

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

REF Responses 041-051

REFERENCE NUMBER*	ORGANISATION	PARTICIPATING IN HEARING SESSIONS
REF041	Quod on behalf of DHL Real Estate Solutions	Yes
REF042	nineteen47 Ltd on behalf of Bellway Homes Ltd	No
REF043	Gladman Developments	Yes
REF044	Planning Issues on behalf of Churchill Retirement Living and McCarthy Stone	No
REF045	Crowley Associates Ltd on behalf of Rose & Co Homes	Yes
REF046	Frampton Town Planning Ltd on behalf of J G Pears	Yes
REF047	Planning and Design Group on behalf of Welbeck Estates Company Limited	Yes
REF048	Nottinghamshire County Council	Yes
REF049	Historic England	No
REF051	Resident	No

*There is no REF050

REF041



[REDACTED]

From: [REDACTED]
Sent: 21 October 2021 15:35
To: The Bassetlaw Plan
Subject: Local Plan representations
Attachments: Vertical Park Rep - reg-19-form-a-b-12pt 21.10.21.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 Madam/Sir,

Please find enclosed a representation made on behalf of DHL Real Estate Solutions to the Bassetlaw Local Plan 2020-2037 Publication Version Consultation.

Sincerely,



[REDACTED]
Senior Planner
[REDACTED]



8-14 Meard Street
London
W1F 0EQ

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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**

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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:

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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/departamental-privacy-notices/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:

[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: N/A

Organisation (if applicable): DHL Real Estate Solutions

Address: c/o Agent


Postcode:

Tel:

Fax:

Email:


2. Agent Details (if applicable)

Agent: 


Organisation (if applicable): Quod

Address: 8-14 Meard Street, London

Postcode: W1F 0EQ

Tel: 

Fax: N/A

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: DHL Real Estate Solutions

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

Policy: Policy ST7

Paragraph: N/A

Policies Map: N/A

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.

DHL are generally supportive of the Local Plan, however it is considered Policy ST7 (Provision of Land for Employment Development) and the evidence base underpinning this policy is not sound.

The Bassetlaw Local Plan – Housing & Employment Note, July 2020, and the Bassetlaw A1 Logistics Assessment, August 2021 both fail to recognise the extant consent (09/05/00002) at Bevercotes Colliery, Bothamsall, Retford. The extant consent has the capability to deliver 2.7m sq ft of employment floorspace across 80 hectares.

It is also considered that Bevercotes Colliery should be listed under Policy ST7 as one of the “Sites with planning permission”, with the land available for employment before 2037.

DHL, alongside the existing landowner Gladman, have been in positive discussions with Officers at Bassetlaw regarding the delivery of Bevercotes Colliery and consider it has a very reasonable prospect of being delivered, and should therefore be included in both the evidence base and the emerging Local Plan.

It has been confirmed by Officers at Bassetlaw that the consent is extant, with a material start on site formally recognised via email.

Our response to Q6 sets out our proposed route to rectifying the above to enable the Plan to be sound.

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 proposed the evidence base is updated to reflect the very reasonable prospect of Bevercotes Colliery being delivered. It should reflect the capability of the site to deliver 2.7m sq ft of employment floorspace across 80 hectares. As currently drafted, the evidence base and Policy ST7 cannot be considered “up-to-date”. We recommend that an addendum to the Bassetlaw A1 Logistics Assessment, August 2021 is produced to take account of this and make sure that the Bevercotes Colliery site is included in the Local Plan’s evidence base.

Quod have undertaken a review of the numbers underpinning the Bassetlaw A1 Logistics Assessment, August 2021. While there are a number of potential calculations to estimate the future supply of employment land in the District, the inclusion of Bevercotes Colliery still results in an undersupply in all scenarios, and therefore would not represent a material change to the outcome of this Assessment.

It is considered minor changes to the evidence base and Local Plan policy would allow the Plan to be found sound in this regard.

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:

DHL/Quod do not intend to participate in hearing sessions, but reserve the right to do so should the desired amendments not be addressed sufficiently.

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.

REF042



[REDACTED]

From: [REDACTED]
Sent: 21 October 2021 15:52
To: The Bassetlaw Plan
Subject: Bassetlaw Local Plan Publication Version Consultation Response - Land to the north of Retford
Attachments: n1767_Bassetlaw Local Plan Reps_Location Plan.pdf; n1767_Bassetlaw Local Plan Reps_Oct 21.pdf; reg-19-form-a-b-12pt.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

Good Afternoon,

Please find attached our representations pursuant to the current consultation on the Regulation 19 (Publication) version of the Local Plan (2020-2037) in the context of our client's site 'Land to the north of Retford'. I have attached the relevant form as well as a supporting letter and location plan.

Please do not hesitate to contact me if you require any further information.

If you could please acknowledge receipt of this email and additionally add my email address onto your database for future local plan updates.

Kind Regards,

[REDACTED]
Senior Planner

nineteen47
CHARTERED TOWN PLANNERS
& URBAN DESIGNERS

[REDACTED]
w: www.nineteen47.co.uk

York Office: 106 Micklegate | York | YO1 6JX

Midlands Office: Unit 4 | Innovate Mews | Lake View Drive | Sherwood Park | Nottingham | NG15 0EA

Sheffield Office: Acero | 1 Concourse Way | Sheffield | S1 2BJ

To view our new digital brochures, please click on the images below



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Yes ☒

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:

[REDACTED]

Signature:

[REDACTED]

Date:

19.10.2021

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:

Organisation (if applicable): Bellway Homes Ltd

Address: C/O agent

Postcode:

Tel:

Fax:

Email:

2. Agent Details (if applicable)

Agent:

[REDACTED]

Organisation (if applicable): nineteen47 Ltd

Address: Unit 4, Innovate Mews, Lake View Drive, Sherwood Park,
Nottingham

Postcode: NG15 0EA

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: nineteen47 on behalf of Bellway Homes

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

Policy: ST15

Paragraph:

Policies Map: Settlement boundary

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 refer to attached covering letter.

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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Please refer to attached covering letter.

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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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:

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.

RB/01/n1767

Planning Policy,
Queens Building,
Potter Street,
Worksop,
Nottinghamshire
S80 2AH

Sent via email:
thebassetlawplan@bassetlaw.gov.uk

21st October 2021

Dear Sir/Madam,

**Bassetlaw Local Plan 2020-2037 Publication Version Consultation
Regulation 19 (Publication) Local Plan**

nineteen47 is instructed by Bellway Homes Ltd to submit representations pursuant to the current consultation on the Regulation 19 (Publication) version of the Local Plan (2020-2037) in the context of our client's site 'Land to the north of Retford'. A site plan is included for your reference.

The Site

The site is not currently included in the Publication Version of the Local Plan as a draft housing allocation. The land has not been previously promoted to our client's knowledge and has only recently become available due to a family bereavement. The land located to the south of the site, 'Land off Longholme Road, Retford' is currently being developed for housing, following a planning appeal in 2019 (ref: APP/A3010/W/19/3223548), where outline permission was granted. A reserved matters application was subsequently approved in 2021 for 60 dwellings (ref: 21/00357/RES).

The representation site is approximately 2.53 hectares in size and is presently a vacant field located on the northeastern edge of Retford and has residential development to the south and west (beyond the adjacent field). The site is not located within the Green Belt and is not within a conservation area or within the immediate vicinity of any heritage assets. Furthermore, it is well enclosed by existing vegetation on boundaries to the north and east, and by the emerging built development to the south.

The site is considered to have capacity for approximately 60 dwellings and is considered to form a logical extension to the north of Retford, extending the settlement in line with the residential built form located to the west.

As the site has only recently become available, survey work is currently being undertaken at the site in order to inform a future planning application. Access can be achieved through the approved site via Longholme Road. The Inspector in the previous appeal relating to the land to the south concluded that the development of that site would not prejudice highway safety and the access was acceptable. It is considered that this remains the case for the northern parcel and highways survey work will be undertaken to ensure this is the case.

Planning Policy Context

As the emerging Local Plan acknowledges, Retford is the second largest town in the District and is a sustainable location for growth. It has a wide range of services, shops and employment opportunities with good public transport links.

Draft policy ST1 (Bassetlaw's Spatial Strategy) defines Retford as a 'main town' along with Worksop and Harworth & Bircotes. The emerging Plan allocates a minimum of 10,047 dwellings across the plan period, of which approximately 2,128 dwellings will be in Retford.

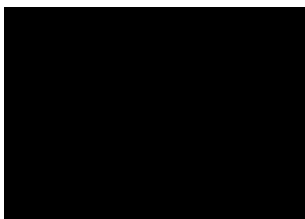
The site is to the north of Retford and represents a logical extension to the settlement and offers the opportunity for additional choice within the housing supply. The site is being promoted by a reputable housebuilder, who is currently delivering the site immediately to the south. As such, the site to the north can come forward promptly once it has planning permission, at which point the current site will have largely been completed.

We object to the Plan as currently drafted as it is our view that the site should be included within the settlement boundary together with the land to the south (under development) and potentially land to the west, which is also within the same landownership. As the plan is currently drafted, there is recognition of the committed status of the site to the south, but it is not proposed to amend the settlement boundary. This is considered to be a missed opportunity to amend the boundary to reflect development that is underway and to take the opportunity to round off the settlement in this location and we would encourage you to review this approach.

We propose the site's inclusion as a housing allocation in the emerging Local Plan at this stage, the proposed allocations in Retford are currently focused largely on a single strategic site, which will inevitably take longer to deliver and will not provide choice in the market. This site offers the opportunity to deliver market and affordable housing and will be available early on in the plan period, boosting the Council's figures early on and will help to ensure that the LPA maintains a five-year housing land supply.

We trust these comments will be given due consideration in relation to the current Publication Version Consultation. We would be grateful to be kept informed of all future progress and consultations on the Local Plan and would be happy to discuss any queries you might have on the matters raised within this correspondence. In the meantime, if you are able to confirm safe receipt of this correspondence, it would be appreciated.

Yours faithfully

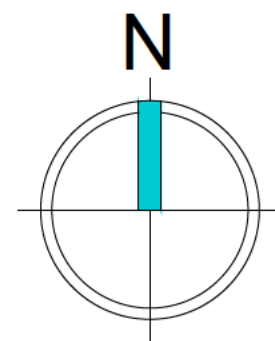


Senior Planner





Scaled @ 1:1250



<div><div>STEN</div><div>ARCHITECTURE</div></div> <div><div>STEN Architecture Ltd</div><div>The Studio</div><div>Harrison Street</div><div>Wakefield</div><div>WF1 1PS</div><div>Tel: 01924 950985</div></div> <div><div>Web: www.sten-architecture.co.uk</div><div>Twitter: @STEN_arch</div><div>Facebook: stenarchitectureltd</div><div>Linkedin: Sten Architecture</div></div>			CLIENT: BELLWAY HOMES Yorkshire Division		TITLE: Location Plan				
			SITE: Land North of Longholme Road Retford		SCALE AT A3: 1:1250		DATE: Oct 21	DRAWN: SSH	CHECKED: X
					PROJECT NO: 2105:100		DRAWING NO: LP01		REVISION:
DESCRIPTION:	BY:	DATE:							

REF043



[REDACTED]

From: [REDACTED]
Sent: 21 October 2021 16:25
To: The Bassetlaw Plan
Subject: Bassetlaw Local Plan 2020-2037: Publication Version August 2021 Consultation - Gladman Developments' Representation
Attachments: Bassetlaw Local Plan Regulation 19 Consultation August 2021 - Gladman Representation.docx.pdf; reg-19-form-a-b-12pt - Gladman Developments.pdf; reg-19-form-b-12pt - Gladman Developments.pdf

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Good afternoon,

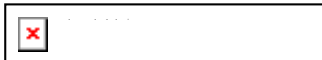
Please see attached Gladman Developments' representations to the Bassetlaw Local Plan 2020-2037 Regulation 19 (August 2021) consultation.

I would be grateful if you can confirm receipt of the attached documents by responding to this email.

Many thanks,

[REDACTED]

[REDACTED]
Assistant Planner



T: 01260 288 981 | [REDACTED]
[REDACTED].co.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 ☒

No ☐

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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:

[REDACTED]

Date:

21/10/2021

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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): Gladman Developments

Address: Gladman House, Alexandria Way, Congleton

Postcode: CW12 1LB

Tel: [REDACTED]

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: Gladman Developments

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

Policy: ST1 / ST2 / ST4 / ST30 / ST58 / Promoting Economic Growth & Priority Regeneration 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 ☒

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 corresponding 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 corresponding 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:

Gladman are promoting land in Bassetlaw for employment uses. The site has current extant planning permission for B8 and B2 uses but has not been assessed against employment criteria or included as a potential employment site.

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: Gladman Developments

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

Policy: ST1 / ST2 / ST4 / ST30 / ST58 / Promoting Economic Growth & Priority Regeneration 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 ☒

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 corresponding representations

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 corresponding 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.

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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:

Gladman are promoting land in Bassetlaw for employment uses. The site has current extant planning permission for B8 and B2 uses but has not been assessed against employment criteria or included as a potential employment site.

