)

Existing Water Main (6m easement)

Proposed foul pump station (15m offset required)

Proposed surface water pump station

Listed Buildings

Non designated heritage asset

Non designated Park and Garden

B	19.01.21	SB	BNG.
Rev	Date	By	Description

CSA

environmental

Drillers Arms, High Street
Atherstone, Warwickshire CV32 9JH

01452 743647

central@csaenvironmental.co.uk

central@csaenvironmental.co.uk

Project

Land west of Tiln Lane, Retford

Title

Concept Masterplan

Client

Vistry Group

Scale

1:2500 @ A3

Drawn

SB

Date

Jan 2021

Checked

RR

Drawing No.

CSA/5209/104

Rev

B

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Appendix C Agreed Access Arrangements



NOTES

1. The contractor is responsible at all times for carrying out his work strictly in accordance with the Health and Safety at Work Act 1974 and the CDM Regulations 2015.
2. The contractor is responsible for checking all tie-in work with existing for line and level before commencing work. Any discrepancies or errors shall be reported to the engineer in writing immediately.
3. All accommodation works necessary to establish a satisfactory link between existing and new work will have been allowed for in the contractors price.
4. It is the responsibility of the contractor to locate any service apparatus in the vicinity of the works and he will be deemed to have allowed for all hand digging and locating of service apparatus in his price. Cala Homes (North Home Counties) Ltd will accept no claims whatsoever in respect of any loss or damage in respect of such apparatus, however caused.
5. All materials for use in the contract are to be BSI kitemarked.
6. All redundant sewers to be grubbed up or grouted and manholes broken down and the void filled.
7. All buried concrete and mortar shall be sulphate resisting unless tests prove otherwise.
8. The contractor is responsible for arranging a meeting with the highway clerk of works to ascertain any variations that are relevant to this development prior to work commencing.
9. The contractor is responsible for ensuring that all works are to the satisfaction of the highway authority engineer and will have included for any necessary testing in his price.
10. This drawing is to be read in conjunction with all other relevant engineers, architects and specialist design drawings and details.
11. All dimensions shown are in millimetres unless noted otherwise and all levels and coordinates relate to topographical survey provided by Cala Homes (North Home Counties) Ltd.
12. Do not scale from this drawing, if in doubt ask.
13. All accommodation works necessary to provide a satisfactory link between the new works and the existing is to be undertaken by the Developer.

KEY

- Proposed Carriageway
- Proposed Footway
- Proposed Verge
- Tactile Paving

Rev	Description	Date	Drawn	Checked
C	Drawing updated to show latest planning layout, bus stop added to Tiln Lane	03.06.19	TJW	TJW
B	LHM comments 07.02.19	14.02.19	JMW	TJW
A	Visibility splay amended, Phase 1 layout added and hedge removed indicated	31.01.19	TJW	TJW


Drawing Approval Status:-

N/A Section 104 N/A Section 38 N Section 278

 **Wormald Burrows Partnership Ltd**
Civil Engineering Consultants
12a - 18a Hitchin Street, Biggleswade, SG18 8AX
Tel: (01787) 317244 Fax: (01787) 315434
Web: www.wormburp.com
Email: engineer@wormburp.com

Project:
**Tiln Lane
Proposed Residential Development
Retford, Nottinghamshire**

Drawing Description:
**Section 278 Works
Site Access - General Arrangement**

Client:
 **Linden HOMES**
Linden Homes Midlands
Ashurst, Southgate Park
Bakewell Road, Orton Southgate
Peterborough, PE2 6YS

Drawing Number:
E3861/705/C

Client Reference:
LHM 163

Scale:
1:250 @ A1
1:500 @ A3

Designed By: TJW
Date: 12.12.18

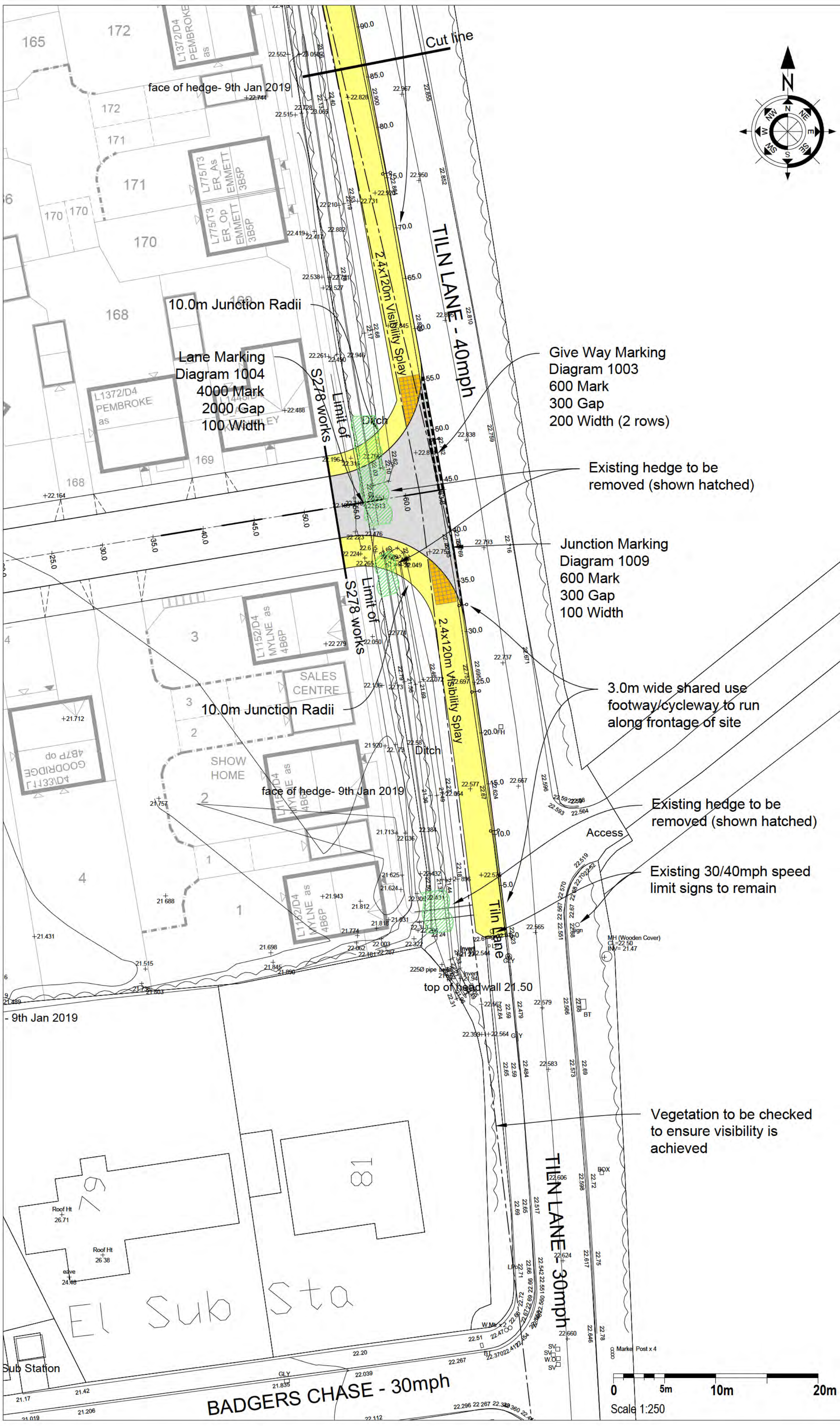
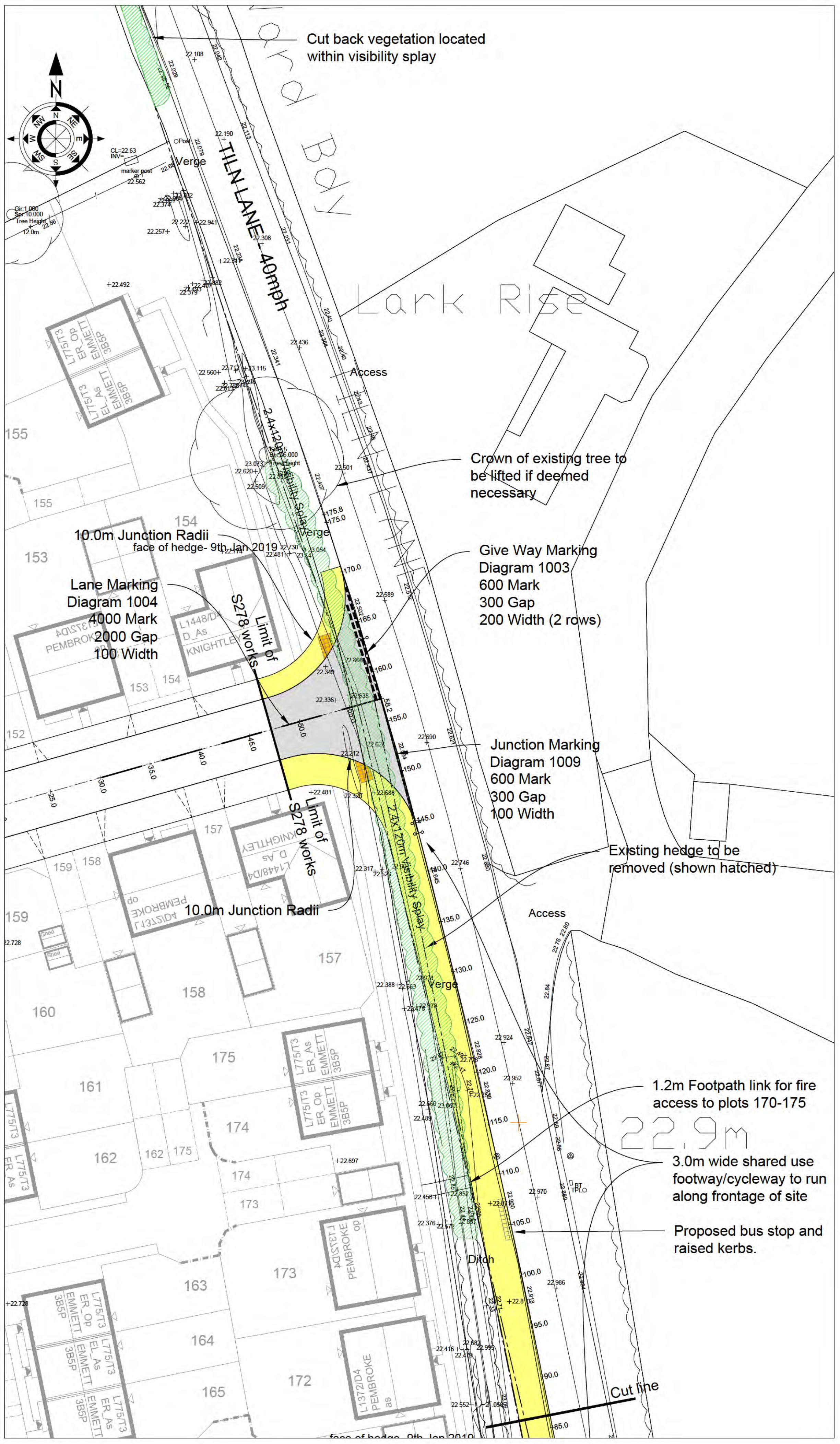
Drawn By: JMW
Date: 18.12.18

Checked By: TJW
Date: Jan 2019

 **afaq ISO 9001 Quality**

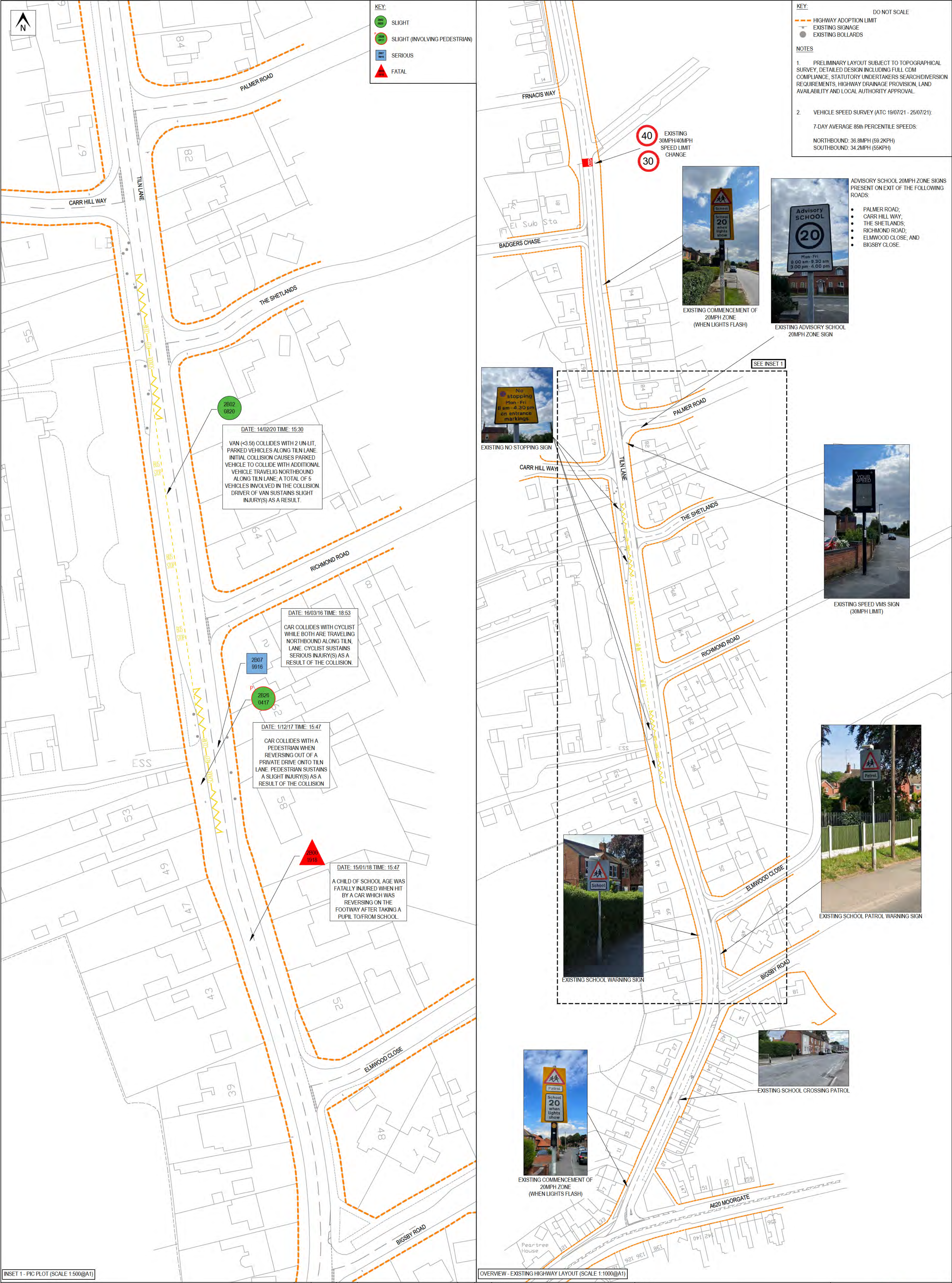
 **UKAS MANAGEMENT SYSTEMS**

Certified by Afnor UK



Appendix D Optima Drawing 21003/IN/01





INSET 1 - PIC PLOT (SCALE 1:500@A1)

OVERVIEW - EXISTING HIGHWAY LAYOUT (SCALE 1:1000@A1)

KEY:

- HIGHWAY ADOPTION LIMIT
- EXISTING SIGNAGE
- EXISTING BOLLARDS

NOTES

1. PRELIMINARY LAYOUT SUBJECT TO TOPOGRAPHICAL SURVEY, DETAILED DESIGN INCLUDING FULL CDM COMPLIANCE, STATUTORY UNDERTAKERS SEARCH/DIVERSION REQUIREMENTS, HIGHWAY DRAINAGE PROVISION, LAND AVAILABILITY AND LOCAL AUTHORITY APPROVAL.

2. VEHICLE SPEED SURVEY (ATC 19/07/21 - 25/07/21):

7-DAY AVERAGE 85th PERCENTILE SPEEDS:

NORTHBOUND: 36.8MPH (59.2KPH)
SOUTHBOUND: 34.2MPH (55KPH)

EXISTING COMMENCEMENT OF 20MPH ZONE (WHEN LIGHTS FLASH)

EXISTING ADVISORY SCHOOL 20MPH ZONE SIGN

ADVISORY SCHOOL 20MPH ZONE SIGNS PRESENT ON EXIT OF THE FOLLOWING ROADS:

- PALMER ROAD;
- CARR HILL WAY;
- THE SHETLANDS;
- RICHMOND ROAD;
- ELMWOOD CLOSE; AND
- BIGSBY CLOSE.


EXISTING NO STOPPING SIGN

EXISTING SCHOOL WARNING SIGN

EXISTING SCHOOL PATROL WARNING SIGN

EXISTING SCHOOL CROSSING PATROL

PROJECT					CLIENT				
TILN LANE, RETFORD					VISTRY GROUP PLC				
-	17/09/21	JS	INITIAL ISSUE	MEW	MEW	DRAWING TITLE	CHECKED MEW	APPROVED MEW	DRG No. 21003/IN/01
REV	DATE	BY	DESCRIPTION	CHK	APP	TILN LANE EXISTING HIGHWAY LAYOUT & KEY PIC LOCATIONS	DRAWN BY: JS	SCALE @ A1 AS SHOWN	DATE 17/09/21
STATUS					REV. -				
INFORMATION									



OPTIMA
Intelligent Highway Solutions
Suite 1, 3rd Floor, Goodland House, Infirmary Street
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Appendix E Optima Drawing 21003-GA-01





INSET 1 - SCHEME DETAIL (SCALE 1:200@A1)

SCHEME OVERVIEW (SCALE 1:1000@A1)

				PROJECT		CLIENT			
				TILN LANE, RETFORD		VISTRY GROUP PLC			
				DRAWING TITLE		CHECKED	APPROVED	DRG No.	
				TILN LANE PROPOSED TRAFFIC CALMING ENHANCEMENT SCHEME		MEW	MEW	21003/GA/01	
				DRAWN BY:		SCALE @ A1	DATE	REV.	
				JS		AS SHOWN	17/09/21		
				STATUS					
				INFORMATION					
REV	DATE	BY	DESCRIPTION	CHK	APP				
-	17/09/21	JS	INITIAL ISSUE	MEW	MEW				

Appendix F PICADY Outputs



Junctions 9

PICADY 9 - Priority Intersection Module

Version: 9.5.1.7462

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Filename: Site Access - Tiln Lane 120.j9

Path: O:\Tiln Lane, Retford\ANALYSIS\CAPACITY\Priority Junctions

Report generation date: 28/09/2021 11:45:28

»Design 2026, AM

»Design 2026, PM

Summary of junction performance

	AM			PM		
	Queue (PCU)	Delay (s)	RFC	Queue (PCU)	Delay (s)	RFC
Design 2026						
Stream B-C	0.0	8.15	0.02	0.0	7.34	0.01
Stream B-A	0.7	14.67	0.40	0.2	11.08	0.20
Stream C-AB	0.0	4.81	0.01	0.0	5.12	0.02

There are warnings associated with one or more model runs - see the Data Errors and Warnings tables for each Analysis or Demand Set.

Values shown are the highest values encountered over all time segments. Delay is the maximum value of average delay per arriving vehicle.

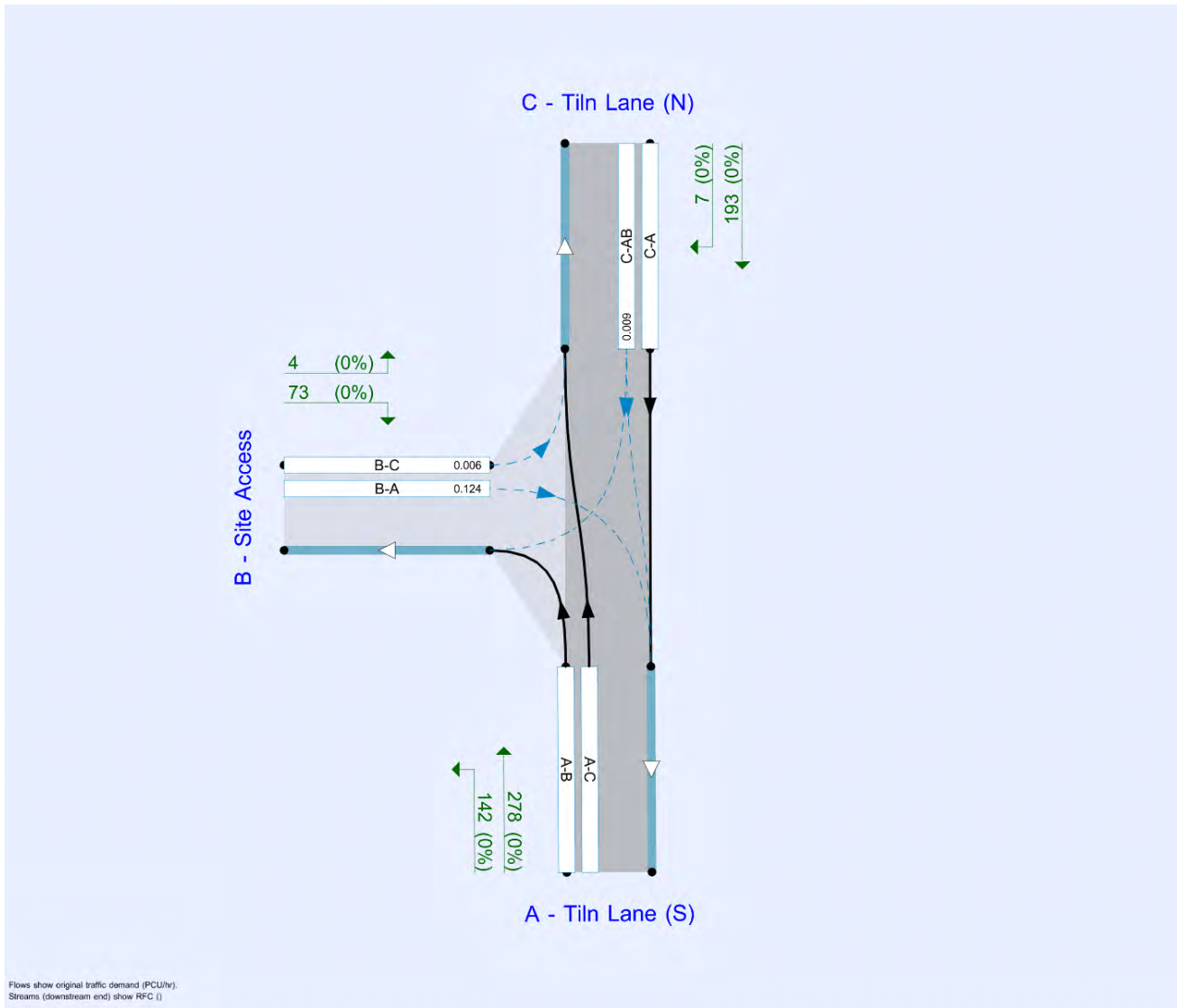
File summary

File Description

Title	
Location	
Site number	
Date	07/01/2021
Version	
Status	(new file)
Identifier	
Client	
Jobnumber	
Enumerator	OPTIMA\optima
Description	

Units

Distance units	Speed units	Traffic units input	Traffic units results	Flow units	Average delay units	Total delay units	Rate of delay units
m	kph	PCU	PCU	perHour	s	-Min	perMin



The junction diagram reflects the last run of Junctions.

Analysis Options

Vehicle length (m)	Calculate Queue Percentiles	Calculate detailed queueing delay	Calculate residual capacity	RFC Threshold	Average Delay threshold (s)	Queue threshold (PCU)
5.75				0.85	36.00	20.00

Demand Set Summary

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH mm)	Finish time (HH mm)	Time segment length (min)	Run automatically
D1	Design 2026	AM	ONE HOUR	08:00	09:30	15	✓
D2	Design 2026	PM	ONE HOUR	08:00	09:30	15	✓

Analysis Set Details

ID	Include in report	Network flow scaling factor (%)	Network capacity scaling factor (%)
A1	✓	100.000	100.000

Design 2026, AM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Vehicle Mix		HV% is zero for all movements / time segments. Vehicle Mix matrix should be completed whether working in PCUs or Vehs. If HV% at the junction is genuinely zero, please ignore this warning.

Junction Network

Junctions

Junction	Name	Junction type	Major road direction	Use circulating lanes	Junction Delay (s)	Junction LOS
1	Site Access/Tiln Lane	T-Junction	Two-way		3.11	A

Junction Network Options

Driving side	Lighting
Left	Normal/unknown

Arms

Arms

Arm	Name	Description	Arm type
A	Tiln Lane (S)		Major
B	Site Access		Minor
C	Tiln Lane (N)		Major

Major Arm Geometry

Arm	Width of carriageway (m)	Has kerbed central reserve	Has right turn bay	Visibility for right turn (m)	Blocks?	Blocking queue (PCU)
C - Tiln Lane (N)	6.30			215.0	✓	0.00

Geometries for Arm C are measured opposite Arm B. Geometries for Arm A (if relevant) are measured opposite Arm D.

Minor Arm Geometry

Arm	Minor arm type	Width at give-way (m)	Width at 5m (m)	Width at 10m (m)	Width at 15m (m)	Width at 20m (m)	Estimate flare length	Flare length (PCU)	Visibility to left (m)	Visibility to right (m)
B - Site Access	One lane plus flare	10.00	4.70	3.00	3.00	3.00	✓	1.00	24	18

Slope / Intercept / Capacity

Priority Intersection Slopes and Intercepts

Stream	Intercept (PCU/hr)	Slope for A-B	Slope for A-C	Slope for C-A	Slope for C-B
B-A	528	0.095	0.240	0.151	0.343
B-C	612	0.093	0.234	-	-
C-B	698	0.267	0.267	-	-

The slopes and intercepts shown above do NOT include any corrections or adjustments.

Streams may be combined, in which case capacity will be adjusted.

Values are shown for the first time segment only; they may differ for subsequent time segments.

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH mm)	Finish time (HH mm)	Time segment length (min)	Run automatically
D1	Design 2026	AM	ONE HOUR	08:00	09:30	15	✓

Vehicle mix varies over turn	Vehicle mix varies over entry	Vehicle mix source	PCU Factor for a HV (PCU)
✓	✓	HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Profile type	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
A - TiIn Lane (S)		ONE HOUR	✓	329	100.000
B - Site Access		ONE HOUR	✓	158	100.000
C - TiIn Lane (N)		ONE HOUR	✓	249	100.000

Origin-Destination Data

Demand (PCU/hr)

	To			
		A - TiIn Lane (S)	B - Site Access	C - TiIn Lane (N)
	From			
	A - TiIn Lane (S)	0	65	264
	B - Site Access	149	0	9
	C - TiIn Lane (N)	245	4	0

Vehicle Mix

Heavy Vehicle Percentages

	To			
		A - TiIn Lane (S)	B - Site Access	C - TiIn Lane (N)
	From			
	A - TiIn Lane (S)	0	0	0
	B - Site Access	0	0	0
	C - TiIn Lane (N)	0	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS	Average Demand (PCU/hr)	Total Junction Arrivals (PCU)
B-C	0.02	8.15	0.0	A	8	12
B-A	0.40	14.67	0.7	B	137	205
C-AB	0.01	4.81	0.0	A	5	8
C-A					223	335
A-B					60	89
A-C					242	363

Main Results for each time segment

08:00 - 08:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	7	2	518	0.013	7	0.0	0.0	7.043	A
B-A	112	28	447	0.251	111	0.0	0.3	10 670	B
C-AB	4	1.00	752	0.005	4	0.0	0.0	4.812	A
C-A	183	46			183				
A-B	49	12			49				
A-C	199	50			199				

08:15 - 08:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	8	2	493	0.016	8	0.0	0.0	7.426	A
B-A	134	33	431	0.311	133	0.3	0.4	12 093	B
C-AB	5	1	764	0.007	5	0.0	0.0	4.743	A
C-A	219	55			219				
A-B	58	15			58				
A-C	237	59			237				

08:30 - 08:45

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	10	2	452	0.022	10	0.0	0.0	8.138	A
B-A	164	41	409	0.401	163	0.4	0.7	14 575	B
C-AB	7	2	781	0.009	7	0.0	0.0	4.647	A
C-A	267	67			267				
A-B	72	18			72				
A-C	291	73			291				

08:45 - 09:00

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	10	2	451	0.022	10	0.0	0.0	8.152	A
B-A	164	41	409	0.401	164	0.7	0.7	14 670	B
C-AB	7	2	781	0.009	7	0.0	0.0	4.647	A
C-A	267	67			267				
A-B	72	18			72				
A-C	291	73			291				

09:00 - 09:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	8	2	492	0.016	8	0.0	0.0	7.443	A
B-A	134	33	431	0.311	135	0.7	0.5	12.177	B
C-AB	5	1	764	0.007	5	0.0	0.0	4.743	A
C-A	219	55			219				
A-B	58	15			58				
A-C	237	59			237				

09:15 - 09:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	7	2	517	0.013	7	0.0	0.0	7.060	A
B-A	112	28	447	0.251	113	0.5	0.3	10.783	B
C-AB	4	1.00	752	0.005	4	0.0	0.0	4.812	A
C-A	183	46			183				
A-B	49	12			49				
A-C	199	50			199				

Design 2026 , PM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Vehicle Mix		HV% is zero for all movements / time segments. Vehicle Mix matrix should be completed whether working in PCUs or Vehs. If HV% at the junction is genuinely zero, please ignore this warning.

Junction Network

Junctions

Junction	Name	Junction type	Major road direction	Use circulating lanes	Junction Delay (s)	Junction LOS
1	Site Access/Tiln Lane	T-Junction	Two-way		1.27	A

Junction Network Options

Driving side	Lighting
Left	Normal/unknown

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH mm)	Finish time (HH mm)	Time segment length (min)	Run automatically
D2	Design 2026	PM	ONE HOUR	08:00	09:30	15	✓

Vehicle mix varies over turn	Vehicle mix varies over entry	Vehicle mix source	PCU Factor for a HV (PCU)
✓	✓	HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Profile type	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
A - Tiln Lane (S)		ONE HOUR	✓	420	100.000
B - Site Access		ONE HOUR	✓	77	100.000
C - Tiln Lane (N)		ONE HOUR	✓	200	100.000

Origin-Destination Data

Demand (PCU/hr)

	To			
		A - Tiln Lane (S)	B - Site Access	C - Tiln Lane (N)
From	A - Tiln Lane (S)	0	142	278
	B - Site Access	73	0	4
	C - Tiln Lane (N)	193	7	0

Vehicle Mix

Heavy Vehicle Percentages

	To			
		A - Tiln Lane (S)	B - Site Access	C - Tiln Lane (N)
From	A - Tiln Lane (S)	0	0	0
	B - Site Access	0	0	0
	C - Tiln Lane (N)	0	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS	Average Demand (PCU/hr)	Total Junction Arrivals (PCU)
B-C	0.01	7.34	0.0	A	4	6
B-A	0.20	11.08	0.2	B	67	100
C-AB	0.02	5.12	0.0	A	9	13
C-A					175	262
A-B					130	195
A-C					255	383

Main Results for each time segment

08:00 - 08:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	3	0.75	534	0.006	3	0.0	0.0	6.774	A
B-A	55	14	444	0.124	54	0.0	0.1	9.221	A
C-AB	7	2	710	0.009	7	0.0	0.0	5.119	A
C-A	144	36			144				
A-B	107	27			107				
A-C	209	52			209				

08:15 - 08:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	4	0.90	518	0.007	4	0.0	0.0	6.994	A
B-A	66	16	428	0.153	65	0.1	0.2	9.928	A
C-AB	8	2	714	0.012	8	0.0	0.0	5.104	A
C-A	171	43			171				
A-B	128	32			128				
A-C	250	62			250				

08:30 - 08:45

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	4	1	495	0.009	4	0.0	0.0	7.335	A
B-A	80	20	405	0.198	80	0.2	0.2	11 060	B
C-AB	11	3	720	0.015	11	0.0	0.0	5.079	A
C-A	209	52			209				
A-B	156	39			156				
A-C	306	77			306				

08:45 - 09:00

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	4	1	495	0.009	4	0.0	0.0	7.337	A
B-A	80	20	405	0.198	80	0.2	0.2	11 077	B
C-AB	11	3	720	0.015	11	0.0	0.0	5.081	A
C-A	209	52			209				
A-B	156	39			156				
A-C	306	77			306				

09:00 - 09:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	4	0.90	518	0.007	4	0.0	0.0	6.997	A
B-A	66	16	428	0.153	66	0.2	0.2	9.950	A
C-AB	8	2	714	0.012	8	0.0	0.0	5.106	A
C-A	171	43			171				
A-B	128	32			128				
A-C	250	62			250				

09:15 - 09:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-C	3	0.75	534	0.006	3	0.0	0.0	6.780	A
B-A	55	14	444	0.124	55	0.2	0.1	9.254	A
C-AB	7	2	710	0.009	7	0.0	0.0	5.121	A
C-A	144	36			144				
A-B	107	27			107				
A-C	209	52			209				

Phase 1 Ecological Assessment

Land at Tiln Lane,
Retford, Nottinghamshire

Linden Limited

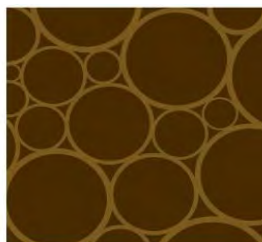


Report Reference:
CL1164/005/002_V2

Clear Environmental Consultants Limited
April 2014



ENVIRONMENTAL



DRAINAGE



FLOOD RISK



ECOLOGY

QUALITY ASSURANCE	
Client:	Linden Limited
Project:	Land at Tiln Lane, Retford
Project No.:	CL1164
Report Title:	Phase 1 Ecological Assessment

REPORT ISSUE REGISTER			
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1 Executive Summary

1.1 The Project and Commissioned Work

Clear Environmental Consultants Ltd (Clear) was instructed by Linden Limited to carry out a Phase 1 Habitat and Preliminary Protected Species Survey at a site referred to as Land at Tiln Lane, Retford in Nottinghamshire (the 'site'). The survey aimed to assess the ecological value of the habitats present and identify any evidence of, or potential for the Site to support protected species. The survey and this report provide an update to the original Phase 1 Habitat and Preliminary Protected Species Survey undertaken by Clear in 2012.

The proposals for the site are understood to comprise the construction of a number of new residential dwellings, their associated infrastructure and open space.