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 District Council Local Plan 2020-2037

**Publication Version
Regulation 19 Consultation**

October 2021



[gladman.co.uk](https://www.gladman.co.uk)



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1 INTRODUCTION

1.1 Context

1.1.1 Gladman welcome the opportunity to comment on the Bassetlaw District Council Local Plan Regulation 19 consultation and request to be updated on future consultations and the progress of the Local Plan.

1.1.2 Gladman Developments Ltd specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.

1.1.3 The Council will need to carefully consider its policy choice and ensure that the proposed approach positively responds to the revised National Planning Policy Framework (2021). There will also be a need to take consideration of changing circumstances associated with national planning policy and guidance over the course of the plan preparation period, including the Government's emerging proposals for the planning system.

1.1.4 Gladman Developments are promoting the former Bevercotes Colliery site through the local plan making process. The emerging Plan's consideration of the site to date has been focused on its potential development as a garden village, however, notwithstanding the judgements reached in that regard to date, the Council should also actively consider alternative options for the future of the site and the ability to deliver significant economic development and regeneration through the implementation of the extant planning permission for 2,733,602 sq.m of B2/B8 development.

1.1.5 The regeneration potential of the site should be supported through a positive and proactive approach within the Local Plan that fully recognises its ability to support the sustainable economic growth of the area. The site offers significant potential for logistics uses which has been recognised through the extant planning permission for its redevelopment for B2 and B8 uses (reference: 09/05/00002).

1.1.6 In addition to appropriate recognition of this site as part of the overarching economic growth strategy of the local plan, it is also an imperative that this site is considered as part of the underlying evidence base including the logistics study. Since the grant of planning

permission, the A1 corridor and the logistics sector has increased as has the interest in the site from developers.

- 1.1.7 Gladman looks forward to engaging further with the Council as the plan preparation process progresses.

1.2 Plan Making

- 1.2.1 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2 LEGAL COMPLIANCE

2.1 Duty to Cooperate

- 2.1.1** The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 2.1.2** Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Bassetlaw must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.
- 2.1.3** The revised Framework introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process¹. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.

¹ PPG Reference ID: 61-001-20180913

2.2 Sustainability Appraisal

- 2.2.1** In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 2.2.2** Bassetlaw District Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Bassetlaw Local Plan's decision-making and scoring should be robust, justified and transparent.

3 NATIONAL PLANNING GUIDANCE

3.1 National Planning Policy Framework

3.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019 and July 2021. These publications are revisions to the initial 2012 Framework and implemented changes that were informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and Planning for the Future consultation.

3.1.2 The revised Framework (2019) introduced a number of major changes to national policy which provide further clarification to national planning policy as well as new measures on a range of matters. Crucially, national policy reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, Paragraph 16 of the Framework (2021) states that Plans should:

"a) Be prepared with the objective of contributing to the achievement of sustainable development;

b) Be prepared positively, in a way that is aspirational but deliverable;

c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."

-
- 3.1.3 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.
- 3.1.4 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.
- 3.1.5 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. While Annex 2 of the Framework (2021) provides definitions for the terms "deliverable" and "developable".
- 3.1.6 Once a local planning authority has identified its housing needs, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see Paragraph 35 of the NPPF 2021).
- 3.1.7 The July 2021 revision to the NPPF provides greater focus on the environment, design quality and place-making alongside providing additional guidance in relation to flooding setting out a Flood Risk Vulnerability Classification at Annex 3, the importance of Tree-lined streets and amendments to Article 4 directions. Additionally, Local Plans which have not yet progressed to Regulation 19 stage should ensure that where strategic developments such as new settlements or significant extensions are required, they are set within a vision that looks ahead at least 30 years (See paragraph 22).
- 3.1.8 The amendments coincide with the publication of the National Design Guide and National Model Design Code, a toolkit which helps local communities to shape local design needs

and provide guidance for creating environmentally responsive, sustainable and distinctive places with a consistent and high-quality standard of design.

3.2 Planning Practice Guidance

- 3.2.1** The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy. The most significant changes to the PPG relate to defining housing need, housing supply and housing delivery performance.
- 3.2.2** The Standard Method was introduced by the Government to simplify the process of defining housing need, avoid significant delay in plan preparation and ultimately facilitate the Government's ambition to achieve 300,000 new homes annually.
- 3.2.3** Revisions to the PPG on the 20th February 2019 confirmed the need for local planning authorities to use the 2014-household projections as the starting point for the assessment of housing need under the standard method².
- 3.2.4** It is also vital to consider the economic impact of COVID-19 and the long-term role that housing will play in supporting the recovery of the economy, both locally and nationally. We support the Council in its positive approach to plan for above the minimum requirement, which will enable Bassetlaw to capture a larger proportion of the £7 billion yearly housebuilder contributions³. With 218,000 homes predicted not to be built due to COVID-19 from now to 2024/25⁴, it is also imperative that Bassetlaw District Local Plan identifies sufficient land to support the delivery of homes.
- 3.2.5** In order for the housing needs for the whole plan period to be met, it will also be essential to provide sufficient headroom within the housing supply. In this regard, Gladman supports the Home Builders Federation's recommendation that local plan should seek to identify

² PPG Paragraph: 005 Reference ID: 2a-005-20190220

³ MHCLG (2020). 'Planning for the Future'. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf

⁴ Shelter & Savills (2020). 'Over 80,000 new homes will be lost in one year due to COVID chaos'. Available at: https://england.shelter.org.uk/media/press_releases/articles/over_80,000_new_homes_will_be_lost_in_one_year_to_covid_chaos

sufficient deliverable sites to provide a 20% buffer between the housing requirement and supply.

3.3 National Planning Policy Consultations

- 3.3.1** On the 6th August 2020, Government published the Planning for the Future White Paper setting out proposals for how it is seeking to 'radically reform' the planning system. The proposals are seeking to streamline and modernise the planning process.
- 3.3.2** A further consultation on immediate changes to the current planning system closed on 01 October 2020⁵. Of significant note is a proposed revised standard method for calculating local housing need, which proposed to incorporate a percentage of existing stock as the baseline of the calculation.
- 3.3.3** In December 2020 the Government published their response to the 'Changes to the Current Planning System'. This document provides an overview of the consultation responses before highlighting that it has been deemed that the most appropriate approach is to retain the Standard Method in the current form with an additional 35% uplift to the 'post-cap number' for 20 local authorities. The Government's rationale behind this approach is to increase home-building in existing urban areas to make the most of previously developed brownfield land over and above that in the existing standard method.
- 3.3.4** The latest correspondence from Government regarding the revisions to the Standard Method for calculating local housing need will not affect the minimum local housing need which Bassetlaw District Council should Plan for.
- 3.3.5** In her speech at the State Opening of Parliament in May 2021, the Queen announced that the Government will introduce "laws to modernise the planning system, so that more homes can be built, will be brought forward...". Notes accompanying the speech confirm that a future Planning Bill will seek to create a simpler, faster, and more modern planning system that ensures homes and infrastructure can be delivered more quickly across England. Timings on the publication of the draft Planning Bill remain uncertain, however, subject to the outcomes of this process, the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new

⁵ Ministry of Housing, Communities & Local Government: Changes to the Current Planning System Consultation <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

legislation to implement the changes. In September 2021, Michael Gove replaced Robert Jenrick as the Secretary of State for Housing, Communities and Local Government while the ministry was renamed to the 'Department for Levelling Up, Housing and Communities'.

- 3.3.6 It will be important that the Council keeps abreast with the implementation of these changes to determine any potential implications for the Local Plan.

4 REGULATION 19 CONSULTATION

4.1 Background

4.1.1 The Bassetlaw District Core Strategy and Development Management Policies Development. The Council previously were working towards a Site Allocations Plan; however, the Council took the decision to withdraw the Plan and began working towards a new Local Plan.

4.1.2 The sections that follow below include specific comments from Gladman on the Council's Local Plan covering a range of the topics and questions that have been posed.

4.2 Strategic Objectives

4.2.1 Gladman are generally supportive of the Council's vision and objectives which provide a positive and proactive approach to future development in Bassetlaw over the plan period to 2037.

4.2.2 The Strategic Objectives (SO) of the Plan, principally SO₃ and SO₄, highlight the need to prioritise development on previously developed land that is capable of sustainable economic growth and offering wider benefits to the A1 corridor. Gladman are of the view that land at Bevercotes Colliery can help the Council achieve its strategic objectives and the site should, therefore, be identified as an additional Priority Regeneration Area. Land at Bevercotes Colliery can also be bought forward in a manner to meet the intentions of SO₁₄.

4.2.3 The sections that follow include specific comments from Gladman on the Council's Regulation 18 consultation documents which is guided by the strategic objectives.

4.3 Policy ST1: Bassetlaw's Spatial Strategy

4.3.1 Gladman broadly support the Council's proposed spatial strategy which seeks to deliver sustainable development and growth in line with the Council's ambition to achieve a 'step change' in the local economy. Gladman welcome the fact that the Council continues to recognise the need to deliver housing to meet the population and economic growth needs of the district and that the evidence concludes that an uplift against the 2014 household projections is required in order to align with the Council's economic growth ambitions.

4.3.2 The latest iteration of the plan no longer recognises the Cottam Priority Regeneration Area within the spatial strategy, while it is acknowledged that the Council are not reliant on the delivery of Cottam to meet current development needs it is recognised that the site is a broad location for future growth. In this regard, Gladman consider that Priority Regeneration Areas should be recognised within the spatial strategy, either noted in the settlement hierarchy or acknowledged within Criterion 4-5 of Policy ST1, given that the Council acknowledge development is likely to come forward at the site.

4.3.3 Gladman welcome Policy ST1 (5) which reflects the contribution of job growth in the spatial strategy through the delivery of the General Employment Sites and at Apleyhead Strategic Employment Site. Similarly, to the information set out at 4.3.2, Gladman consider that Bevercotes Colliery should be referenced in Policy ST1 (5) as a Priority Regeneration Area capable of delivering employment uses and significant employment opportunities, notably logistic uses, as highlighted through the extant planning permission. Gladman will set out further reasoning why Bevercotes Colliery should be included and referenced within the Plan to deliver employment uses in sections 4.6 and 4.7 of this representation.

4.4 Policy ST2: Residential Growth in Rural Bassetlaw

4.4.1 The above policy sets out the Council's approach to support the delivery of sustainable development to meet the needs of Bassetlaw's rural area over the plan period to 2037.

4.4.2 Part 2 of Policy ST2 states that proposals for residential development in an eligible Large or Small Rural Settlement will be supported where they meet certain criteria. Criterion B states that sites should be located within development boundaries where appropriate. While this provides further flexibility than the last iteration of the Plan, it is still considered that the use of settlement boundaries to arbitrarily restrict sustainable development from coming forward on the edge of suitable settlements would not accord with the positive approach to growth required by the Framework. Gladman would object to an overly onerous approach such as this if it were to preclude appropriately sited and sustainable development coming forward to meet the District's housing need, in accordance with the 'Presumption in Favour of Sustainable Development.

4.4.3 Part 2 of Policy ST1 states that 1,496 dwellings will be delivered at Large Rural Settlements and 1,733 dwellings will be delivered at eligible Small Rural settlements. Yet, the

corresponding table in Part 1 ST2 which directs the number of dwellings to eligible settlements does not align with the aforementioned figures.

- 4.4.4 The number of dwellings directed to large rural settlements in the table amounts to 1,558 dwellings, while only 188 dwellings are required at eligible small rural settlements. These figures mark vary significantly from those proposed in Policy ST1. It is unclear what these figures are in reference to, further guidance and clarity is required to address the discrepancies between policies ST1 and ST2.
- 4.4.5 In addition, the number of dwellings to be delivered through small rural settlements has increased substantially from the first Regulation 18 iteration of the Plan, which stood at 1,090 dwellings. The second Regulation 18 Plan increased this figure by 37.8% to 1,502 dwellings and the requirement for this tier of settlement has now increased further to 1,733 dwellings. While this has been justified as an attempt to provide a more balanced approach to the distribution of growth between the District's urban and rural areas, however this recent amendment to the spatial strategy does not appear to have been fully tested through the latest Sustainability Appraisal.
- 4.4.6 The wording of Part 2 of the policy suggests that once the housing requirement for an eligible settlement identified in the table, has been achieved, additional housing proposals will not be supported. Yet, Part 3 highlights that once the requirement has been met, new development will only be supported where it can be demonstrated that it has the support of the community and the Council through the preparation or review of a neighbourhood plan. Firstly, consistency is required in the wording of the various policy sections and in relation to Policy ST1 which sets different growth figures for eligible small and large rural settlements.
- 4.4.7 Furthermore, Gladman are concerned that the proposed requirement for local community support for development goes further than that required by paragraph 40 of the Framework. This requirement may hinder and restrict otherwise sustainable development from coming forward and Gladman suggest this aspect is removed from the Plan.

4.5 Policy ST4: Bassetlaw Garden Village

- 4.5.1 Policy ST3 details the Council will support the delivery of a new Garden Village on 216ha of land adjacent to the A1/A57 Apleyhead Junction. The Framework is clear that local plans should positively seek opportunities to meet the development needs of the area and be

sufficiently flexible to adapt to rapid change⁶. In this regard it is essential therefore that the expected supply from the Garden Village over the plan period is based on realistic assumptions on lead-in times and delivery rates.

4.5.2 It is important that clear evidence is provided to demonstrate that any assumptions that are made within the housing trajectory are demonstrably realistic at this stage, accurately reflecting the challenges associated with the delivery of such sites and their current planning status. This evidence should include Statements of Common Ground between interested parties and appropriate sense checking should also be undertaken against local, regional and national evidence (for example, the information on lead in times and delivery rates from sites contained within Reports such as Lichfields 'Start to Finish' Report; and Savills Spotlight: Planning and Housing Delivery Report, Second Edition, February 2020). The potential for further slippage from such a scheme will necessitate a flexible approach within the Local Plan's policies to ensure that they are responsive to rapid change and that development needs can be met in full over the plan period.

4.5.3 Given the strategic scale and specific nature of the proposal it will be vitally important for the Local Plan to provide a clear contingency against its overall requirement to take into account the fact that such proposals will invariably deliver at a slower rate than originally envisaged when a Local Plan is examined. This can be achieved by including policies that take a responsive and flexible approach to sustainable development at the edge of suitable settlements to ensure that a positive response can be taken where monitoring indicates that the expected delivery from the proposed Garden Village has slipped.

4.6 Priority Regeneration Areas

4.6.1 The regeneration of previously developed vacant or underused sites within urban and rural Bassetlaw forms a key part of the vision and objectives of the Local Plan. Two 'Priority Regeneration Areas are identified in the Plan: 'Policy ST5: Worksop Central' and 'Policy ST6: Cottam Priority Regeneration Area'.

4.6.2 Gladman assert the Bevercotes Colliery merits inclusion within the Local Plan as an additional Priority Regeneration Area, reflecting its past use and unique locational

⁶ Paragraph 11(a) NPPF (2021)

advantage in relation the strategic highway network and logistics corridors to support economic investment and job growth and its extant planning permission.

- 4.6.3 The redevelopment of the former Bevercotes Colliery will remediate and reclaim a significant brownfield site and its identification as a regeneration site would fully align with the strategic objectives of the Plan to spearhead the regeneration of previously developed land and of Bassetlaw. Furthermore, the site's planning history supports a development area which can deliver the redevelopment of Bevercotes Colliery alongside new and enhanced habitats for nature and wildlife including designated Local Wildlife Sites, which through continual improvement will help realise the areas' full biodiversity potential.

Policy ST6: Cottam Priority Regeneration Area

- 4.6.4 Policy ST6 safeguards land at the former Cottam Power Station site as a broad location for priority regeneration within the Local Plan. The policy sets out considered acceptable main uses for sites including housing development, employment development (B2, B8 E(G)), public transport hub and renewable energy uses providing that the listed criteria are met.
- 4.6.5 Gladman welcome the Council's ambition to regenerate large brownfield sites with a legacy of contamination and support Policy ST6, which supports Strategic Objectives 3 and Strategic Objective 4 of the Local Plan.
- 4.6.6 It is noted that Policy ST6 and the Cottam site are not relied on by the Council to meet the housing or economic requirements and in essence form an aspirational policy to safeguard brownfield land as a potential location for future growth.
- 4.6.7 Gladman are of the view that a similar approach should be taken to support the regeneration of the Bevercotes Colliery site for employment uses to support the demand identified in Icenis's A1 Corridor Logistics Assessment Final Report (August 2021) and the site should have been considered as part of that study. The Council are aware through on-going engagement and previous representations, that land at Bevercotes Colliery predominantly comprises previously developed land thereby offering the sustainability advantages of turning previously developed land back into use – a key objective for the Council. Furthermore, the site has extant planning permission (09/05/00002) for employment demonstrating the principle of development in this location.

- 4.6.8 It is Gladman's view that the Bevercotes Colliery site should also be included in the Plan as a Priority Regeneration Area and an aspirational location to regenerate previously development land while allowing for relevant conditions to be complied with. It is evident that the site also offers the opportunity to provide flexibility to the Council's future needs with its ability to support employment proposals.
- 4.6.9 While the Local Plan evidence base has not thoroughly assessed the site for economic and employment purposes, but clearly should have been, Bevercotes Colliery site is a long-standing, historic site of employment and now offers the opportunity to provide a range of business uses including B(8) and aligned B(2) uses which meet the requirements of the Framework to drive economic development and regeneration while recognising the differing locational requirements of different sectors.
- 4.6.10 Indeed, Gladman highlight that Bevercotes Colliery should be recognised for its ability to deliver employment uses across the footprint of the existing extant planning permission including much sought after high bay warehousing, allowing for the effective use of land in meeting employment purposes on brownfield land while safeguarding and enabling the improvement of the surrounding environment. One of its unique features is the significant boundary tree coverage and surrounding topography, which provides effective mitigation to allow for the development of large buildings up to 2,733,602 sq.ft. in size.
- 4.6.11 Including Bevercotes Colliery as an aspirational Priority Regeneration Area, which does not contribute to meeting specifically defined development needs of the District, while setting conditions which recognise the site's unique set of circumstances would support the Council's objective of regenerating brownfield sites while safeguarding any potential ecology that may exist. Indeed, the site's location and challenging brownfield characteristics provide significant opportunities for the region to deliver a pioneering green economy at the heart of the Government's ambition to 'Build Back Greener'.
- 4.6.12 The site is also situated in a prime location in the A57 / A1 corridor, with close links to the M1 and wider region to deliver logistics uses. This would allow the district to take advantage of an in demand and growing market with a corresponding boost to the local employment market.

4.7 Promoting Economic Growth

- 4.7.1 Section 6.1 of the publication version Local Plan sets out the Council's strategy for maintaining and enhancing the economic prosperity of Bassetlaw highlighting the potential to capitalise on the districts strategic accessibility along the A1 and A57 corridors, notably within the logistics sector.
- 4.7.2 Paragraph 6.1.7 of the Local Plan notes that to resist over-reliance on the manufacturing and logistics sectors allocations, in the form of Bassetlaw Garden Village and Marnham Energy Hub, are identified to meet other employment growth sector needs.
- 4.7.3 Gladman consider that this approach does not align with the evidence of demand for B(8) and B2 uses set out in the background evidence documents, chiefly the A1 Corridor Logistics Assessment Final Report (August 2021). It is contended that further employment sites delivering logistic B(8) use floorspace should be allocated to ensure that there is a 15 year supply alongside enabling the district to capture the long-term economic growth and demand in the sector.
- 4.7.4 Iceni's A1 Corridor Logistics Assessment report highlights the scale of warehousing needs due to market restructuring and a move to ecommerce type deliveries before considering the supply levels in the Property Market Area (PMA). Iceni consider that there is around 8 years' worth of past take up / 11 years of delivery although this likely under represents future need. Iceni also highlight that there likely to be insufficient supply of such employment sites overall when planning for 15 years or more in the Plan process. The report further considers that there is likely to be a need for additional logistic employment sites in the southern part of the PMA over the plan period.
- 4.7.5 In this regard, Gladman highlight Bevercotes Colliery as a long-standing employment location which has extant planning permission for redevelopment to B2 and B8 uses (reference: 09/05/00002). The site offers the opportunity to deliver a comprehensive employment site including B(8) and B(2) uses in an excellent location for strategic development aligning with key locational requirements for the logistic sector on the A1 and A57 alongside being approximately 17 miles from the M1.
- 4.7.6 During the preparation of the Bassetlaw Local Plan, the former Bevercotes Colliery was considered as a new garden community location with the site tested for this purpose through the Sustainability Appraisal process. Yet, the site has not been considered or tested

for employment uses despite having extant planning permission for B(8) and aligned B(2) use and the current iteration of the Plan is completely silent on Bevercotes Colliery.

- 4.7.7 Gladman assert that the Local Plan as currently proposed does not fully consider all potential employment sites for logistic uses and it is vital that the economic development and regeneration potential of Bevercotes Colliery is recognised. It would be prudent to recognise the site as an additional Priority Regeneration Area providing flexibility in the supply of employment land.

Policy ST8: EMoo8: High Marnham Green Energy Hub

- 4.7.8 Gladman support the identification High Marnham as a green energy hub and welcome the ambition in delivering green and low carbon employment on a brownfield regeneration site.
- 4.7.9 Policy ST8 states that proposals will be required to provide B(2) and B(8) employment functions connected with the renewable energy and low carbon technology sectors. However, the site is primarily an opportunity for renewable and low carbon energy production and is it considered that location of the site in relation to the strategic highway network, alongside surrounding road infrastructure limits the scope for logistic uses at the site. The Local Plan states that the proposed allocation is situated in a rural location in eastern Bassetlaw with potential impacts on traffic movements upon the amenity of local communities.
- 4.7.10 Given the above, it is considered that further flexibility is required in the delivery of B(8) and logistic employment sites and serious consideration should be given to the former Bevercotes Colliery to support this. The principle of development at the site and location has already been demonstrated through the extant planning permission for employment.

4.8 Policy ST30: Housing Mix

- 4.8.1 Gladman broadly support the suggested approach of Policy ST30 which seeks to provide a range of housing types to meet the ever-growing needs of the District. In particular, Gladman remain supportive of the fact that the above policy does not set out a prescriptive approach regarding the specific mix of properties.

Self and custom build

4.8.2 The second element of the housing mix policy outlines the Council's proposed policy approach towards self and custom build housing, whereby it is intended that on housing allocations of 100 dwellings or more, 2% of the proportion of the developable plots should be set aside for self-build and custom housebuilding. Gladman highlight that any policy requirement for self and custom build plots must be justified with robust evidence on demand and need for this type of housing.

4.8.3 The supporting text to this policy states in paragraph 7.18.9:

"The Housing and Economic Development Needs Assessment 2020 on the demand for self-build suggests that there is potential to encourage developers of larger housing site allocations to provide plots for self-build. Whilst it is recognised that not all self-builders want to build their homes on larger developments, they should be provided with an opportunity to do so..."

4.8.4 However, there is no reference to self-build or custom housebuilding in the entirety of the Housing and Economic Development Needs Assessment (SHMA) 2020 and Gladman raise concerns regarding the proposed policy requirement set out in Criterion 3 of Policy ST30. It is unclear how the 2% proportion of developable plots of allocations over 100 dwellings has been derived other than having 91 persons on the self-build register or why such a requirement is only applied on housing allocations of over 100 dwellings (notably excluding any major developments under that threshold and speculative development sites).

4.8.5 The PPG is clear that authorities should publish data relating to the register through their Authority Monitoring Report (AMR)⁷. While the Local Plan references that 91 people are on the Self-build register, Bassetlaw District Council's AMR does not provide any information relating to the register, nor does any evidence paper consider the self-build demand and need. Furthermore, it may not be appropriate to apply a blanket requirement for the provision of self-build plots on major development sites as this does not respond to differing needs across the housing market area; yet this does not appear to have been assessed.

4.8.6 In addition, the Whole Plan & Community Infrastructure Level Viability Assessment does not appear to account for the implications of delivering self and custom-build housing at all, notably given that the Community Infrastructure Levy Regulations 2010 allow for certain

⁷ PPG Paragraph: 012 Reference ID: 57-012-20210508

development such as self-build and custom build housing to apply for an exemption from the levy.

- 4.8.7 Gladman are not opposed to policies which seek to deliver self and custom-build housing, however it is considered that at present sufficient evidence has not been published to justify the proposed policy requirement.

4.9 Policy ST58: Provision and Delivery of Infrastructure

- 4.9.1 It is intended that the identified infrastructure set out in the Bassetlaw Infrastructure Delivery Plan will be provided through a combination of Community Infrastructure Levy (CIL), Developer Contributions, and appropriate funding assistance from Council's, central Government and funding partners.
- 4.9.2 Gladman highlight that the allocation of Bevercotes Colliery as an additional Priority Regeneration Area for employment development can provide the necessary mitigation 'across the board' and mitigation measures can be included as part of appropriate conditions or planning obligations associated with the redevelopment of the site where necessary.
- 4.9.3 Furthermore, Gladman highlight that the regeneration of Bevercotes Colliery for employment uses offers the opportunity to deliver improved highway and junction access to the A1 network along the B6387 at the Twyford Bridge junction. This will further ensure the infrastructure along the A1 and A57 corridor is able to support the key logistics and economic growth identified within the A1 Corridor Logistics Assessment Report and allow the district to capture the benefits such growth will deliver.