This report comprises the results of an extended Phase 1 Habitat Survey of the site, which has been used to inform recommendations for detailed protected species surveys. The Phase 1 Habitat Survey followed best practice methodology and was carried out during March 2014 by an experienced ecologist.

Pre-application feedback has been received from Nottinghamshire Wildlife Trust (April 2014) and has been taken into account within this report.

1.2 Findings and Recommendations

The site comprises a large arable field with species-poor semi-improved grassland margins and four hedgerows located along sections of the field boundary. Several mature trees were located on the site's periphery, with a pond located within an area of scrub adjacent to the southern boundary of the site. Areas of scrub and tall ruderal vegetation were also located along the southern and western boundaries of the site.

Habitats suitable for wildlife were recorded on site during the survey, including mature trees, scrub and hedgerows. The trees, scrub and hedgerows were considered to provide suitable potential roosting and foraging habitat for bat and bird species. As the field margins were considered to provide habitat for reptile species it is recommended that the field margins are cleared under the watching brief of a suitably experienced ecologist during summer when they will be active. Refer to table 1 below for a summary of recommendations for the site.

Table 1. Summary of Recommendations

Item	Recommendation	Timing
Habitats	Retain hedgerows and trees where possible. Include soft landscaping scheme in development, with native species	During development
Bats	Retain trees and hedgerows as part of current proposals. Sensitive lighting and landscaping scheme. Erect bat boxes as part of enhancement measures.	During and post development
Birds	Any tree, scrub or hedgerow removal should be undertaken outside of the bird-breeding season, where possible. Where this is not possible vegetation should be checked by a suitably experienced ecologist for any evidence of nesting birds. Erect bird boxes as part of enhancement measures.	Vegetation clearance should avoid mid-March to September inclusive.
Reptiles	Vegetation in field margins to be cleared under watching brief of a suitably qualified ecologist. The small 50 metre section of H1 to be removed will be timed sensitively to avoid any potential hibernating reptiles.	Between March & September



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APPENDICES

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Appendix C	Phase 1 Habitat Survey Species List
Appendix D	GCN HSI Assessment Data
Appendix E	Photographs of trees with bat potential



2 Introduction and Background

2.1 Purpose and Scope of this Report

Clear Environmental Consultants Ltd was commissioned to carry out a preliminary ecological appraisal of land at Tiln Lane, near Retford in Nottinghamshire in order to inform a planning application for a proposed housing development. This appraisal is based on a review of the development proposals provided by the Client, desk study data (third party information) and a survey of the Site. This report pertains to these results only; recommendations included within this report are the professional opinion of an experienced ecologist and therefore the view of Clear Environmental Consultants Ltd.

The study area is defined as shown in the enclosed Site Location Plan and Phase 1 Habitat Plan plus a buffer zone extended to include the Zone of Influence (see below) of the proposals (hereafter referred to as the “Site”).

2.2 Zone of Influence

The term Zone of Influence is used to describe the geographic extent of potential impacts of a proposed development. The Zone is determined by the nature of the development and also in relation to individual species, depending on their habitat requirements, mobility and distances indicated in any best practice guidelines.

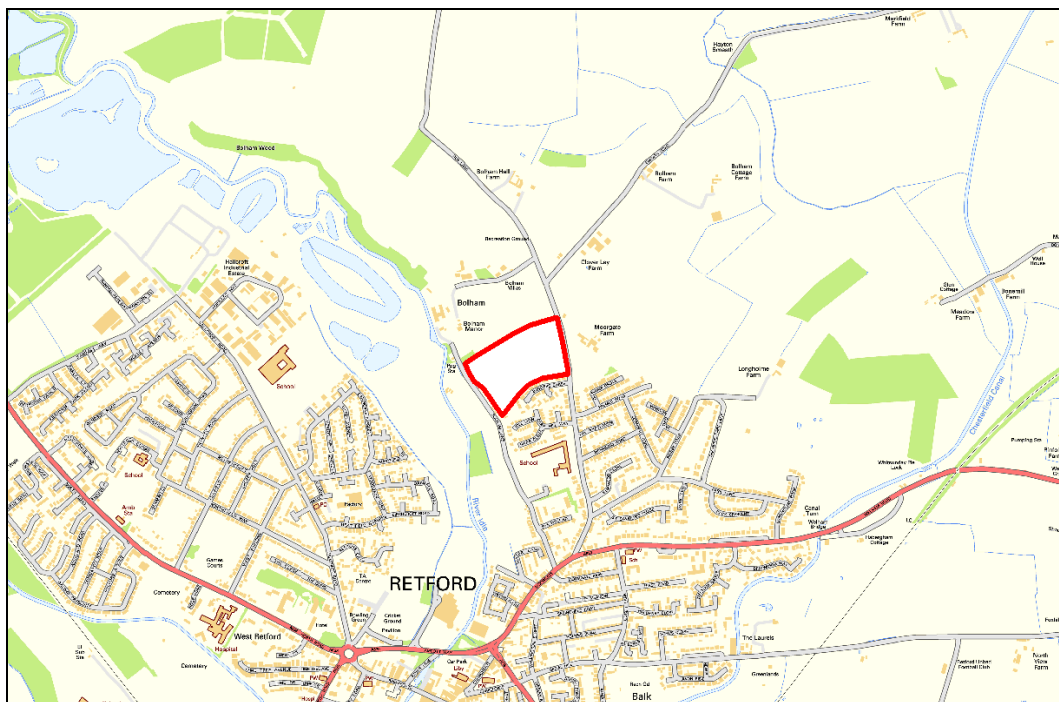
For this site the Zone of Influence is considered to be land on and immediately adjacent to the site and, specifically in respect of great crested newts *Triturus cristatus*, land within 500m of the site boundary as illustrated on the location plan.

2.3 Site Context and Location

The site covers 6.43 hectares and comprises a large arable field with species-poor semi-improved field margins, four hedgerows, trees, scrub, tall ruderal vegetation and a small pond.

The site is situated off Tiln Lane on the northern extents of Retford, Nottinghamshire (approximate OS central Grid Reference: SK 707 825). The location of the site is shown in Figure 1, with the site boundary highlighted in red.

Figure 1: Site Location Plan



2.4 Legislation and Planning Policy

Articles of British wildlife and countryside legislation, policy guidance and both Local and National Biodiversity Action Plans (BAPs) are referred to throughout this report. Their context and application is explained in the relevant sections of this report. The relevant articles of legislation are:

- The National Planning Policy Framework (2012)
- ODPM Circular 06/2005 (retained as Technical Guidance on NPPF 2012)
- The Conservation of Habitats and Species Regulations 2010 (as amended);
- The Wildlife and Countryside Act 1981 (as amended);
- EC Council Directive on the Conservation of Wild Birds 79/409/EEC;
- National Parks and Access to the Countryside Act 1949;
- The Protection of Badgers Act 1992;
- The Countryside and Rights of Way Act 2000;
- The Hedgerow Regulations 1997;
- The Natural Environment and Rural Communities Act 2006;
- Local Biodiversity Action Plan for Nottinghamshire



3 Methodology

3.1 Desk Based Assessment

Data regarding statutory and non-statutory designated sites, plus any records of protected or notable species and habitats was requested from the local ecological records centre and online resources, details of which are provided in Table 2 below.

Table 2: Consulted Resources

Consultee/Resource	Data Sought	Search Radius from Boundary
Nottinghamshire Biological and Geological Records Centre (NBGRC)	Site designations, protected/notable species records	2km
www.magic.gov.uk ¹	Statutory Site Designations	5km
	NERC 2006 Habitats	1km

3.2 Phase 1 Habitat Survey

A Phase 1 Habitat Survey of the Site was carried out on 12th March 2014. Habitats were described and mapped following standard Phase 1 Habitat Survey methodology (JNCC, 2010), which categorises habitat type through the identification of individual plant species.

Nomenclature follows Stace (Stace, 2010) for vascular plant species and uses the DAFOR scale for relative abundance (D = dominant, A = abundant, F = frequent, O = occasional and R = rare).

3.3 Protected / Notable Species Scoping

The habitats on Site were assessed for their suitability for supporting any legally protected or notable species that would be affected by the proposed development. This includes invasive non-native plant species such as Japanese knotweed *Fallopia japonica*, giant hogweed *Heracleum mantegazzianum* and Himalayan balsam *Impatiens glandulifera*.

Any incidental sightings of individual species or field signs such as footprints, latrines or feeding remains discovered during the survey were noted. In the case of great crested newts and bats, specific quantitative assessment methodologies have been adopted industry wide and details of these are provided below.

3.3.1 Great Crested Newt (GCN)

All water bodies on the Site were evaluated against the GCN Habitat Suitability Index (HSI) (Oldham *et al*, 2000). This comprised a combination of field survey and review of aerial view and OS maps to identify ponds outside of the site boundary.

The HSI provides a measure of the suitability of a water-body for supporting great crested newts by assigning an overall score of between 0 and 1, which is based on ten key criteria as follows:

SI ₁	Geographic location	SI ₆	Presence of water-fowl
SI ₂	Pond area	SI ₇	Presence of fish
SI ₃	Pond drying	SI ₈	Number of local ponds
SI ₄	Water quality	SI ₉	Terrestrial habitat quality
SI ₅	Shade	SI ₁₀	Plant coverage

In general, ponds with a higher score are more likely to support GCN than those with lower score and suitability for GCN is determined according to the scale outlined in Table 3 below. For reference, each water body that was assessed was numbered P1, P2, P3 etc.

¹ Multi Agency Geographic Information for the Countryside Interactive GIS Map.

Table 3: HSI Scoring Criteria

HSI score	Habitat Suitability
<0.5	Poor
0.5 - 0.59	Below Average
0.6 – 0.69	Average
0.7 – 0.79	Good
>0.8	Excellent

3.3.2 Bats

Any trees present on or immediately adjacent to the Site were visually inspected and all potentially suitable entry / exit points for bats such as holes and crevices were noted together with any evidence of bat presence such as droppings or feeding remains.

For reference, individual trees were numbered T1, T2 etc. Following standard best practice methodology (Hundt, 2012), each was then classified either as Categories 1*, 1, 2 and 3 which informs the need for and survey effort of any nocturnal survey required.

Six trees were identified as having potential for bats following a visual inspection from the ground. Four of these trees were subsequently climbed by a licensed bat worker/qualified tree climber to further assess their potential for roosting bats. These trees were climbed to inspect any features such as holes, cracks and crevices for evidence of bats or signs of bats such as droppings, staining or scratch marks around a potential feature. An endoscope was used, where necessary, to examine deep holes /fissures. The remaining two trees were not climbed as they were situated within or on the boundary of the adjacent private gardens.

For reference, individual trees identified with bat potential were numbered T1, T2 etc. All such trees were each given a potential grading category of 1*, 1, 2 or 3. Tree grading categories are explained further in the table below.

Table 4: Tree Category Descriptions (Hundt, 2012)

Tree category	Description of criterion
Confirmed Roost	Trees with known bat roost presence or evidence of bats observed such as droppings
Category 1*	Trees with multiple, highly suitable features capable of supporting larger roosts
Category 1	Trees with definite bat potential, supporting fewer suitable features that category 1* trees or with potential for use by single bats
Category 2	Trees with no obvious potential, although the tree is of a size and age that elevated surveys may result in cracks or crevices being found; or the trees supports some features which may have limited potential to support bats
Category 3	Trees with no potential to support bats

The overall value of the site for foraging and/or commuting bats was also assessed based on the guidelines provided in table 5 overleaf.

Table 5: Assessment of site value for bats, based on the occurrence of habitat features

	Description of feature
<div> <div>Low</div> <div> <div>Increasing site value for bats</div> <div>↓</div> </div> <div>High</div> </div>	<p>No features likely to be used by bats (for roosting, foraging or commuting)</p> <p>Small number of potential (opportunistic) roost sites (i.e. probably not maternity roosts or hibernacula).</p> <p>Isolated habitat that could be used by foraging bats (e.g. a lone tree or patch of scrub – not parkland)</p> <p>Isolated site not connected by prominent linear features to suitable adjacent/other foraging habitat</p> <p>Several potential roost sites in buildings, trees or other structures</p> <p>Habitat could be used by foraging bats (e.g. trees, shrub, grassland or water)</p> <p>Site is connected with the wider landscape by linear features that could be used by commuting bats (e.g. lines of trees and scrub or linked gardens)</p> <p>Buildings, trees or other structures (e.g. mines, caves, tunnels, ice houses and cellars) of particular significance to roosting bats</p> <p>Site includes habitat of high quality for foraging bats (e.g. broadleaved woodland, tree-lined watercourses and grazed parkland)</p> <p>Site is connected with the wider landscape by strong linear features that could be used by commuting bats (e.g. river valleys, streams, hedgerows)</p> <p>Site is close to known roosts</p> <p>Bats recorded or observed using an area for foraging or commuting close to a potential roost</p>
Confirmed presence	Evidence indicates that a building, tree or other structure is used by bats (e.g. bats seen roosting or observed flying from a roost or freely in the habitat; droppings, carcasses, feeding remains etc. found; and/or bats heard ‘chattering’ inside a roost on a warm day or at dusk.

3.4 Appraisal Methodology

The overall ecological appraisal is based on the standard best practice methodology provided by the Guidelines for Preliminary Ecological Appraisal (IEEM, 2012). The assessment identifies sites, habitats, species and other ecological features that are of value based on factors such as legal protection, statutory or local site designations such as Sites of Special Scientific Interest (SSSI) or Local Wildlife Sites (LWS) or inclusion on Red Data Book Lists or Biodiversity Action Plans. Ecological value is considered in the context of international, national, regional or local scale and potential constraints to development are identified on that basis, with recommendations for further more detailed surveys made as appropriate, for example to fully investigate botanical value or to confirm presence / likely absence of a protected species.

The assessment also refers to planning policy guidance (e.g. NPPF) where relevant to relate the value of the site and potential impacts of development to the planning process, identifying constraints and opportunities for ecological enhancement in line with both national and local policy.

3.5 Surveyors

The habitat survey was led by Pamela Wakefield BSc (Hons) ACIEEM. Pamela has been a professional ecologist for six years and is appropriately qualified and experienced to carry out this type of survey. She also holds class licences issued by Natural England for survey of great crested newts and bats and is experienced in habitat assessment for these species. The survey was assisted by Elisabeth Welbourn BSc (Hons) Grad CIEEM.

The at height tree inspections for bats were led by licenced bat ecologist Jeremy Truscott BSc (Hons) MCIEEM (Bat licence 20123096) and assisted by Grant Bramall.



3.6 Limitations

3.6.1 Desk Based Assessment

The desk study data is third party controlled data, purchased for the purposes of this report only. Clear Environmental Consultants Ltd cannot vouch for its accuracy and cannot be held liable for any error(s) in these data.

3.6.2 Survey

It should be noted that whilst every effort has been made to provide a comprehensive description of the site, no investigation could ensure the complete characterisation and prediction of the natural environment.

The protected/notable species assessment provides a preliminary view of the likelihood of these species occurring on the site, based on the suitability of the habitat, known distribution of the species in the local area provided in response to our enquiries and any direct evidence on the site. It should not be taken as providing a full and definitive survey of any protected/notable species group.

Two of the mature trees considered to have potential for roosting bats (T5 and T6) could not be climbed as they are situated within/on the boundary of private gardens adjacent to the boundary of the site.

3.6.3 Accurate lifespan of ecological data

The majority of ecological data remain valid for only short periods due to the inherently transient nature of the subject. The survey results contained in this report are considered accurate for 2 years.



4 Results

4.1 Desk Based Assessment

A total of three statutorily designated sites were recorded within the search area identified in Section 3.1. Details of these are provided in Table 6 below.

Table 6: Statutory Designated Sites

Site Name	Designation	Location	Brief Description
Chesterfield Canal	SSSI ²	1.2km to E	Supports nationally uncommon aquatic plant community characteristic of brackish, eutrophic water
Sutton and Lound Gravel Pit	SSSI	1km to NW	Extensive areas of open water and margins supporting exceptionally rich assemblage of breeding wetland birds and nationally important population of wintering gadwall
Retford Cemetery	LNR ³	1.2km to SW	Mature trees and grassland. Site of county importance for bats.

As part of the desk study a prospective Special Protection Area (SPA) was identified within the Newark and Sherwood District. This area has come about following an initial screening assessment, during a public inquiry into a proposed Energy Recovery Facility at Rufford. The area has been put forward for designation for its nightjar *Caprimulgus europaeus* and woodlark *Lullula arborea* populations, in accordance with the Birds Directive (79/409/EEC as amended) and Habitats Regulations 1994 (as amended). This prospective SPA is not however situated within 5km of the Tiln Lane site and furthermore the site does not provide optimal habitat for either of these bird species. It is therefore considered that the prospective SPA will not pose a constraint to development.

Eight non-statutorily designated sites were also identified, details of which are provided in Table 7.

Table 7: Non-statutory Designated Sites

Site Name	Designation	Location	Brief Description
Idle Valley Nature Reserve	LWS ⁴	1km to NW	Mosaic of habitats with botanical, bird and water beetle/bug interest
Chesterfield Canal (Shireoaks to Welham)	LWS	0.9km to S	Varying aquatic and emergent communities and water beetle/bug interest
Longholme Pasture, East Retford	LWS	0.8km to SE	Damp ridge and furrow pastures with high botanical species diversity
East Retford Marshy Grasslands	LWS	1km to SE	Species-rich marshy grassland
Tiln Wood Track	LWS	1.1km to NW	Remnant sandy open grassland with notable botanical species
Bolham Wood	LWS	0.7km to NW	Characteristic acid ancient woodland on river bluff. Botanical interest
River Idle - Bolham	LWS	0.1km to W	Section of river with water beetle/bug interest
Welham Road Marshy Grassland	LWS	1.1km to SE	Species-rich wet grassland and marsh

² Site of Special Scientific Interest (SSSI)

³ Local Nature Reserve (LNR)

⁴ Local Wildlife Site (LWS)

Protected species records were received from NBGRC. A summary of the records considered most relevant to the site and/or proposed development are provided in Table 8.

Table 8: Summary of Protected and Notable Species Records

Species	Most Recent record	Closest Record to Site	Total Number of Records	Conservation Status
Amphibian				
Common toad	2012	1.5km to SW	6	NERC ⁵ , LBAP ⁶
Mammal				
Badger	2012	14.2km to S	1	PBA ⁷ , LBAP
Brown long-eared bat	2008	1.5km to SW	1	EPS ⁸ , WACA ⁹ , LBAP
Daubenton's bat	2008	2.2km to SW	1	EPS, WACA, LBAP
Noctule bat	2008	1.5km to SW	1	EPS, WACA, LBAP
Pipistrelle bat	2012	0.2km to S	9	EPS, WACA, LBAP
Whiskered bat	1987	0.6km to SE	1	EPS, WACA, LBAP
Unidentified bat	2009	0.5km to SW	6	EPS, WACA
Hedgehog	2012	1.1km to S	1	NERC, LBAP
Otter	2007	1.5km to SW	3	WACA, NERC, LBAP
Water vole	2009	0.2km to WNW	16	WACA, NERC, LBAP
Reptile				
Grass snake	2012	1.2km to SE	2	WACA, NERC, LBAP
Invasive plants				
Japanese knotweed	2006	0.4km to S	3	N/A

A number of water beetle/bug records were provided by NBGRC, however the vast majority of these records were associated with the Chesterfield Canal and the River Idle, and as such are not considered to be relevant to this particular site in light of the fact that no aquatic habitats will be affected during the proposed works.

One tree (T5) covered by Tree Preservation Order B139 was recorded within hedgerow 2 (H2) located on the southern boundary immediately adjacent to a property on Badgers Chase.

Aerial imaging was reviewed to assess the site in relation to its context in the wider landscape. As illustrated on Figure 2, the site forms part of a mosaic of habitats within a generally agricultural landscape. Hedgerows and tree lines within the site provide connectivity with habitats on adjacent land. Additional features that provide opportunities for wildlife on site are a small pond on the southern boundary, mature trees and areas of scrub and tall ruderal vegetation. The River Idle runs to the west of the site, with the Idle Valley Nature Reserve, a mosaic of habitats and wetland areas, situated to the north-west.

⁵ NERC - The Natural Environment and Rural Communities Act 2006;

⁶ LBAP – Local Biodiversity Action Plan Species

⁷ PBA - Protection of Badgers Act 1992

⁸ EPS - European Protected Species (EPS), protected by the Conservation of Habitats and Species Regulations 2010

⁹ WACA -Wildlife and Countryside Act 1981 (as amended)

Figure 2: Aerial image of the site and local landscape



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4.2 Habitat Survey Results

The site was dominated by arable land with other habitats present in the field margins. These habitats are described under the individual sub-headings below. No protected, notable or invasive plant species were recorded.

4.2.1 Mature Trees

A number of scattered trees of mixed age were recorded on site. They were all located on the sites periphery within hedgerows and along fence lines. Two mature ash trees (T5 and T6) were located just outside of the site boundary within private gardens but have been included in the site assessment as they provided potential bat roosting habitat (refer to section 4.3.3). Within the south-western corner of site a group of immature cherry *Prunus avium* trees were present. Within the hedgerow and along the fence line located in the north-eastern area of the site several immature to semi-mature oak, sycamore *Acer pseudoplatanus* and field maple *Acer campestre* were observed. The majority of the trees on site appeared to be in good condition from an ecological point of view.

Figure 3: Mature trees located along the southern boundary of site



4.2.2 Scrub

A small area of scrub was present along the central part of the southern boundary. Species present comprised blackthorn *Prunus spinosa*, bramble *Rubus fruticosus*, elder *Sambucus nigra*, hawthorn *Crataegus monogyna* and coppiced willow *Salix sp.*

4.2.3 Species-poor Semi-improved Grassland

Areas of species-poor semi-improved grassland formed sections of the arable field margins along the southern, south-eastern, south-western and north-eastern boundaries. Species present comprised Yorkshire fog *Holcus lanatus*, with abundant cleavers *Galium aparine*, frequent cow parsley *Anthriscus sylvestris*, cock's foot *Dactylis glomerata*, dove's-foot crane's-bill *Geranium molle* and wood avens *Geum urbanum*. Occasional perennial rye grass *Lolium perenne*, ground ivy *Glechoma hederacea* and hedge woundwort *Stachys sylvatica* were also present.

Figure 4: Species-poor semi-improved grassland in south-eastern corner of site



4.2.4 Tall Ruderal Vegetation

A strip of tall ruderal vegetation was recorded along the southern and western boundaries of the site. Dominant species present comprised rosebay willowherb *Chamerion angustifolium*, common nettle *Urtica dioica* and bramble with hogweed *Heracleum sphondylium*, mugwort *Artemisia vulgaris* and lesser burdock *Arctium minus* also present.

Figure 5: Tall ruderal vegetation along the western boundary of the site



4.2.5 Arable

Arable land dominated the site; a cereal crop was present.

Figure 6: Arable field



4.2.6 Hedgerows

Four hedgerows were present across the site, all of which were present along the site boundary. The hedgerows were dominated by hawthorn *Crataegus monogyna* with blackthorn *Prunus spinosa*, holly *Ilex aquifolium*, elder, dog rose *Rosa canina*, hazel *Corylus avellana* and field maple *Acer campestre* also present.

Hedgerows 1 and 2 were classified as being of moderate nature conservation value (3) under HEGS. Hedgerow 3 was classified as being of low nature conservation value (4) under HEGS. Hedgerow 4 was a newly laid hedge; it was classified as being of moderate nature conservation value. None of the hedgerows were considered to be 'important' under Hedgerow Regulations (1997) due to their lack of species diversity and associated features. All of the hedgerows were dominated by native species and therefore are considered to be NERC priority habitats.

Figure 7: Hedgerow 1 along eastern boundary of site



4.2.7 Standing water

A small pond, approximately 10m² was noted within the area of scrub adjacent to the southern site boundary. The pond was very shallow and it is considered likely that it dries on a regular basis. It was heavily over-shaded by the surrounding scrub and contained a large amount of vegetation debris. No aquatic vegetation was observed at the time of survey.

4.3 Preliminary Protected / Notable Species Assessment

Habitats suitable for a number of protected and/or notable species were recorded at the site, as described under the sub-headings below.

4.3.1 Great Crested Newt (GCN)

One pond was located within the site boundary. It has been assessed using HSI criteria and was rated as having poor suitability for GCN, largely due to its over-shaded nature and lack of depth and submerged vegetation which would be used for egg laying. The full suitability indices scores are provided in Appendix D and the location of the water-body on site is highlighted in the Phase 1 Habitat Plan in Appendix B.

With the use of OS maps and aerial photographs water bodies located within 500 metres of the site were identified. Three large fishing lakes, one small pond and numerous ditches were identified. All these water bodies and ditches were located on the opposite side of features considered to be barriers to GCN dispersal such as the River Idle to the west and Tiln Lane to the east.

The site was considered to provide sub-optimal terrestrial habitat for GCN as it consists largely of arable land. The habitats around the perimeter of the site however, namely areas of scrub, tall ruderal vegetation and hedgerows do provide possible opportunities for this species. No GCN records were highlighted within 2km of the site during the desk study.

As the pond on site was classified as having 'poor' suitability for GCN, the terrestrial habitat on site was limited and largely sub-optimal as well as no neighbouring ponds being located within 500m of suitable connected habitat GCN are not considered to pose a constraint to the development and therefore will not be discussed further within this report.

4.3.2 Birds

Several bird species were incidentally noted during the survey, including treecreeper *Certhia familiaris*, blue tit *Cyanistes caeruleus*, mistle thrush *Turdus viscivorus* and dunnoek *Prunella modularis*, the latter two of which are Amber Listed Birds of Conservation Concern (BoCC). Dunnock is also a NERC 2006 species.

Trees, scrub and hedgerows within the site provide suitable nesting and foraging habitat for a range of bird species, including those noted during the survey. One old nest was recorded within the trunk cavity of T4 and several of the trees situated in private gardens along the site boundary had nest boxes fixed to them. The habitats on site are similar to those available within local area, and although they do provide nesting and foraging opportunities for birds, are not likely to be of high significance to local bird populations. Several of the hedgerows on site contained 5 or more canopy species, including hawthorn and blackthorn, which provide foraging opportunities in the form of berries for bird species such as redwing *Turdus iliacus* and fieldfare *Turdus pilaris*. These are both Schedule 1 species.

The arable field provides nesting habitat for some farmland bird species most notably skylark *Alauda arvensis* and lapwing *Vanellus vanellus*, however no arable nesting birds were noted during the survey.

4.3.3 Bats

The overall value of the site for bats was considered to be low due to the dominance of arable land however the hedgerows and tree lines were considered to provide potential for commuting and foraging bats. Assessed against criteria in Best Practice Guidelines (Hundt 2012) the site is of medium size (1-15ha) and of low-medium habitat quality. During the desk study, records of four bat species were noted within 2km of the site.



All the trees were assessed for their potential to support roosting bats. The majority of trees on site were categorised as category 3 trees with negligible potential for supporting roosting bats however four of the trees on site (T1-4), and two immediately off site (T5 and T6) were considered to have potential to support roosting bats. These trees were assessed from the ground and T1-4 were also assessed at height with the aid of an endoscope. T5 and T6 were located off site therefore were not assessed at height due to access restrictions. Although T5 and T6 were located outside of the site boundary, they were both within 10m of the boundary and it was therefore considered appropriate to assess their potential for roosting bats.

T1 to 4 were mature oak trees and T5 and T6 were mature ash trees; the trees had a variety of suitable features such as lifted bark, missing branches and rot holes. Photographs and descriptions of the location of T1-6 are available in Appendix E. Table 9 summarises the results of the bats in trees assessment.



Table 9: Summary of Bat Tree Assessment

Tree Ref	Species	Aerial survey carried out	Potential Bat Roosting Features	Evidence of Bats	Bat Roosting Potential Category
T1	Oak	Y	Deadwood (with missing bark) and loose bark on dying limbs. Features on all aspects of tree between 4 and 8 metres height. Upward facing branch cavity on northern aspect.	None	(Cat. 2)
T2	Oak	Y	Branch cavity (5cm into branch) and callus roll at 9m height on south-eastern aspect. Exposed, upward facing branch cavity (6cm deep) and rot hole at 8m height on northern aspect. Upward facing branch cavity at 6m height on north-western aspect extends into branch filled with debris.	None	(Cat. 1)
T3	Oak	Y	Large, upward facing branch split at 8m height on north-eastern aspect. Exposed to elements. Large upward facing callus roll on lower limb on south-western aspect.	None	(Cat. 3)
T4	Oak	Y	Ivy covering – majority thin, thicker in places. Trunk cavity: 55cm deep, tapers from bottom to top of tree. 8cm wide at opening (at 3m height). Deadwood and loose bark situated in crown of tree on north-western aspect at 7m height. Rot hole at 6m height on eastern aspect (3.5cm diameter, 10cm deep). Small rot hole/branch cavity (5cm deep) at 4m height on south-western aspect	None	(Cat. 1)
T5	Ash	N – outside site boundary	Branch cavities on NE and NW facing aspects between 6 and 7m height Ivy covering on lower part of trunk (0-4m height)	None	(Cat 1*)
T6	Ash	N – outside site boundary	Branch cavity at 7m height, branch split at 5m height and missing branch at 5m height. All on eastern aspect.	None	(Cat 1*)

4.3.4 Badger

During the survey no evidence of badger, such as setts or latrines, was recorded on site. It is considered that the site provides sub-optimal resting and foraging habitat for badgers due to the dominance of arable land and lack of dense vegetated cover. The field margins provide limited foraging opportunities for badger. Two mammal paths were noted on site however these were considered to be created by fox or rabbit due to evidence of these species being noted on site in the form of rabbit holes, dropping and fox hair and scats. The presence of badger is not considered a constraint to the proposals and will therefore not be considered further in this report.

4.3.5 Reptiles

The site was considered to be largely sub-optimal for supporting reptile species due to the dominance of arable land however the field margins provide suitable habitat for foraging reptiles due to the presence of grassland, scrub and tall ruderal habitats. The hedgerows provide potential hibernation habitat for reptile species. Under current proposals all hedgerows are to be retained with the exception of a 50 metre section of H1. The section is proposed for removal to facilitate vehicular access into the site. It is considered that the removal of this small section of hedgerow will have limited overall impact on any potential hibernating reptiles. Furthermore, no reptile records were highlighted by the local records centre within 1km of the site boundary, only 1 record of grass snake was recorded 1.2km from the site.

4.3.6 Other Notable Fauna Species

The site provides suitable habitat for hedgehog, a NERC priority species. The hedgerows and scrub provide foraging habitat and potential opportunities for breeding and hibernation.

The site is not considered likely to support any other legally protected or notable species.

5 Evaluation

5.1 Habitats and Botanical Value

None of the individual habitats recorded at the site are of particular conservation significance and no notable or protected plant species were noted; however, the mosaic of habitats does provide suitable habitat for a range of wildlife, as described in section 6.3.

The hedgerows on the site are NERC priority habitats and as such impacts on these habitats are a material planning consideration.

The mature oak and ash trees within and immediately adjacent to the site boundary are considered to be of particular value as they provide shelter for wildlife and potential nesting and roosting habitat for birds and bats. The tree covered by TPO B139 is outside of the development boundary, and as such it is highly unlikely that it will be affected by the proposed development. Should any remedial works to the tree be necessary, consent must be obtained from the LPA prior to commencement.

Three statutory sites were highlighted within 2km of the site however the closest was located 1km north-west of the site. A number of non-statutory designated sites were highlighted within the local area. River Idle – Bolham LWS, at just 70m west of the site is the most proximal; however it is considered unlikely that the development will adversely affect the river corridor and provided steps are taken to prevent run off from any site activities into the river, as per Environment Agency protocols, this will not be a constraint to development.

It is considered that the scale and type of the development would not have a detrimental effect on the habitats and associated fauna present within the remaining local non-statutory sites or the three statutory sites highlighted.

5.2 Protected and Notable Species

5.2.1 Bats

The site provides suitable habitat for roosting bats, which are European Protected Species, therefore both the bats and their habitats are fully protected by law. The potential presence of any protected species is a material planning consideration; mitigation and enhancement measures in relation to bats are outlined in Section 6.

5.2.2 Birds

The scrub, trees and hedgerows on site were considered to provide suitable nesting habitat for birds. The arable field provides nesting habitat for farmland bird species such as lapwing and skylark although none were noted during the walkover survey. Nesting birds, their nests, eggs, and dependant young are fully protected under the Wildlife and Countryside Act 1981 (as amended) and therefore impacts on nesting birds will need to be considered further, particularly in relation to timing of any site clearance.

5.2.3 Reptiles

The field margins on site are considered to provide suitable foraging habitat for reptiles and the hedgerows on site are considered to provide potential hibernation habitat. One 50 metre section of H1 is to be removed to allow vehicular access onto the site and the margins are to be removed / altered. As reptiles are partially protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended), which protects them from reckless or intentional killing or injury, it is recommended that precautionary measures are taken.



6 Recommendations

6.1 Further Investigations Required

Under current proposals, all trees and hedgerows within the site and immediately adjacent to the site boundary are to be retained, except a small 50m section of H1. If the proposals change and tree and/or hedgerow removal is required then further survey work may be required and further advice. If the trees recorded as having bat roosting potential are to be removed then it will be necessary to give consideration to timing and method of tree removal.

6.2 General Mitigation

Under current proposals the bounding trees and hedgerows (minus a 50m section) are to be retained on site. Furthermore, swale habitats are to be created as part of the new development and therefore it is considered that there will be no net habitat loss for reptiles. However as the field margin habitats are to be removed / altered and a small section of H1 is to be removed precautionary measures concerning reptiles should be adhered to. It is recommended:

- Suitable reptile habitats are checked by an ecologist prior to clearance;
- The section of hedgerow to be removed will be cut leaving the stumps in place (outside the breeding bird season). The hedgerow stumps will then be removed in summer (avoiding the reptile hibernation period);
- The field margins will be directionally strimmed at a height of 300mm, checked by an ecologist, then the process repeated at a height of 50mm;
- The area to be cleared will then be stripped of surface vegetation using a JCB or tracked excavator (standing only on cleared areas) under the watching brief of an ecologist; and
- Any reptiles (or other fauna) displaced during this exercise shall be relocated to the field to the north where similar suitable reptile habitats exist.
- Works to the margins should be carried out between March and September in temperatures >10°C (ideally early spring or late autumn to avoid the main nesting bird season).