5 SITE SUBMISSION PROFILE

5.1 Former Bevercotes Colliery, Bothamsall, Retford

- 5.1.1** Gladman Developments are promoting the former Bevercotes Colliery site through the local plan making process. The emerging Plan's consideration of the site to date has been focused on its potential development as a garden village, however, notwithstanding the judgements reached in that regard to date, the Council should also actively consider alternative options for the future of the site and the ability to deliver significant economic development and regeneration through the implementation of the extant planning permission for 2,733,602 sq.m of B2/B8 development (09/05/00002).
- 5.1.2** Bevercotes Colliery is a long-standing employment location which offers the opportunity to deliver a comprehensive employment site including B(8) and B(2) uses in an excellent location for strategic development aligning with key locational requirements for the logistic sector on the A1 and A57 alongside being approximately 17 miles from the M1. The location has been highlighted been subject to significant logistic employment demand and opportunities and in this regard the site could deliver employment land along key strategic highway networks to support economic investment in Bassetlaw.
- 5.1.3** The redevelopment of the former Bevercotes Colliery will remediate and reclaim a significant brownfield site and its identification as a regeneration site would fully align with the strategic objectives of the Plan to spearhead the regeneration of previously developed land and of Bassetlaw. Furthermore, the site's planning history supports a development area which can deliver the redevelopment of Bevercotes Colliery alongside new and enhanced habitats for nature and wildlife including designated Local Wildlife Sites, which through continual improvement will help realise the areas' full biodiversity potential.
- 5.1.4** Gladman include a location plan, aerial image and masterplan for the delivery of employment uses at Bevercotes Colliery in appendices 1, 2 and 3 of this representation.

6 CONCLUSIONS

6.1 Summary

- 6.1.1 Gladman welcomes the opportunity to comment on the Regulation 19 Local Plan. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2021) and the associated updates that were made to Planning Practice Guidance.
- 6.1.2 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.
- 6.1.3 We hope you have found these representations informative and useful towards the preparation of the Bassetlaw District Local Plan and Gladman welcome any future engagement with the Council to discuss the considerations within forwarded documents.

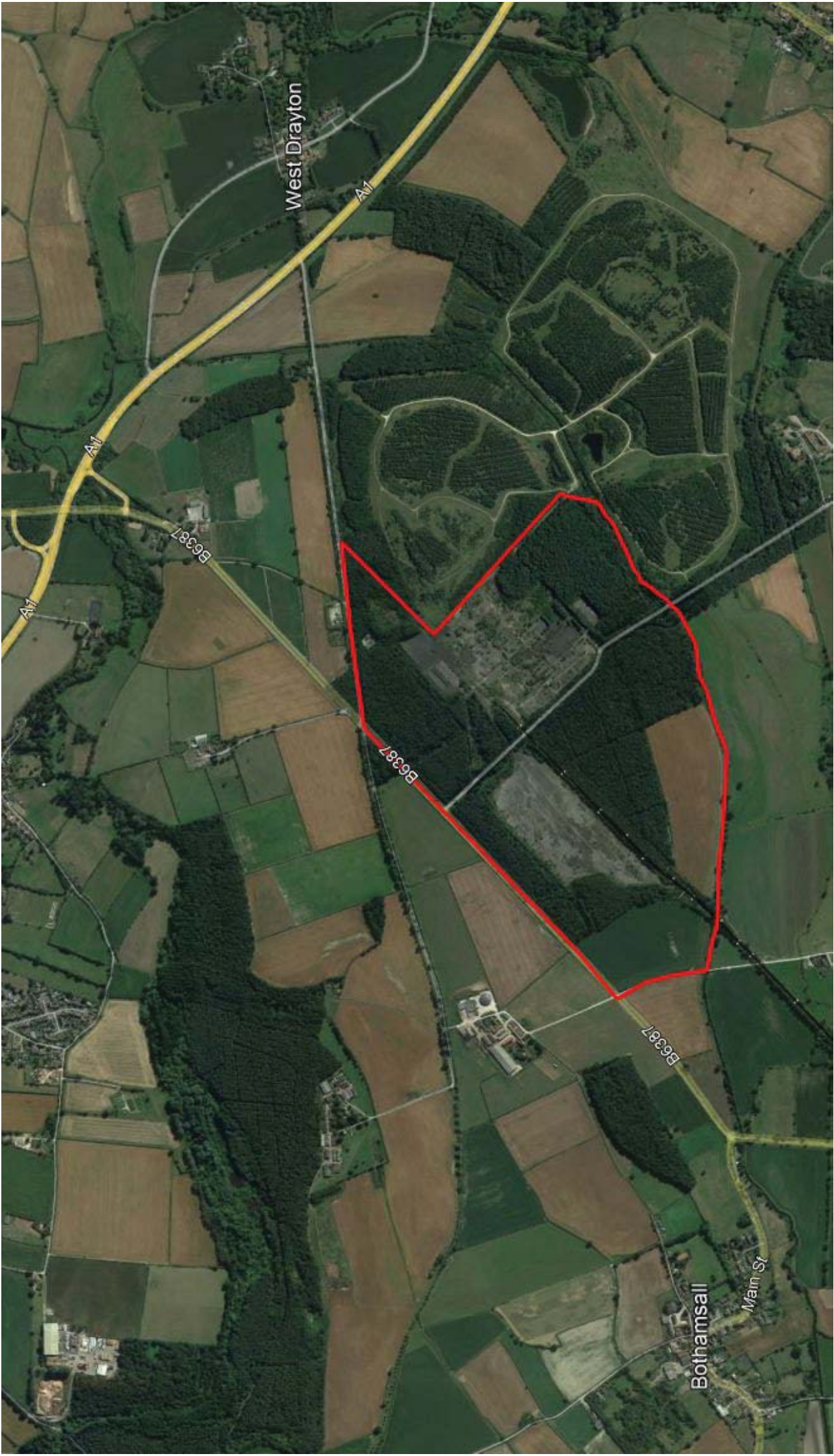
APPENDICES

Appendix 1: Site Location Plan



*	*	*	*	*	*
Ren	Date			Revision notes	By
DO NOT SCALE					
Status					
<h2 style="text-align: center;">INFORMATION</h2>					
Project	<h1 style="text-align: center;">BEVERCOTS GARDEN VILLAGE</h1>				
Title	<h2 style="text-align: center;">LOCATION PLAN</h2>				
<div style="display: flex; justify-content: space-around; align-items: center;">  <div style="text-align: right;"> <p>GLADMAN <small>Planning & Design</small> <small>10000 Gladman Road, Suite 100</small> <small>Chalfont St Giles, Bucks HP8 4LN</small> <small>Tel: 01295 380000</small> <small>www.gladman.co.uk</small></p> </div> </div>					
<div style="display: flex; justify-content: space-between;"> <div> <p>Project no.</p> <p>2016-149</p> </div> <div> <p>Scale</p> <p>101</p> </div> <div> <p>Revision</p> <p>A</p> </div> </div>					

Appendix 2: Former Bevercotes Colliery Aerial Image



Appendix 3: Former Bevercotes Colliery Masterplan

[illegible]



REF044



From:

To:

Cc:

Subject:

21 October 2021 16:25

The Bassetlaw Plan

Representation to the Bassetlaw Local Plan 2020 - 2037 (Regulation 19)
Consultation

Attachments:

Bassetlaw Local Plan Rep - Policy ST29.pdf; Bassetlaw Local Plan Rep - Policy ST31.pdf; Bassetlaw Local Plan Rep - Policy ST41.pdf; Bassetlaw Local Plan - Policy ST44.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 Sirs,

Please find attached a representation on behalf of Churchill Retirement Living and McCarthy Stone to the above-mentioned consultation.

Thank you for the opportunity for comment.

Regards

Associate Director

Planning Issues Ltd

Churchill House

Parkside

Ringwood

BH24 3SG

Tel: 01425 462161

Mob: 07502 322374

www.planningissues.co.uk



planningissues
TOWN PLANNING AND ARCHITECTURE



Churchill House, Parkside, Ringwood, Hampshire, BH24 3SG. Tel: 01425 462100 Fax: 01425 462101

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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-notice/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]

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

Organisation (if applicable): Churchill Retirement Living Ltd

Address: [REDACTED]

Postcode: [REDACTED]

Organisation (if applicable): McCarthy Stone

Address: [REDACTED]

Postcode: [REDACTED]

2. Agent Details (if applicable)

Agent:

Organisation (if applicable): Planning Issues

Address: Churchill House, Parkside, Ringwood

Postcode: BH24 3SG

Tel: 01425 462116

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: Churchill Retirement Living / McCarthy Stone

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 ☐

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.

Policy ST29 – Affordable Housing

The *Bassetlaw Local Plan 2020 – 2037 (Regulation 19 Consultation)* is one of an alarmingly limited number of emerging Local Plans that have set a differential affordable housing rate, with a 15% affordable housing requirement for brownfield sites and a 25% requirement for greenfield sites. This is, of itself, highly commendable and suggests a greater focus on viability at the Plan making stage.

The affordable housing targets detailed in the above policy are informed by the *Bassetlaw District Council Whole Plan & Community Infrastructure Levy Viability Assessment* (hereafter referred to as the Viability Study) undertaken by NCS.

In assessing the Viability Study, we note that no viability appraisals were undertaken for specialist older persons' housing typologies – namely Sheltered Housing and Extra Care accommodation. This is disappointing and considered to be contrary to both best practice and the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. "A *typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.*

The *Bassetlaw Housing and Economic Development Needs Assessment* (2020) and *Policy ST31: Specialist Housing* of the draft Local Plan details a requirement for 3,000 units of specialist older persons' housing (and a further 603 care home spaces) over the Local Plan period, and unless action is urgently taken the Council will struggle to address this need. It is therefore clear that viable sites bringing these forms over development forward will be required over the Plan period.

Having reviewed the Viability Study, we note that the viability appraisal results (pages 40 -42) for residential development show that apartment developments are unviable with the lowest requirement of affordable housing tested - a 10% affordable housing and s106 contributions of £1,750 per dwelling. Brownfield sites are less viable than greenfield sites.

The viability of specialist older persons' housing is more finely balanced than that of 'conventional' apartments for several reasons.

- Build costs for are higher for supported housing, with the most recent BCIS build costs rebased to Bassetlaw 20% higher than estate housing and 5% higher than flats.
- Communal floorspace accounts for between 25% and 35% of the Gross Internal Area for specialist older persons' housing, compared to 15% for flats and 0% for houses.
- Sales rates for older persons' housing are currently under 1 unit per month with the nearest retirement living scheme, Eliot Lodge in Ashbourne, selling at a rate of 0.7 units per month.

While specialist older persons' housing can typically achieve an uplift on sales values compared to 'conventional' apartments, this uplift is less pronounced in lower value areas.

The viability appraisal results do show that flatted developments, which would include the retirement living and extra care apartments provided by the respondents, are unviable in the authority. This would reflect the experience of both McCarthy Stone and Churchill Retirement Living who have struggled to bring forward specialist older persons' housing within Bassetlaw historically.

We are therefore strongly of the view that it would be more appropriate to set a nil affordable housing target for sheltered and extra care development, at the very least in urban areas. This approach accords with the guidance of the PPG which states that '*Different (affordable housing) requirements may be set for different types or location of site or types of development*' (Paragraph: 001 Reference ID: 10-001-20190509).

To that end, we would like to draw the Council's attention to Paragraph 5.33 of *Policy HP5: Provision of Affordable Housing* in the emerging Fareham Borough Local Plan which advises that:

5.33 ... The Viability Study concludes that affordable housing is not viable for older persons and specialist housing. Therefore, Policy HP5 does not apply to specialist housing or older persons housing.

A nil affordable housing rate could facilitate a step-change in the delivery of older person's housing in the District, helping to meet the diverse housing needs of the elderly as detailed in *Policy ST31: Specialist Housing*. The benefits of specialist older persons' housing extend beyond the delivery of planning obligations as these forms of development contribute to the regeneration of town centres and assist Council's by making savings on health and social care.

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

The *Bassetlaw District Council Whole Plan & Community Infrastructure Levy Viability Assessment* concludes that flatted development cannot support affordable housing or CIL contributions and we consider that this is representative of the respondent's own experience of trying to bring forward specialist older persons' housing in the District. We are therefore strongly of the view that it would be more appropriate to set a lower, potentially nil, affordable housing target for sheltered and extra care development, particularly in urban areas

As a suggestion we would recommend an addition to *Policy ST29: Affordable Housing* which is as follows:

Policy ST29: Affordable Housing

- ... a) 15% of dwellings on brownfield sites should be for affordable housing. Of this, 25% should be First Homes, and any remaining requirement will be social or affordable housing for rent and/or affordable home ownership;
- b) 25% of dwellings on greenfield sites should be for affordable housing. Of this, 25% will be for First Homes; and any remaining requirement will be social or affordable housing for rent and/or affordable home ownership;
- c) *Contributions will not be sought from self-build, custom housebuilding developments or specialist older persons' housing including sheltered and extra care accommodation.*

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:

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 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: Churchill Retirement Living / McCarthy Stone

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

Policy: 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 ☒

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 ST31: Specialist Housing

McCarthy Stone and Churchill Retirement Living are independent and competing housebuilders specialising in sheltered housing for older people. Together, we are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing.

Paragraph 1 of the PPG Housing for Older and Disabled people states:

"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. Offering older people, a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking".

Paragraph: 001 Reference ID: 63-001-20190626

The supporting text to this policy advises that that the population aged 65 and over is projected to increase by 9,663 people by between 2020 and 2037, a 40% increase.

It is notable that population aged 75 and over is the demographic with the largest projected increase in the Authority, 75.6% - an increase of 5,905 persons.

Table 60 of the *Housing and Economic Development Needs Assessment* (2020) details the need for specialist older persons' housing by type and tenure over the Local Plan period. This advises that there is a significant requirement for 2,018 units of housing with support (also referred to as retirement living apartments) and 911 units of housing with care (also referred to as extra care). For both types of accommodation, the biggest requirement is for open market units.

The delivery of 3,000 units of specialist older persons' housing (and a further 603 care home spaces) is a substantial undertaking over the Local Plan period and unless action is urgently taken the Council will struggle to address this need.

The consequences of failing to provide sufficient housing to meet the needs of older people is made clear in the supporting text to *Policy ST31* - 44% of those on the Council's housing waiting list (at January 2020) are older people requiring specialist accommodation now and in the short term. The Council spends close to £1million per annum on adaptations to ensure that tenants can remain in their home.

We both note and commend the way the housing needs of older people are addressed in the *Policy ST31*. We consider the overview of the matter given in the supporting text to be comprehensive and the inclusion of dedicated policy for older persons' housing to be positive as it both acknowledges the need and stipulates the circumstance in which the Local Authority will support its delivery.

We would also, respectfully, highlight, that despite the positive manner which *Policy ST31* addresses the Housing Needs of the elderly, it is undermined by the lack of consideration given to older persons' housing typologies in *Policy ST29: Affordable Housing* and the *Bassetlaw District Council Whole Plan & Community Infrastructure Levy Viability* undertaken by NCS.

Both McCarthy Stone and Churchill Retirement Living have struggled to bring forward specialist older persons' housing within Bassetlaw historically as we have been unable to make development viable. The District is however of interest to both companies and we would appreciate the opportunity to work with Council Officers to help facilitate the delivery of specialist older persons' housing.

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 respondents commend the Council for a positively written policy and supporting text, which comprehensively addresses the housing needs of older people in Bassetlaw. We would appreciate the opportunity to work with you to bring forward the development of specialist older persons' housing in the future.

Notwithstanding the above w the lack of consideration given to older persons' housing typologies in *Policy ST29: Affordable Housing* and the *Bassetlaw District Council Whole Plan & Community Infrastructure Levy Viability Assessment*) is disappointing.

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 ☐

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:

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

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

Name or Organisation: Churchill Retirement Living / McCarthy Stone

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

Policy: Policy ST41

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 41: Trees, woodlands and hedgerows

The benefits of tree planting and their role in the Government's target to reach net zero by 2050 has been widely publicised. It is commendable that the Council is looking to engage proactively with this matter in the Local Plan.

We note that there is a requirement for in sub-clause e) of this policy for contributions to the national tree planting target to contribute to net zero emissions in accordance with Policy ST50. This contribution to tree planting is open-ended and there are no details on how it is to be applied.

The aim of tree planting standards is a long-term increase in tree cover, which could be an impediment to building at higher densities on previously developed sites in urban areas. While we appreciate there are benefits to providing trees in urban areas, building at higher densities in these locations reduces greenfield land-take and is a highly sustainable outcome accordingly. We respectfully ask that you take this matter into consideration when determining how to apply sub-clause e).

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

A) Clarify how the tree planting contribution in sub-clause e) will be applied

b) Balance the sustainability benefits of efficiently redeveloping previously developed land against those of increasing tree cover in urban area

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 ☐

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:

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: Churchill Retirement Living / McCarthy Stone

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

Policy: Policy ST44

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 ST44: Promoting Healthy, Active Lifestyles

We welcome the Council's commitment to the health and wellbeing of its residents. As detailed in our representation to *Policy ST31 – Specialist Housing*, the demographic profile of the District is ageing with a requirement for 3,000 units of specialist older persons' accommodation over the Plan period.

An ageing population inevitably results in an increase in frail individuals and persons with long term health issues. There is a commensurate pressure on care and health services accordingly with many local authorities spending over a third of their budgets on adult social care currently.

It is well established that poor housing can exacerbate health problems in old age, with enormous resultant costs to the NHS and social care. For example:

Falls - Public Health England statistics show that in 2017/18 falls accounted for 335,000 hospital admissions in England of people aged 65 and over.

Cold Homes - Millions of older people in the UK are living in homes that are too cold. A cold home can cause chronic and acute illnesses and lead to reduced mobility, falls and depression.

Social Isolation - 1.5 million people aged 50 and over are always or often lonely, researchers have calculated. Loneliness makes it harder for people to regulate behaviours such as drinking, smoking, and over-eating, which in turn have their own significant negative outcomes.

Specialist older persons' housing has been developed with the needs of the elderly in mind, enabling them to remain independent for longer. These homes are designed to be warm and with features to alleviate the physical impact of ageing (such as level access throughout) and offer opportunities for residents to access support, care, and companionship. The recently published *Healthier and Happier Report* by WPI Strategy (September 2019) calculated **that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year.**

The Council's aspirations to improve the health and wellbeing of its residents is commendable and we are strongly of the view that increasing the delivery of specialist older persons' housing is wholly aligned with this objective.

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

We recommend that the role of specialist older persons' housing in improving the health and wellbeing of the district's elderly residents is acknowledged in the wording of this policy.

As a suggestion we would recommend an additional sub-clause to the policy which reads as follows:

i Ensure that the needs of the District's ageing population are addressed, and that older people have increased access to support, care, companionship, and appropriate accommodation.

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 ☐

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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REF045



[REDACTED]

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Attachments: [REDACTED]

21 October 2021 16:34
The Bassetlaw Plan
Representation on behalf of Rose & Co Homes
reg-19-form-a-b-12pt.pdf; 21_043_Representation on behalf of Rose & Co_SV.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

On behalf of our client, Rose & Co Homes, please find representations to the Publication Version Local Plan consultation attached, along with the required proforma.

If you have any queries regarding this submission please contact me.

Kind Regards

[REDACTED]
Senior Planner



t: 0114 349 7678
w: www.crowleyassociates.co.uk

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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/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 ☐

The agent wishes for their name and practice details to be redacted if possible.

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: [REDACTED]

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): Rose & Co Homes

Address: 1 Albion Close

Postcode: S80 1RA

Tel: [REDACTED]

Fax: N/A

Email: [REDACTED]

2. Agent Details (if applicable)

Agent: [REDACTED]

Organisation (if applicable): Crowley Associates Ltd

Address: [REDACTED]

Postcode: [REDACTED]

Tel: [REDACTED]

Fax: N/A

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: Rose & Co Homes

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

Policy:

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 supporting 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.

(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 supporting representation.

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.

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:

Rose and Co Homes wish to promote their site as an alternative to those proposed for allocation within this plan, in line with comments made in the supporting representation.

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.

Land North of Common Lane

Representation on behalf of

Rose & Co Homes

Bassetlaw Local Plan 2020 – 2037:
Publication Version (August 2021)

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DOCUMENT CONTROL:

Issue	Date	Author	Signed
DV	21/10/2021	JD	-
SV	21/10/2021	JD	Submission

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1 INTRODUCTION

- 1.1.1 This representation is prepared on behalf of Rose & Co Developments Ltd (“Rose & Co”) in response to the consultation on Bassetlaw District Council’s (the “Local Authority”) Publication Version Local Plan (the “PVLP”).
- 1.1.2 Having reviewed the supporting Evidence Base, Rose & Co are of the understanding that land north of Common Lane, Ranskill (the “site”) in which they retain an interest has not previously been considered for allocation through the Local Plan process.
- 1.1.3 Rose & Co seek to object to the PVLP on the grounds that in failing to consider the land – which is capable of delivering highly sustainable, carbon neutral residential-led development for allocation, the failings of the spatial strategy and the limiting nature of the settlement hierarchy - the PVLP cannot be found sound.

2 OVERVIEW OF DRAFT HOUSING STRATEGY

2.1 Introduction

2.1.1 The Local Authority's PVLP was issued for consultation between 2 September 2021 and 21 October 2021. According to the Local Authority, *this is the version of the Plan the Council thinks is ready for examination by the Government.*

2.1.2 The consultation is intended to invite comments on whether the PVLP meets the soundness and legal tests set out in paragraph 35 of the National Planning Policy Framework (the "NPPF"). According to the NPPF, *Plans are sound if they are:*

- 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 authorities 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.*

2.1.3 This representation clarifies why Rose & Co considers the PVLP fails to meet the tests of soundness identified above and presents the case in support of the allocation of the site in the interests of meeting the tests.

2.2 PVLP Strategic Objectives

2.2.1 According to Chapter 4 of the PVLP (from Paragraph 4.15) the Local Authority has identified fourteen strategic priorities. In summary and so far as it related to the matter of delivering housing, the Local Authority expects the PVLP to:

1. *Ensure housing is delivered in sustainable locations and through new settlements;*
2. *Provide a choice of housing land to ensure that the District's housing stock better meets local housing needs and aspirations of all residents;*
3. *To encourage and support a step change in the local economy and sustainable economic growth by promoting a competitive, diverse and stable economy;*
4. *Support the sensitive regeneration of previously developed, vacant or under underused sites and spaces within urban and rural Bassetlaw;*
5. *To promote the establishment of a new sustainable heritage and landscape-led Garden Village;*
6. *To promote rural Bassetlaw as a living and working landscape;*
7. *To support and enhance the vitality and vibrancy of town centres and local centres as places for shopping, leisure, cultural, commercial, community and residential activities, and secure their positive regeneration by promoting an appropriate mix and scale of development and environmental improvements, which maximise their potential for residents, businesses, developers and visitors alike;*
8. *To ensure new development, places and spaces are of a high quality and sustainable design which reflects local character and distinctiveness;*
9. *To promote healthier active communities and help reduce health inequalities;*
10. *To protect and enhance the District's diverse historic building and natural environments;*
11. *To protect, restore and enhance the quality, diversity, character, distinctiveness, biodiversity and geodiversity of the ... natural environment;*
12. *To support Bassetlaw's transition to a low carbon District;*
13. *To make efficient use of existing transport infrastructure and help make walking, cycling and public transport a more attractive and viable choice;*
14. *To ensure that new development contributes to the provision of necessary physical, social and green/blue infrastructure to deliver planned levels of growth.*

- 2.2.2 The strategic objectives contain goals to ensure that those more rural areas of Bassetlaw are allowed to thrive whilst also seeking to encourage economic growth across the District. Providing a choice of housing land must be read in the context of providing choice in different locations and of different sizes. The market must be kept buoyant for developers of all sizes to bring sites forward. The local economy is mentioned and so it is clearly a priority within the District for the local economy to support itself. Local centres must be allowed to grow both economically and physically to ensure their vitality – without growth local centres are unlikely to be able to be sustained and will lose residents and businesses to those locations within which growth is promoted. This is closely aligned with Objective 14 regarding physical infrastructure.
- 2.2.3 In order to sustain, local centres and rural areas must be given opportunities to grow their infrastructure by way of essential services. Low carbon aspirations are now commonplace within plan-making; however the climate for this to occur must be set by Local Authorities who must allow new entrants to the development industry to take opportunities to introduce low carbon development on a manageable scale.

2.3 Housing Distribution

- 2.3.1 Rose & Co wish to make clear that this representation does not consider the merits or otherwise of the housing need figures presented by the Local Authority, and has taken (for now) the calculations and the evidence (underpinning the PVLP) put forward as part of the consultation at face value. It focusses instead on the proposed housing spatial strategy in the context of suitability, deliverability and alignment with the strategic objectives.
- 2.3.2 Chapter 5 of the PVLP outlines the Local Authority's intended spatial strategy, which identifies that growth within the District over the plan period will be distributed in line with the settlement hierarchy identified within draft Policy ST1.
- 2.3.3 Draft Policy ST1 identifies Worksop, Retford, and Harworth and Bircotes as main towns, with Ranskill identified as a Small Rural Settlement. Tuxford is identified as a Large Rural Settlement.
- 2.3.4 At Paragraph 5.1.38, the PVLP states:

"The strategy directs housing growth to locations attractive to the market, whilst ensuring there are no locations that are over-burdened by development or that

other locations are not receiving the opportunity to grow especially where this is required to support local service provision.”

2.3.5 Taking into account projected housing supply, existing commitments, neighbourhood plan sites and windfall allowances, and according to Paragraph 5.1.37, the residual Local Plan housing requirement for the Plan Period amounts to 3,639 new homes.

2.3.6 In terms of delivery – and in line with the settlement growth hierarchy - two large urban extensions are identified; on the northern edge of Worksop at Peaks Hill Farm (1000 dwellings) and at Ordsall South in Retford (800 dwellings). Together, these draft allocations are set to deliver 49% of the total outstanding housing need. A further 500 dwellings (an additional 14%) are allocated (in draft) to the Bassetlaw Garden Village located at the junction of the A1 and A57.

2.3.7 The remaining 37% is identified for allocation through the redevelopment of brownfield sites and the identification of small-scale greenfield sites, solely within the settlement boundaries of Worksop and Retford.

2.3.8 At Paragraph 5.1.40, the PVLP states:

“To meet the residual requirement within this plan period; as well as redeveloping brownfield sites and identifying small scale greenfield sites within the development boundaries, two large urban extensions are identified; on the northern edge of Worksop at Peaks Hill Farm for 1000 dwellings; and, at Ordsall South in Retford.”