Although no evidence of badger was recorded on site following comments from Nottinghamshire Wildlife Trust and in accordance with best practice it is recommended that precautionary measures during works should be taken to protect mammals utilising the site;

- Any trenches created on site during works should be covered over at night to prevent wildlife falling into the trench or a ramp left in situ to allow animals to exit;
- Any pipes left on site should be capped off at night to prevent animals entering.

When developing the lighting scheme for the site these trees and hedgerows should not be artificially lit and cowl or hoods should be placed on any nearby proposed lighting to ensure no light spill along these tree lines and hedgerows.

Due to the presence of bird nesting habitat throughout the site, any site clearance of vegetation should be undertaken between October and the end of February to avoid the bird breeding season.

If works cannot be avoided at this time then a watching brief to supervise these operations should be undertaken by a suitably qualified ecologist. Should nesting birds be found once works are underway, an appropriate stand-off should be enforced around the nest until the young have fledged.



6.3 General Recommendations for Enhancement

In addition to any specific mitigation required to compensate for impacts on protected species or habitats, both national and local planning policy encourages ecological enhancement in all development. Based on the existing ecological value of the site and information available about the proposed development, consideration should be given to the following options.

A soft landscaping scheme, including planting of native shrubs and broadleaved tree species around the development would increase the breeding and foraging habitat available to many species throughout the site. Planting up gaps in the hedgerows would also increase their value for wildlife. Suitable species include hawthorn, blackthorn, dogwood *Cornus sanguinea* and hazel.

Roosting boxes for bats, such as the Schwegler 2F Bat Box could also be placed on trees within the development such as those within the retained hedgerows or within the area of public open space. Exact locations of boxes will be provided following finalisation of the master plan. The boxes should be placed in sheltered positions but in areas where a clear flight path to and from the box is present. Up to three boxes can be placed around one tree, but they must face in different directions (ideally north, south-east and south-west) and be located between 3-6 metres from the ground.

A range of nest boxes for birds, for example the CedarPLUS Modern, could be fixed to existing (retained) trees to increase nesting opportunities for species present at the site, locations will be provided at a later date. Nest boxes for passerines should ideally be positioned 2 to 5 metres from ground level and should face north to south east with a slight forwards tilt to prevent rain entering them.

Table 10: Summary of recommendations for ecological enhancement

Recommendation	Rationale
Include areas of soft landscaping	Green infrastructure, habitat for wildlife
Use native species or those with recognised benefit to wildlife	Best practice to maximise value of the site for wildlife
Provide nest boxes for birds	Mitigation for loss of nesting habitat and create additional nesting sites
Provide roost features for bats	Enhance the value of the site for roosting bats

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Appendix B: Phase 1 habitat plan



Appendix C: Species list

Trees

<i>Acer campestre</i>	Field maple
<i>Acer pseudoplatanus</i>	Sycamore
<i>Crataegus monogyna</i>	Hawthorn
<i>Fagus sylvatica</i>	Beech
<i>Fraxinus excelsior</i>	Ash
<i>Prunus avium</i>	Cherry
<i>Sambucus nigra</i>	Elder
<i>Quercus robur</i>	Oak

Scrub

<i>Crataegus monogyna</i>	Hawthorn
<i>Prunus spinosa</i>	Blackthorn
<i>Rubus fruticosus</i>	Bramble
<i>Salix</i> sp.	Willow
<i>Sambucus nigra</i>	Elder

Semi-improved Grassland

<i>Agrostis stolonifera</i>	Creeping bent
<i>Anthriscus sylvestris</i>	Cow parsley
<i>Arrhenatherum elatius</i>	False oat-grass
<i>Cardamine flexuosa</i>	Wavy bittercress
<i>Cerastium fontanum</i>	Common mouse-ear
<i>Cirsium arvense</i>	Creeping thistle
<i>Cirsium vulgare</i>	Spear thistle
<i>Dactylis glomerata</i>	Cock's foot
<i>Galium aparine</i>	Cleavers
<i>Geranium molle</i>	Dove's-foot crane's-bill
<i>Geum urbanum</i>	Wood avens
<i>Glechoma hederacea</i>	Ground ivy
<i>Hedera helix</i>	Ivy
<i>Heracleum sphondylium</i>	Hogweed
<i>Holcus lanatus</i>	Yorkshire fog
<i>Hypochoeris radicata</i>	Cat's ear
<i>Lamium album</i>	White dead nettle
<i>Lamium purpureum</i>	Red dead nettle
<i>Lapsana communis</i>	Nipplewort
<i>Lolium perenne</i>	Perennial rye grass
<i>Malva sylvestris</i>	Common mallow
<i>Ranunculus ficaria</i>	Lesser celandine
<i>Ranunculus repens</i>	Creeping buttercup
<i>Rubus fruticosus</i>	Bramble
<i>Rumex</i> sp.	Dock
<i>Senecio jacobae</i>	Common ragwort
<i>Stachys sylvatica</i>	Hedge woundwort



<i>Taraxacum officinale</i>	Dandelion
<i>Urtica dioica</i>	Common nettle
<i>Veronica hederifolia</i>	Ivy-leaved speedwell
<i>Viola</i> sp.	Viola

Tall Ruderal


<i>Arctium minus</i>	Lesser burdock
<i>Artemisia vulgaris</i>	Mugwort
<i>Chamerion angustifolium</i>	Rosebay willow-herb
<i>Elytrigia repens</i>	Common couch
<i>Fraxinus excelsior</i>	Ash
<i>Glechoma hederacea</i>	Ground ivy
<i>Heracleum sphondylium</i>	Hogweed
<i>Rubus fruticosus</i>	Bramble
<i>Urtica dioica</i>	Common nettle

Hedgerow




<i>Acer campestre</i>	Field maple
<i>Acer pseudoplatanus</i>	Sycamore
<i>Corylus avellana</i>	Hazel
<i>Crataegus monogyna</i>	Hawthorn
<i>Fagus sylvatica</i>	Beech
<i>Fraxinus excelsior</i>	Ash
<i>Hedera helix</i>	Ivy
<i>Ilex aquifolium</i>	Holly
<i>Prunus spinosa</i>	Blackthorn
<i>Quercus robur</i>	Oak
<i>Rosa canina</i>	Dog rose
<i>Sambucus nigra</i>	Elder






Appendix D: Habitat Suitability Index for Great Crested Newts

Water body	Description	Suitability Indices Scores				Photograph
		SI ₁ Geographic location	1.0	SI ₆ Water fowl	1	
P1	OS Grid Reference: SK 70778 82339 Small, very shallow pond within area of scrub. Subject to annual drying, no visible aquatic flora. Heavily over-shaded by scrub. Suitability for GCN: Poor	SI ₂ Surface area	0.05	SI ₇ Fish	1	
		SI ₃ Drying	0.1	SI ₈ Pond count	0.38	
		SI ₄ Water quality	0.33	SI ₉ Terrestrial habitat quality	0.33	
		SI ₅ Shade	0.2	SI ₁₀ Plant cover	0.3	

Appendix E – Photographs of trees with bat potential.

Tree ref.	Location	Photograph
T1	Adjacent to fence line along northern boundary of site	
T2	Adjacent to fence line along northern boundary of site	
T3	Adjacent to fence line along northern boundary of site	

T4	Within hedgerow along eastern boundary of site	
T5	Within private garden along southern boundary of site	
T6	Within private garden along western boundary of site	



Land west of Tiln Lane, Retford,
Nottinghamshire

Heritage Setting Assessment

Prepared by
CSA Environmental

on behalf of
Vistry Group

Report Ref: CSA/5209/04

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Report Reference	Date	Revision	Prepared by	Checked by	Approved by	Comments
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EXECUTIVE SUMMARY

CSA Environmental was instructed by Vistry Group to undertake a Heritage Setting Assessment in relation to Land West of Tiln Lane, Retford, Nottinghamshire (the 'Site'). The Site is being promoted through the Local Plan process for residential development. This report provides a review of potential impacts to heritage assets as a result of alteration to setting. It assesses the significance of the heritage resource which may be affected, and the potential impact of proposals on that significance.

The Site is within the historic agricultural landholding of the Grade II listed Bolham Hall. There are glimpsed views to the listed building from the eastern area of the Site and there will be filtered views of this area of the Site from Bolham Hall. Formulation of design plans have taken into account the proximity of Bolham Hall and include for open space in the north-eastern area of the Site as well as enhanced boundary planting to offset built form and further filter views. With these measures in place any harm to the significance of Bolham Hall through the alteration of part of its wider agricultural landscape would be negligible, that is to say less than substantial harm at the very lowermost end of this harm spectrum. The HER records a non-designated Park and Garden surrounding Bolham Hall east of the Site. Any harm to the significance of the non-designated Bolham Hall Park and Garden would be negligible at most. Development of the Site would not adversely impact any other designated heritage assets.

The Site is located immediately south of a non-designated Water Pumping Station first recorded on 1920s Ordnance Survey mapping. Current design plans include for open space at the northern / north-western edge of the Site, allowing for the retention of views to the pumping station from adjacent areas. Any harm resulting from the loss of adjacent agricultural land and non-key views would be negligible at most.

The Site is located to the rear of the non-designated Bolham Manor, a mid-19th century mill owner's/manager's house. Bolham Manor is located within a designed wooded plot, above the former mill site. The principal elevation looks west, and Bolham Manor is designed to be viewed from the west, not from within the Site. Formulation of design plans have taken into account the proximity of Bolham Manor and utilise open space to offset built form. Any harm as a result of the loss of non-key views and alteration of adjacent agricultural land would be minimal. The key setting of Bolham Manor, i.e. its surrounding wooded plot, will remain.

1.0 INTRODUCTION

- 1.1 This Heritage Setting Assessment has been prepared by CSA Environmental on behalf of Vistry Group, in relation to Land West of Tilt Lane, Retford, Nottinghamshire (hereafter 'the Site'). The Site is being promoted through the Local Plan process for residential development.
- 1.2 This report provides a review of potential impacts to heritage assets due to alteration to setting as a result of development proposals. It assesses the significance of the heritage resource which may be affected and the potential impact of proposals on that significance.
- 1.3 The Site occupies an area of c. 5.88 ha and is located around central grid reference SK 7069 8260, to the north of Retford (see Figure 1: Site Location Plan). It consists of two agricultural fields, one of which was partially in-use as a construction site compound at the time of the site visit.
- 1.4 This report aims to:
 - identify any heritage assets located beyond the Site which may be impacted by the proposals through alteration to setting; and
 - assess the potential impact of the proposals on these heritage assets.
- 1.5 This report has been prepared with reference to the Historic England Guidance The Setting of Heritage Assets: Historic Environmental Good Practice Advice in Planning: 3 (2nd Edition) (2017).

2.0 LEGISLATION, PLANNING POLICY AND GUIDANCE

2.1 This assessment has been prepared in the context of current heritage legislation, planning policy and guidance, including:

- Ancient Monuments and Archaeological Areas Act (1979)
- Planning (Listed Buildings and Conservation Areas) Act (1990)
- English Heritage (now Historic England) *Conservation Principles, Policies and Guidance* (2008)
- Historic England *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning Note 2* (2015)
- Historic England *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)* (2017)
- The National Planning Policy Framework (MHCLG 2019)
- The Planning Practice Guidance (MHCLG 2018)

2.2 Further information is provided in Appendix B.

National Planning Policy

2.3 The National Planning Policy Framework (NPPF; MHCLG 2019) sets out the government planning policies for England and how they should be applied. Chapter 16: Conserving and Enhancing the Historic Environment, is of particular relevance to this report as it relates to heritage assets. Accompanying guidance is published in the Planning Practice Guidance (PPG; MHCLG 2018) which expands on how the historic environment should be assessed within the National Planning Policy Framework. Further details are provided in Appendix B.

Local Planning Policy

2.4 Local planning policy is contained within the Bassetlaw Local Plan. Relevant policies relating to heritage are summarised in Table B.1 of Appendix B.

Guidance

2.5 Historic England have prepared a number of guidance documents including Good Practice Advice notes (GPAs) designed to provide supporting information on good practice and how national policy and guidance can be applied. These include GPA2, *Managing Significance in Decision-Taking in the Historic Environment* and GPA3, *The Setting of Heritage Assets*. Further details are provided in Appendix B.

3.0 METHODOLOGY

Sources of Information and Study Area

3.1 The report involved consultation of publicly available archaeological and historical information including heritage databases and documentary, cartographic and aerial photographic sources. The major sources of information included:

- The National Heritage List for England (NHLE), maintained by Historic England, for details of designated heritage assets.
- The Nottinghamshire Historic Environment Record (HER), for details of recorded heritage assets and previous archaeological works.
- Historic maps, documentary sources and aerial photographs available online, including Tithe and Ordnance Survey mapping and historic satellite imagery.
- Online sources including the Local Authority website for information on conservation areas.
- A heritage site visit undertaken 14 October 2020, and a visit by a CSA landscape colleague undertaken 20 November 2020. Inter-visibility with designated heritage assets was assessed from within the Site and public rights of way.
- Reports prepared for the residential development immediately to the south including a Heritage Statement, Desk-Based Assessment and Trial Trench Evaluation.¹ Geophysical survey has previously been undertaken within the western area of the Site².

3.2 Due to Covid19 restrictions, the Nottinghamshire Archives were closed at the time of preparing this assessment. A remote search of their online catalogue did not identify any resources likely to influence the findings of this report.

3.3 HER data has been reviewed for a minimum 1km buffer from the sites central point. Designated heritage assets for a wider area were assessed as professional judgement deemed appropriate.

Assessment of Significance

3.4 A heritage asset is “a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest”. This interest may be archaeological, architectural, artistic or historic. Significance may derive from physical remains and also from setting,

¹ Prospect Archaeology 2014. *Tiln Lane, Retford Notts. Desk Based Archaeological Assessment*. Pdf. report; Turley Heritage 2014. *Heritage Statement: Land at Tiln Lane, Retford*. Pdf. report; WYAS 2019. *Land off Tiln Lane, Retford, Nottinghamshire: Archaeological Evaluation*. Pdf report WYAS ref. 3242.

² WYAS 2018. *Land off Tiln Lane Retford Nottinghamshire Geophysical Survey*. WYAS report no. 3208

that is “the surroundings in which a heritage asset is experienced” (NPPF).

- 3.5 Heritage assets include designated heritage assets and non-designated heritage assets. Designated heritage assets include world heritage sites, scheduled monuments, listed buildings, protected wreck sites, registered parks and gardens, registered battlefields and conservation areas. Of these, world heritage sites, scheduled monuments, Grade I and II* listed buildings, protected wreck sites, and Grade I and II* registered parks and gardens are of the highest significance.
- 3.6 Non-designated heritage assets may include those identified by the local authority, such as local listings or assets recorded on a Historic Environment Record, or assets identified during the course of an application (HE 2015). They are generally of lesser significance than designated heritage assets. However, non-designated archaeological assets may at times be of a significance commensurate to a scheduled monument, such as where they are not of a type suitable for designation or have not yet been formally assessed. Assessment of the significance of archaeological assets refers to criteria for scheduling monuments outlined by DCMS (2013), including period, rarity, documentation, group value, survival/condition, fragility/vulnerability, diversity and potential (DCMS 2013), as well as the Historic England Scheduling Selection Guides.
- 3.7 An assessment of significance will consider archaeological, historic, architectural and artistic interest of an asset, its fabric and its setting. In order to further understand significance, an assessment may also refer to the heritage values identified in Historic England's *Conservation Principles* (2008), namely evidential, historical, aesthetic and communal values. An assessment of significance should also seek to identify the nature, extent and level of significance for a particular heritage asset (HE 2015).

Assessment of Impacts

- 3.8 Change may preserve, enhance or harm the significance (value) of a heritage asset. In order to understand the impact of change it is necessary to first understand the significance of a heritage asset, and how this significance will be altered, both in terms of direct physical change, and change to setting (HE 2015). Assessment of impacts may also consider how an asset might be enhanced, or how loss of significance might be offset (CIfA 2017).
- 3.9 Assessment of impacts through change to setting will reference the Historic England Guidance, *The Setting of Heritage Assets* (GPA3; HE 2017). This guidance document details the recommended approach to assessing setting and potential harm to heritage assets through alteration to setting. This clarifies that “setting is not itself a heritage

asset...its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance". Historic England recommends that assessment of setting covers five broad steps:

- Step 1: Identify which heritage assets and their settings are affected.
- Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it.
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm.
- Step 5: Make and document the decision and monitor outcomes.

3.10 Step 1 should consider whether proposals have the potential to affect the setting of any heritage assets. Where appropriate this may utilise a 'search area' and 'Zone of Theoretical Visibility', as well as the nature of proposals.

3.11 Step 2 should consider the assets physical surroundings and its relationship with other heritage assets, intangible associations with surroundings and patterns of use, the contribution made by factors such as noise and smell, as well as the ways in which views allow the significance of the asset to be appreciated. A non-exhaustive checklist of potential attributes is given on page 11 of GPA3, including items such as: topography, aspect, definition of surrounding spaces, formal design, orientation, historic materials, greenspace, vegetation, openness, functional relationships, history, change over time, surrounding character, views, intentional intervisibility, visual dominance, vibration, tranquillity, busyness, enclosure, land use, accessibility, patterns of movement, degree of interpretation, rarity, associations, artistic representations and traditions.

3.12 Step 3 is informed by step 2 and considers the effects of the proposed development with reference to factors including location, siting, form, appearance and permanence.

3.13 Minimising harm in Step 4 may include design alterations or the implementation of mitigating factors such as screening. Step 5 includes documenting steps 1-4, but also reviewing a scheme following its implementation.

3.14 With reference to the NPPF, for designated heritage assets, harm may be expressed in terms of 'substantial harm' or 'less than substantial harm'. Substantial harm *"is a high test, so it may not arise in many cases...It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed"* (PPG).

4.0 SETTING ASSESSMENT

- 4.1 This section follows the methodology detailed in the Historic England Guidance *The Setting of Heritage Assets* (HE 2017). This recommends a stepped approach, as detailed in Appendix B.
- 4.2 In line with step 1 of the guidance, consideration was given to which heritage assets in the vicinity of the Site include the Site as part of their setting, and which may therefore be affected by the proposed development. The location of designated heritage assets is shown on Figure 1. The location of selected non-designated heritage assets is shown on Figure 2.
- 4.3 Designated heritage assets in the vicinity of the Site include:
- Grade II listed Moorgate House, c. 190m south-east of the Site (**LB1**).
 - Grade II listed Bolham Hall, c. 250m north of the Site (**LB2**).
 - Designated heritage assets within the historic core of Retford including listed buildings and Retford Conservation Area (**CA1**), to the south of the Site.
- 4.4 These are discussed in further detail below. A review of designated heritage assets in the wider area, taking into account factors including distance, intervisibility and historic relationships, did not identify any considered potentially sensitive to adverse impacts as a result of development proposals or requiring further detailed assessment.
- 4.5 A review of the Nottinghamshire HER identified the following non-designated heritage assets in the immediate vicinity of the Site and potentially sensitive to adverse impacts as a result of development proposals:
- Bolham Manor (**1**)
 - Bolham Mill (**2**)
 - Water Pumping Station (**3**)
 - Bolham Hall Park and Garden (**4**)
- 4.6 These are discussed in further detail below. A review of Nottinghamshire HER data for a wider area, within 1km of the Site, did not identify any other non-designated heritage assets considered potentially sensitive to adverse impacts as a result of development proposals or requiring further detailed assessment.

Moorgate House Grade II listed building

- 4.7 Moorgate House Grade II listed building (**LB1**) is located c. 190m south-east of the Site. This is a three-storey late 18th-century farmhouse (Plate 1). The mid-19th century Tithe survey records Moorgate House as under

separate ownership and occupancy to the Site. At this time Moorgate House was associated with adjacent agricultural land, east of Tiln Lane.



Plate 1: View to Moorgate House from Tiln Lane, view to north-east



Plate 2: View to Moorgate House from Tiln Lane, view to south-east



Plate 3: View looking north along Tiln Lane, west of Moorgate House



Plate 4: View towards Moorgate House from within the eastern area of the Site, view to south-east

- 4.8 Moorgate House is located to the south-east of a group of associated farm buildings, which include both historic buildings and modern barns (Plate 2). Its immediate setting comprises these farm buildings and surrounding agricultural land located to the east of Tiln lane. The wider setting includes the settlement of Retford, including residential development currently under construction immediately south of the Site (Plate 3), and the wider agricultural landscape. The principal elevations of Moorgate House face south-west/north-east, looking towards

adjacent agricultural land and not towards the Site. The Site is separated from Moorgate House by intervening built form, including farm buildings immediately north-west of Moorgate House, and also by residential development currently under construction immediately south of the Site (Plate 4).

- 4.9 As a Grade II listed building, Moorgate House is a designated heritage asset. It principally derives its significance from the architectural and historic interest associated with its built form, and its corresponding historic and evidential values. Adjacent historic farm buildings, historically associated with the farmhouse, and also adjacent agricultural land, particularly where part of the historic landholding, also contribute to the significance of the listed building. Agricultural land within the Site is separated from Moorgate House by intervening residential development and does not contribute to the significance of Moorgate House. Development of the Site will not interrupt the relationship between Moorgate House and its adjacent associated agricultural land. It is concluded that residential development of the Site would not adversely impact the significance of this listed building.

Retford Conservation Area and associated listed buildings

- 4.10 Retford Conservation Area is located c. 900m south of the Site (**CA1**). The conservation area contains 109 associated listed buildings, of which six are Grade II* and the remainder are Grade II.
- 4.11 Bassetlaw District Council have produced and approved Retford Conservation Area Appraisal (May 2012). This describes the conservation area in detail, including those elements which contribute to its significance and key views. The conservation area is a designated heritage asset which principally derives its significance from the architectural and historic interest of its associated historic buildings, including listed buildings, and its historic layout and character. The Site is not a focus of key views identified in the Retford Conservation Area Appraisal. Agricultural land within the Site does not contribute to the significance of Retford Conservation Area.
- 4.12 There are glimpsed views from within the Site towards the tower of the Grade II* listed Church of St Swithun (**LB3**) and the Grade II* listed Church of St Michael the Archangel (**LB4**), both located within Retford Conservation Area. There are also glimpsed views to the bell-cote of the Grade II listed Town Hall, also within the conservation area (**LB5**). Grade II* listed buildings are designated heritage assets of the highest significance and Grade II listed buildings are designated heritage assets. These listed buildings principally derive their significance from the architectural and historic interest of their built form. Agricultural land within the Site does not contribute to the significance of these listed buildings. Views to these assets from within the Site are limited and are likely to be further screened once the development to the south is

complete. There will be views to the Site from the church tower (where accessible), beyond intervening residential development, with the Site forming part of the wider mixed residential and agricultural landscape.



Plate 5: View to the Spire of the Grade II* listed Church of St Michael the Archangel from within the eastern area of the Site, view to south-west



Plate 6: View to the tower of the Grade II* listed Church of St Swithun and the bell-cote of the Grade II listed Town Hall from within the site, view to south.

- 4.13 A reduction in limited views to the tower of the Church of St Swithun, the spire of the Church of St Michael the Archangel and the Town Hall Bell-cote as a result of development of the Site would not adversely impact the significance of these listed buildings or the conservation area. Development may be visible from the tower of the Church of St Swithun

(where accessible), but the character of the wider landscape would remain residential and agricultural and this would not adversely impact the significance of the listed building. It is not anticipated that development of the Site would adversely impact the significance of Retford Conservation Area or its associated listed buildings.

Bolham Hall Grade II listed building

- 4.14 The Grade II listed Bolham Hall (**LB2**) is located c. 250m north of the Site. This is a mid-18th century house, altered and extended in the 19th century and sub-divided into two dwellings in the 20th century. The mid-19th century Tithe Survey indicates that land within the Site was under the same ownership and occupancy as Bolham Hall in the mid-19th century.
- 4.15 In the mid-19th-century Bolham Hall and the Site were part of the Hamlet of Bollam (sic) in the parish of Claborough. At this time Bolham Hall was under the same ownership and occupancy as the Site, with the Site forming part of the landholding surrounding the country house. There is no indication on the Tithe map or later mapping that the Site comprised designed parkland.

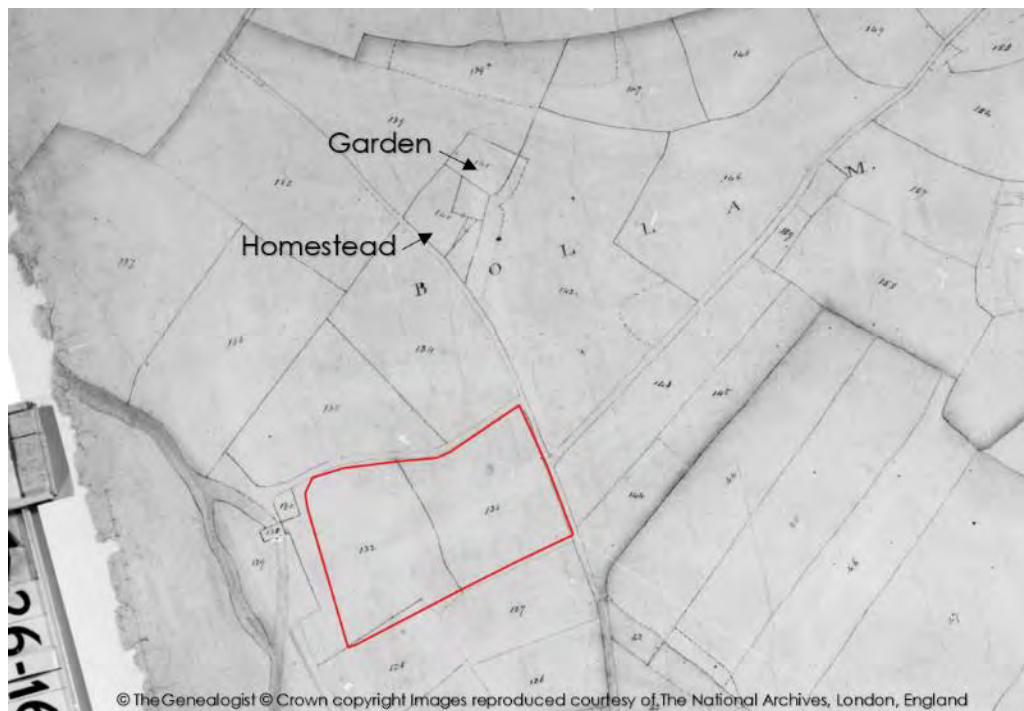


Plate 7: Extract from the 1842 Tithe map, with labels showing the location of the homestead and garden recorded in the accompanying apportionment register.

- 4.16 The HER records an area of historic park and garden associated with Bolham Hall to the east of the Site, this is not designated (**4**; see below). Parkland is often (although not exclusively) shaded on early 20th-century Ordnance Survey mapping. Historic Ordnance Survey mapping does not record park surrounding Bolham Hall. The 19th-century mapping records a small wooded block to the south of the hall, and orchard to its

north-east. The Ordnance Survey mapping doesn't record trees or planting in the wider landholding which might suggest wider parkland.

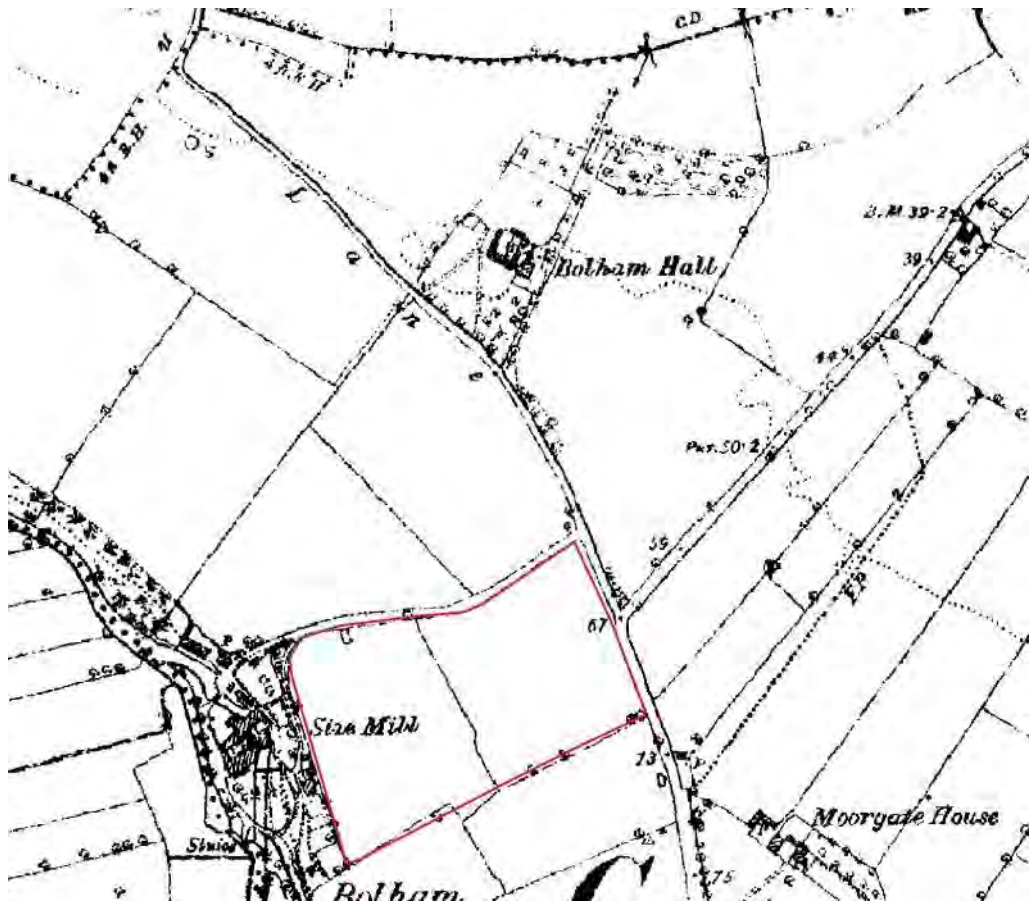


Plate 8: Extract from the 1888 Ordnance Survey mapping, 6" series



Plate 9: Glimpsed view to Bolham Hall from the eastern area of the Site, view to north.



Plate 10: View towards Bolham Hall (screened) from the central area of the Site, view to north-east

- 4.17 The setting of Bolham Hall comprises surrounding agricultural land. There are glimpsed views to Bolham Hall from the eastern area of the Site (Plate 9). These views are filtered by vegetation and may be screened in summer, but there are most likely glimpsed winter views of the far eastern area of the Site from Bolham Hall.
- 4.18 As a Grade II listed building Bolham Hall is a designated heritage asset. It is principally listed for its architectural interest as a *“well-preserved example of a substantial Georgian farmhouse with a carefully proportioned principal elevation and good surviving interior detail, including a turned baluster staircase, panelled doors and window shutters and a number of C19 hearth surrounds.”* (NHLE list entry). It principally derives this architectural interest from its built form. It also derives some significance, and aesthetic value, from its agricultural setting, including historically associated agricultural land. The Site does not appear to have ever formed part of a designed landscape to Bolham Hall but does form part of its wider agricultural landholding. There is some intervisibility between the eastern area of the Site and Bolham Hall and this area can be considered to make some contribution to the significance of Bolham Hall, although to a lesser extent than land east of Tiln Lane.
- 4.19 Formulation of design plans have taken into account the historic association between the Site and Bolham Hall, and the limited intervisibility between the hall and the eastern area of the Site. Current design plans include for open space in the north-eastern area of the Site, and enhanced boundary planting, to offset built form and further filter views. With these measures in place it is anticipated that any harm to

the significance of Bolham Hall would be negligible, that is to say less than substantial harm at the lowermost end of this harm spectrum.

Bolham Hall Park and Garden non-designated heritage asset

- 4.20 The HER records Bolham Hall Park and Garden to the east of the Site, on the far side of Tiln Lane (Fig. 2, 4). As noted above, this area is not recorded as park on the historic Ordnance Survey mapping, nor does it display any typical park characteristics such as specimen trees. It does however form the immediate surroundings to Bolham Hall and comprises the adjacent historic setting to this listed building. The area closest to Bolham Hall Park is recorded as garden on historic sources. As it is identified on the HER, Bolham Hall Park and Garden may be considered to be a non-designated heritage asset. It principally derives its significance through its association with the listed building.
- 4.21 Views to ground level of the area identified as Bolham Park and Garden from within the Site are generally screened by hedgerows, although trees are visible (Plate 10). Views into the Site are likely to be similarly limited. The Site forms part of the agricultural setting, also associated with Bolham Hall, but does not notably contribute to the significance of the identified area of park. Formulation of design plans has taken into account the proximity of Bolham Hall and its associated immediate grounds. Current design plans include for open space in the north-eastern area of the Site, and enhanced boundary planting, to offset built form and further filter views. With these measures in place it is anticipated that any harm to the significance of the non-designated Bolham Hall Park and Garden would be negligible at most.

Water pumping station non-designated heritage asset

- 4.22 A Water Pumping Station immediately north of the Site is recorded on the HER. The tithe survey indicates this area was under the same ownership as Bolham Hall in the mid-19th century (see above), although it had not been constructed at this point. The HER records it as dating to 1880 although it is not recorded on the Ordnance Survey mapping until the 1920s. At this time it is recorded as 'Sewage Disposal Works (East Retford Corporation)'. Associated tanks and sluices are recorded to the north of the pumping station. The building is relatively ostentatious for a utilitarian structure, although this is not uncommon for buildings of this date.
- 4.23 There are views to part of the Water Pumping Station's south elevation from within the Site, particularly from the area to its south/south west (Plate 11), with more limited views elsewhere (Plate 12).



Plate 11: View to Water Pumping Station from within the Site, view to north-east.



Plate 12: View to Water Pumping Station from the northern area of the Site, view to north-west.

- 4.24 The Water Pumping Station is a non-designated heritage asset. It principally derives its significance from the modest architectural interest of its built form, as an example of early-20th century sewage infrastructure. While it would have intentionally been located away from settlement, agricultural land within the Site does not make any key contribution to the significance of the building. Development will alter agricultural land to the south of the pumping station to built form and open space, though its relationship with tanks and sluices to the north

will be unchanged. Current design plans include for open space at the northern / north-western edge of the Site, allowing for the retention of views to the pumping station from these adjacent areas. Harm resulting from the alteration of the adjacent agricultural land and reduction in non-key views would be negligible at most.