2.3.9 As for the strategic approach to housing delivery within the Small Rural Settlements, the PVLP does not preclude growth noting that sustainable growth would *help sustain these villages in the long term*. The PVLP continues:

“The growth in the small Rural Settlements will be primarily delivered through committed sites with planning permission and from made neighbourhood plans as well as appropriate development consistent with the provisions of Policy ST2.”

2.3.10 Small Rural Settlements are expected to deliver 1,773 dwellings over the Plan Period, however it should be noted that 100% of this figure is already accounted for through completions, extant planning permissions or made Neighbourhood Plan allocations without planning permission. Therefore no additional allocations are to be made within the PVLP, on sites in Small Rural Settlements.

- 2.3.11 Notably, the Neighbourhood Plan for Ranskill has been withdrawn and this is addressed in Section 3.2 below.
- 2.3.12 It is clear to Rose & Co that the Local Authority decided at the very outset of the plan-making process, that growth would be directed solely to those settlements considered the most sustainable. Whilst this strategy is not uncommon in plan-making, it is often set alongside a more joined up strategy to direct some growth to more rural, but sustainable, locations outside of the main towns.
- 2.3.13 Again, whilst Rose & Co accept that commitments and made Neighbourhood Plan allocations account for 1,773 units within the overall growth strategy, they question why no further opportunity for growth was afforded to Large or Small Rural Settlements other than Tuxford, in order to provide the choice of housing land that the Local Authority's own strategic objectives seek to secure.

2.4 Draft Strategic Allocations

- 2.4.1 Rose & Co have concerns that approximately 63% of housing to be allocated falls across just three large strategic sites. Large sites of this nature can experience slow delivery rates owing to a number of constraints including but not limited to:
- Land ownership issues;
 - Complex legal agreements;
 - Cumbersome planning applications;
 - Slow infrastructure delivery; and
 - Limitation of choice in the market restricting developer interest.
- 2.4.2 In practical terms, regarding those sites which are the subject of draft allocations outlined above, Rose & Co note that:
- Ordsall South suffers from constraints related to landscape impacts and flood risk (at either extent of the draft allocation);
 - Peaks Hill Farm suffers from constraints relating to ecology, highways, proximity to services and highway access; and
 - Bassetlaw Garden Village suffers from constraints relating to archaeology, heritage and potential impacts on the Sherwood Forest Special Protection Area.

- 2.4.3 Additionally, by proposing three large strategic sites in the south of the District, and none in the north, the Local Authority runs the risk of creating economic division between the north and south of the District.
- 2.4.4 With regard to those sites identified within the existing settlement boundaries of Worksop and Retford, it is surprising to Rose & Co that the Local Authority considers it necessary or appropriate to allocate sites which already benefit from a favourable planning outlook given their location.
- 2.4.5 Rose & Co consider that the Local Authority should instead seek to allocate land outside of settlement boundaries, particularly in those more rural locations which would see the greatest benefit from investment in their communities.
- 2.4.6 By focusing housing allocations solely within three settlements, Rose & Co are concerned that the housing spatial strategy currently proposed fails to provide a suitably diverse choice of housing land. By failing to take account of the Local Authority's own Strategic Objectives, Rose & Co are concerned that the plan fails to act in the best interests of the District, its residents and business.

2.5 Summary

- 2.5.1 On the above basis, Rose & Co consider the housing strategy – as it relates to the delivery and distribution of growth in rural Bassetlaw and when assessed against the fourteen primary objectives set out in Chapter 5 of the PVLP – is neither:
- Justified;
 - Effective; or
 - Consistent with national policy.
- 2.5.2 As such Rose & Co do not consider the PVLP to be sound.

3 RANSKILL'S POSITION WITHIN THE SETTLEMENT HIERARCHY

3.1 Ranskill

3.1.1 Within the Local Authority's 'Rural Settlement Study' (August 2021 Update), Ranskill is considered to be a settlement of 'Medium Sustainability', defined as a rural settlement which can, to a certain extent, support itself.

3.1.2 It has a number of services and facilities which support itself and the smaller village of Torworth to the south.

3.1.3 Torworth contains very little in the way of services and/or amenities and its residents are heavily reliant on those services contained within Ranskill, including:

- Post Office
- Convenience Store
- Primary School
- Public House
- Church

3.1.4 Rose & Co consider that Ranskill and Torworth are read as a single settlement due to the reliance of Torworth upon the services available within Ranskill.

3.1.5 In the same manner that the Local Authority considers Carlton in Lindrick and Costhorpe as one settlement within the Settlement Hierarchy, Rose & Co consider there is no reason why Ranskill and Torworth could not be treated in the same manner.

3.2 Ranskill Neighbourhood Plan

3.2.1 Following designation of the Neighbourhood Area in March 2016 and publication of the pre-submission draft Plan in November 2020, it was withdrawn shortly after in December of the same year.

3.2.2 Ranskill Parish Council's Withdrawal Statement confirms that the withdrawal followed the publication of the Local Authority's own emerging draft Local Plan. The letter stated:

"There is a significant difference between the plans, both currently in public consultation, relating to the housing requirement such that they are mutually incompatible."

- 3.2.3 The withdrawal appears to have been prompted by the reduction in the allowance of residential development within the Small Rural Settlements from 20% of their existing dwelling number (122 in the case of Ranskill) to 5% (30 in the case of Ranskill).
- 3.2.4 Rose & Co note that there is currently no sign that the Ranskill Neighbourhood Plan may be restarted. The 'loss' of the Neighbourhood Plan has clear negative implications for Ranskill, with the 'Community Vision' clearly outlining the desire for:
- Development which will benefit local people;
 - A range of housing types;
 - Additional local employment;
 - A new village hall;
 - Local services; and
 - Recreational activities for all ages.
- 3.2.5 A series of objectives were also set out, of particular interest are those relating to the type of housing to be supplied, meeting the needs of the local community, providing employment opportunities and essential local services.
- 3.2.6 Rose & Co consider that in the absence of a Neighbourhood Plan which can help to facilitate development and the overlooking of Ranskill by the PVLP, the needs of the community and its aspirations to provide growth and services will simply be ignored.

3.3 Ranskill as a Small Rural Settlement

- 3.3.1 Even when considered alone, Ranskill, according to a combination of Figure 4 of the Local Authority's Rural Settlement Update (August 2021) and the Spatial Strategy Background Paper (January 2020), is on the cusp of being considered as a 'Higher Sustainability – Large Rural Settlement'. According to these documents, Ranskill has a dwelling count of 607, whilst the criteria for 'acceptance' as a Large Rural Settlement is as follows:

"Large Rural Settlements play a role as a 'service centre' for other smaller settlements, have individually 500 or more dwellings and have all of the following: a primary school, doctors surgery/health centre, a community centre/hall, a convenience store, a church and a public house."

- 3.3.2 Ranskill fails to meet the above referenced test only by failing to be able to provide a health centre. Whilst Rose & Co accept that this is the case, they also contest that this measure is largely outdated due to the changing nature of local health provision and the closure of many practices within rural areas.
- 3.3.3 In fact, Rose & Co consider that such facilities are more likely to thrive in locations such as Ranskill were the population increased to a level whereby usage also increased.
- 3.3.4 Ranskill is capable of accommodating development of a level greater than that for which it is identified within the PVLP (and which has already been delivered).
- 3.3.5 There is a strong argument to suggest that Ranskill (and Torworth) could be considered as a Large Rural Settlement, rather than the Small Rural Settlement which it currently is within the PVLP.
- 3.3.6 Were it considered a Large Rural Settlement, Rose & Co understand that it would have benefitted from consideration for additional residential allocation (20% of its existing dwelling count) either to be brought forward under a Neighbourhood Plan or through distinct allocation within the Local Plan.

4 LAND NORTH OF COMMON LANE

4.1 The Site

- 4.1.1 The site is located immediately to the east of the village of Ranskill outside of the settlement boundary as per the planning proposals maps of both the Adopted Bassetlaw Local Plan (“adopted development plan”) and the Draft Local Plan (the settlement boundary can be seen later in this section at Figure 3).



Figure 1 Aerial View of the site © Google Maps

4.2 General Description

- 4.2.1 The site encloses approximately 19.5 hectares (ha) comprising a pair of open fields predominantly used for grazing.
- 4.2.2 It is currently accessed from Common Lane which runs eastwards along the southern boundary of the site. The junction of Station Road with Common Lane is adjacent to the site’s southern boundary. A view of the site from this junction is provided in Figure 2.
- 4.2.3 There exists an access track, which runs north from the junction, as far as Mattersey Road, and splits the site into two uneven parcels, with the eastern parcel measuring circa 14.7 ha and the western parcel 3.14 ha.



Figure 2 View north east towards the site from the junction between Station Road and Common Lane
© Google Maps

4.3 Surroundings

- 4.3.1 The site is bound to the west, and northeastern corner by stretches of mature woodland, whilst the remainder of the northern and eastern boundaries abut neighbouring fields. To the south of the site, on the other side of Common Lane, is an industrial unit, whilst to the north east lies Mill Grove Farm. There are also two recreational fisheries in the vicinity of the site - one to the north east and one to the south east.
- 4.3.2 A review of the Local Authority's (adopted) planning proposals maps shows that the site is adjacent to designated local wildlife sites¹. The previously mentioned woodland to the north west of the site is identified as Ranskill Birch Woodland and is described as a *successional habitat with notable plant species and communities*². Ranskill Wetlands also surround the site to the north, east and south, and are described as *a valuable mosaic of open-water, grassland and scrub habitats developed on old gravel workings - of zoological importance*³.
- 4.3.3 Although outside the site boundary, the northern edge of Common Lane itself is regarded as a Local Wildlife Site, with its description being *notable sand plant communities along trackside verges*⁴. The Local Wildlife Site designations are annotated in Figure 3 below.

¹ Following descriptions of Local Wildlife Sites are found within the Local Authority's Environmental Sites Assessment

(June 2009): <https://www.bassetlaw.gov.uk/media/1649/bsenvironmentalsitesassessment.pdf>

² Ranskill Birch Woodland - Adopted Plan SINC ID: 5/11; Emerging Plan SITE ID: 5/2211

³ Ranskill Wetlands - Adopted Plan SINC ID: 1/99, Emerging Plan SITE ID: 1/99

⁴ Common Lane - Adopted Plan SINC ID: 5/12, Emerging Plan SITE ID: 5/2212

Local Wildlife Site (ST36)

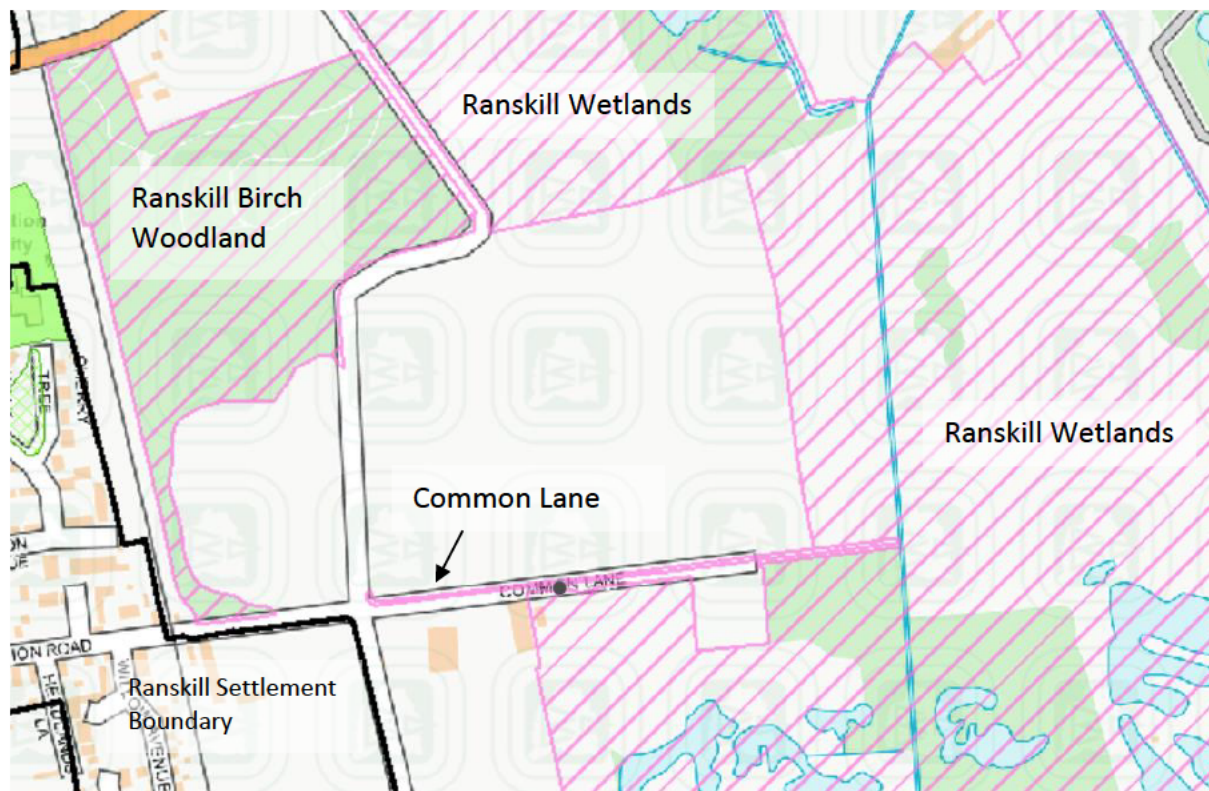


Figure 3 Emerging Local Plan Planning Proposals Map © Bassetlaw District Council

4.3.4 As can be seen from Figure 4, the majority of the site falls within Flood Zone 1; with a portion (3.14ha) located towards the eastern boundary falling within Flood Zones 2 and 3.