Bolham Manor and Mill non-designated heritage assets

- 4.25 Bolham Manor, a non-designated heritage asset recorded on the HER, is located immediately west of the Site (Fig. 2, **1**). This is a two-storey mid-19th century house, historically the manager's/owner's house to Bolham Mill. The latter (**2**), formerly located c. 50m west of the Site, was demolished and replaced with flats in the 20th century.
- 4.26 The 19th-century Ordnance Survey mapping records Bolham Manor located within a well-treed plot adjacent to the mill site (Plate 13). Bolham Manor is intentionally located to look west across the river valley and in a dominant position above the mill site (Plate 14). Agricultural land within the Site is to the rear and there is no apparent historic relationship between the Site and Bolham Manor other than proximity. The main façade of the house looks west, away from the Site, and architecturally it is designed to be viewed from the west.



Plate 13: Extract from the 1886 Ordnance Survey mapping, 25" series



Plate 14: View to Bolham Manor from footpath to its west, view to east



Plate 15: View to Bolham Manor from within the north-western area of the Site



Plate 16: View to Bolham Manor from the north-eastern edge of the Site, adjacent to Tilt Lane

- 4.27 The rear aspect of Bolham Manor overlooks the Site. There are views to the rear of Bolham Manor from within the Site and glimpsed views from adjacent roads when not screened by hedgerow (Plate 15, Plate 16). The difference in architectural composition between the main west-facing façade and the rear of the property is notable; views to/from the rear are not key designed views.
- 4.28 Bolham Manor is a non-designated heritage asset. It has modest historic and architectural interest as an example of a mid-19th century house located within associated grounds. The associated wooded plot forms its designed grounds and contributes to its significance. Although the mill has been demolished, its relationship with the former mill site makes some contribution to the significance of Bolham Manor, as its location is designed to sit above and dominate the mill site. Agricultural land within the Site forms part of its adjacent setting but makes a much lesser contribution. Views to Bolham Manor from within and across the Site might be considered to make a small contribution to its aesthetic value, in the context of an appreciation to/from the rear aspect of the building, but these are not key designed views and they are not key to its significance. In architectural composition the property is designed to be viewed from the west, and key views look west. Agricultural land within the Site and views across the Site make a very minimal contribution to the significance of this non-designated heritage asset.
- 4.29 Formulation of design plans have taken into account the proximity of Bolham Manor. Built form is offset beyond open space in order to retain views to the rear of Bolham Manor and also to retain its detached setting. It is anticipated that this will also avoid the appearance of built

form behind Bolham Manor when viewed from the west. With these design measures in place, any harm as a result of the loss of non-key views and alteration of adjacent agricultural land would be minimal. The key setting of Bolham Manor, i.e. its surrounding wooded plot, will be retained.

5.0 CONCLUSIONS

- 5.1 The Site is within the historic agricultural landholding of the Grade II listed Bolham Hall. There are glimpsed views to the listed building from the eastern area of the Site and there will be filtered views of this area of the Site from Bolham Hall. Formulation of design plans have taken into account the proximity of Bolham Hall and include for open space in the north-eastern area of the Site as well as enhanced boundary planting to offset built form and further filter views. With these measures in place any harm to the significance of Bolham Hall through the alteration of part of its wider agricultural landscape would be negligible, that is to say less than substantial harm at the lowermost end of this harm spectrum. The HER records a non-designated Park and Garden surrounding Bolham Hall east of the Site. Any harm to the significance of the non-designated Bolham Hall Park and Garden would be negligible at most. Development of the Site would not adversely impact any other designated heritage assets.
- 5.2 The Site is located immediately south of a non-designated Water Pumping Station first recorded on 1920s Ordnance Survey mapping. Current design plans include for open space at the northern / north-western edge of the Site, allowing for the retention of views to the pumping station from adjacent areas. Any harm resulting from the loss of adjacent agricultural land and non-key views would be negligible at most.
- 5.3 The Site is located to the rear of the non-designated Bolham Manor, a mid-19th century mill owner's/manager's house. Bolham Manor is located within a designed wooded plot, above the former mill site. The principal elevation looks west, and Bolham Manor is designed to be viewed from the west, not from within the Site. Formulation of design plans have taken into account the proximity of Bolham Manor and utilise open space to offset built form. Any harm as a result of the loss of non-key views and alteration of adjacent agricultural land would be minimal. The key setting of Bolham Manor, i.e. its surrounding wooded plot, will be retained.
- 5.4 Under the NPPF less than substantial harm to designated heritage assets should be weighed against the public benefit in decision making. Harm to a non-designated heritage asset should be taken into account in decision making.

6.0 REFERENCES

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Cartographic Sources

1842	Map of the Hamlets of Moorgate and Bollam in the Parish of Clarborough
1886/88	First Edition Ordnance Survey mapping, 25" and 6" series
1899/1900	Second Edition Ordnance Survey mapping, 25" and 6" series
1920/21	Third Edition Ordnance Survey mapping, 25" and 6" series

Appendix A

Heritage Data Gazetteers

Designated Heritage Assets (selected)

CSA Ref.	NHLE Ref.	Name/Designation
LB1	1045164	Grade II listed building MOORGATE HOUSE
LB2	1045165	Grade II listed building BOLHAM HALL
LB3	1370346	Grade II* listed building PARISH CHURCH OF ST SWITHUN
LB4	1370357	Grade II* listed building CHURCH OF ST MICHAEL THE ARCHANGEL
LB5	1370374	Grade II listed building TOWN HALL
CA1	n/a	Retford Conservation Area

HER data (selected)

CSA Ref./Summary	HER No.	HER Description
1	17605	Bolham Manor
2	L4995	Bolham Mill
3	M17604	Water Pumping Station
4	MNT26969	Bolham Hall Park and Garden

Appendix B

Legislation, Policy and Guidance

The **Ancient Monuments and Archaeological Areas Act (1979)** forms the principle legislation for designated archaeological sites. It relates to Scheduled Monuments and designated Areas of Archaeological Importance (the historic city centres of Canterbury, Chester, Exeter, Hereford and York). The 1979 Act does not contain any requirements relating to the setting of designated archaeological assets.

The **Planning (Listed Buildings and Conservation Areas) Act 1990** (the 1990 Act) sets out legislation relating to listed buildings and conservation areas. With regards to listed buildings, Section 66 (1) of the 1990 Act states that *"in considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority or, as the case may be, Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"*. With regards to conservation areas, Section 72 (1) of the 1990 Act states that *"...with respect to any building or other land in a conservation area...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area"*.

National Planning Policy Framework (2019) (NPPF) sets out the government planning policies for England and how they should be applied. With regards to the historic environment, Chapter 16: Conserving and Enhancing the Historic Environment highlights that heritage assets *"are an irreplaceable resource, and should be conserved in a manner appropriate to their significance"* (NPPF paragraph 184).

A heritage asset is defined as *"a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing)"* (NPPF Annex 2). Heritage significance is defined as *"The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."* Setting is defined as *"the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral"*.

With regards to the level of information to be provided, paragraph 189 of the NPPF states that *"In determining planning applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation"*.

With regards to considering impacts the NPPF states that “*great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance*” (paragraph 193).

With regards to impacts to designated heritage assets, “*Any harm to, or loss of...should require clear and convincing justification*”, substantial harm to or loss of designated heritage assets of the highest significance should be “wholly exceptional”, and for grade II designated heritage assets should be “exceptional” (paragraph 194). Less than substantial harm to a designated heritage asset “*should be weighed against the public benefits of the proposal*” (paragraph 196). Footnote 63 clarifies that “*non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets*”.

With regards to non-designated heritage assets “*a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*” (paragraph 197).

Where heritage assets will be lost as a result of development “*Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact*” (paragraph 199).

Advice on enhancing and conserving the historic environment is also published in the **Planning Practice Guidance (2018)** (PPG) which expands on how the historic environment should be assessed within the National Planning Policy Framework. This recognises that “*the conservation of heritage assets in a manner appropriate to their significance is a core planning principle, Heritage assets are an irreplaceable resource and effective conservation delivers wider social, cultural and economic and environmental benefits*”.

Local Planning Policy is contained within **Bassetlaw Development Plan** including the Bassetlaw Core Strategy and Development Management Policies DPD adopted December 2011. Emerging policy is contained within the Draft Bassetlaw Local Plan November 2020. Local planning policies and emerging policies relevant to heritage and the Site have been set out in Table B.1 below.

Table B.1. Local planning policy and emerging policy relating to heritage

Policy Ref.	Policy Text
Bassetlaw Core Strategy and Development Management Policies DPD (adopted December 2011)	
Policy DM8: The Historic Environment	“ <i>Support will be given to development proposals or regeneration schemes (particularly in central Worksop, Retford and Tuxford) that protect and enhance the historic environment and secure its long-term future, especially the District’s Heritage at Risk. Support will also be given to proposals from the Welbeck Estate for the re-use of heritage assets, where these will result in the enhancement of the assets. Such proposals must recognise the significance of heritage assets as a central part of the development. They will be expected to be in line with characterisation studies, village appraisals, conservation area appraisals (including any site specific development briefs that may be found within them), archaeological reports and other relevant studies.</i> ”

	<p>A. Definition of Heritage Assets</p> <p><i>Designated heritage assets in Bassetlaw include:</i></p> <ul style="list-style-type: none"> <i>i. Listed Buildings (including attached and curtilage structures);</i> <i>ii. Conservation Areas;</i> <i>iii. Scheduled Monuments; and</i> <i>iv. Registered Parks and Gardens.</i> <p><i>Non-Designated assets in Bassetlaw include:</i></p> <ul style="list-style-type: none"> <i>v. Buildings of Local Interest;</i> <i>vi. Areas of archaeological interest;</i> <i>vii. Unregistered Parks and Gardens; and</i> <i>viii. Buildings, monuments, places, areas or landscapes positively identified as having significance in terms of the historic environment.</i> <p>B. Development Affecting Heritage Assets</p> <p><i>There will be a presumption against development, alteration, advertising or demolition that will be detrimental to the significance of a heritage asset.</i></p> <p><i>Proposed development affecting heritage assets, including alterations and extensions that are of an inappropriate scale, design or material, or which lead to the loss of important spaces, including infilling, will not be supported. The setting of an asset is an important aspect of its special architectural or historic interest and proposals that fail to preserve or enhance the setting of a heritage asset will not be supported. Where appropriate, regard shall be given to any approved characterisation study or appraisal of the heritage asset. Development proposals within the setting of heritage assets will be expected to consider:</i></p> <ul style="list-style-type: none"> <i>i. Scale;</i> <i>ii. Design;</i> <i>iii. Materials;</i> <i>iv. Siting; and</i> <i>v. Views away from and towards the heritage asset.</i> <p><i>...</i></p>
Draft Bassetlaw Local Plan November 2020	
Policy ST44: The Historic Environment	<p><i>"A. The historic environment will be conserved and enhanced, sensitively managed and enjoyed for its contribution to character, local distinctiveness and sustainable communities by:</i></p> <ul style="list-style-type: none"> <i>1. Giving great weight to the conservation of heritage assets (designated and non designated) and their settings based on their significance in accordance with national policy¹ , and by ensuring that their significance is recognised through Heritage Statements, Characterisation Studies and other relevant documentation;</i> <i>2. Supporting Heritage Statements that are proportionate to the asset(s) significance and complexity of the application, by ensuring that each statement identifies all assets likely to be affected, the significance of those assets and the level of impact with explanation provided to demonstrate how any harm to significance has been avoided, minimised or mitigated against;</i> <i>3. Supporting new development which makes a positive contribution to the character and local distinctiveness of the historic environment;</i> <i>4. Ensuring that historic designed landscapes are positively conserved or enhanced;</i>

	<p>5. Supporting and developing innovative initiatives that identify, maintain, conserve, sustain or return to beneficial use designated or non-designated assets;</p> <p>6. Capitalising in an appropriate and sensitive manner the regeneration, tourism and energy efficiency potential of heritage assets;</p> <p>7. Taking a positive and proactive approach to securing the conservation and re-use of heritage assets 'at risk', including working with owners and partner organisations to develop schemes that will address the 'at risk' status of the assets and exploring opportunities for grant-funding to deliver viable schemes;</p> <p>8. Reviewing existing local heritage designations, such as conservation areas, and making new designations to protect and conserve built heritage assets, where justified, by appropriate surveys and evidence;</p> <p>9. Using Article 4 Directions, where appropriate, to protect features of historic/architectural importance and to restrict harmful minor alterations; and</p> <p>10. Improving access and enjoyment of the historic environment where appropriate, by supporting proposals that retain, create or facilitate public access to heritage assets to increase understanding of their significance."</p>
Policy 45 Heritage Assets	<p>"Development affecting heritage assets (both designated and non-designated) or their settings should recognise and respond to their significance and demonstrate how they conserve and enhance the significance and character of the asset(s), including any contribution made by its setting where appropriate.</p> <p><i>Designated Heritage Assets and Archaeological Sites of Equivalent Significance</i></p> <p>A. Proposals affecting designated heritage assets and/or their settings should:</p> <ol style="list-style-type: none"> 1. Be sympathetic and complementary to the local vernacular in terms of its scale, massing, alignment, proportions, form, architectural style, building technique(s), building materials, detailing and its setting, or are of a high quality contemporary or innovative nature which complements the local vernacular; 2. Be reflective of the historic setting in terms of use a traditional siting, layout and urban grain; 3. Use landscaping, boundary treatments and surfacing appropriate to the historic setting; 4. Reflect the traditional roofscape in the vicinity; 5. Ensure significant views away from, through, towards and associated with the heritage asset(s) are preserved or enhanced. <p>B. Proposals involving enabling development associated with heritage assets 'at risk' will be supported where a clear justification is provided that results in the conservation of the heritage asset 'at risk' and its setting.</p> <p>C. Proposals involving the viable new use of a designated heritage asset or temporary use of a heritage asset 'at risk' that conserves significance, or that which preserves or enhances the character and appearance of a conservation area will be supported.</p> <p>D. Proposals that result in substantial harm or loss of significance of designated heritage assets will only be considered in exceptional circumstances and with clear and convincing justification.</p> <p>E. Proposals that result in less than substantial harm to a designated heritage asset will only be supported where it is demonstrated that the public benefits will outweigh any harm identified.</p>

	<p>Non-Designated Heritage Assets and archaeological sites of equivalent significance</p> <p>A. Proposals that retain or enhance the significance of a non-designated heritage asset and their setting will be supported which are:</p> <ol style="list-style-type: none"> 1. Sympathetic and complementary to the local vernacular in terms of scale and design; materials; siting, layout and urban grain. <p>B. The demolition (total or substantial loss) of a non-designated heritage asset will only be considered where it is demonstrated that:</p> <ol style="list-style-type: none"> 1. The asset's architectural or historic significance is proven to be minimal; or 2. Through an up-to-date structural report produced by a suitably qualified person, the asset is not capable of viable repair; or 3. Through appropriate marketing, the asset has no viable use; or 4. Where the public benefits of the scheme can be demonstrated to outweigh the loss of significance. <p>Archaeological sites</p> <p>A. Where the 'in situ' preservation of archaeological remains is not possible or desirable, suitable provision shall be made by the developer for the excavation, recording, analysis, storage, relocation of assets and archiving, in accordance with a Written Scheme of Investigation that has been approved by the Local Planning Authority."</p>
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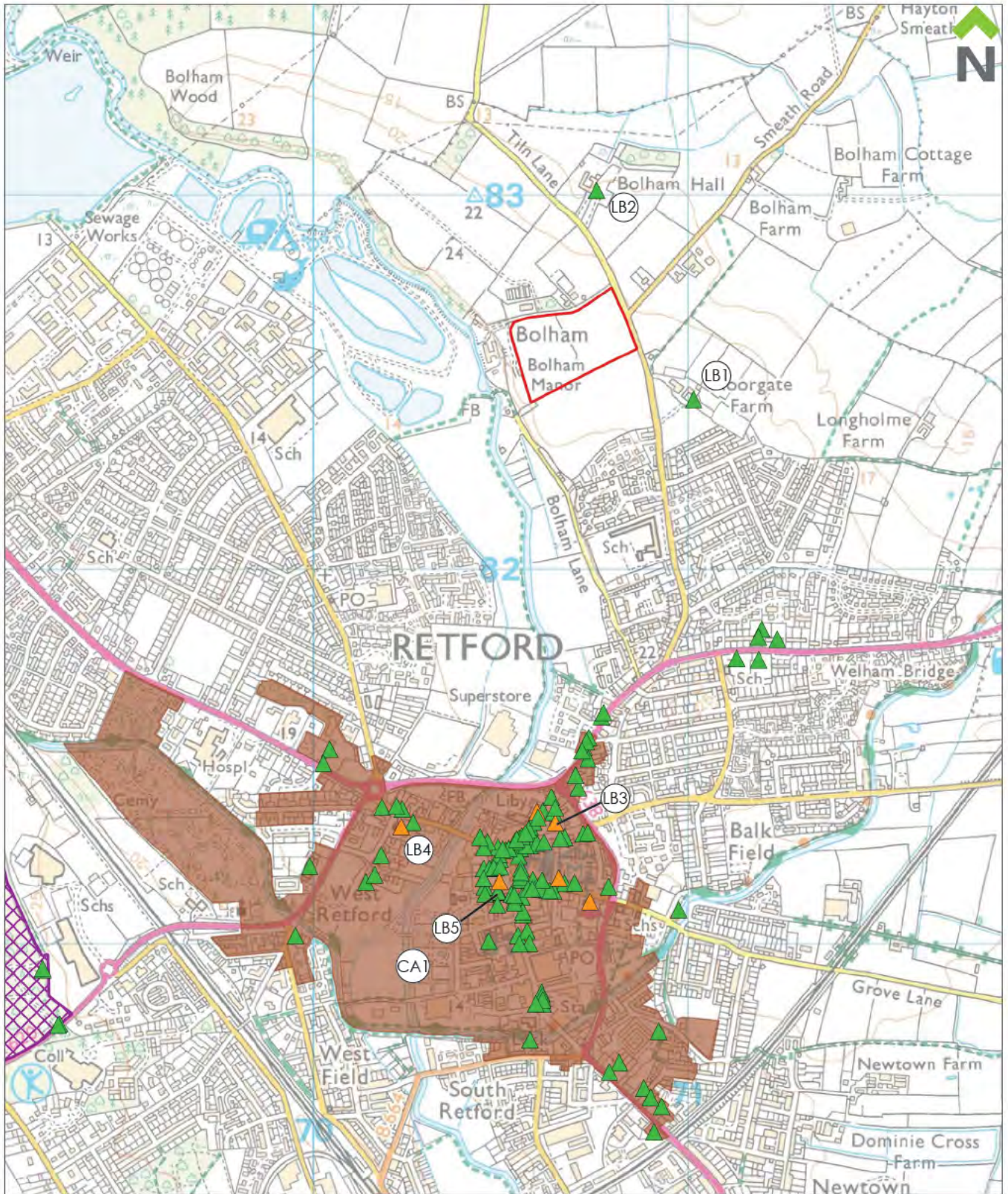
The Historic England document **Conservation Principles, Policies and Guidance** (2008) sets out the recommended approach making decisions about the historic environment. It defines 'conservation' as "*the process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations*" (Principle 4.2). In order to understand significance, it recommends consideration of four heritage 'values', evidential, historical, aesthetic and communal in relation to a 'place'. Conservation Principles uses the term 'place' to mean "*any part of the historic environment that can be perceived as having a distinct identity*". **Evidential value** "*derives from the potential of a place to yield evidence about past human activity*", derives from the physical remains or genetic lines that have been inherited from the past. The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement". **Historical value** "*derives from the ways in which past people, events and aspects of life can be connected through a place to the present*". Historical value is often 'illustrative', i.e. visible remains may illustrate an aspect of the past, or 'associative', i.e. may be associate with a notable family, person, event or movement. **Aesthetic value** "*derives from the ways in which people draw sensory and intellectual stimulation from place*" and may be associated with conscious deign or 'fortuitous' development. **Communal value** "*derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory*". Communal value is closely related to historical associative value and aesthetic value but tends to have additional aspects such as commemorative, symbolic, social or spiritual values. Conservation Principles recommends that assessment of significance should also consider setting and context. Setting being "*the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape*", with the clarification that "*definition of the setting of a significant place will normally be guided by the extent to*







which material change within it could affect (enhance or diminish) the place's significance". Context relates to the "relationship between a place and other places". In the context of managing change to significant places Conservation Principles highlights that "Change to a significant place is inevitable, if only as a result of the passage of time, but can be neutral or beneficial in its effect on heritage values. It is only harmful if (and to the extent that) significance is eroded".

Historic England have prepared a series of advice notes including **Good Practice Advice notes** (GPAs) and **Historic England Advice Notes** (HEANs). The GPAs included **Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning Note 2** (2015) which includes guidance relating to the assessment of significance through understanding the nature, extent and level of significance. The Historic England guidance **The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3** (Second Edition) (2017) (GPA3) details the recommended approach to assessing setting and potential harm to heritage assets through alteration to setting.

Appendix C

Figures



- | | | | |
|---|---------------------------|---|----------------------------|
|  | Site boundary |  | Conservation Area |
|  | Grade II* listed building |  | Registered Park and Garden |
|  | Grade II listed building |  | CSA reference |

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Project Land west of Tilt Lane Retford Nottinghamshire
Drawing Title Site Location and Designated Heritage Assets
Client Vistry Group

Drawing No.
CSA/5209/105

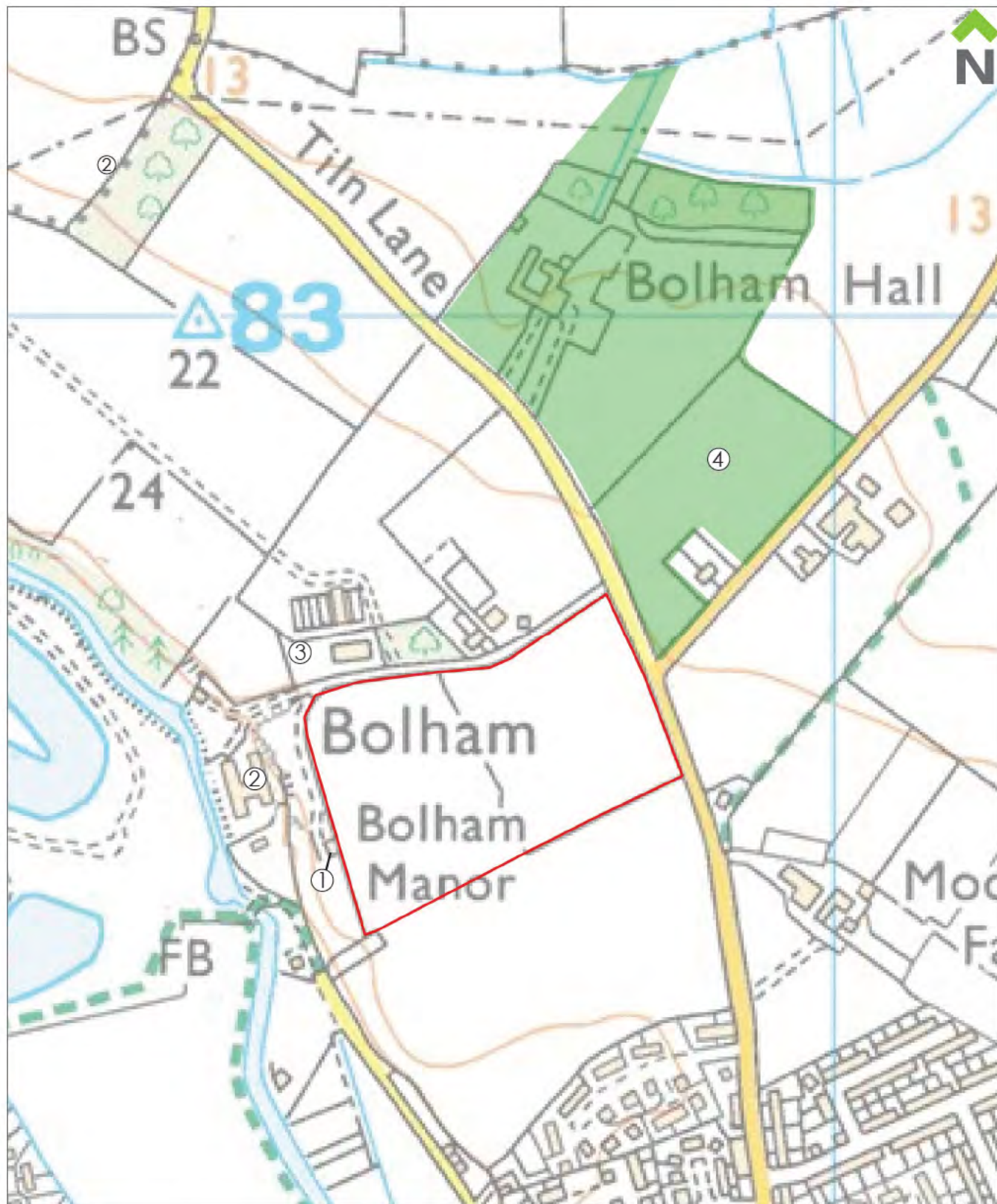
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Date
Jan 2021

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Site boundary



Park and Garden non-designated (after Nottinghamshire HER)



CSA reference

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Project Land west of Tilt Lane Retford Nottinghamshire

Drawing Title Non-Designated Heritage Assets (selected)

Client Vistry Group

Drawing No.
CSA/5209/106

Scale
1:5000

Date
Jan 2021

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Land Off Tiln Lane, Retford, Nottinghamshire

Preliminary Appraisal of Flood Risk and Drainage

Briefing Note

Project ref:	5123 - Tiln Lane, Retford
Prepared by:	Colette Lancaster BSc (Hons) MSc <i>Graduate Flood Risk Consultant</i>
Approved by:	
Date:	20 January 2021
Version:	Final v1.2

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Introduction

1. This document presents a preliminary appraisal of flood risk and drainage in relation to the promotion of land off Tiln Lane, Retford ("the site") for the development of approximately 120 new homes. The report also highlights the presence of existing sewerage and water supply infrastructure and associated constraints.
2. The preliminary assessment of the risk of flooding from waterbodies, surface water, groundwater, reservoirs and canals is based on a review of the information presented on a number of websites. The risk of flooding from sewers and highway drains has not been assessed.

Site Details

3. The approximately 5.88 ha greenfield site is located at off Tiln Lane, Retford at Ordnance Survey National Grid Reference SK 70724 82625 (**Figure 1**).
4. The site is located to the east of Tiln Lane, to the west of the River Idle, to the north of the adjacent Vistry Group (Linden Homes) development (Treswell Gardens), and to the south of Bolham Hall Farm.
5. The River Idle is located approximately 70 m to the west of the site. The Hallcroft fishery complex is located to the west and north-west of the site.
6. A digital terrain model of the site has been developed using LiDAR data (**Figure 2**). The DTM indicates that ground levels are indicated to range between approximately 19.0 m AOD to 23.0 m AOD. Approximately two-thirds of the site falls towards the north-east, with the remaining third falling towards the south-west.
7. National Soils Research Institute mapping¹ classifies soil conditions within the site as loamy and clayey soils with slightly impeded drainage.
8. British Geological Survey mapping of surface geology² indicates the underlying bedrock formation predominately comprises mudstones and sedimentary rock (Retford Member) overlain by superficial deposits of sand and gravel.
9. The National Geoscience Data Centre's Single Onshore Borehole Index³ holds records of boreholes approximately 230 m to the north of the site. The records indicate clayey sand and gravel to 4.9 m bgl, underlain by mudstone and sandstone. Records for a borehole to the south-west of the site records the same ground conditions to the northern borehole.

¹ www.landis.org.uk/soilscapes

² <http://mapapps.bgs.ac.uk/geologyofbritain/home.html>

³ <https://www.bgs.ac.uk/products/onshore/SOBI.html>

Overview of Flood Risk

Historical Records of Flooding

10. There are no records of historic flooding within the vicinity of the site in Bassetlaw District Council's Strategic Flood Risk Assessment⁴ (SFRA) or in the Environment Agency's Recorded Flood Outlines database⁵.

Fluvial Flood Risk

11. The Flood Map for Planning⁶ (**Figure 3**) indicates the site to be located in flood zone 1. Flood zones refer to the probability of river and sea flooding. Table 1 of the NPPG defines flood zones as follows⁷:
- Flood zone 1: Low Probability. Land having a less than 1 in 1,000 annual probability of river or sea flooding
 - Flood zone 2: Medium Probability. Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding
 - Flood zone 3a: High Probability. Land having a 1 in 100 or greater annual probability of river flooding or a 1 in 200 or greater annual probability of sea flooding
 - Flood zone 3b: Functional Floodplain. Land where water has to flow or be stored in times of flood.

Risk of Flooding from Surface Water

12. The Flood Risk from Surface Water map (**Figure 4**) indicates that there is a Very Low risk of surface water flooding. The mapping indicates that some surface water may accumulate along Bolham Way.

Risk of Flooding from Groundwater

13. The JBA Groundwater Flood Risk Indicator map (**Figure 5**) indicates that groundwater may be present across the site at a depth of between 0.005 to 0.5 m bgl during the 1 in 100 year flood event, and therefore there may be a risk of groundwater emergence.

Risk of Flooding from Reservoirs, Canals and Other Artificial Sources

14. The Flood Risk from Reservoirs map indicates that the site is not at risk of flooding due to reservoir failure. There are no canals and no known artificial impounding structures near the site (**Figure 6**).

Planning Considerations

National Planning Policy

15. The NPPF sets out government's planning policies for England and how these are expected to be applied. The NPPF seeks to ensure that flood risk is taken into account at all stages in the planning process and is appropriately addressed.
16. Footnote 50 of the NPPF states that a site-specific flood risk assessment should be submitted for all development proposed in flood zone 2 and flood zone 3 whilst in flood zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land identified as having critical drainage problems or as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.
17. NPPF paragraph 163 states that development should only be allowed in areas at risk of flooding if it incorporates sustainable drainage systems (SuDS) unless there is clear evidence that this would be inappropriate. NPPF paragraph 165 states that applications for major developments should incorporate sustainable drainage systems to appropriate operational standards and with maintenance arrangements in place unless there is clear evidence that this would be inappropriate.

⁴ Strategic Flood Risk Assessment for Bassetlaw District Council – Bassetlaw District Council, January 2019

⁵ <https://data.gov.uk/dataset/16e32c53-35a6-4d54-a111-ca09031eaaaf/recorded-flood-outlines>

⁶ <https://flood-map-for-planning.service.gov.uk/>

⁷ <https://www.gov.uk/guidance/flood-risk-and-coastal-change#flood-zone-and-flood-risk-tables>

18. Non-statutory technical standards for sustainable drainage published by DEFRA in March 2015 set out how surface water runoff generated during the present day 1 in 30 and 1 in 100 AEP rainfall events and for events exceeding the present day 1 in 100 AEP event should be managed, how peak runoff rates should be restricted and how runoff volumes should be controlled.

Local Planning Policy and Guidance

Bassetlaw District Council Local Development Framework – June 2011

19. Bassetlaw District Council Local Development Framework was adopted in December 2011 and includes the following relevant strategic objectives and policies:

20. Strategic Objectives for Bassetlaw ‘Strategic Objective 6’ States:

To ensure that all new development addresses the causes and effects of climate change by, as appropriate, reducing or mitigating flood risk; realising opportunities to utilise renewable and low carbon energy sources and/or infrastructure, alongside sustainable design and construction; taking opportunities to achieve sustainable transport solutions; and making use of Sustainable Drainage Systems.

21. ‘Policy DM12: Flood Risk, Sewerage & Drainage’ states:

- *We do not believe it necessary to consider development proposals (other than those directly suited to areas that may flood) in higher risk areas.*
- *We have sought to reflect the support for Sustainable Drainage Systems (SuDS) and the strong local support for ensuring that development in certain areas is restricted to that which will not exacerbate land drainage problems.*
- *A. Flood Risk Site specific Flood Risk Assessments will be required for all developments in flood risk areas, even where flood defences exist*
- *B. Sewerage and Drainage: All new development (other than minor extensions) will be required to incorporate Sustainable Drainage Systems (SuDS) and provide details of adoption, ongoing maintenance and management.*
- *B. Sewerage and Drainage: Preference will be given to systems that contribute to the conservation and enhancement of biodiversity and green infrastructure in the District.*

22. ‘Policy DM4: Design And Character’ states:

New development will need to demonstrate that careful consideration has been given to minimising CO2 emissions and measures that will allow all new buildings in Bassetlaw to adapt to climate change. Such measures include, but are not limited to: minimising water consumption and maximising water recycling; achieving the highest feasible level of energy efficiency; and maximising opportunities to integrate renewable and low carbon energy infrastructure.

23. ‘Policy DM9: Green Infrastructure; Biodiversity & Geodiversity; Landscape; Open Space & Sports Facilities’ states:

Development proposals will be expected to support the Council’s strategic approach to the delivery, protection and enhancement of multi-functional Green Infrastructure, to be achieved through the establishment of a network of green corridors and assets (please refer to the Council’s Green Infrastructure work for a full list of Green Corridors and Nodes within, and running beyond, the District) at local, sub-regional and regional levels.

Draft Bassetlaw Local Plan 2020

24. Bassetlaw District Council is currently undertaking consultation on the Initial Draft Bassetlaw Local Plan 2020. The initial Draft Plan addresses the District’s housing and economic needs and other social and environmental priorities by 2037. The following relevant emerging policies include:

25. Policy ST45: Climate Change Mitigation and Adaptation states:

... in order to be sustainable, development must minimise the impact and mitigate the likely effects of climate change on the environment and wider community by, in part, proactively managing surface water through the promotion of sustainable drainage techniques and positive land management.

It is encouraged that developments will strive to be energy and water efficient wherever feasible. For example but not limited to: incorporating water recycling such as through rainwater and stormwater harvesting to reduce demand on mains water supply, and to conserve energy and water resources through the layout and design of the development.

26. Policy ST47: Flood Risk states, in part, the following:

- *An appropriate Flood Risk Assessment will be required for proposals in Flood Zone 1 of 1 hectare or more*
- *Flood risk mitigation will be incorporated as conditions to the planning permission.*
- *Developments must demonstrate that they can be considered safe over their lifetime taking account of climate change and the vulnerability of its users, without increasing flood risk elsewhere*
- *Developments are required to incorporate sustainable drainage systems (SuDS) in accordance with national standards*
- *New developments should maximise opportunities to provide natural flood management, including integration with green infrastructure and mitigation*
- *SuDS should maximise environmental gain through enhancing the green infrastructure network, securing biodiversity gain and amenity benefits along with flood storage volumes*
- *Flood Risk must be mitigated and residual flood risk managed.*

27. Policy ST48: Protecting Water Quality states in part, the following:

- *Appropriate sustainable drainage systems should improve water quality, such as swales along hardstanding boundaries, or a more advanced reed bed system for larger sites*
- *Developments should ensure that the quantity and quality of drinking water sources is not compromised*
- *Proposals must be served by an adequate supply of water and appropriate sewerage infrastructure and there must be sufficient sewage treatment capacity to ensure that there is no deterioration of water quality.*

Land Drainage Consent

28. Land drainage consent may be required from the Lead Local Flood Authority, i.e. Nottinghamshire County Council, for work to an Ordinary Watercourse. Undertaking activities controlled by local byelaws (made under the Water Resources Act 1991) also requires the relevant consent.

Surface Water Management

29. The site is currently undeveloped greenfield. Given site topography and ground conditions, surface water runoff would be expected to infiltrate where conditions allow and to flow overland in a north-eastern and south-western areas of the site.
30. The NPPG⁸ states that surface water runoff from new development should be disposed of according to the following hierarchy: Into the ground (infiltration); To a surface water body; To a surface water sewer, highway drain, or another drainage system; To a combined sewer.
31. For the purposes of this appraisal, it is assumed that the disposal of surface water by infiltration would not be feasible due to the underlying geology. However, infiltration tests would need to be undertaken in accordance in accordance with BRE365⁹ to confirm this.
32. To ensure that surface water is managed in accordance with the relevant policy and technical guidance and that flood risk is not increased elsewhere, the rate at which surface water runoff discharges from impermeable surfaces would need to be restricted to the pre-development greenfield runoff rate.
33. The greenfield surface water runoff rates for the site, calculated using the ICP SUDS method within MicroDrainage, are presented in **Table 1**.

⁸ Paragraph 080, Reference ID: 7-080-20150323

⁹ BRE Digest 365 Soakaway Design, Building Research Establishment, 2016

Table 1: Greenfield Runoff Rate

Annual exceedance probability of rainfall event	Greenfield Runoff Rate (l/s/ha)
1 in 1	1.3
QBAR	1.5
1 in 30	3.0
1 in 100	3.9

34. The attenuation storage required to store runoff generated from the 1 in 100 annual probability storm event plus a 40% climate change allowance, based on approximately 3.1 ha of the developed site comprising of impermeable surfaces, and surface water runoff being restricted to the QBAR greenfield rate (8.4 l/s) has been estimated using the Source Control module of MicroDrainage to be 2,244 cu m.
35. The estimated storage volumes storage does not account for storage provided within the on-site surface water conveyance system serving the development.
36. For the purposes of this appraisal, it is assumed that the storage would be provided in an above ground attenuation basin. The viability of using an attenuation basin would be subject to an intrusive site investigation at the proposed location.
37. Attenuation storage is likely to be provided in a number of different storage facilities and the potential for alternative and/or additional SuDS features, e.g. permeable paving, geo-cellular storage crates, filter drains, filter strips, swales and attenuation ponds. These would be investigated further at the planning application stage.
38. Assuming that the attenuation basin would fill to a depth of 1.0 m, with a 0.3 m freeboard and 1 in 4 side slopes, approximately 2,800 sq m of land would be required (assuming level ground).
39. To facilitate a gravity flow of surface water to the storage facilities, an attenuation basin would need to be located in the north-east part of the site. The basin could potentially be supplemented by a second facility located in the south-west corner (**Figure 7**).
40. Surface water could be discharged to the River Idle via an existing public surface water sewer located 230 m south of the site via a point of location located on the adjacent Vistry Group (Linden Homes) development (Treswell Gardens) (refer **Figure 8**).
41. It is likely that this would need require a rising main, and as such, provision should be made for a surface water pumping station on the site, potentially adjacent to the attenuation basin.
42. If a second basin is proposed in the south-west corner of the site, a gravity connection to the surface water drainage system for the adjacent development may be feasible. However, this would be subject to the system having sufficient capacity to convey the runoff.
43. Discharging surface water runoff to the public sewer would be subject to there being sufficient spare capacity in the sewer. This would need to be confirmed by consultation with Severn Trent Water.
44. Attenuation basins can provide water quality benefits via the settlement of pollutants and sediment in still or slow-moving water, adsorption by the soil, and biological activity.

Foul Water Management

45. Severn Trent Water public sewer records (see **Annex 1**) indicate a foul rising main along the eastern and southern boundary of the site. The rising main discharges into a gravity combined sewer close to the south-west boundary of the site. A gravity foul sewer to the west of the site (south of River View and to the west of Cumber Court) is also indicated.
46. The proposed development is estimated to generate a peak foul water loading of 5.5 l/s based on 120 dwellings, an occupancy rate of 3 persons/dwelling and a domestic water consumption of 200 litres/person/day.

47. Potential points of connection to the public sewer network could be (i) to the foul water sewer to the south of River View, approximately 90 m from the north-west corner of the site (this would require a requisitioned connection across third party land), and (ii) to the gravity foul sewer located on the south-west corner of the site. (Refer **Figure 8**). Connection would be subject to an approval from Severn Trent Water.
48. Based on existing ground levels, it is likely that at least part of the foul drainage system would need to be pumped, irrespective of which foul connection is used. It is suggested that provision for a foul pumping station is made, possibly adjacent to the proposed surface water attenuation storage facility in the north-east of the site. If the drainage system is to be offered for adoption by Severn Trent Water, then an allowance for a Type 3 pump station compound (refer **Figure 8**) with appropriate access should be made.
49. It should be noted that under the Water Industry Act (1991), developers have a right to connect foul water flows from new developments to public sewer. The Act places a general duty on sewerage undertakers to provide the additional capacity that may be required to accommodate additional flows and loads arising from new domestic development.

Development Constraints and Opportunities

50. Attenuation is drawn to the following:
 - Public sewers that run along the eastern and southern boundaries of the site. Severn Trent Water will require a no development easement along these sewers. This is likely to be 6m, i.e. 3 m either side of the sewers, but this should be confirmed by Severn Trent Water. (Refer **Annex 1**)
 - There is a public water main located close to the east, north and western boundaries of the site. The precise location of the water main has not been mapped. Anglian Water, the water supply company for the area will require a no development easement along this water main. This is likely to be 6 m, i.e. 3 m either side of the sewers, but this should be confirmed by Anglian Water. If required, it may be possible to realign the water main, subject to approval from Anglian Water. (Refer **Annex 2**).

Summary and Conclusions

Context

51. This preliminary appraisal of flood risk and drainage has been prepared on behalf of Vistry Home Ltd and relates to the proposed development of land off land off Tiln Lane, Retford for the development of approximately 120 homes.

Flood Risk

52. The site is located within flood zone 1. As such the proposals satisfy the requirements of the sequential test and the exception test need not be applied. Nevertheless, as the site is greater than 1 hectare the proposals are still required to meet the requirements for site specific flood risk assessments.
53. The site is assessed to be at a very low risk of flooding from all sources with the exception of groundwater flooding.
54. It is assessed that flood risk would not preclude development of the site and it is likely that the only measure required to mitigate flood risk would be to raise the finished floor levels of dwellings e.g. by 150 mm above adjacent ground levels to enable any potential overland flows to be conveyed safely across the site without affecting property in accordance with the approach promoted by government policy¹⁰.

¹⁰ Making Space for Water, Taking forward a new Government strategy for flood and coastal erosion risk management in England, March 2005, Dept for Environment, Food and Rural Affairs

Surface Water Drainage

55. The feasibility of disposing of surface water by infiltration will need to be assessed by on-site infiltration testing.
56. In the event that disposal of surface water by infiltration is not feasible, it is likely that surface water runoff generated from impermeable surfaces would need to be discharged to the River Idle via connection to an existing public surface water sewer approximately 230 m south of the site.
57. Surface water runoff would need to be restricted to existing greenfield rates and approximately 2,244 cu m of attenuation storage would be required. This could feasibly be provided by an attenuation basin located in the north-east corner of the site, although in practice it is recognised that this may be provided using a number of approaches.
58. It is likely that a rising main would be required and discharging surface water to the public sewer would be subject to the agreement of Severn Trent Water.

Foul Water Drainage

59. Foul water would need to be discharged to the public sewer network. Two potential points of connection exist, one located on the south-west boundary of the site, and one approximately 90 m west of the north-west corner of the site. A point of connection would need to be confirmed by Severn Trent Water.
60. Given ground levels, it is likely that at least part of the foul drainage system would need to be pumped, and it is recommended that provision for a foul pumping station is made, possibly adjacent to the proposed surface water attenuation storage facility in the north-east of the site. If the drainage system is to be offered for adoption by Severn Trent Water, then an allowance for a Type 3 pump station compound (should be made within the proposed layout.

Conclusion

61. The appraisal also indicates that foul water from the developed site could be managed in accordance with planning policy and relevant technical guidance.
62. In conclusion, it is assessed that the site could be readily developed for residential use in accordance with planning policy and relevant technical guidance, and that surface water runoff could be managed using sustainable drainage systems.

FIGURES

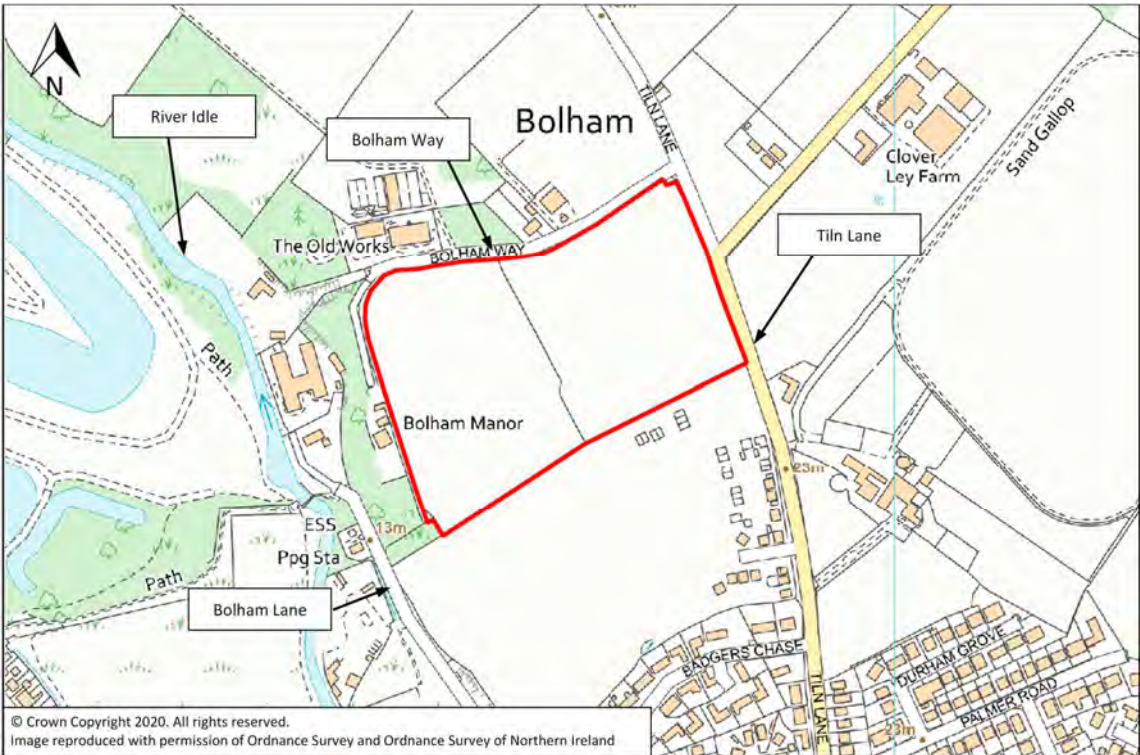


Figure 1: Site Location

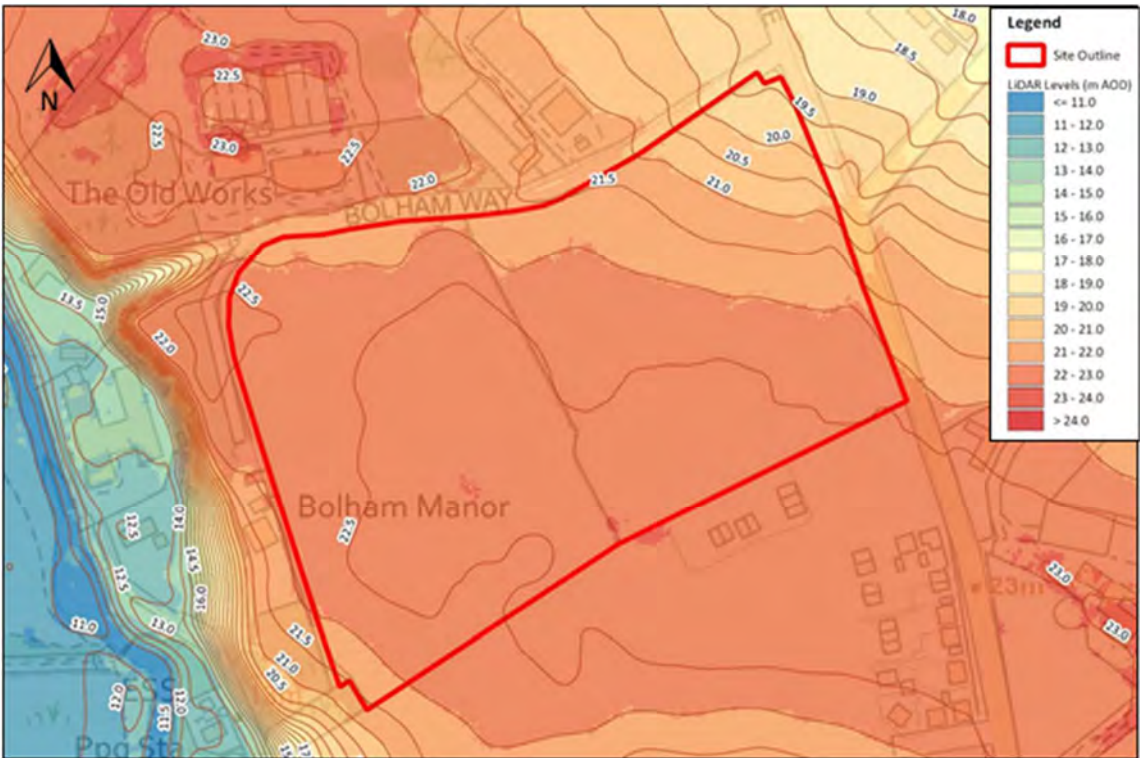


Figure 2: Digital Terrain Model from LiDAR Data

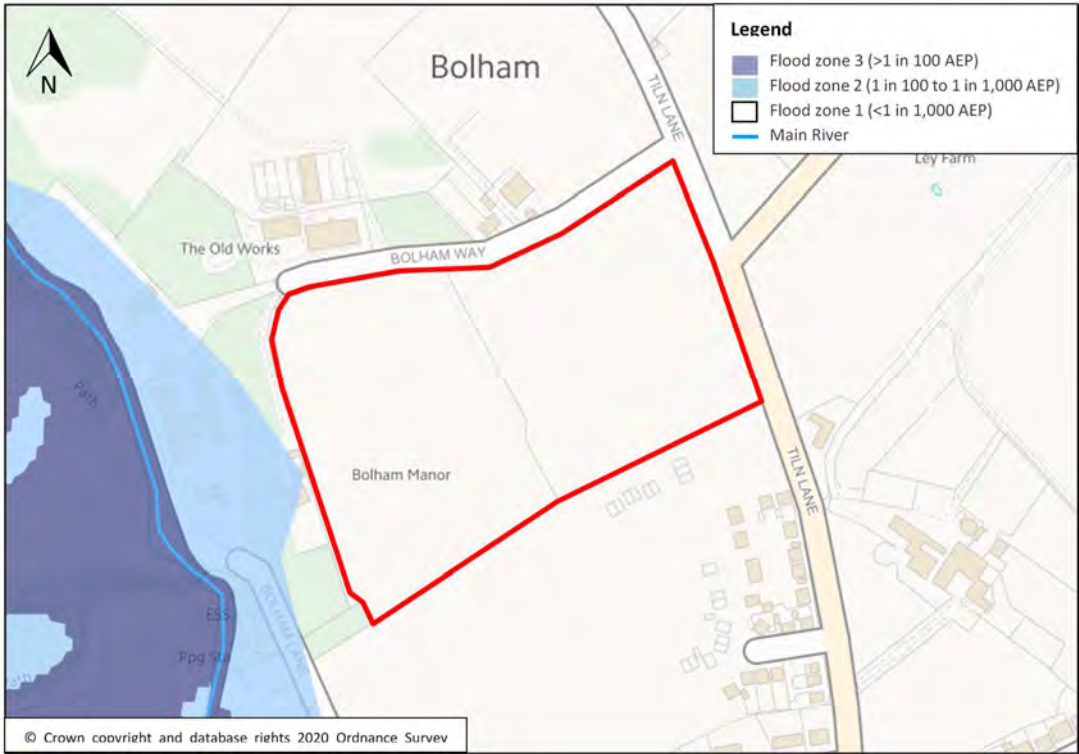


Figure 3: Flood Map for Planning
Source: gov.uk website; Accessed: January 2021

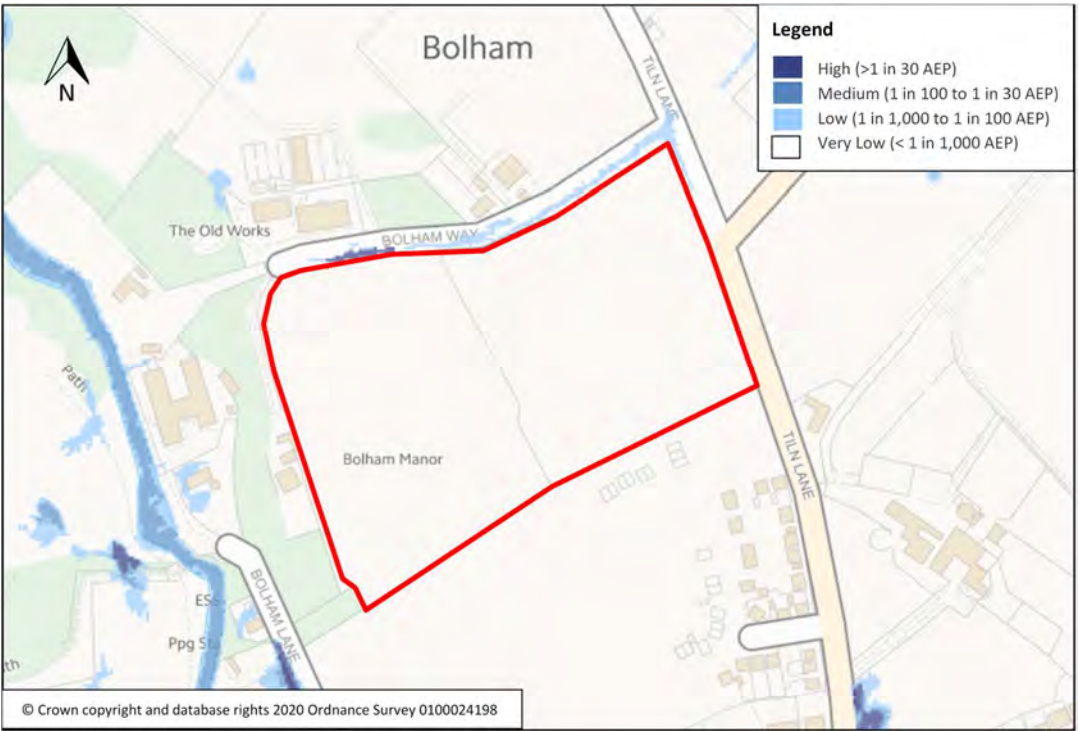


Figure 4: Flood Risk from Surface Water
Source: gov.uk website; Accessed: January 2021

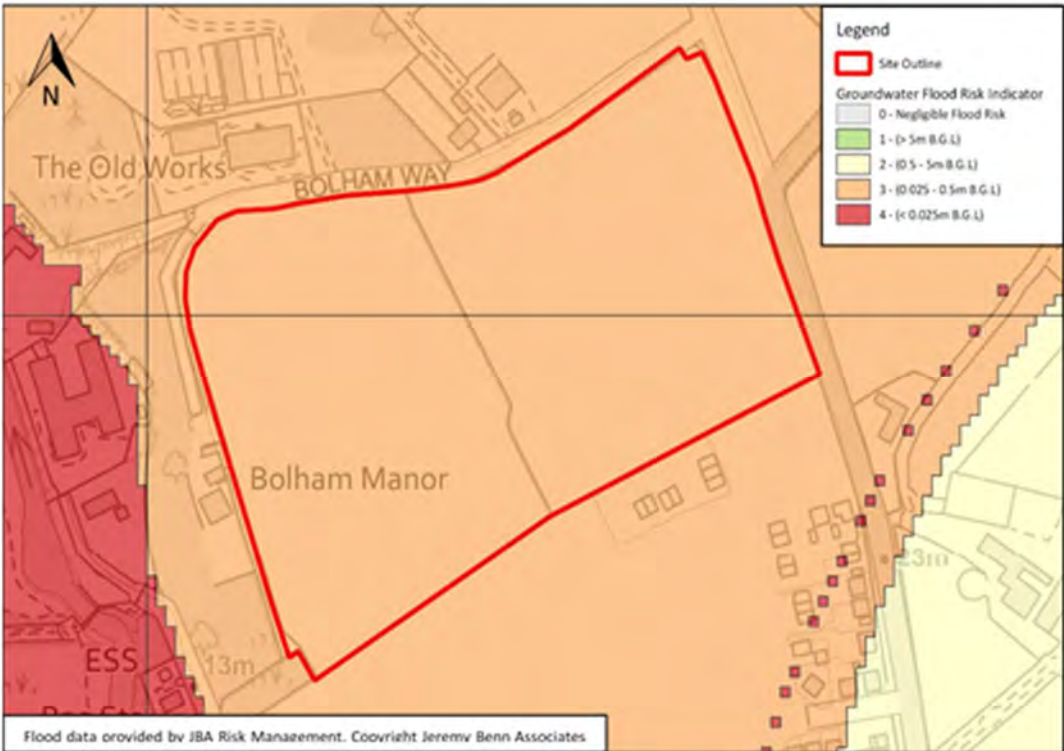


Figure 5: JBA Groundwater Flood Risk Indicator Map
Source: Blue Sky Maps; Accessed: November 2021

63.

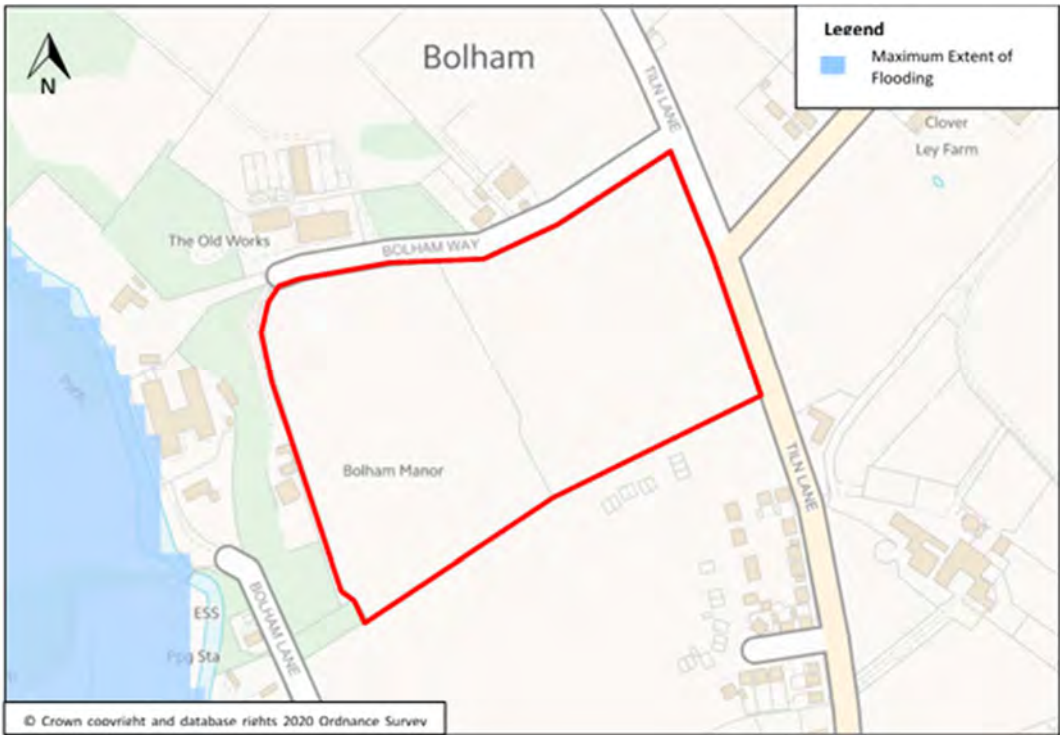
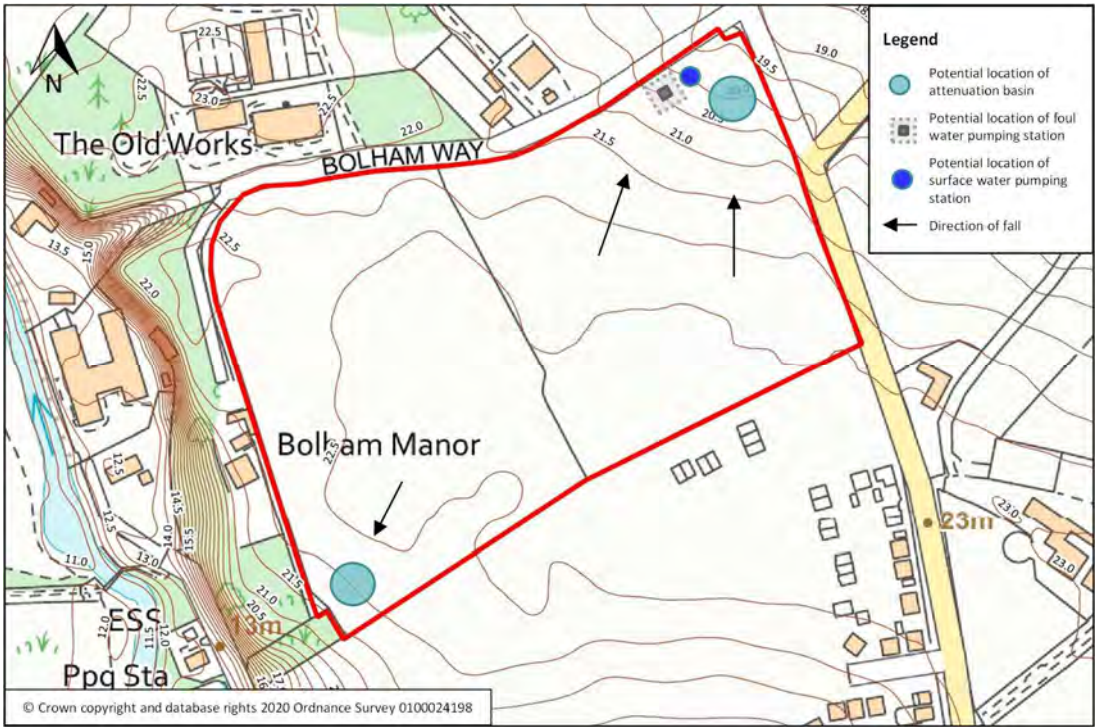
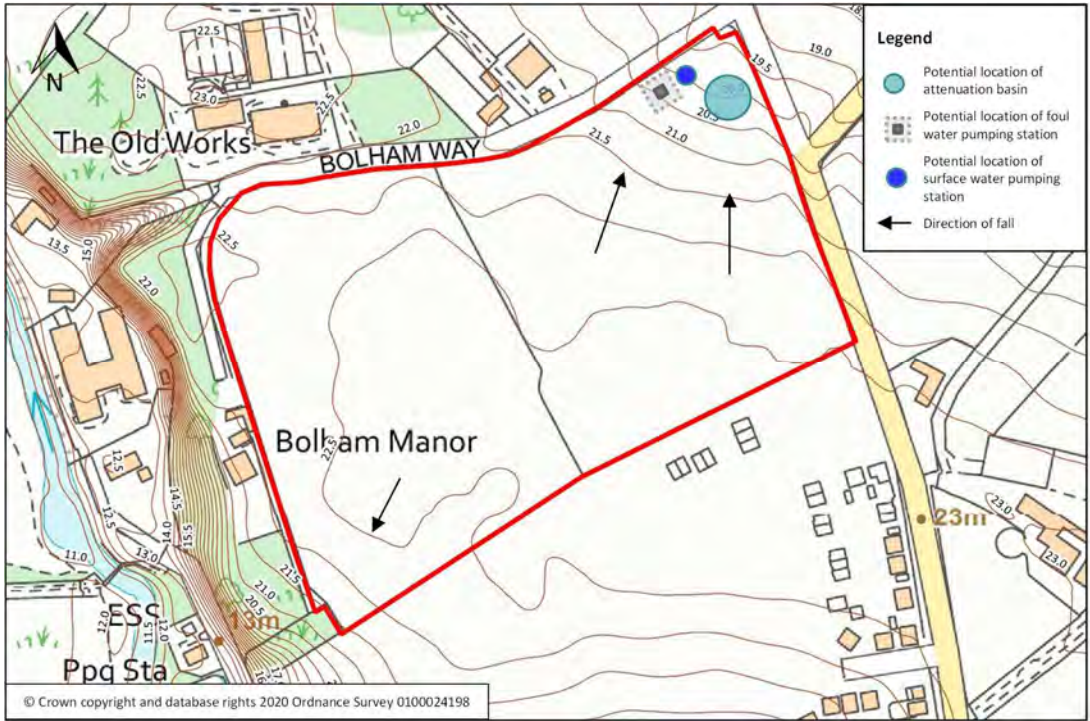


Figure 6: Flood Risk from Reservoirs
Source: gov.uk website; Accessed: January 2021