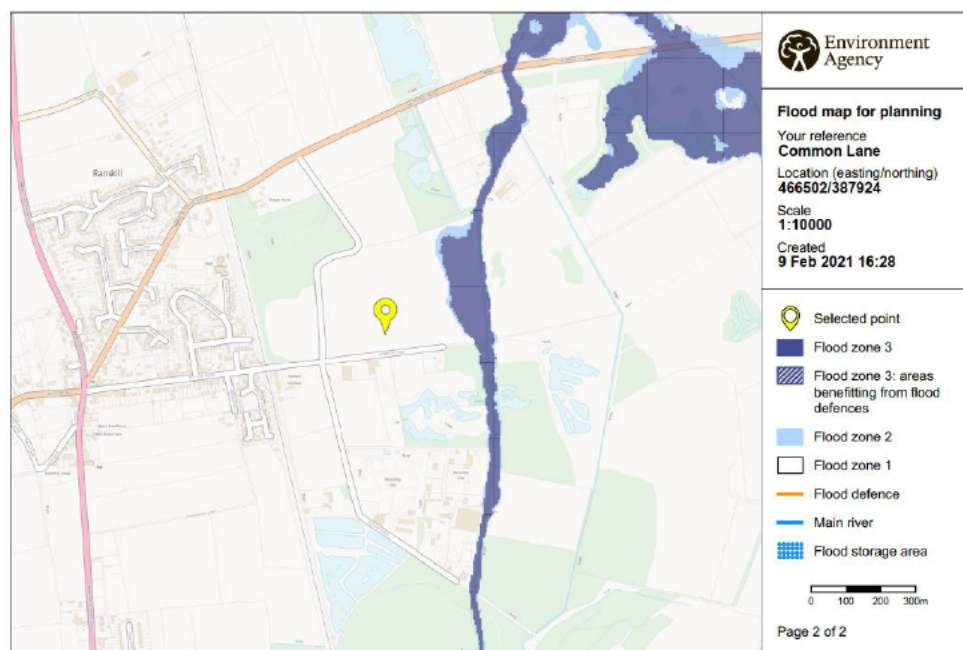


Figure 4 Flood Map for Planning © Environment Agency

4.4 Relevant Planning History

4.4.1 A portion of the site, to the south-west, has been the subject of a dismissed planning appeal (decision issued in March 2020) for the erection of 9 no. open market starter homes, with associated access off a private driveway, off-street parking and private gardens.

4.4.2 The main issues considered at appeal were:

- The effect of the proposed development on the character and appearance of the area;
- Whether the site is a suitable location for residential development with particular reference to potential land contamination; and
- The effect of the proposed development on highway safety.

4.4.3 The Inspector confirmed that the form of the development for which permission was sought would harm the character and appearance of the area and that, in the absence of a Phase II Site Investigation, the site could not be confirmed as being suitable for residential development.

4.4.4 In other matters considered, it was established that the site is not isolated and benefits from being *in a sustainable location close to the facilities and services within Ranskill Village*.

5 ABOUT ROSE & CO DEVELOPMENTS

5.1.1 Rose & Co have built their reputation around delivering high quality, residential development. Their overriding objective is to provide sustainable development, which meets the needs of its end users, respects the existing context, delivers much needed housing; and provides a boost to the local economy (creating jobs and generating revenue for the Local Authority (in the form of the new homes bonus payment, CIL and Council Tax) and expenditure in the local economy.

6 THE DEVELOPMENT OPPORTUNITY

- 6.1.1 Rose & Co consider the site capable of accommodating a viable scheme of highly sustainable, zero carbon residential-led mixed-use development.
- 6.1.2 The site comprises at least 14.19 ha of gross developable area and when calculated at a density of between 30 and 40 dwellings per hectare, could yield between 425 and 570 zero carbon residential units.
- 6.1.3 Rose & Co's zero carbon aspirations are something which should be taken seriously and embraced by the Local Authority – there is the potential to create an exemplar development, providing highly skilled jobs in the construction phase and boosting the local labour market for the supply and fit of sustainability enhancements.

6.2 The Site's Ability to Accommodate Residential-Led Mixed Use Development

- 6.2.1 Rose & Co note the intention to allocate land for the provision of 75 dwellings in Tuxford, a Large Rural Settlement. As outlined above, Rose & Co consider that Ranskill is extremely close to being considered as a Large Rural Settlement and with more up to date indicators, or development to provide key local services, could be.
- 6.2.2 Rose & Co are keen to invest in Ranskill and in order to provide the facilities it requires to ensure it can be considered a Large Rural Settlement, offer the possibility of encapsulating services (e.g. a health centre) within any development they propose.
- 6.2.3 On that basis, they feel it important to outline the site's credentials and ability to deliver 20% of its existing dwelling count, which would equate to new residential development in the form of 121 additional units.
- 6.2.4 Although it is acknowledged that as of August 2021, 42 units have been delivered, which would result in a reduction of the 20% figure to 79 units, this would still be commensurate with the size of the proposed allocation at Tuxford which, in Rose & Co's opinion suffers from:
- Appearing as though it comprises ribbon development;
 - A weak western boundary;
 - Potential heritage constraints; and
 - Potential landscape constraints given its visibility.

- 6.2.5 By contrast, the site at Ranskill is capable of delivering at least 75 units on a site which is more contained, does not suffer from heritage or landscape constraints and which is available and deliverable by a developer who is keen to provide highly sustainable, zero carbon residential-led development, much in line with current national aspirations.
- 6.2.6 The site at Ranskill could also be considered as an alternative to reduce some of the reliance upon the existing strategic sites, or to stand ready to help deliver the required amount of housing should the strategic sites identified run into issues. The site is suitable for either allocation or safeguarding for highly sustainable, zero carbon residential-led development.
- 6.2.7 If the site were to be safeguarded, Rose & Co suggest that any such policy could be worded on the basis that development of the site will become acceptable should the strategic sites remain undelivered or if delivery rates are low.
- 6.2.8 Rose & Co are keen to work alongside the Local Authority to devise a suitable evidence base and policy wording to reflect the site's ability to be allocated or held in reserve.

7 CONCLUSION

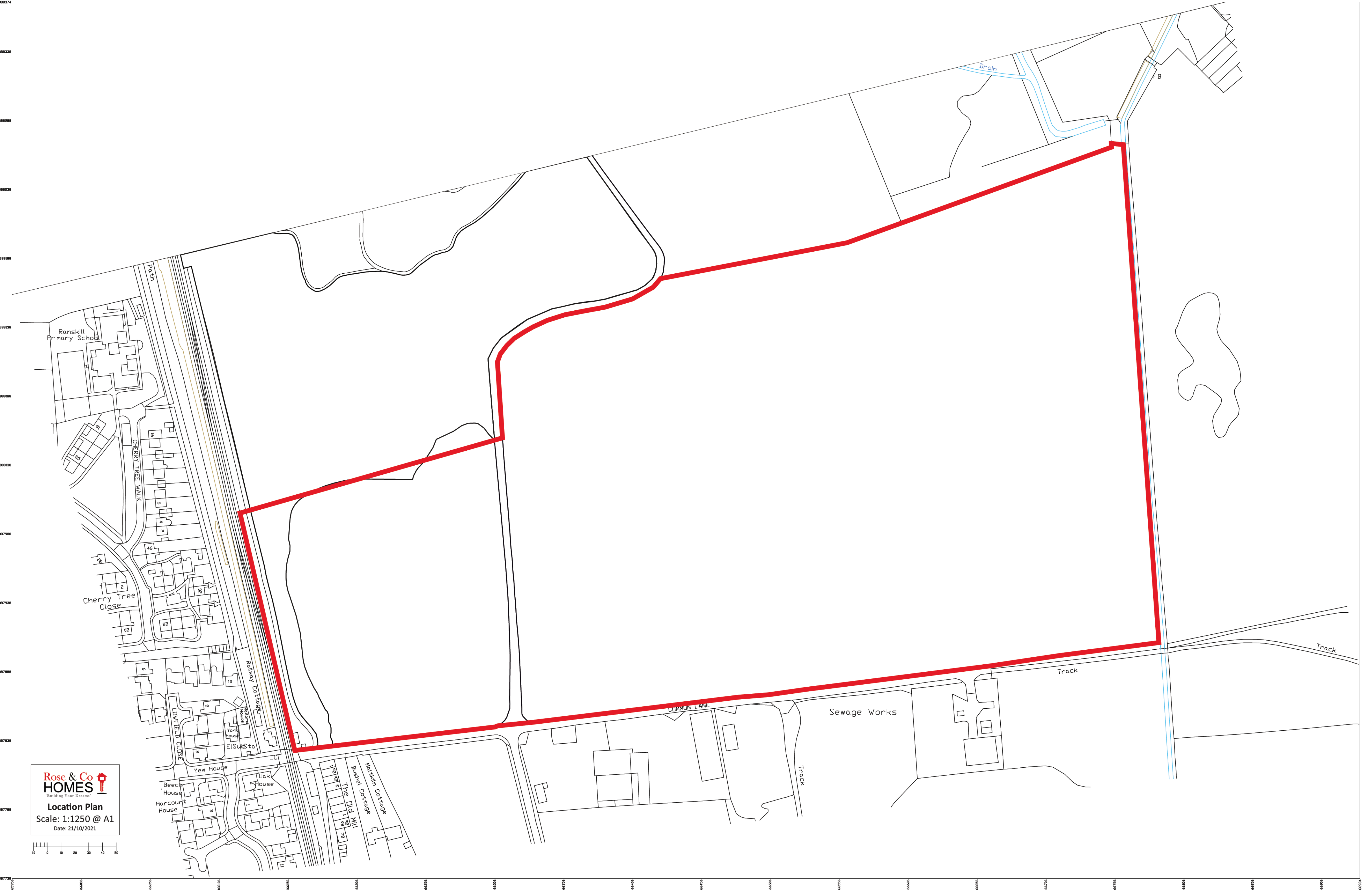
- 7.1.1 Rose & Co Homes, having had regard to the PVLP and its published evidence base, considers that the lack of consideration of Land North of Common Lane through the Local Plan process along with the identified failings of the Spatial Strategy and Settlement Hierarchy, mean that the PVLP cannot at this time be found sound.
- 7.1.2 The failure to identify land for residential development in Large and Small Rural Settlements has the potential to ostracise these settlements from those which are the subject of growth, creating a wealth divide between main towns and rural settlements and between the north of the District and south of the District.
- 7.1.3 In order for Rose & Co to reconsider their position, they would appreciate dialogue with the Local Authority regarding Land North of Common Lane, the reconsideration of the Spatial Strategy and Ranskill's position within the Settlement Hierarchy.
- 7.1.4 Rose & Co respectfully request that this representation and the Appendices are held on file as part of the PVLP evidence base.

**APPENDIX A ASSESSMENT OF SITE AGAINST NORTH DERBYSHIRE AND BASSETLAW LAND
AVAILABILITY ASSESSMENT FLOWCHART CRITERIA: LAND NORTH OF COMMON LANE,
RANSKILL**

STAGE 1: SCREENING CRITERIA			
		Further Details	Assessment
Availability	Known landowner who is prepared to me the site available for development	Yes, the landowners consent to the site being developed (Please see Annexe 1).	
Suitability	Capable of delivering 5 or more dwellings and/or 0.25ha or more of economic development	Discounting the area of the site which lies within Flood Zone 3 (circa 3.14 hectares) and utilising an estimated Net Developable Area of 14.19 hectares the site is capable of delivering between 425 and 570 units at a density of between 30 and 40 dwellings per hectare.	
	Predominantly outside of the green belt (unless a green belt review is undertaken)	This is not located within the Green Belt.	
	Predominantly outside of a European or local designated site (e.g. SSSI or LNRs)	The site is predominantly outside these designations however does contain two areas of Local Wildlife Sites which are not intended for development.	