(a) Option A



(a) Option B

Figure 7: Potential Location of SUDS Attenuation Basins

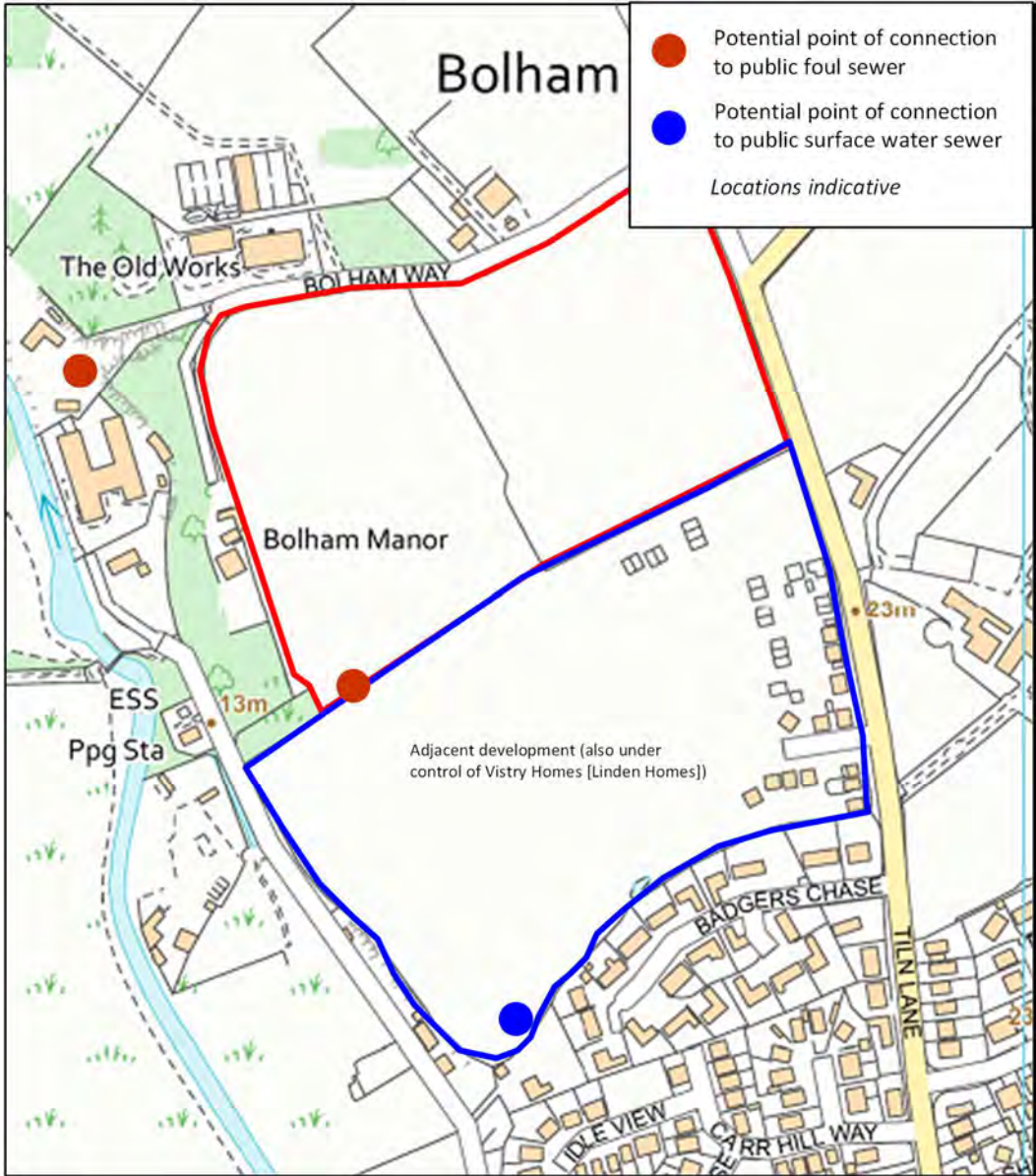


Figure 8: Potential Points of Connection to Surface and Foul Public Sewers

Approved Version
2.0
10 March 2020

Sewerage Sector Guidance Appendix C

Figure D 3
Typical Type 3 pumping station layout

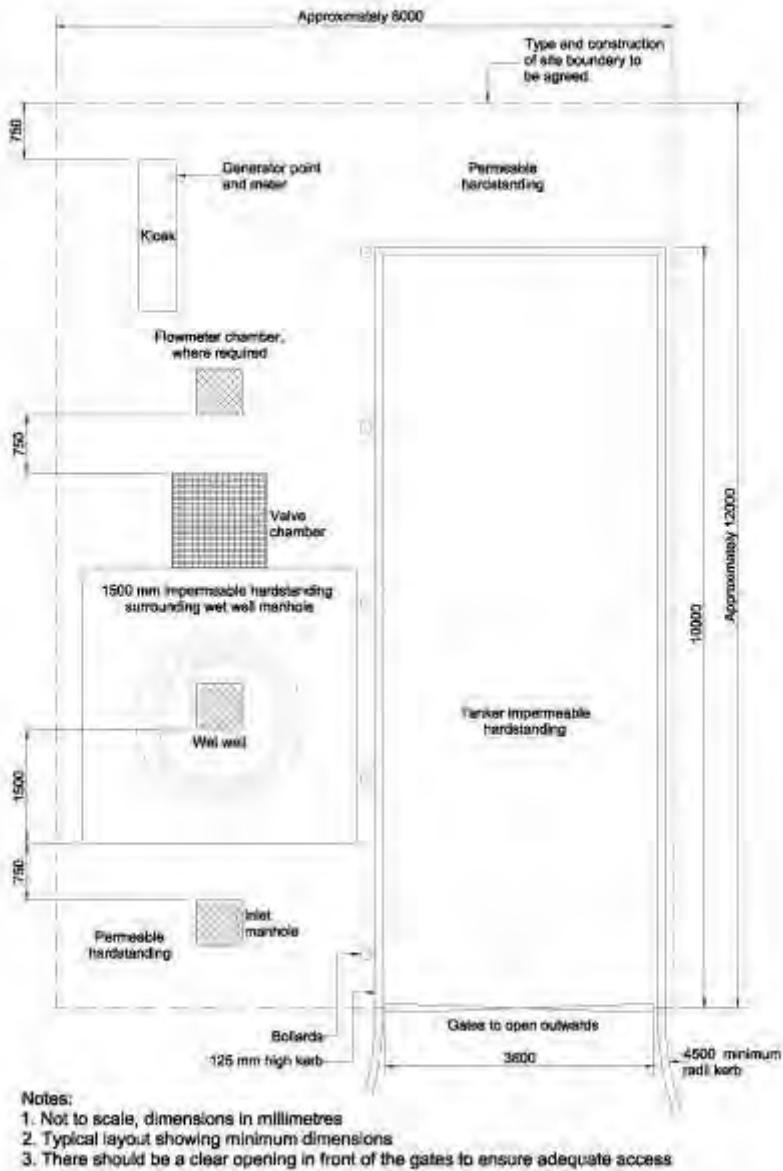
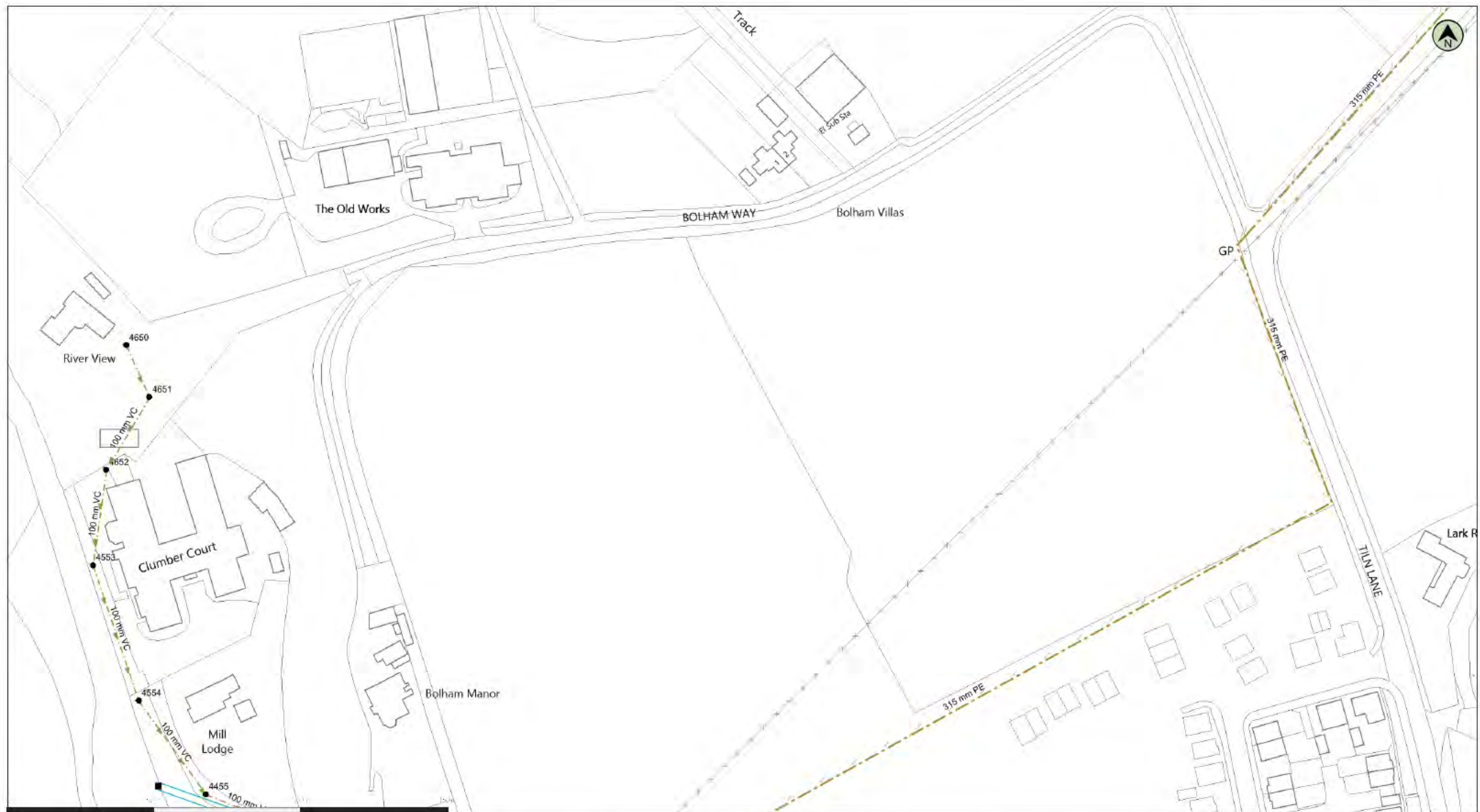


Figure 9: Typical Adoptable Foul Water Pumping Station Compound

ANNEX 1

Severn Trent Water Asset Plans (Sewerage)



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Date: 07/01/21

Scale: 1:1250

Map Centre: 470670,382623

Data updated: 14/12/20

Our Ref: 471831 - 2

Wastewater Plan A3

Do not scale off this Map. This plan and any information supplied with it is furnished as a general guide, is only valid at the date of issue and no warranty as to its correctness is given or implied. In particular this plan and any information shown on it must not be relied upon in the event of any development or works (including but not limited to excavations) in the vicinity of SEVERN TRENT WATER assets or for the purposes of determining the suitability of a point of connection to the sewerage or distribution systems. On 1 October 2011 most private sewers and private lateral drains in Severn Trent Water's sewerage area, which were connected to a public sewer as at 1 July 2011, Transferred to the ownership of Severn Trent Water and became public sewers and public lateral drains. A further transfer takes place on 1 October 2012. Private pumping stations, which form part of these sewers or lateral drains, will transfer to ownership of Severn Trent Water on or before 1 October 2016. Severn Trent Water does not possess complete records of these assets. These assets may not be displayed on the map. Reproduction by permission of Ordnance Survey on behalf of HMSO. © Crown Copyright and database right 2004. All rights reserved. Ordnance Survey licence number: 100031673. Document users other than SEVERN TRENT WATER business users are advised that this document is provided for reference purpose only and is subject to copyright, therefore, no further copies should be made from it.

Public Foul Gravity/Lateral Drain	Highway Drain	Manhole Foul
Public Combined Gravity/Lateral Drain	Overflow Pipe	Manhole Surface
Public Surface Water Gravity/Lateral Drain	Disposal Pipe	Abandoned Pipe
Pressure Foul	Culverted Water Course	Sections of sewerage are shown in green
Pressure Combined	Pumping Station	Outside sewerage area shown in magenta
Pressure Surface Water	Fitting	

info@severn-trent.net

Retford

SEVERN
TRENT



GENERAL CONDITIONS AND PRECAUTIONS TO BE TAKEN WHEN CARRYING OUT WORK ADJACENT TO SEVERN TRENT WATER'S APPARATUS

Please ensure that a copy of these conditions is passed to your representative and/or your contractor on site. If any damage is caused to Severn Trent Water Limited (STW) apparatus (defined below), the person, contractor or subcontractor responsible must inform STW immediately on:

0800 783 4444 (24 hours)

a) These general conditions and precautions apply to the public sewerage, water distribution and cables in ducts including (but not limited to) sewers which are the subject of an Agreement under Section 104 of the Water Industry Act 1991 (a legal agreement between a developer and STW, where a developer agrees to build sewers to an agreed standard, which STW will then adopt); mains installed in accordance with an agreement for the self-construction of water mains entered into with STW and the assets described at condition b) of these general conditions and precautions. Such apparatus is referred to as "STW Apparatus" in these general conditions and precautions.

b) Please be aware that due to The Private Sewers Transfer Regulations June 2011, the number of public sewers has increased, but many of these are not shown on the public sewer record. However, some idea of their positions may be obtained from the position of inspection covers and their existence must be anticipated.

c) On request, STW will issue a copy of the plan showing the approximate locations of STW Apparatus although in certain instances a charge will be made. The position of private drains, private sewers and water service pipes to properties are not normally shown but their presence must be anticipated. This plan and the information supplied with it is furnished as a general guide only and STW does not guarantee its accuracy.

d) STW does not update these plans on a regular basis. Therefore the position and depth of STW Apparatus may change and this plan is issued subject to any such change. Before any works are carried out, you should confirm whether any changes to the plan have been made since it was issued.

e) The plan must not be relied upon in the event of excavations or other works in the vicinity of STW Apparatus. It is your responsibility to ascertain the precise location of any STW Apparatus prior to undertaking any development or other works (including but not limited to excavations).

f) No person or company shall be relieved from liability for loss and/or damage caused to STW Apparatus by reason of the actual position and/or depths of STW Apparatus being different from those shown on the plan.

In order to achieve safe working conditions adjacent to any STW Apparatus the following should be observed:

1. All STW Apparatus should be located by hand digging prior to the use of mechanical excavators.
2. All information set out in any plans received from us, or given by our staff at the site of the works, about the position and depth of the mains, is approximate. Every possible precaution should be taken to avoid damage to STW Apparatus. You or your contractor must ensure the safety of STW Apparatus and will be responsible for the cost of repairing any loss and/or damage caused (including without limitation replacement parts).
3. Water mains are normally laid at a depth of 900mm. No records are kept of customer service pipes which are normally laid at a depth of 750mm; but some idea of their positions may be obtained from the position of stop tap covers and their existence must be anticipated.
4. During construction work, where heavy plant will cross the line of STW Apparatus, specific crossing points must be agreed with STW and suitably reinforced where required. These crossing points should be clearly marked and crossing of the line of STW Apparatus at other locations must be prevented.
5. Where it is proposed to carry out piling or boring within 20 metres of any STW Apparatus, STW should be consulted to enable any affected STW Apparatus to be surveyed prior to the works commencing.
6. Where excavation of trenches adjacent to any STW Apparatus affects its support, the STW Apparatus must be supported to the satisfaction of STW. Water mains and some sewers are pressurised and can fail if excavation removes support to thrust blocks to bends and other fittings.
7. Where a trench is excavated crossing or parallel to the line of any STW Apparatus, the backfill should be adequately compacted to prevent any settlement which could subsequently cause damage to the STW Apparatus. In special cases, it may be necessary to provide permanent support to STW Apparatus which has been exposed over a length of the excavation before backfilling and reinstatement is carried out. There should be no concrete backfill in contact with the STW Apparatus.
8. No other apparatus should be laid along the line of STW Apparatus irrespective of clearance. Above ground apparatus must not be located within a minimum of 3 metres either side of the centre line of STW Apparatus for smaller sized pipes and 6 metres either side for larger sized pipes without prior approval. No manhole or chamber shall be built over or around any STW Apparatus.
9. A minimum radial clearance of 300 millimetres should be allowed between any plant or equipment being installed and existing STW Apparatus. We reserve the right to increase this distance where strategic assets are affected.
10. Where any STW Apparatus coated with a special wrapping is damaged, even to a minor extent, STW must be notified and the trench left open until the damage has been inspected and the necessary repairs have been carried out. In the case of any material damage to any STW Apparatus causing leakage, weakening of the mechanical strength of the pipe or corrosion-protection damage, the necessary remedial work will be recharged to you.
11. It may be necessary to adjust the finished level of any surface boxes which may fall within your proposed construction. Please ensure that these are not damaged, buried or otherwise rendered inaccessible as a result of the works and that all stop taps, valves, hydrants, etc. remain accessible and operable. Minor reduction in existing levels may result in conflict with STW Apparatus such as valve spindles or tops of hydrants housed under the surface boxes. Checks should be made during site investigations to ascertain the level of such STW Apparatus in order to determine any necessary alterations in advance of the works.
12. With regard to any proposed resurfacing works, you are required to contact STW on the number given above to arrange a site inspection to establish the condition of any STW Apparatus in the nature of surface boxes or manhole covers and frames affected by the works. STW will then advise on any measures to be taken, in the event of this a proportionate charge will be made.
13. You are advised that STW will not agree to either the erection of posts, directly over or within 1.0 metre of valves and hydrants,

14. No explosives are to be used in the vicinity of any STW Apparatus without prior consultation with STW.

TREE PLANTING RESTRICTIONS

There are many problems with the location of trees adjacent to sewers, water mains and other STW Apparatus and these can lead to the loss of trees and hence amenity to the area which many people may have become used to. It is best if the problem is not created in the first place. Set out below are the recommendations for tree planting in close proximity to public sewers, water mains and other STW Apparatus.

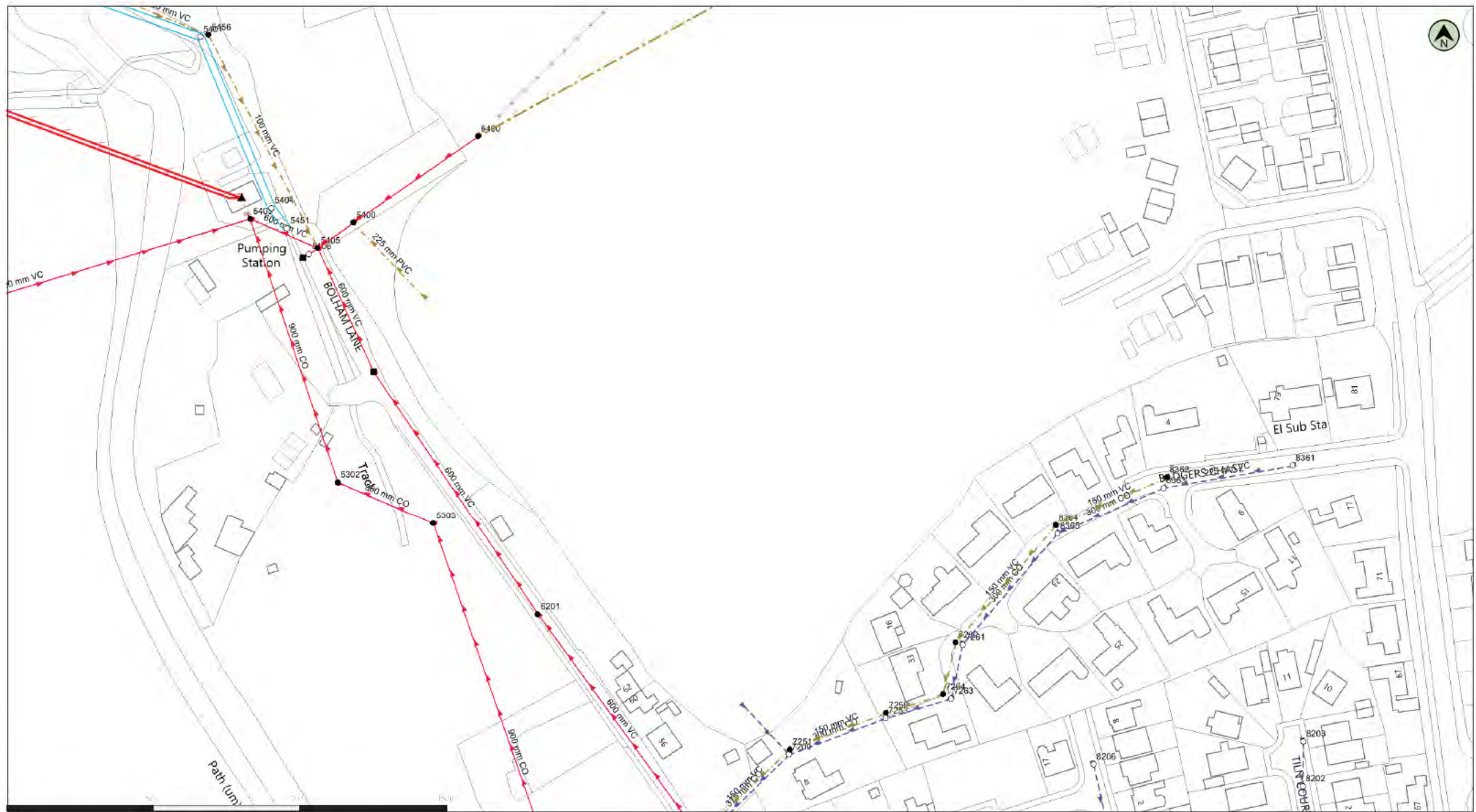
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Date: 07/01/21

Scale: 1:1250

Map Centre: 470697,382353

Data updated: 14/12/20

Our Ref: 471831 - 4

Wastewater Plan A3

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Public Foul Gravity/Lateral Drain	Highway Drain	Manhole Foul
Public Combined Gravity/Lateral Drain	Overflow Pipe	Manhole Surface
Public Surface Water Gravity/Lateral Drain	Disposal Pipe	Abandoned Pipe
Pressure Foul	Culverted Water Course	Sections of the sewerage are shown in green
Pressure Combined	Pumping Station	Discrete sewerage line shown in magenta
Pressure Surface Water	Fitting	

info@severn-trent.co.uk

Retford 2

SEVERN
TRENT

GENERAL CONDITIONS AND PRECAUTIONS TO BE TAKEN WHEN CARRYING OUT WORK ADJACENT TO SEVERN TRENT WATER'S APPARATUS

Please ensure that a copy of these conditions is passed to your representative and/or your contractor on site. If any damage is caused to Severn Trent Water Limited (STW) apparatus (defined below), the person, contractor or subcontractor responsible must inform STW immediately on:

0800 783 4444 (24 hours)

a) These general conditions and precautions apply to the public sewerage, water distribution and cables in ducts including (but not limited to) sewers which are the subject of an Agreement under Section 104 of the Water Industry Act 1991 (a legal agreement between a developer and STW, where a developer agrees to build sewers to an agreed standard, which STW will then adopt); mains installed in accordance with an agreement for the self-construction of water mains entered into with STW and the assets described at condition b) of these general conditions and precautions. Such apparatus is referred to as "STW Apparatus" in these general conditions and precautions.

b) Please be aware that due to The Private Sewers Transfer Regulations June 2011, the number of public sewers has increased, but many of these are not shown on the public sewer record. However, some idea of their positions may be obtained from the position of inspection covers and their existence must be anticipated.

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d) STW does not update these plans on a regular basis. Therefore the position and depth of STW Apparatus may change and this plan is issued subject to any such change. Before any works are carried out, you should confirm whether any changes to the plan have been made since it was issued.

e) The plan must not be relied upon in the event of excavations or other works in the vicinity of STW Apparatus. It is your responsibility to ascertain the precise location of any STW Apparatus prior to undertaking any development or other works (including but not limited to excavations).

f) No person or company shall be relieved from liability for loss and/or damage caused to STW Apparatus by reason of the actual position and/or depths of STW Apparatus being different from those shown on the plan.

In order to achieve safe working conditions adjacent to any STW Apparatus the following should be observed:

1. All STW Apparatus should be located by hand digging prior to the use of mechanical excavators.
2. All information set out in any plans received from us, or given by our staff at the site of the works, about the position and depth of the mains, is approximate. Every possible precaution should be taken to avoid damage to STW Apparatus. You or your contractor must ensure the safety of STW Apparatus and will be responsible for the cost of repairing any loss and/or damage caused (including without limitation replacement parts).
3. Water mains are normally laid at a depth of 900mm. No records are kept of customer service pipes which are normally laid at a depth of 750mm; but some idea of their positions may be obtained from the position of stop tap covers and their existence must be anticipated.
4. During construction work, where heavy plant will cross the line of STW Apparatus, specific crossing points must be agreed with STW and suitably reinforced where required. These crossing points should be clearly marked and crossing of the line of STW Apparatus at other locations must be prevented.
5. Where it is proposed to carry out piling or boring within 20 metres of any STW Apparatus, STW should be consulted to enable any affected STW Apparatus to be surveyed prior to the works commencing.
6. Where excavation of trenches adjacent to any STW Apparatus affects its support, the STW Apparatus must be supported to the satisfaction of STW. Water mains and some sewers are pressurised and can fail if excavation removes support to thrust blocks to bends and other fittings.
7. Where a trench is excavated crossing or parallel to the line of any STW Apparatus, the backfill should be adequately compacted to prevent any settlement which could subsequently cause damage to the STW Apparatus. In special cases, it may be necessary to provide permanent support to STW Apparatus which has been exposed over a length of the excavation before backfilling and reinstatement is carried out. There should be no concrete backfill in contact with the STW Apparatus.
8. No other apparatus should be laid along the line of STW Apparatus irrespective of clearance. Above ground apparatus must not be located within a minimum of 3 metres either side of the centre line of STW Apparatus for smaller sized pipes and 6 metres either side for larger sized pipes without prior approval. No manhole or chamber shall be built over or around any STW Apparatus.
9. A minimum radial clearance of 300 millimetres should be allowed between any plant or equipment being installed and existing STW Apparatus. We reserve the right to increase this distance where strategic assets are affected.
10. Where any STW Apparatus coated with a special wrapping is damaged, even to a minor extent, STW must be notified and the trench left open until the damage has been inspected and the necessary repairs have been carried out. In the case of any material damage to any STW Apparatus causing leakage, weakening of the mechanical strength of the pipe or corrosion-protection damage, the necessary remedial work will be recharged to you.
11. It may be necessary to adjust the finished level of any surface boxes which may fall within your proposed construction. Please ensure that these are not damaged, buried or otherwise rendered inaccessible as a result of the works and that all stop taps, valves, hydrants, etc. remain accessible and operable. Minor reduction in existing levels may result in conflict with STW Apparatus such as valve spindles or tops of hydrants housed under the surface boxes. Checks should be made during site investigations to ascertain the level of such STW Apparatus in order to determine any necessary alterations in advance of the works.
12. With regard to any proposed resurfacing works, you are required to contact STW on the number given above to arrange a site inspection to establish the condition of any STW Apparatus in the nature of surface boxes or manhole covers and frames affected by the works. STW will then advise on any measures to be taken, in the event of this a proportionate charge will be made.
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14. No explosives are to be used in the vicinity of any STW Apparatus without prior consultation with STW.

TREE PLANTING RESTRICTIONS

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Manhole Reference	Liquid Type	Cover Level	Invert Level	Depth to Invert
5302	C	13.33	8.59	4.74
5303	C	13.15	8.58	4.57
6102	C	13.55	9.2	4.35
6103	C	13.25	9.01	4.24
6201	C	12.88	8.97	3.91
9003	C	23.78	21.38	2.4
9102	C	23.59	21.88	1.71
9103	C	23.63	21.98	1.65
9104	C	23.57	21.98	1.59
9201	C	23.55	21.99	1.56
9202	C	23.53	22	1.53
9206	C	23.39	22.07	1.32
6253	F	13.78	12.33	1.45
7102	F	20.3	18.6	1.7
7104	F	19.14	12.52	0
7107	F	19.06	16.64	2.42
7109	F	19.17	17.01	2.16
7250	F	16.02	13.8	2.22
7251	F	15.45	13.32	2.13
7262	F	17.4	15.21	2.19
7264	F	17.13	14.52	2.61
8102	F	22.32	19.51	2.81
8104	F	21.86	19.11	2.75
8205	F	21.88	19.85	2.03
8207	F	23.13	20.58	2.55
8362	F	19.77	17.49	2.28
8364	F	18.4	16.4	2
9112	F	-	0	0
9114	F	-	0	0
9208	F	23.53	22.15	1.38
6104	S	12.91	10.65	2.26
6105	S	12.91	10.96	1.95
6106	S	12.94	11.98	0.96
6107	S	13.37	12.39	0.98
6108	S	13.4	12.26	1.14
6150	S	-	0	0
6156	S	13.36	11.84	1.52
6157	S	12.73	10.76	1.97
6255	S	13.69	12.19	1.5
7101	S	20.83	19.23	1.6
7103	S	20.22	18.91	1.31
7105	S	19.14	13.18	5.96
7106	S	13.8	12.75	1.05
7108	S	18.72	16.33	2.39
7110	S	18.41	16.51	1.9
7111	S	18.75	16.77	1.98
7200	S	15.52	13.9	1.62
7201	S	20.53	19.28	1.25

7253	S	16.02	14.3	1.72
7261	S	17.92	16.11	1 81

ANNEX 2

Anglian Water Asset Plans (Water Supply)



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Date: 07/01/21

Scale: 1:1250

Map Centre: 470670,382623

Data updated: 30/11/20

Our Ref: 471831 - 1

Clean Water Plan A3

This plan is provided by Anglian Water pursuant to its obligations under the Water Industry Act 1991 sections 198 or 199. It must be used in conjunction with any search results attached. The information on this plan is based on data currently recorded but position must be regarded as approximate. Service pipes, private sewers and drains are generally not shown. Users of this map are strongly advised to commission their own survey of the area shown on the plan before carrying out any works. The actual position of all apparatus MUST be established by trial holes. No liability whatsoever, including liability for negligence, is accepted by Anglian Water for any error or inaccuracy or omission, including the failure to accurately record, or record at all, the location of any water main, discharge pipe, sewer or disposal main or any item of apparatus. This information is valid for the date printed. This plan is produced by Anglian Water Services Limited (c) Crown copyright and database rights 2020 Ordnance Survey 100022432. This map is to be used for the purposes of viewing the location of Anglian Water plant only. Any other uses of the map data or further copies is not permitted. This notice is not intended to exclude or restrict liability for death or personal injury resulting from negligence.

Potable Water



Raw Water



Decommissioned Water



Fitting



Hydrant



info@weetwood.net

Retford





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Date: 07/01/21

Scale: 1:1250

Map Centre: 470697,382353

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Potable Water
Raw Water
Decommissioned Water



Fitting
Hydrant



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Retford 2

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Environmental Permit and Land Drainage Applications
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From:

To:

Cc:

Attachments:

21 October 2021 11:41

The Bassetlaw Plan

P19-1895 Cottam - Bassetlaw Reg 19 Local Plan reps

2021 10 21 - P19-1895 Bassetlaw Publication LP Reps - FINAL.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 Bassetlaw Regulation 19 Publication Version Local Plan consultation, prepared by Pegasus Group on behalf of Harworth Group plc.

I would be grateful if you can confirm receipt of these representations please.

Kind regards

Sophie

Associate Planner

Pegasus Group

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS | HERITAGE

4 The Courtyard | Lockington | Derby | DE74 2SL

T 01509 670806 |

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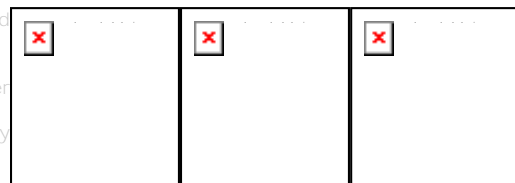
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Bassetlaw Local Plan 2020-2037

Publication Version Representation Form September to October 2021

Please submit electronically if possible to thebassetlawplan@bassetlaw.gov.uk

Please use this form to provide representations on the Bassetlaw Local Plan. Bassetlaw District Council must receive representations by **5pm on 21st October 2021**. Only those representations received within this period have the statutory right to be considered by the inspector at the subsequent examination.

Responses can be submitted via the electronic version of the comment form which can be found on the Council's web site at: www.bassetlaw.gov.uk/BassetlawPlan Alternatively this form can be completed and returned as an e-mail attachment to thebassetlawplan@bassetlaw.gov.uk or by post to **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

Please note:

- Representations must only be made on the basis of the legal compliance, compliance with the Duty to Co-operate and/or soundness of the Plan.

Please read the guidance note, available on the Council's webpage, before you make your representations. The Local Plan and the proposed submission documents, and the evidence base are also available to view and download from the Council's Local Plan webpage:

www.bassetlaw.gov.uk/bassetlawplan

Data Protection Notice:

Under the General Data Protection Regulation 2016 (GDPR) and Data Protection Act 2018 (DPA) Bassetlaw District Council, Queen's Building, Potter Street, Worksop, Notts, S80 2AH is a Data Controller for the information it holds about you. The lawful basis under which the Council uses personal data for this purpose is consent.

All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: <https://www.bassetlaw.gov.uk/about-us/data-protection/departamental-privacy-notices/planning-policy-privacy-notice/>

Due to the Data Protection Act 2018, Bassetlaw District Council now needs your consent to hold your personal data for use within the Local Plan. If you would like the Council to keep you informed about the Bassetlaw Local Plan, we need to hold your data on file. Please tick the box below to confirm if you would like to 'opt in' to receive information about the Bassetlaw Local Plan. Note that choosing to 'opt in' will mean that the Council will hold your information for 2 years from the 'opt in' date. At this time we will contact you to review if you wish to 'opt in' again. You can opt-out at any time by emailing thebassetlawplan@bassetlaw.gov.uk or by calling 01909 533495.

For more information on how Bassetlaw District Council's Planning Policy department processes personal information about you, please see our main privacy notice at <https://www.bassetlaw.gov.uk/about-us/data-protection/departamental-privacy-notices/planning-policy-privacy-notice/>

Please tick/ delete as appropriate:

Please confirm you have read and understood the terms and conditions relating to GDPR.

Yes ☒

No ☐

Please tick as appropriate to confirm your consent for Bassetlaw District Council to publish and share your name/ organisation and comments regarding the Bassetlaw Local Plan.

I confirm my consent for Bassetlaw District Council to share my name/ organisation and comments regarding the Bassetlaw Local Plan including with the Planning Inspectorate.

Yes ☒

No ☐

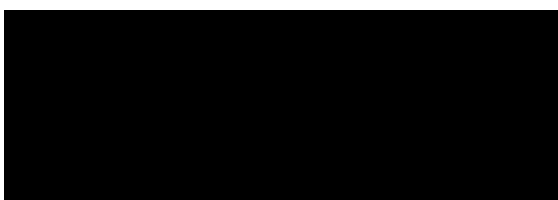
Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Bassetlaw Local Plan.

I would like to opt in to receive information about the Bassetlaw Local Plan.

Yes ☒

No ☐

Printed Name



Signature:

Date:

21/10/2021

This form has two parts:

Part A - Personal details – need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part A- Personal Details

1. Personal Details

Name: [REDACTED]

Organisation (if applicable): Harworth Group plc

Address: c/o Agent

Postcode:

Tel:

Fax:

Email:

2. Agent Details (if applicable)

Agent: [REDACTED]

Organisation (if applicable): Pegasus Group

Address: [REDACTED]

Postcode: [REDACTED]

Tel: 01509 670 806

Fax:

Email: [REDACTED]

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Pegasus Group on behalf of Harworth Group plc

3. To which part of the Local Plan does your representation relate?

Policy: Policy ST6

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Thank you for the opportunity to respond to the Bassetlaw Local Plan 2020-2037: Publication Version (August 2021) in relation to land interests at the former Cottam Power Station. These representations have been prepared in relation to Policy ST6: Cottam Priority Regeneration Area.

Policy ST6 allocates the former Cottam Power Station as a broad location for mixed use regeneration. We understand that the proposed allocation is supported by the land owner, EDF. Harworth Group plc is one of the leading land and property regeneration companies across the Midlands and the north of England; owning and managing circa 16,000 acres across 100 sites. Harworth specialise in redeveloping brownfield sites into new employment areas and homes.

Harworth is an experienced developer of brownfield sites, with a proven track record and a **large portfolio of employment and residential sites**. Harworth's flagship sites, such as Waverley in Rotherham and Logistics North in Bolton, are of national economic significance and are at the forefront of regeneration in the UK. Harworth recently secured a resolution to grant planning permission for a mixed use development of 1,000 dwellings, a retirement village, employment development, retail and other uses as part of a local centre, allotments, sports pitches, a railway link, leisure uses, a primary school and a park and ride facility, at the former Ironbridge Power Station in September 2021. Harworth has been responsible for the demolition of the cooling towers, turbine house and the bunker bay and the site has been cleared over the last 24 months. Harworth work closely with local communities, public bodies, developers and other professionals to bring forward previously developed sites into employment areas and new homes. Harworth are highly experienced in redeveloping previously developed land, including former collieries, power stations, an aluminium smelter site and a tractor factory, and are therefore ideally placed to redevelop large brownfield sites such as Cottam Power Station.

The National Planning Policy Framework (2021) (NPPF) at paragraph 119 confirms that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed land. Paragraph 120 advises that planning policies and decisions should give substantial weight to the value of using suitable brownfield land for homes and other identified needs, supporting opportunities to remediate land. The emerging Local Plan will play a critical role in bringing forward previously-developed land such as Cottam Power Station. Policy ST6 is considered to be consistent with Section 11 of the NPPF.

Subsection 1) confirms that the site will be safeguarded from development which would jeopardise the comprehensive remediation, reclamation and redevelopment of the whole site. Subsection 2) requires a scheme to be delivered in accordance with a comprehensive masterplan framework, design code and agreed site infrastructure delivery, and Subsection 3) confirms that proposals will be permitted where they form part of the comprehensive redevelopment of the site, setting out a series of requirements (A – K). The emerging allocation at Policy ST6 is supported, as the thrust of the policy is to secure the comprehensive remediation, reclamation and redevelopment of the whole site.

Continue on a separate sheet if necessary

It is important to acknowledge that the previous Draft Bassetlaw Local Plan Consultation (November 2020) included a series of acceptable main uses for the site, including up to 1,600 dwellings, 14ha employment development, a public transport hub and renewable energy uses. This aspect of the policy was supported by EDF and Harworth Group, and previous submissions suggested that the overall site capacity could be increased to approximately 1,750 dwellings. **Harworth's own speculative** masterplanning work undertaken since this time has confirmed that 1,850 dwellings can be accommodated on site as part of the mix of uses. This clarity on acceptable main uses on the site has subsequently been deleted from the latest iteration of Policy ST6. It is imperative that Policy ST6 sets out detail of the type and scale of development that is acceptable on site, in order to provide clarity and certainty for potential developers. Paragraph 16d) of the Framework advises that:

"Plans should... d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals..."

Furthermore, this approach is confirmed in the Plan-Making Guidance Section of the Planning Practice Guidance (PPG):

"Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development."

Without this clarity, uncertainty about the type and scale of development proposed by emerging Policy ST6 would undermine developer confidence in bringing forward comprehensive redevelopment proposals for the whole site. In order to ensure Policy ST6 is sound and has sufficient regard to paragraph 16 of the Framework and the PPG, Policy ST6 should include detail to confirm the nature and scale of development proposed.

Subsection 3(e) requires the delivery of a flood management scheme, incorporating Sustainable Drainage System (SuDS), including green/blue infrastructure measures, informed by a Flood Risk Assessment (FRA), a hydrology assessment and a Surface Water Management Masterplan and Strategy. Policy commentary at paragraph 4.11 advises that on site flood mitigation and infrastructure is required to support the proposed regeneration. Early engagement has been held with the Environment Agency through **Harworth's** technical consultants to discuss the proposals for the site and to agree the principles of development. Subsequently detailed modelling has been undertaken to review the impact should a breach of the flood defences occur. This modelling has been undertaken using the Environment Agency Trent model and to an agreed methodology. The results of this modelling has demonstrated that the proposed work has no impact on the surrounding flood levels during a breach/flood event, and the reporting is currently being compiled with a view to this shortly being submitted for Environment Agency review.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

In order to address the soundness issue outlined above, the below modification is suggested to Policy ST6, having regard to paragraph 16d) of the Framework.

The following are considered acceptable main uses for the site, subject to meeting the requirements above:

- 1. Housing development of approximately 1,850 dwellings;*
- 2. Employment development (comprising offices, research and development and industry in (comprising B2, B8 E(g)) for up to 14 ha;*
- 3. Public transport hub;*
- 4. Renewable energy uses.*

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes ☒

No, I do not wish to participate in hearing session(s)

No ☐

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

It is important to appear in person at the hearing sessions in order to ensure that Policy ST6 is clear and unambiguous, and that the policy therefore provides certainty for the local community and developers on the type and quantum of development that will be delivered.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

REF038



[REDACTED]

From: [REDACTED]
To: 21 October 2021 14:14
Cc: The Bassetlaw Plan
Subject: Bassetlaw Local Plan 2020-2037: Publication Version
Attachments: Regulation 19 Bassetlaw Local Plan Reps Final.pdf; Response Form.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

Good afternoon,

Please find attached to this email representations on behalf of our client The Hospital of the Holy and Undivided Trinity.

I trust the contents of this email are clear, however should you have any questions please do let me know.

Could you please confirm safe receipt of this email, and its attachments, ahead of the 5pm deadline.

Kind regards,

[REDACTED]
[REDACTED]
Senior Planner

For and on behalf of Fisher German LLP



The Estates Office - Norman Court - Ivanhoe Business Park- Ashby de la Zouch - LE65 2UZ



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Bassetlaw Local Plan 2020-2037

Publication Version Representation Form September to October 2021

Please submit electronically if possible to thebassetlawplan@bassetlaw.gov.uk

Please use this form to provide representations on the Bassetlaw Local Plan. Bassetlaw District Council must receive representations by **5pm on 21st October 2021**. Only those representations received within this period have the statutory right to be considered by the inspector at the subsequent examination.

Responses can be submitted via the electronic version of the comment form which can be found on the Council's web site at: www.bassetlaw.gov.uk/BassetlawPlan Alternatively this form can be completed and returned as an e-mail attachment to thebassetlawplan@bassetlaw.gov.uk or by post to **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

Please note:

- Representations must only be made on the basis of the legal compliance, compliance with the Duty to Co-operate and/or soundness of the Plan.

Please read the guidance note, available on the Council's webpage, before you make your representations. The Local Plan and the proposed submission documents, and the evidence base are also available to view and download from the Council's Local Plan webpage:

www.bassetlaw.gov.uk/bassetlawplan

Data Protection Notice:

Under the General Data Protection Regulation 2016 (GDPR) and Data Protection Act 2018 (DPA) Bassetlaw District Council, Queen's Building, Potter Street, Worksop, Notts, S80 2AH is a Data Controller for the information it holds about you. The lawful basis under which the Council uses personal data for this purpose is consent.

All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: <https://www.bassetlaw.gov.uk/about-us/data-protection/departmental-privacy-notices/planning-policy-privacy-notice/>

Due to the Data Protection Act 2018, Bassetlaw District Council now needs your consent to hold your personal data for use within the Local Plan. If you would like the Council to keep you informed about the Bassetlaw Local Plan, we need to hold your data on file. Please tick the box below to confirm if you would like to 'opt in' to receive information about the Bassetlaw Local Plan. Note that choosing to 'opt in' will mean that the Council will hold your information for 2 years from the 'opt in' date. At this time we will contact you to review if you wish to 'opt in' again. You can opt-out at any time by emailing thebassetlawplan@bassetlaw.gov.uk or by calling 01909 533495.

For more information on how Bassetlaw District Council's Planning Policy department processes personal information about you, please see our main privacy notice at <https://www.bassetlaw.gov.uk/about-us/data-protection/departmental-privacy-notice/planning-policy-privacy-notice/>

Please tick/ delete as appropriate:

Please confirm you have read and understood the terms and conditions relating to GDPR.

Yes ☒

No ☐

Please tick as appropriate to confirm your consent for Bassetlaw District Council to publish and share your name/ organisation and comments regarding the Bassetlaw Local Plan.

I confirm my consent for Bassetlaw District Council to share my name/ organisation and comments regarding the Bassetlaw Local Plan including with the Planning Inspectorate.

Yes ☒

No ☐

Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Bassetlaw Local Plan.

I would like to opt in to receive information about the Bassetlaw Local Plan.

Yes ☒

No ☐

Printed Name: [REDACTED]

[REDACTED]

[REDACTED]

Date: 21/10/21

This form has two parts:

Part A - Personal details – need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part A- Personal Details

1. Personal Details

Name:

Organisation (if applicable): The Hospital of the Holy and Undivided Trinity

Address: C.O Agent

Postcode:

Tel:

Fax:

Email: C.O Agent

2. Agent Details (if applicable)

Agent: [REDACTED]

Organisation (if applicable): Fisher German

Address: The Estates Office, Norman Court, Ashby de la Zouch

Postcode: LE65 2UZ

Tel: [REDACTED]

Fax:

Email: [REDACTED]

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Please see submitted representations

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

3. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes ☒

No, I do not wish to participate in hearing session(s)

No ☐

4. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To provide an up to date position in respect of the site and to reflect any comments made by third parties.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

Draft Bassetlaw Local Plan Regulation 19 Draft: October 2021

Prepared by Fisher German LLP
on behalf of The Hospital of the Holy and
Undivided Trinity



Project Title:

North Road, Retford

Agent:

[REDACTED]

Contact Details:

c/o Fisher German LLP

The Estates Office

Norman Court

Ashby-de-la-Zouch

LE65 2UZ

[REDACTED]

[REDACTED]

01 Introduction

- 1.1 These representations have been prepared on behalf of The Hospital of the Holy and Undivided Trinity in respect of their land interests at North Road, Retford, which is an emerging allocation within the Draft Plan, proposed Site HS7: Trinity Farm, Retford. The landowner has promoted the wider land to the south and east of North Road under permission 15/00493/OUT. The land to the south has been acquired by housebuilder Avant Homes who have commenced development under Reserved Matters Application 20/01477/RES, delivering 196 dwellings.
- 1.2 The Hospital of the Holy and Undivided Trinity support the proposed allocation of HS7 and consider it to be a logical and deliverable site, with a strong degree of synergy with neighbouring approved development and Retford as a whole.



Figure 1: Google Earth extract illustrating proposed Site HS7 (redline) and land the approved under 15/00493/OUT

- 1.3 For ease of reference, these representations discuss policies in the order in which they appear in the Plan. Where we have not commented, we have no specific comments at this stage.

02 Representations

Policy ST1: Bassetlaw's Spatial Strategy

- 2.1 Policy ST1 sets the housing requirement for Bassetlaw during the period 2020-2037. As set out in the supporting text, the Council have followed national policy and guidance utilising the Local Housing Need (LHN) as a starting point for establishing its housing requirement. It is noted that in December 2020 the Government published further changes to the Standard Method for assessing LHN, however, for Bassetlaw this results in no change from the existing method, albeit the LHN significantly increases for Sheffield.
- 2.2 The Planning Practice Guidance is unequivocal that “the standard method for assessing local housing need provides a **minimum starting point** in determining the number of homes needed in an area. It **does not attempt to predict the impact that future government policies, changing economic circumstances** or other factors might have on demographic behaviour” [our emphasis]. In this context, it is worth remembering the LHN is predominantly demographic led, and as such policy-on considerations such as delivering infrastructure, increasing the supply of affordable housing or as in this case, ensuring economic growth and prosperity cannot always be achieved using this base figure. In this regard, the Council's approach to increase the Housing Requirement to 591 dwellings per annum is supported and has been effectively justified in the supporting Housing and Economic Development Needs Assessment (HEDNA) (Update 2020). Without suitable increases in housing, the Council's employment and economic goals are likely to be restricted due to lack of available working population, as set out in HEDNA, or alternatively will lead to large patterns of unsustainable movements as residents commute from out of the District to access jobs.
- 2.3 Increasing the Housing Requirement also reflects Government ambitions to boost significantly the supply of housing (NPPF Para 59). The Councils approach to increasing the LHR above the figure derived from the Standard Methodology is considered sound and is supported,
- 2.4 Notwithstanding the above, it should be noted that the recent changes to the Standard Method significantly increase the housing requirement for Sheffield City. It is therefore considered that additional flexibility should be built into Bassetlaw's emerging Plan so in the event that Sheffield

City confirm it is unable to meet its own needs, any share of the unmet need can be accommodated by Bassetlaw ahead of any review of the Plan.

- 2.5 The proposed Spatial Strategy within Policy ST1, which seeks to deliver sustainable development and growth, appropriate to the size of each settlement to meet the evidenced need for new homes and jobs in the District is generally supported
- 2.6 With regards to spatial distribution, the Council intends to locate 65% of its housing requirement in the Main Towns of Retford, Worksop and Harworth. The approach to locate the majority of the District's growth to the towns is supported as it focuses development in the most sustainable locations, whilst still enabling suitable rural growth which is essential for ensuring rural communities can support essential services and ensures their long-term vitality.
- 2.7 Retford is allocated circa 20% of the total level of growth delivered through the Plan period, the second highest of any settlement, behind only Worksop. This is considered to be an entirely commensurate and reflects both the spatial standing and sustainability of Retford. The Draft Plan states at 5.1.47 that Retford has seen strong housing growth in recent years. This should provide comfort to an Inspector that there is strong demand and market interest in Retford and that allocations are likely to be delivered in a timely manner.
- 2.8 The acceleration of home working and flexible working post Covid-19 will make locations such as Retford, which is on the East Coast Main Line, highly attractive. With many workers in centres such as London only likely to need to be in the office a couple of days a week, reducing the commuting burden and thus extending commuting range. Retford also benefits from easy rail access to other key centres, including Sheffield, Doncaster, Newark, Lincoln and Grantham, enabling easy access to higher order services such as universities.

POLICY ST7: Provision of Land for Employment Development

- 2.9 The Draft Local Plan identifies sufficient sites to deliver circa 290ha of employment land. Policy ST7 sets out the proposed policy position in respect of development proposals on land identified as a General Employment Site, which includes land east of North Road (Trinity Farm EM006). In particular the policy as currently proposed, seeks to limit the uses coming forward on General Employment Sites to E(g)/B2/B8 uses and ensure that major applications deliver a site related

employment and skills plan to maximise local engagement and training opportunities.

- 2.10 Policy ST7 further seeks to limit uses on General Employment Sites to E(g) (uses which can be carried out in a residential area without detriment to its amenity), B2 (Industrial) and B8 (Storage and Distribution) uses. Whilst we understand the rationale of seeking to control uses forthcoming on employment sites, we consider the approach adopted by the Council in this case is overly restrictive and in conflict with the flexibility Class-E was introduced to deliver. We consider the Council should increase flexibility on its employment sites by adopting a wider definition of suitable uses which could be brought forward on such sites. For example, proposals could be required to be employment generating, or additional uses within Class E could be included.
- 2.11 In this regard, many Class-E uses are likely to have a significantly higher employee numbers than traditional B uses, particularly B8 uses. In this regard, in terms of job provision, other uses could be more economically beneficial and as such shouldn't be entirely excluded.
- 2.12 For example, the Employment Density Guide 3rd edition (November 2015) sets out that B8 uses tend to range between an employment density of 70-95sqm per full time employee. In terms of Retail uses for example, the employment density can be as low as 15-20sqm per full time employee. Therefore, retail is likely to provide significantly more jobs than traditional B8 uses.
- 2.13 It is requested that the definition of suitable uses on General Employment Sites be extended to employment generating uses rather than prescriptively state restrictive uses. This could be caveated with requirements for uses to deliver an appropriate employment density, for example no uses with an employment density lower than B8 uses, to ensure no loss in job provision through such a revision. Or, the level of employment generating uses outside of E(g)/B2/B8 could be restricted to be no more than 50% of the site for example. Clearly there could be requirements that such proposals would need to demonstrate that they do not have undue impacts on the town centre for example.
- 2.14 Alternatively, the Council could open up the Policy to enable the development of B and all E Class uses. The Council could ensure there is supporting criterion to ensure such a policy would not have adverse impacts on the town centre for example. This approach would enable the delivery of uses which would be entirely suitable in such locations, such as showroom retail, gyms, nurseries,

medical etc.

- 2.15 At the very least, the policy should apply some flexibility and caveats as to when other uses would be acceptable. It is unclear whether the provisions of ST10 are applicable to General Employment Sites. It is unproductive and inefficient to have land which could be brought forward for economically beneficial purposes vacant awaiting uses which may not be suitable or unviable. The current policy only enables the development of alternative uses only if they are ancillary to the Strategic Employment Site. Such proposals will only be enabled wherein they can sufficiently demonstrate that they support, maintain or enhance the primary business and employment function of the site. There is a further requirement that the number and distribution of ancillary units would not result in an over-concentration that might affect the function and appearance of the area. As referenced above, there are a number of uses which would be an entirely logical use on such locations. It is vital that there is flexibility to ensure landowners and developers can bring forward economic growth flexible, commensurate with modern requirements and in the way most suiting for each individual site, reflective of demand, location, access to public transport, availability of services, etc.

Policy ST15: Housing Distribution

- 2.16 The identification of land at Trinity Farm, Retford for residential development is supported. As detailed in response to Policy 23: Site HS7, the site is sustainably located and can deliver a comprehensive development responding to its gateway location to Retford. The site is however capable of delivering a higher number of units than currently proposed. Whilst we accept the Policy uses 'minimum' to express the number of dwellings deliverable, it is considered that the policy should be amended to reflect the true capacity of the site more closely (as expanded on in response to Policy 23: Site HS7).
- 2.17 We continue to support the removal of former site HS7: Leafields Retford and would object to its re-inclusion. The allotments at Leafields are a much-valued community facility, and to remove established allotments from the site, to Trinity Farm as previously proposed, would have been unsound and damaging to the local community.

POLICY 21: Site HS7: Trinity Farm, Retford

- 2.18 The allocation of land at Trinity Farm, Retford for residential use is supported. This land is sustainably located adjacent to Retford and will form part of a wider mixed-use development to the north of the town, inclusive of employment and community facilities. The site is within close proximity to a number of existing bus stops, which provided easy and regular access to Retford's town centre, Doncaster and other locations. The site also enjoys a good synergy with existing and proposed employment development, which will enable people to live close to their place of work. This is particularly important given the key linkages within the Plan generally between housing and employment. This allocation is sound and will make a vital contribution to meeting future housing needs within the town.
- 2.19 The illustrative masterplan (figure 2) and these representations have been prepared having regard to a number of site-specific assessments which have been undertaken. These include Ecology, Flood Risk and Drainage, Highways and Landscape Impact. A summary of the conclusions of these documents is detailed below. Copies of the technical reports will be provided to the Council in due course.

Ecology

- 2.20 A Preliminary Ecological Appraisal Report (PEAR) has been undertaken on the site. This sets out the site is predominantly formed of arable land, surrounded by poor quality semi-improved grassland field margins, tall ruderal vegetation and hedgerow. The site also contained a field compartment of short mown poor semi-improved grassland and broadleaved scattered trees. A small brick-utility building is present within the site to the north-east. Just beyond the sites northern boundary is a small easterly flowing brook.
- 2.21 The site does not contain or adjoin any designated sites, however it is within the SSSI Impact Risk Zone for the Sutton and Lound Gravel Pits, as such Natural England may make comments, albeit it is considered unlikely this will preclude the uses proposed on site.
- 2.22 The PEAR sets out that habitats onsite are generally of low botanical diversity and species found are common, widespread and typical of such habitat. There is higher biodiversity value in the hedgerows and the brook to the north, albeit still not of great local significance. Hedges will be retained where possible throughout the site, and any loss needed to facilitate the scheme (such as to deliver an access onto North Road), will be mitigated by compensatory planting. With regards

to the brook, the illustrative masterplan demonstrates how the site can be delivered inclusive of a substantial landscape buffer to the north, in line with the conclusions of the PEAR.

There are no ponds present onsite, or within 250 of the site. Whilst there are ponds within 500m, this is beyond the intermediate zone for Great Crested Newts and although all beyond barriers which would likely prevent dispersal onto the site.

- 2.23 The site is considered to be of moderate value to roosting bats, due to the presence of hedgerows, scattered trees onsite, and adjacent railway, woodland and brook. As much of the hedgerow is to be maintained, combined with new landscape features, the PEAR concludes that the value of the site will not be significantly impacted in a post development scenario.

Hedgerows and trees could provide habitat for nesting birds, as such an additional Nesting Bird check will be carried out by a suitably qualified ecologist prior to any works on site if commencing between March-September.

- 2.24 The site is considered to be of relatively low value to reptiles, water voles, otters, Terrestrial Invertebrates or white-clawed crayfish. Some mitigation measures suggested, but no significant residual impacts.

- 2.25 There is no setts or signs of badgers recorded within the site survey. Mitigation is however recommended in new open space features. Similarly for principal species, again hedgerow which is likely to be of greatest value to such animals will be largely retained and new landscape features can provide habitat.

Flood Risk and Drainage

- 2.26 The indicative comprehensive masterplan illustrates how the site can be brought forward accommodating the area of flood Risk to the north of the site. A comprehensive drainage strategy which has regard to the current Reserved Matters site is currently being prepared, however initial works have not suggested any issues in delivery of the site.

Landscape and Visual Impact Assessment

- 2.27 A Landscape and Visual Impact Assessment (LVIA) has been undertaken which concludes that the proposed development, as currently proposed by the comprehensive masterplan, promotes a sensitive and considered development which relates to the existing and emerging urban edge and

character of Retford. The LVIA confirms that consideration has been given to the scale and layout of the proposals, to the proposed landscape structure, and provision of open space seeking to promote a strong green infrastructure.

2.28 The development proposals seek to retain and enhance the site's key existing green infrastructure assets in order to retain and enhance the site's character and distinctiveness. The considered development layout ensures that the proposals can be integrated into the site and its immediate setting within the market town of Retford.

2.29 The Assessment confirms that it is considered that the application site and receiving environment have the capacity to accommodate the proposals. The proposals will not result in significant harm to the landscape character or visual environment and, as such, it is considered that the proposed development can be successfully integrated in this location, is supportable from a landscape and visual perspective, and therefore meets the landscape requirements of both national and local planning policy.

Highways

2.30 In preparing the movement strategy for the land to the south of the proposed allocation (planning references 15/00493/OUT & 20/01477/RES) consideration was given to a future second phase on the proposed allocation site. As such the land to the south was designed with a spine road to its northern boundary. The spine road has been designed so that it is capable of accommodating a bus route which can extend further through the proposed allocation site in the future.

2.31 A roundabout is proposed on North Road to facilitate access to the Phase 2 land and also to the employment land east of North Road, as demonstrated on the illustrative masterplan (Figure 2).



Figure 2: Illustrative Masterplan demonstrating how a comprehensive scheme can be delivered across the wider site.

POLICY 21: Site HS7 - Site Specific Criteria

2.32 As referenced at 2.15 the work undertaken on the site to date confirms that the site can deliver in excess of the 244 dwellings proposed within the emerging Plan. In preparing a comprehensive masterplan for the site (Figure 2), having regard for the consented land to the south, it is clear that the proposed allocation could deliver in excess of 297 dwellings at the same time as accommodating the additional requirements of emerging Policy 23: Site HS7. It is recognised that reference to the dwelling numbers are a “minimum” in Policy ST15 and “at least” in Policy 23: Site HS7 however for transparency, and to support the delivery of the Plan, it is considered that the true quantum of housing should be expressed in the policy.

2.33 We comment on a number of criteria below, by subheading as reflective of the Draft Policy. Where we have not commented we have no specific observations at this stage.

Good quality design and local character

2.34 Criterion D) The site adjoining approved residential development would clearly not be suitable for mineral extraction. As such the need for criterion D is questioned.

2.35 Criterion E) In respect of the need for intrusive site investigations, this should be informed by the geophysical assessment and the results of the assessments for the land to the south. It is not sound for this to be required if better evidenced produced by the applicant demonstrates that this is not necessary.

Mix of uses

2.36 Criterion F) In respect of the housing mix, any eventual housing mix will have due regard for adopted policy, evidence of local need at that time as well as local market signals to ensure any proposed scheme both meets local needs and is viable. As per 7.8.5 of the Draft Plan, the possibility of providing a care home or other accommodation on site is being explored but cannot be required. The need for self-build units is discussed in relation to policy ST30 at 2.43-2.47.

Green/blue infrastructure

2.37 Criteria G-I) Seeks the provision of 1.5ha of high quality, multifunctional publicly accessible open space, to include approximately 0.5ha for community woodland as well as a neighbourhood play area. The Policy also required a landscape buffer to the adjacent railway line to mitigate noise pollution and ensure a suitable residential amenity. There is a further requirement that the scheme

will provide quality green/blue infrastructure to achieve a multifunctional, biodiverse, coherent and connected network that integrates with Phase 1 of the Trinity Farm development, adjoining ecological assets including Retford Beck, the woodland to the north and Sutton and Lounds Gravel Pits SSSI.

- 2.38 We support the reduction in open space required from the previous iteration of the Local Plan, which sought the provision of 6.5ha of open space. This was far in excess of what would ordinarily be sought through the Council's open space requirements for a scheme of even 297 dwellings. It was also far in excess of what was being sought on comparable sites and thus was clearly not sound.
- 2.39 Whilst only illustrative, Figure 2 demonstrates how a scheme could be advanced on the site delivering the specific site requirements of these policies. In particular the buffer between the railway line and the site would provide a green corridor which would help to connect most of the green spaces within the site, including the wider countryside to the north. Such open spaces and landscape buffers will be designed and implemented with full regard for the recommendations of further ecological surveys and reports to ensure the most ecologically proficient provision is delivered.
- 2.40 It remains unclear why this site specifically has a policy provision requesting a community woodland, when only one other site, a strategic site, has such a provision. The Plan does not clearly explain what is meant by a community woodland or why it is not a requirement for other sites. It is noted that this site will already benefit from significant existing trees on the site's northern boundary. This development will deliver new trees as integral part of its open space and landscape strategy. This we consider to be sufficient and without specific justification for a community woodland on this site, we consider any requirement above and beyond this proposed provision to be unsound, due to not being justified.

Transport and connectivity

- 2.41 Kvii) We do not consider this requirement has been adequately justified and is a matter best explored through a detailed planning application. It is not clear that the proposed development will need to make contributions to all the junctions listed, and this will likely depend on chronologically when the application is submitted and determined and what intervening development has occurred prior elsewhere. As written the policy essentially necessitates financial contributions to

all the listed junctions. In this regard we consider the wording of the policy should read as follows, to ensure the Local Plan is effective and justified and eventual contributions to be request are compliant with the CIL regulations:

appropriate improvements to highways infrastructure in the locality of the site, this may include ~~including an~~ appropriate financial contribution towards:

- a. improvements to the junction at A620 Babworth Road / B6420 Mansfield Road / A620 Straight Mile / Sutton Lane;
- b. improvements to the junction at Ordsall Road/A620 Babworth Road;
- c. improvements to London Road / Whinney Moor Lane / Bracken Lane;
- d. improvements to London Road / Whitehouses Road.

POLICY ST30: Housing Mix

- 2.42 1b) Whilst we broadly support the criterion, we consider that whilst the housing mix should reflect and be supported by up-to-date evidence on need as published by the Council, an allowance must be added to ensure schemes coming forward are also able to reflect local market signals and demands. This ensures schemes coming forward are viable and will be delivered quickly, with high levels of market absorption.
- 2.43 Future Council documents must also consider the impacts of the accelerated pattern of home working caused by the Covid-19 pandemic and its impacts on peoples buying habits. Many people will now seek to buy a property with an additional bedroom to be turned into a workspace/office. This means people who may of usually only required a 3-bed property may now seek a 4th bed. As such this may imbalance local markets if sufficient supply is not delivered. This could disproportionately impact larger dwellings, increasing house prices. This could then price out families who require larger properties due to having more children for example.
- 2.44 3) This criterion seeks the delivery of 2% of the developable plots to be set aside for self-build and custom housebuilding on sites of more than 100 dwellings. We object to this policy and consider it to be unsound. It is well established that such criteria are largely unworkable on modern housing developments and do not serve to provide additional units. In reality, such requirements may impede development unnecessarily, adding to developer burden without delivering the necessary housing units. Self-builders generally do not want to buy serviced plots within or adjacent to a modern housing estate. Our experience is that for the most part that they are instead looking for

more bespoke rural opportunities.

- 2.45 We are yet to see evidence that this method of delivery has been successful. Furthermore, just because individuals are registered on the self-build register it does not mean that they will all build their own property, even if suitable land was available. The reality is the difficulty of such a task, the skills and finances required will mean only a small percentage of those on the register will ever develop a self-build property. It is also important to note that individuals can be on multiple self-build registers, which inflates the figures across a number of areas.
- 2.46 This policy requirement will serve to frustrate and slow housing delivery, given special consideration would need to be given to the location of the plots and how they can be accessed safely and independently from the typical development parcels. The delivery of plots following unsuccessful marketing is also more complex than suggested within the Policy. The Policy assumes such plots could simply just be built out by the developer; the nature of the plots may not however lend themselves to being built by the developer and as such could leave undeveloped plots for significant period of time. Such requirements will also deter developers, given the increased complexity, impacts on cashflows and lack of certainty of outcomes.
- 2.47 There appears to be no reference to self-build or the provision of serviced plots within the viability study and as such the impacts of such policy requirements and the impacts on site viability across the Plan are not known. It is considered that such proposals are likely to negatively impact viability in both the costs of providing such plots and the reduced land values as developers seek to mitigate for potential risks.
- 2.48 The Council should instead seek to ensure a positive policy environment exists where suitable self-build schemes, either of individual units or larger schemes providing serviced plots will be treated favourably. This encourages delivery in line with the Council's statutory duties, without compromising sites which make up a vital facet of the Council's overall proposed housing supply.

REF039



[REDACTED]

From: [REDACTED]
Sent: 21 October 2021 14:45
To: The Bassetlaw Plan
Cc: [REDACTED]
Attachments: Bassetlaw Local Plan - Publication draft Reg 19 consultation
366524 - Form B Shadow Habitats Regulations Assessment.pdf; 366524 - Form B
ST40 support.pdf; 366524 - Form Part A and 5.3.17.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 Karen,
Please find attached Natural England's representations in response to the above consultation.
Kind regards
Ros

[REDACTED]
Senior Planning Adviser
East Midlands Area
Ceres House
2, Searby Road
Lincoln
LN2 4DT
02080268500

[REDACTED]
www.gov.uk/natural-england.

During the current coronavirus situation, Natural England staff are working remotely and from some offices to provide our services and support our customers and stakeholders. Although some offices and our Mail Hub are now open, please continue to send any documents by email or contact us by phone to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.

Wash hands. Cover face. Make space.



This message has been sent using TLS 1.2



Bassetlaw Local Plan 2020-2037

Publication Version Representation Form September to October 2021

Please submit electronically if possible to thebassetlawplan@bassetlaw.gov.uk

Please use this form to provide representations on the Bassetlaw Local Plan. Bassetlaw District Council must receive representations by **5pm on 21st October 2021**. Only those representations received within this period have the statutory right to be considered by the inspector at the subsequent examination.

Responses can be submitted via the electronic version of the comment form which can be found on the Council's web site at: www.bassetlaw.gov.uk/BassetlawPlan Alternatively this form can be completed and returned as an e-mail attachment to thebassetlawplan@bassetlaw.gov.uk or by post to **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

Please note:

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Please read the guidance note, available on the Council's webpage, before you make your representations. The Local Plan and the proposed submission documents, and the evidence base are also available to view and download from the Council's Local Plan webpage:

www.bassetlaw.gov.uk/bassetlawplan

Data Protection Notice:

Under the General Data Protection Regulation 2016 (GDPR) and Data Protection Act 2018 (DPA) Bassetlaw District Council, Queen's Building, Potter Street, Worksop, Notts, S80 2AH is a Data Controller for the information it holds about you. The lawful basis under which the Council uses personal data for this purpose is consent.

All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: <https://www.bassetlaw.gov.uk/about-us/data-protection/departamental-privacy-notices/planning-policy-privacy-notice/>

Due to the Data Protection Act 2018, Bassetlaw District Council now needs your consent to hold your personal data for use within the Local Plan. If you would like the Council to keep you informed about the Bassetlaw Local Plan, we need to hold your data on file. Please tick the box below to confirm if you would like to 'opt in' to receive information about the Bassetlaw Local Plan. Note that choosing to 'opt in' will mean that the Council will hold your information for 2 years from the 'opt in' date. At this time we will contact you to review if you wish to 'opt in' again. You can opt-out at any time by emailing thebassetlawplan@bassetlaw.gov.uk or by calling 01909 533495.

For more information on how Bassetlaw District Council's Planning Policy department processes personal information about you, please see our main privacy notice at <https://www.bassetlaw.gov.uk/about-us/data-protection/departmental-privacy-notice/planning-policy-privacy-notice/>

Please tick/ delete as appropriate:

Please confirm you have read and understood the terms and conditions relating to GDPR.

Yes ☐ ☒

Please tick as appropriate to confirm your consent for Bassetlaw District Council to publish and share your name/ organisation and comments regarding the Bassetlaw Local Plan.

I confirm my consent for Bassetlaw District Council to share my name/ organisation and comments regarding the Bassetlaw Local Plan including with the Planning Inspectorate.

Yes ☐ ☒

Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Bassetlaw Local Plan.

I would like to opt in to receive information about the Bassetlaw Local Plan.

Yes ☐ ☒

Printed Name: [REDACTED]

Date: 21.10.2021

Part A - Personal details – need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part A- Personal Details

1. Personal Details

Name: XXXXXXXXXX

Organisation (if applicable): Natural England

Address: East Midlands Area Delivery Team, Apex Court, City Link,
Nottingham

Postcode: NG2 4LA

Tel: 02080 266680

Fax: [REDACTED]

Email: [REDACTED]

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: [REDACTED] – Natural England

2. To which part of the Local Plan does your representation relate?

Policy:

Paragraph: 5.3.17

Policies Map:

3. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant Yes ☒

4.(2) Sound Yes ☐

4.(3) Complies with the Duty to Cooperate Yes ☒

4. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Bassetlaw Garden Village - Green and Blue Infrastructure

Paragraph 5.3.17 – We note that the current wording in this paragraph says that new habitats can be managed to **minimise** breeding opportunities. We assume this is a typographical error and it should say that new habitats can be managed to **maximise** breeding opportunities.

Continue on a separate sheet if necessary

5. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Natural England suggest a change from “minimise” to “maximise” within this paragraph.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

No ☐ **V**

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

n/a

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.



Bassetlaw Local Plan 2020-2037

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Part A - Personal details – need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: [REDACTED] – Natural England

3. To which part of the Local Plan does your representation relate?

Policy: ST40

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☒

No ☐

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy ST40: Biodiversity and Geodiversity

Natural England particularly supports this policy as it provides a comprehensive policy framework for the protection and enhancement of biodiversity and geodiversity within Bassetlaw District. We are pleased that it has incorporated recent policy initiatives stemming from the government's 25-year Environment Plan, such as the Nature Recovery Network. We also welcome the explanation regarding Biodiversity Net Gain set out in the accompanying text and within the policy wording.

We also welcome the provision at bullet point (c) regarding appropriate mitigation measures to protect Clumber Park SSSI from additional recreational disturbance. We would require a commitment that the recommended mitigation measures set out in the draft Recreational Impact Assessment will be implemented and we will continue to cooperate with the council on this matter (please note specific separate comments on the HRA).

Continue on a separate sheet if necessary

- 5. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.**

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

N/A

Continue on a separate sheet if necessary

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6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

☐

No, I do not wish to participate in hearing session(s)

☒

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

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Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: [REDACTED] – Natural England

3. To which part of the Local Plan does your representation relate?

Policy: Habitats Regulations Assessment

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Habitat Regulations Assessment

Natural England is satisfied that the submission of this document ensures that a full assessment of the proposed policies within the Bassetlaw Local Plan has been carried out and the requirements of the Habitat Regulations have been met.

We note that the Appropriate Assessment concluded that with the provision of both Policy ST40 (Biodiversity and Geodiversity), and the Recreational Impact Assessment (currently at draft stage), that adverse effects on the integrity of the Birklands and Bilhaugh SAC can be ruled out. Whilst we agree and support this approach, we would need to see a demonstration of a commitment that the recommended mitigation measures can be delivered before any development takes place to ensure compliance with the requirements of the Habitat Regulations.

“Shadow” HRA

We acknowledge that this document also incorporates a “Shadow” HRA for the Sherwood possible potential Special Protection Area (ppSPA). We can confirm that we agree with the conclusion of the “shadow” Appropriate Assessment that no adverse effects on integrity of the ppSPA would occur as a result of the identified impacts.

Continue on a separate sheet if necessary

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N/A

Continue on a separate sheet if necessary

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6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

☐

No, I do not wish to participate in hearing session(s)

☒

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

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REF040



[REDACTED]

From: [REDACTED]
Sent: 21 October 2021 15:31
To: The Bassetlaw Plan
Subject: Bassetlaw Local Plan Representation
Attachments: Local Plan Reps Supporting Letter .pdf; Local Reps Form.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 or Madam,

Please find attached to this email our local plan representation on behalf of William Davis Homes.

Please can you confirm receipt of the attached documents as soon as possible.

Thank you and we look forward to hearing from you.

Regards

[REDACTED]
Associate Director



[REDACTED]
Cheltenham, Glos, GL50 1NW

w: www.mplanning.co.uk

McLoughlin Planning Ltd. Registered Office: 119 Promenade, First Floor, Cheltenham, Gloucestershire, England, GL50 1NW. Company Registration Number: 06964115. Registered in England & Wales.



Bassetlaw Local Plan 2020-2037

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Please tick/ delete as appropriate:

Please confirm you have read and understood the terms and conditions relating to GDPR.

Yes X

No ☐

Please tick as appropriate to confirm your consent for Bassetlaw District Council to publish and share your name/ organisation and comments regarding the Bassetlaw Local Plan.

I confirm my consent for Bassetlaw District Council to share my name/ organisation and comments regarding the Bassetlaw Local Plan including with the Planning Inspectorate.

Yes X

☐

Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Bassetlaw Local Plan.

I would like to opt in to receive information about the Bassetlaw Local Plan.

Yes X

Printed Name:

[REDACTED]

Signature:

[REDACTED]

Date:

21 October 2021

This form has two parts:

Part A - Personal details – need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part A- Personal Details

1. Personal Details

Name: Please see Agent Details below.

Organisation (if applicable):

Address:

Postcode:

Tel:

Fax:

Email:


2. Agent Details (if applicable)

Agent: 

Organisation (if applicable): McLoughlin Planning

Address: 119 The Promenade, Cheltenham

Postcode: GL50 1NW

Tel: 

Fax:

Email: 

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: William Davis Group

3. To which part of the Local Plan does your representation relate?

Policy: See attached letter

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) Legally Compliant

Yes ☐

No ☐

4.(2) Sound

No X

4.(3) Complies with the Duty to Cooperate

Yes ☐

No ☐

- 5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.** If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached

Continue on a separate sheet if necessary

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Please see attached

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Yes ☒ X

No, I do not wish to participate in hearing session(s)

No

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To examine the evidence base behind the plan and the allocations made.

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

MP Ref: NM/0627

Email: [REDACTED]

Tel: [REDACTED]

21/10/2021

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

VIA EMAIL ONLY

Dear Sir or Madam,

**Representation to the Bassetlaw District Council Local Plan (Regulation 19)
Public Consultation**

McLoughlin Planning has been instructed by William Davis Ltd to respond to the Regulation 19 Bassetlaw Emerging Local Plan public consultation.

As stated on the Bassetlaw District Council website, the Council considers this version of the Local Plan as ready for examination and passing the soundness and legal tests set out in the NPPF (paragraph 35).

Under the August 2021 Publication Documents, the Council as helpfully listed the draft Local Plan and supporting evidence base documents. It is against these documents which this consultation response has been prepared.

Scope of the Public Consultation

It is acknowledged and welcomed that the Local Plan, in its entirety, and supporting evidence base are open for consideration and responses by the public. With this regard, the commentary below considers both development management policies and the Council's evidence base relating to the proposed housing land supply and allocations.

It is William Davies Ltd's position that the Local Plan is **unsound** as it is **inconsistent with national guidance** in respect of delivering a sufficient supply of homes (in accordance with paragraphs 60 & 77 of the NPPF). Specific concerns relate to the following sections and policies:

Section 7: Living Communities

The Council's objective to promote sustainable extensions to existing settlements and the reuse of brownfield sites is welcomed. Focusing on Worksop, it is encouraging to see the Council acknowledge the sustainability of the settlement and the aspirations associated with the long-term improvements proposed through the Worksop Central Development Plan Document (DPD). Therefore, for the purposes of this consultation, we raise no objection to the Council's spatial strategy, nor its settlement hierarchy.



However, reviewing the proposed allocations and the make-up of the proposed delivery of homes in the District, we have concerns that the Council are underestimating the speed in which allocated sites will come forward and the starting date for proposed new larger allocations. This means that there is a question as to whether the sites allocated under policy ST15 will deliver the housing required during the plan period.

Turning to the Council's Housing Land Supply Position, Housing Trajectory and Windfall Allowance Background Paper August 2021, the Council advises that they need to deliver 591 dwellings per annum over the plan period. Section 3 of the same report advises that over the past 2 years, the Council has seen an increased speed in delivery with 693 homes in 2019/2020 and 775 homes between 2020/2021.

The reason the above figures are important is because of the make-up of the source of housing proposed for the emerging plan period. With over 50.1% of homes proposed on "committed sites with outstanding planning permission", we are concerned that the Council will find that a large proportion of the housing need required over the 17-year period will come forward in a much shorter timeframe. This will result in a spike of oversupply followed by a prolonged period of undersupply (as the majority homes required over the plan period are coming from sites with existing planning permissions). As highlighted in the recent High Court judgement in *Tewkesbury*, previous years of oversupply cannot be factored into the Council's overall supply¹ which reinforces the viewpoint that a steady and reliable housing land supply is vital to ensure an effective plan-led system.

This concern is reinforced by the housing trajectory set out in the Land Availability Assessment (2020), appendix M. For sites with an existing planning permission (in full), the Council assumes a delivery on larger sites of approximately 30 dwellings per annum for the first 5 years of the plan period. Looking beyond the first 5 years, the Council has also assumed several sites with existing planning permissions (in full), will not be delivered due to the nature and complexity of development on of these sites (for example, a second phase development for a site, following completion of phase 1).

Taking into consideration the annual delivery outlined above (approximately. 693dpa), in conjunction with a national average of around 145dpa from larger housing developers², it is considered that the Council's anticipated 30dpa does not reflect the position on the ground which will warp the current housing trajectory forecast.

A similar issue is identified with the high percentage of windfall sites proposed to meet the Council's identified need. Section 7 of the Council's *Housing Land Supply Position, Housing Trajectory and Windfall Allowance Background Paper* advises that there are already 874 committed sites with planning permissions on sites smaller than 1 hectare. Further allocations are also proposed through neighbourhood plans.

As outlined under paragraph 69 of the NPPF, smaller to medium sites are often delivered faster than larger sites. Therefore, in conjunction with the findings set out above on committed sites deliverability, it is considered that the emerging Local Plan is likely to burn through much of its identified housing sites within a short period of time due to many sites benefiting from planning permission and an opportunity to commence as soon as possible. This raises serious doubts about the Council's housing trajectory figures for the plan period.

¹ *Tewkesbury Borough Council v Secretary of State for Housing, Communities and Local Government & JJ Gallagher Limited & Richard Cook*

² According to data available from Savills; "*Spotlighting: Planning and Housing Delivery*" (2019).

Policies ST4, ST5 and ST15

Looking beyond the initial first 5 years at some of the larger allocations proposed, we also are concerned that the Council is being unrealistic on deliverability on three of its larger allocations. We are of the opinion that there is a high risk that these sites will not come forward during the plan period and are likely to be deliverable in the plan period post-2037.

Beginning with the Worksop Town Centre DPD (policy ST5), the housing trajectory table (Appendix M of the Land Availability Assessment (2020)) advises that development will commence in 2026/2027. However, assuming the Local Plan's adoption is timetabled for 2023/2024, the supporting Town Centre DPD guidance document will need to be amended and examined AFTER the Local Plans adoption to ensure compliance with the final set of Local Plan policies.

The Town Centre DPD's continued inclusion in the current housing trajectory position appears to be a hangover from when the Council had hoped the Local Plan would be proceeding to adoption in 2022 (which is unlikely to be the case).

Therefore, development commencing as part of the earlier part of the plan period is considered unrealistic. Considering this in parallel with the time delays often associated with examinations of Local Plan and DPD documents, this issue is likely to exacerbate.

With this information before us, it can be concluded that the planned 600 homes in the Worksop DPD will not come through till the end of the plan period in 2037 or beyond.

Turning onto the Bassetlaw Garden Village (new settlement under policy ST15), it is considered a similar conclusion can be applied. Whilst an initial vision statement has been produced (September 2021), further detailed guidance (like the Worksop Town Centre DPD) is yet forthcoming. As part of the issued vision statement, it is noted that the Council do not expect development to be forthcoming until 2032 and has been planned for delivery of the following 20 years.

Supporting policies ST3 and ST4 offer overall master planning guidance for the new garden village but advise that the Bassetlaw Garden Village framework is yet to come forward to be agreed with the Local Authority and the Bassetlaw Garden Village Consultative Group. This includes the provision of a governance and stewardship management plan, which given the scale of the development, is likely to take many years to come forward.

The lacking management plan and guidance on deliverability also conflicts with new NPPG guidance³ on paragraph 22 of the NPPF. Paragraph 22 advises that for new villages, or larger extensions to villages and towns, policies should be look ahead within a vision document ahead at least 30 years to consider the likely timescale for delivery.

The vision document initially prepared for the Garden Village only looks so far as 20 years ahead. This, in conjunction with the significant supporting documentation yet to be produced for the masterplan advises that this allocation currently fails to comply with the requirements of paragraph 22 of the NPPF and raises doubts on the site's deliverability.

³ NPPG - Paragraph: 083 Reference ID: 61-083-20211004



Site HS1 – Peaks Hill Farm

The above conclusions on paragraph 22 of the NPPF are also considered applicable to the Peaks Hill Farm (HS1) proposed allocation, when considering the housing trajectory against the site constraints identified.

Concerns about the deliverability are also reinforced in policy HS1 that advises that the Council has not yet received a supporting framework outlining an infrastructure strategy to ensure the deliverability of the site. This raises doubts on delivery (i.e. any unknown constraints which may reduce unit numbers for example) and whether the development site is realistic over the lifetime of the plan in conflict with paragraph 22 of the NPPF.

What the above observations seek to highlight is a concern of the methodology and number of homes proposed for allocation which are either located on very large sites (garden village) and the high number proposed through existing planning permissions and windfall development.

Consequently, we are of the opinion that the three larger allocation results in an “all eggs in one basket” scenario, with the risk of just one of these sites not coming forward resulting in a future undersupply over the plan period. We would encourage the Council to re-explore the allocation of medium sites in sustainable locations (like Worksop) to dilute the risk across multiple allocations which have provided evidence of being deliverable and realistic (such as preferred option site LAA206). This has the potential of offering a greater long term sustainable housing delivery trajectory versus the current methodology adopted.

Should the Council proceed with its current approach, then it is considered that there is a probability of the Local Plan failing to comply with paragraph 22 of the NPPF and paragraph 35 of the NPPF on soundness.

Omission Sites – Land at Mansfield Road, Worksop

It is our view that the current consultation represents an opportunity to diversify the range and choice of development sites in accordance with the spatial strategy to help spread the risk on delivery and offer a sufficient housing buffer for any delayed or undelivered housing sites.

To introduce an element of flexibility and to ensure the housing requirement is delivered (and reflecting the matters above) we would suggest that a wider source and supply of development sites should be considered in the sustainable communities identified. This should be in terms of quantum and size of sites, as well as their distribution.

Paragraph 68 of the sets out that policy makers should have a clear understanding of the availability of land in its area. Paragraph 68a requires planning policies to identify a supply of deliverable sites for years 1-5 of the plan period. This Clearly, the identification of sites should accord with the spatial framework/settlement hierarchy and include proposals which are of an appropriate scale.

These submissions seek to promote land at Mansfield Road, Worksop for development. In so doing, its necessary to consider the evidence base for the allocation of the site. The key evidence document is the Land Availability Assessment where the site is referred to as LAA06, this concludes that:

- The site is available for development
- The site is in a suitable location, adjacent to existing residential development – from this it can be concluded that it is also compatible with the development strategy of the plan
- Is not subject to any physical constraints.

As a result, given the concerns on the deliverability of major sites, the need for additional flexibility in housing supply necessitates the allocation of new sites and the allocation of this site is clearly supported by the evidence base. The allocation would, be consistent with the guidance in the Framework.

Therefore, the allocation of the site would meet the tests in the NPPF in terms of paragraph 68a in that it is readily available and deliverable.

It is suggested that the site north of Mansfield Road, Worksop is identified as an allocation in the next iteration of the Local Plan and to contribute to the sustainable growth of the District.

Development Management Policy ST38

As set out in the previous rounds of consultation, William Davis Ltd continue to have significant objections to the proposed draft Local Plan policy ST38 and consider the designation unsound. These reservations are directed the west of St Anne's Drive, Worksop which falls within the Green Gap GG4, Worksop West – Shireoaks and Rhodesia.

A review of policy ST38 has been undertaken by Mr. Nathan Edwards (please see supporting document provided under appendix A).

In summary, the support letter confirms how the Green Gap set out under GG4 and the policy which relies on it are flawed and unwarranted. Given the associated severity of this for the purposes of a Local Plan examination, it is respectfully requested that the Council fully reviews the supporting reviews contents and actions amendments to the accordingly.

Conclusions and changes sought

It is hoped that the Council find these comments useful as they continue to progress the Local Plan to submission. We would be happy to discuss these issues in greater detail and bringing the land north of Mansfield Road, Worksop forward.

Considering the findings set out in this consultation response, it is considered that the following amendments are required to ensure a sound Local Plan can proceed to examination:

- The Council should bring forward site LAA206 (preferred option) on the edge of Worksop as an allocation to reduce the risk of future under delivery as part of Local Plan policy HS15. This development site is deliverable and has a reliable housing developer ready to bring the site forward.
- Make amendments to the proposed planning policy map to address the issues associated with emerging Local Plan policies GG4 and ST38.

Please acknowledge receipt of these comments and keep us informed of the progress of and the wider preparation of the Local Plan using the contact details provided below.

Yours faithfully


Managing Director

Appendices

Appendix A – Supporting Letter prepared by Urban Wilderness





Bassetlaw Local Plan 2020-2037 (Publication Version August 2021) consultation

William Davis Ltd

Overview

Urban Wilderness Ltd (UW) has been appointed by William Davis Ltd to assist with representations to the Bassetlaw Local Plan 2020-2037 (Publication Version August 2021) consultation, hereby referred to as The Plan 2020-2037. This technical note pays specific regard to proposed Policy ST38 concerning Green Gaps and makes reference to land under the control of William Davis Ltd to the west of Worksop, accessed from St Anne's Drive and Mansfield Road.

Principally this note considers whether Policy ST38 as drafted is justified and consistent with National Policy. This review will first touch on previous representations made to the local plan process by Tom Dillarstone and Don Munro in February 2020¹ and January 2021², followed by a critique of the policy specifically through a landscape lens. The note will set out why we do not feel the policy is justified, being contrary to the requirements of NPPF paragraphs 16d and 16f. We will also identify that the green gap as drafted girdles existing areas and is therefore unnecessarily restrictive, and that its stated purpose is poorly considered.

Qualifications and Experience

Nathan Edwards, (CMLI, DipLA) is a Chartered Landscape Architect of the Landscape Institute with over 21 years of experience in the field of landscape architecture, landscape assessment, landscape character assessment, masterplanning and urban design. Nathan is managing director of Urban Wilderness Ltd, a landscape company specialising in landscape led masterplanning, including sensitive developments within areas of recognised landscape importance, Green Belt and Strategic Gaps.

Previous Representations

1. In summary, previous representations to the Local Plan by Tom Dillarstone note that 'the purpose of the policy is confused', and that an emphasis on locally valued landscapes needs to be based on justified evidence. Moreover, drawing from the plan's evidence base that *"While the Green Gaps Report Addendum (Oct 2020) refers to examples elsewhere, notably Adur (Policy 14) and Charnwood (CS11), these policies were focussed solely on preventing coalescence rather than on the landscape."*
2. Don Munro's representation provides a detailed review and commentary on the draft Local Plan, in particular Policy ST34 as drafted, and the evidence base which supported

¹ T Dillarstone – 119709 (Policy ST34) and Don Munro – Ref 295 (Policy ST34)

² T Dillarstone 1671323 (ST39) and T Dillarstone 1671323 (ST40)

the draft policy at the time. Much of Don Munro's representation deals with matters of detail and are not therefore repeated here. Don Munro does note however, under the heading Bassetlaw Local Plan Green Gaps Report November 2019 (BLPGGR), that the BLGGR draws out the need to consider the protection and enhancement of valued landscapes, the need to recognise the intrinsic character and beauty of the countryside and that development should be allocated to the land with the least environmental or amenity value. (Paraphrase - NPPF paras 170 and 171).

3. Don Munro goes on to state that Policy ST34 concerning green gaps should therefore be led by these factors and that as the evidence base 'does not deal comprehensively with these matters', i.e. a detailed evaluation of local value in accordance with Box 5.1 of the Guidance for Landscape and Visual Impact Assessment (3rd edition) – GLVIA3, has not been undertaken; therefore the evidence base and assumptions made about value are flawed. Don Munro goes on to highlight that the BLGGR itself does not then attribute a value to the landscape within identified gaps, nor with reference to the Bassetlaw Landscape Character Assessment (2009) the BLGGR is silent on matters of the landscape's sensitivity to change.
4. It is of note that the evidence base referenced above continues to provide the basis for evidence underpinning the current version of the Local Plan and that as such the critique provided by Tom Dillarstone and Don Munro of these documents is as valid today as when submitted.

Review of Policy ST38 within the consultation version

5. In summary, it is my view that Policy ST38 is poorly conceived as a policy tool, it is contradictory in places and does not assist the reader to understand its genuine purpose.
6. I concur with Tom Dillarstone that the policy is 'confused' seeking on one hand to 'maintain the separation between relevant existing settlements' (ST38 part 2ii) and on the other to 'promote local character and distinctiveness' (ST38 part 1). These elements will be addressed separately below.
7. As noted at para 16d of the NPPF, plans should "*contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.*" I will demonstrate in the note that follows that Policy ST38 does not meet this requirement.
8. Despite assertions that the policy relates to the promotion of local character and distinctiveness it is clear that the intended purpose of Policy ST38 is to restrict development in the gaps between settlements, in order to prevent coalescence and preserve the individual identity of settlements i.e. a 'green belt' style policy. This point is partially recognised in the BLGGR at para 5.7 which states that "*...Green Gaps may (or may not) fulfil some of the stated purposes of the Green Belt...*"
9. The following review is set out to address a series of questions as follows:

Is Policy ST38 required to ensure adequate protection of the landscape outside of the identified settlement boundaries?

10. NPPF para 16f clearly states that local plans should “*serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area...*”
11. In the case of Policy ST38 I am of the opinion that the policy is not justified as it creates an unnecessary layering of protection that is otherwise provided in combination by other policies within the plan.
12. Policy ST1 deals with development in the Countryside. It clearly notes that all areas not otherwise identified on the proposals map are considered to fall within the ‘wider countryside’. The policy goes on to note that “*Places not identified in the settlement hierarchy are considered to be part of the wider countryside, where development will be supported where consistent with other policies in this plan and to address an identified local need and can be justified through a neighbourhood plan or national policy.*” (underlined text is my emphasis).
13. Policy ST1 is therefore to be read in conjunction with Policy ST37 which notes that development will only be supported where it can be demonstrated that “*a) it protects and where possible enhances the distinctive qualities of the relevant landscape character policy zone, as identified in the Bassetlaw Landscape Character Assessment 2009 by conserving, restoring, reinforcing or creating relevant landscape forms and features.*” (underlined text is my emphasis). It follows therefore that if a development proposal is contradictory to the identified landscape character policy zone that it would be refused permission. i.e. inappropriate development would be prevented.
14. Additionally, Policy ST35 concerning High Quality Design requires development to respect local context, incorporate high quality landscape design, and to pay particular attention to development that adjoins the countryside. This policy also signposts adherence to national and local design guidance, the Bassetlaw Design Quality SPD and the Bassetlaw Design Code.
15. There are further policies concerned with the protection of biodiversity, blue and green infrastructure and woodland that add further protective measures to the landscape dependent upon a given site’s location and circumstances.
16. Policy ST38 identifying Green Gaps neither wholly addresses landscape character (Policy ST37) nor the promotion of high-quality development (Policy ST35), yet it seeks to do both. In my professional opinion the wording of policies ST1, ST35 and ST37, in combination, could be readily strengthened to reference the need for development to maintain the separation between settlements, or that development must not (individually or cumulatively) lead to the coalescence of settlements. In doing so the designation of a green gap is considered superfluous to other policies proposed for the control of development in the countryside.
17. Dealing directly with the need to maintain the separation of settlements by updating policies ST1, ST35 and ST37 would in my opinion deal with the matters Policy ST38 is

seeking to address and would equally meet the requirements of paragraph 16d of the NPPF.

Is Policy ST38 justified based on the evidence?

18. To be justified a policy needs to be appropriate, take into account the reasonable alternatives, and be based on proportionate evidence; (paraphrase NPPF 35).
19. As currently drafted the starting premise for Policy ST38 would appear to stem from an assertion that the Countryside has a 'distinctive character which is highly valued' and that 'weight should therefore be given to the protection and enhancement of the Countryside's intrinsic character as a non-designated landscape'. (Paraphrase para 8.4.1 Bassetlaw Local Plan 2020-2037).
20. The NPPF is clear at paragraph 174 that for a landscape to be highly valued it must be subject to a statutory designation or be of 'identified quality in the development plan'. Whilst 'Countryside', wherever this is overlooked, walked across, driven through, or worked in, may be considered attractive, and as such confer a local value to those that have the opportunity to reasonably appreciate it, unless specifically designated or allocated for its quality it cannot be considered to be highly valued.
21. In the absence of a recognised landscape designation, a policy that seeks to protect certain tracts of land for their local value or intrinsic character must draw from a credible evidence base that adequately evaluates and identifies each areas quality in turn. If not, then the policy would appear to infer that all of the Countryside would qualify to be protected in this way.
22. A recognised methodology for undertaking this evaluation is provided by the GLVIA3 Box 5.1. The current evidence base supporting green gap selection does not provide this level of evaluation. One must conclude therefore that green gaps have not been selected on the basis that they protect the intrinsic character of the countryside as inferred.
23. Indeed, with reference to land west of St Anne's Drive and north of Mansfield Road, controlled by William Davis, land to the south falls outside of proposed gap GG4, whilst land to the north falls within this gap. The landscape character of the site presents no discernible difference across the site whether within the gap area or not. It follows that the character of the landscape is not therefore a determining factor in gap selection.
24. Moving away from value, the supporting text for Policy ST38 seeks to provide justification for green gaps at paragraphs 8.4.4, 8.4.6 and 8.4.7 (Local Plan 2020 – 2037 publication version) as follows:
 - a. Paragraph 8.4.4 states that *"The use of Green Gaps will provide greater clarity for communities, developers and landowners to appropriately manage development in locally valued landscapes."* The policy fails to identify what clarity is sought or needed. If communities lack certainty over whether a site should be protected or developed, they are empowered to make Neighbourhood Plans to determine this direction. Similarly, developers and landowners can engage with the local

authority in pre-application discussions to determine the suitability of a proposal against relevant policy.

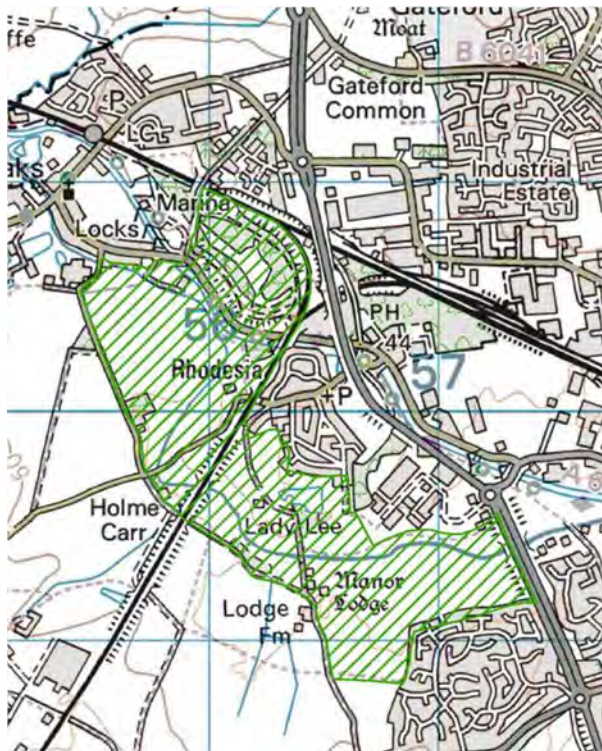
- b. Paragraph 8.4.6 seeks to express the purpose of identifying green gaps, namely, 'to manage the location and scale of development' to 'protect the setting and character of settlements' and to 'secure townscape / landscape enhancement'. In my opinion this is ambiguous at best. The inference is that green gaps will enable development within the countryside so long as this does not fall within a gap between settlements, and that in doing so the character of settlements will be protected. Firstly, suitable locations for development can and should be identified through the local plan process with land allocated within the plan to meet projected need. Secondly the designation of a gap that restricts development in a particular locale does not then dictate or determine the suitability of proposed development in areas outside the gap designation. This will be governed by applying Policies such as ST35 and ST37 in combination. Moreover, inappropriate development adjoining a settlement but falling outside of a green gap will clearly adversely affect settlement character. It is disingenuous therefore to imply that the designation of green gaps can in any way enable high quality development and that in doing so settlement character will be protected. This paragraph also implies that development within green gaps cannot occur without compromising the setting and character of settlements. I would assert that well designed development could in fact compliment the setting of settlements and deliver both recreational, and biodiversity benefit. The key question remains; would development result in the merging of settlements and a loss of their individual identity? In the case of land to the west of St Anne's Drive and north of Mansfield Road, I assert that high quality development could be permitted within the area of the site identified as gap without compromising the stated objectives of the gap. Indeed, development could enhance and diversify footpath provision and create a sensitive urban to rural transition that is currently lacking on the edge of the settlement.
- c. Paragraph 8.4.7 is clear in that gaps have been identified where there is significant development pressure between settlements that would adversely impact upon the 'openness, character, function, appearance and therefore quality...' of these areas. This paragraph cuts to the purpose of Policy ST38, namely a restrictive policy that prevents the erosion of gaps and therefore the individual identity of settlements. I return to my earlier commentary that considers that development policies ST1, ST35 and ST37 among others can effectively control inappropriate development and that a specific gap policy is not required.

- 25. Turning to the wording of the policy itself, section 1 seeks "To 'promote local character and distinctiveness of the Main Towns and nearby Large and Small Rural Settlement, and to reflect the sensitivity of the adjoining landscape quality and character...'" (underlined text is my emphasis). As noted above the policy and supporting text are in my opinion ambiguous in relation to the question of how green gaps are to promote local character and distinctiveness. I would suggest in fact that the policy is silent on this matter leaving it open to the reader to determine the policies meaning. There is no discussion for example with regards to how a green gap will enable landscape or townscape enhancement.

26. Similarly, the sensitivity of the landscape has not been reflected in the determination of gap boundaries. Don Munro deals with this matter within his representation (Jan 2020) noting that the Bassetlaw Landscape Character Assessment (2009) makes reference to sensitivity but that this has little bearing on the extent of designated gaps. Again, by way of an example, land to the west of St Annes Drive and North of Mansfield Road is determined as being of Moderate landscape sensitivity and as such has some capacity for change. The gap boundary is currently proposed to cross this site, with land both to the north and south of this boundary being considered to comprise the same landscape sensitivity. It does not follow therefore that green gaps reflect landscape sensitivity.
27. Part 2 of the policy determines that development should only be considered within green gaps if there are no alternatives, if it comprises critical infrastructure and if it can demonstrate compliance with Policies ST37, and ST39 (green/blue infrastructure). Whilst not stated part i) concerning high standards of design, part iii) concerning the creation of a positive interface between urban and rural areas and, part iv) concerning footpaths are all covered by Policy ST35. With the exception of maintaining the separation of settlements, (part ii) in essence the policy refers the reader to compliance with other policies within the plan. It follows therefore that these policies in themselves should determine whether a landscape on the edge of a settlement should be considered for development and that Policy ST38 is superfluous in this regard.

Are the gap boundaries / extents justified?

28. With reference to GG4 and land to the west of St Annes Drive and North of Mansfield Road I set out below why I do not believe the gaps identified and their indicative boundaries are justified.



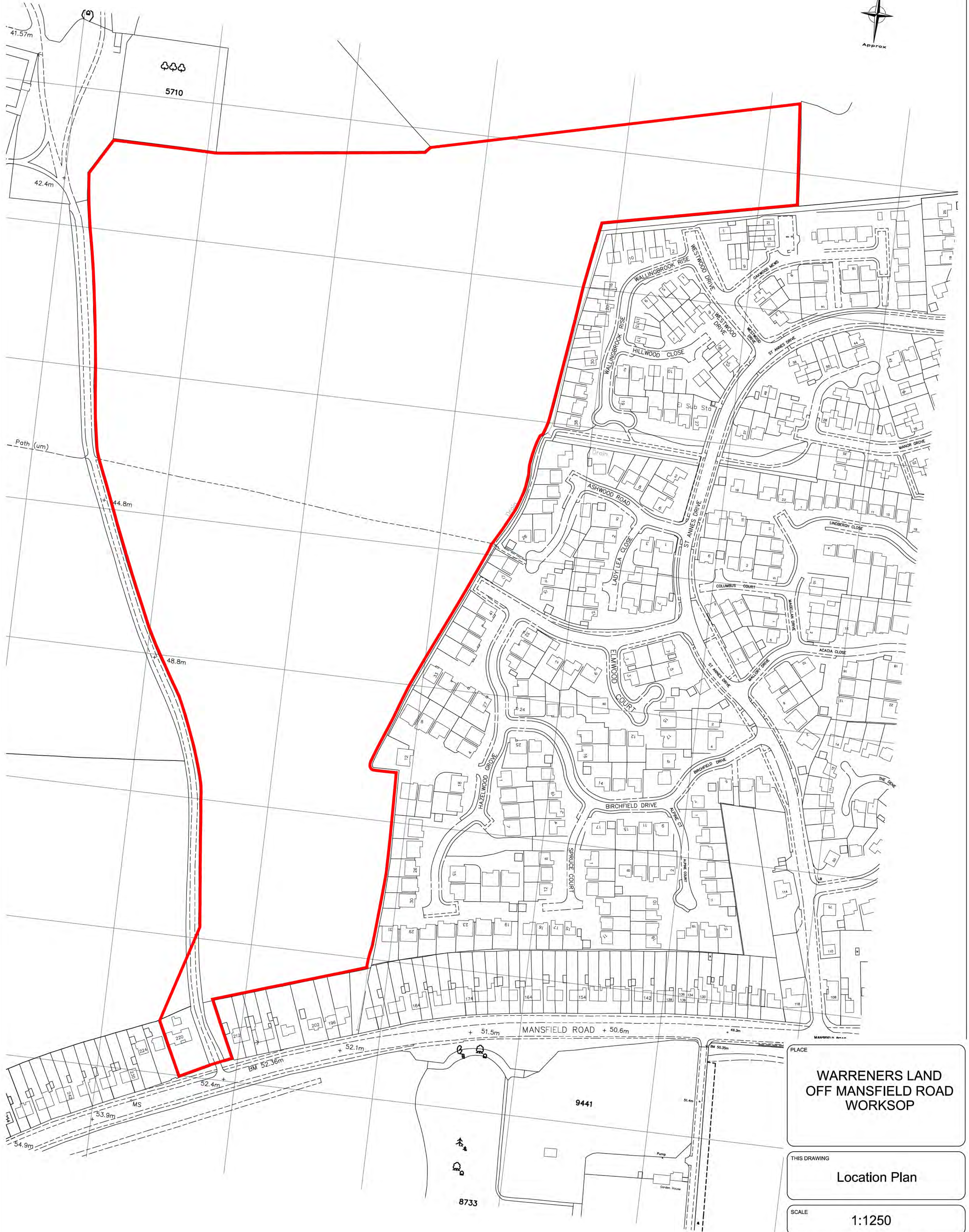
Extract from page 27 of the Bassetlaw Green Gap Report (2019)

29. With reference to GG4 the land to the west and south of Rhodesia has been identified as a green gap. It is evident that roads and footpaths for the most part have been used to form the boundaries of the gap. As noted above landscape value and landscape sensitivity have clearly not informed the extents illustrated.
30. It is unclear what the gap is trying to achieve from its expression alone. For example, if the objective is to maintain separation between the north western edge of Worksop and the residential area to the north of Mansfield Road, it would seem logical to follow the line established by existing development, rather than the footpath as shown. The extension to the south of Manor Lodge does not promote separation, but rather provides a buffer of countryside to the west of Worksop, as does the allocation generally. The current form would sterilise the gap from all but a very limited form of development, which could themselves be contradictory to policy, whilst contributing little to the objective of separation. The gap precludes development that may be consistent with the objectives of the policy, whilst also offering a positive urban edge and transition to the countryside.
31. The question is not therefore should the Public Right of Way define the extent of a Green Gap but in fact should there be a Green Gap at all? As previously noted, existing policy considerations afford the 'countryside' with protection against inappropriate development (Policy ST1). This in turn can be read alongside Policy ST37 which ensures development that does not contribute to the nature and quality of Bassetlaw's landscapes will not be supported.
32. Even if the Green Gap policy framework was to be deemed appropriate, then concerns would remain regarding the application in reference to the stated objectives. In its current form, the designations within the policy are ill defined, appear somewhat arbitrary and unnecessarily prohibitive. Sensitive development would likely be possible within the green gap, without detriment to the objectives of the designation. Such development could be appraised against a more relaxed green gap policy, which allowed for proposals conforming with the stated aspirations on a case by case basis.

To Conclude

33. In conclusion, I do not deem the currently proposed green gap policy to be warranted, as any application could be judged on its merits in accordance with the proposed policies ST1, ST35 and ST37, which similarly seek to protect the countryside and which with modest modification address the prevention of settlement coalescence.
34. If the green gap policy is to remain, I would propose a less prohibitive list of appropriate development, allowing the consideration of proposals on a case by case basis, against the established objectives.

Author: [REDACTED]
October 2021
Urban Wilderness



PLACE
**WARRENERS LAND
OFF MANSFIELD ROAD
WORKSOP**

THIS DRAWING
Location Plan

SCALE
1:1250

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