STAGE 2: SIGNPOST CRITERIA			
Suitability	Level of flood risk	Circa 3.14 hectares falls within Flood Zone 3, leaving in excess of 14 hectares within Flood Zone 1.	
	Relationship to neighbouring land uses and surrounding settlement	To the west of the site lies the East Coast Mainline, to the south Station Road/Common Lane, to the east and north undeveloped agricultural land or wooded areas. Further to the south lie industrial and employment uses and recreational fishing lakes. Beyond the East Coast Mainline lies the existing residential community of Ranskill. The surrounding land uses are not susceptible to any impacts associated with development of this site for residential purposes and any possible impacts from the railway line or industrial uses can be adequately screened or mitigated against.	
	Access to and impact on local highways	Current access from the highway must be obtained from Station Road however the developer is understood to be in discussions with the neighbouring landowner to the north regarding provision of vehicular access from B6045 Mattersey Road.	
	Proximity to HS2 and/or major transport infrastructure	The site lies adjacent to the East Coast Mainline however there is no reason why adequate buffering cannot be created along the site's western boundary. The site is not located in close proximity to the route of HS2.	
	Access to key services and facilities	Ranskill is considered to be a settlement with 'Medium Sustainability' in the Rural Settlement Study (August 2021 update). It contains services including a convenience retail store, post office and primary school. The site has the potential to deliver additional facilities of benefit to existing and future residents should need be demonstrated. Ranskill also benefits from bus services between Doncaster, Bawtry, Retford and Gainsborough.	
	Hazardous risks and/or contamination	The site contains areas of historic landfill however these areas are located in areas likely to be suitable for buffering from the railway line. Contamination is possible.	
	Site topography	The site is predominantly flat.	
	Land stability	The site is predominantly flat although some investigations regarding stability may be necessary due to historic land uses.	
	Pylons or high voltage cables	None	
	Natural obstacles	None	

STAGE 3: SUITABILITY FOR RESIDENTIAL OR GYPSY/TRAVELLER USE			
Achievability and Viability	Known developer willing to invest in the site	Yes, the developer is keen to bring the site forward for residential development which focused on exceptional levels of sustainability and climate change resilience.	
	Development considered viable	Development at this stage is considered viable.	
	No exceptional abnormal costs associated with the site?	The developer is committed to carrying out full assessments of all abnormal costs.	
	Development delivered within 5 years or reasonable prospect it will be delivered beyond this	The developer is committed to delivering a flagship residential development on this site.	



Rose & Co

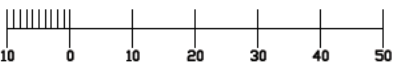
HOMES

Building Your Dreams

Location Plan

Scale: 1:1250 @ A1

Date: 21/10/2021





Rose & Co

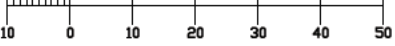
HOMES

Building Your Dreams

Parameters Plan

Scale: 1:1250 @ A1

Date: 21/10/2021



REF046



[REDACTED]

From:

Sent:

To:

Cc:

Attachments:

[REDACTED]

21 October 2021 16:34

The Bassetlaw Plan

[REDACTED]

Representations in response to Policy ST8 EM008

Form A - Personal Details.pdf; Letter from Head of Midlands Energy Hub dated 21.10.21.pdf; Letter from D2N2 dated 20.10.21.pdf; Form B - Response to Policy ST8 EM008.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

Our ref: PJF/fa/PF/10619

Dear Sir/Madam

Bassetlaw Local Plan 2020 – 2037

Representations in response to Policy ST8 EM008

Please find attached Representations of today's date submitted on behalf of my Client, JG Pears, to the Bassetlaw Local Plan 2020 – 2037 Consultation.

I welcome confirmation of safe receipt.

With kind regards,

[REDACTED]

BSc (Hons), TP, MRICS, MRTPI

Attach: Form A – Client/Agent details
Form B – Response to Policy ST8 EM008
Letter of Support dated 20th October 2021 (D2N2)
Letter of Support dated 21st October 2021 (Head of Midlands Energy Hub)



Oriel House
42 North Bar
Banbury
Oxfordshire
OX16 0TH

[REDACTED]

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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/departmental-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 ☐

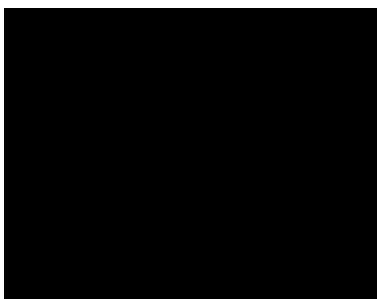
Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Bassetlaw Local Plan.

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

Yes ☒

No ☐

Printed Name:



Signature:

Date:

19/10/2021

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:

Organisation (if applicable): JG Pears (c/o Frampton Town Planning Ltd)

Address:

Postcode:

Tel:

Fax:

Email:

2. Agent Details (if applicable)

Agent:

[REDACTED]

Organisation (if applicable): Frampton Town Planning Ltd

Address:

[REDACTED]

Postcode:

[REDACTED]

Tel:

[REDACTED]

Fax:

Email:

[REDACTED]



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: JG Pears (c/o Frampton Town Planning Ltd)

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

Policy: ST8 EM008

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.

The following submissions are made on behalf of JG Pears, the owners of the former High Marnham Power Station site. These submissions focus upon the provisions of Policy ST8: EM008 High Marnham Green Energy Hub.

JG Pears **OBJECT** to Policy ST8: EM008 as presently prepared. The objections are directed to particular components of Policy ST8: EM008 rather than the principle of the policy which is supported. Indeed, JG Pears is in active discussion with other interested parties in seeking to undertake significant investment at High Marnham with the deployment of green energy. Attached is correspondence dated 20th October 2021 from the Interim Chief Executive of D2N2 and 21st October from the Head of Midlands Energy Hub expressing support to JG Pears in bringing forward High Marnham as a Green Energy Hub.

Statement of Reasons

The supporting text to Policy ST8: EM008 (paragraph 1) states the site 'will be developed in a comprehensive and sensitive manner to support low carbon growth, reduce carbon emissions and leave a positive low carbon economic and environmental legacy for Bassetlaw'. It is important to recognise that the development of High Marnham will not in the ordinary meaning of the word leave a 'legacy'. The development of this site will invariably be dynamic, evolving in response to different technologies and changing market signals. Fundamentally it should be acknowledged that the movement towards low carbon growth, and a reduction in carbon emissions will become embedded within most aspects of society, and particularly within economic activity.

Most companies through their CSR responsibilities and particularly in recognising the committed shift away from fossil fuels recognise the need for and will invest in low carbon technologies. The distinguishing feature at High Marnham will be the co-joining opportunity for a substantial solar farm – the energy generated may be all or in part consumed by occupiers of High Marnham. High Marnham may accommodate within the allocated site a wide range of specific uses related to the energy sector. High Marnham is further supported by JG Pears own direct grid connection from their nearby combined heat and power (CHP) plant at Low Marnham, which currently inputs surplus energy into the Grid, but could potentially be harnessed directly by future occupiers at High Marnham.

Policy ST1 M008

Criterion 1

It is submitted that these words should be omitted from Criterion 1.

Criterion 2

It is submitted this criterion is not justified in its reference to 'employment functions connected with renewable energy and low carbon energy sectors'. The Plan states (6.2.1) that this site:

'provides an opportunity to positively re-use a longstanding, substantial brownfield site and facilitates its redevelopment. Its closure directly affected employment in the rural area and indirectly affected local supply chains'.

Many forms of investment within Class Eg/B2/B8 and uses characterised as being 'sui-generis', can through high quality design, respond to the climate change agenda in reducing energy demand, being efficient in energy use, and in providing renewable sources of energy. Such uses do not themselves have to be 'connected with renewable energy and low carbon technology'. Policy ST8 EM008 should positively encourage new economic investment which will support low carbon growth, but may not be directly involved in energy generation, or necessarily connected to energy generated by various technologies at High Marnham.

It is submitted that this criterion inappropriately restricts the form of investment on this brownfield site and hence will frustrate the delivery of new jobs. There is considered to be no evidence base to justify a criterion that is restrictive to the forms of industrial use.

A further objection is made to Criterion 2 in that it seemingly creates an unjustified limitation to the development of 38.4 hectares (the accuracy is remarkable) within the Plan period and thereafter, i.e., beyond the Plan period the remaining 21.6 hectares. It is submitted that there is no justification, or consistency with national planning policy for such a restriction to be placed on the amount of this major brownfield site being developed in the Plan period.

While it may indeed be anticipated in 2021 that 'the site is expected to be delivered over two plan periods' (paragraph 6.2.2) successful redevelopment may in fact attract a more extensive occupation within the emerging plan period. The reference to the amount of land to be developed in this plan period and the next period should be omitted from the criterion.

Within Class E(g)/B2/B8

Proposed wording to Criteria 2. It is submitted this criterion should read:

'Proposals within Class E(g)/B2/B8 and sui-generis uses providing employment and infrastructure uses which may be suitably located at High Marnham will be required to demonstrate high quality design standards including response to energy hierarchy'.

Criterion 3

There is no issue with this criterion (See objection to Policy ST51)

Criterion 4

This is no issue with this Criterion.

Criterion 5

An objection is raised to the policy provision that states:

'Proposals ... that is [sic] contrary to Local Development Order will not be supported'.

We understand that the underlying purpose of LDO is to incentivise development by simplifying the planning process and making investment more attractive. An LDO provides permitted development rights for specified types of development in a defined location. The content of the proposed LDO is presently not known. The Plan states that works will be completed on the draft LDO by Autumn 2022 to inform implementation following adoption of the Local Plan.

Putting aside the characteristic of LPA's setting unreliable timescales in all aspects of the planning process, it is evident the LDO will not be completed until after the adoption of the Local Plan. The preparation of any development plan can never be omniscient in anticipating each and every circumstance where development may be permitted. It is submitted that this aspect of Criterion 5 is not justified by any evidence base and is inconsistent with national planning policy. Other uses not provided with permitted development rights within an LDO may constitute appropriate land uses for High Marnham. Policy ST8: EM008 should not establish a presumption against such uses being permitted, merely because such uses are not defined in an LDO.

Conclusions

The suggested re-wording of Criterion 2 to extend the uses to include sui generis uses providing employment and infrastructure uses is considered appropriate to provide a wide range of uses for this substantial brownfield site. It is submitted that the wording of Criterion 5 should be revised to omit 'or that is contrary to Local Development Order'. There is no justification for restricting uses to those that may be specified in an LDO. Such uses will benefit from permitted development uses. Other uses will require a specific grant of planning permission and will be determined on their individual merits.

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

Amend Criterion 2) and Criterion 5) as suggested in these 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.

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:

Because the issues raised are very significant to the delivery of this energy hub and employment site.

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.



www.d2n2lep.org

Tel: 0115 957 8757


Group Finance Director
Bella Vista Farm
Hartcliffe Road,
Penistone,
Sheffield,
S36 9FN

20th October 2021

Dear Paul,

**Ref: JG Pears Limited – Letter of Support: Bassetlaw Draft Local Plan 2020-2037
(Version August 2021)**

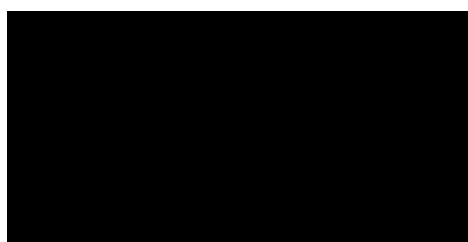
We acknowledge the recent publication of the Bassetlaw's Draft Local Plan, and with specific regard to POLICY ST8: EM008: High Marnham Green Energy Hub, we wish to offer this letter of support for the sites development of low carbon and renewable energy infrastructure (whether in the form of generation, storage, transmission and on-site low carbon energy use).

We recognise JG Pears as the principal landowner of the former High Marnham power station site and associated infrastructure, and we have been actively engaged with you throughout 2021 in maturing the site development for the above purpose.

The D2N2 LEP is supportive of the High Marnham sites redevelopment and would be pleased to see this redevelopment take place in a low carbon manner. The LEPs Recovery and Growth Strategy sets out the key aim of delivering 'The UK's largest carbon turnaround' and High Marnham is explicitly mentioned as one of the sites for redevelopment to help achieve this ambition.

Please accept this letter as an ongoing acknowledgement of our support and we look forward to working with you on an ongoing basis to develop these future plans.

Yours sincerely,



Interim Chief Executive
D2N2 LEP



Nottingham
City Council

[REDACTED]
Group Finance Director
Bella Vista Farm
Hartcliffe Road,
Penistone,
S36 9FN

**Carbon Reduction Energy &
Sustainability Division**
City and Growth
Eastcroft Depot
London Road
Nottingham
NG2 3AH

Tel: 0115 876 3395
www.nottinghamcity.gov.uk

Thursday 21/10/2021

Dear [REDACTED],

REF: JG Pears Limited – Letter of Support : Bassetlaw Draft Local Plan 2020-2037 (Version August 2021)

We acknowledge the recent publication of the Bassetlaw's Draft Local Plan, and with specific regard to POLICY ST8: EM008: High Marnham Green Energy Hub, we wish to offer this letter of support for the sites development of low carbon and renewable energy infrastructure (whether in the form of generation, storage, transmission and on site low carbon energy use).

We recognise JG Pears as the principal landowner of the former High Marnham power station site and associated infrastructure, and we have been actively engaged with you throughout 2021 in maturing the site development for the above purpose.

The Midlands Energy Hub, funded by BEIS with Nottingham City Council acting as accountable body, has been working across D2N2 LEP and the wider Midlands Region to support with the development of low carbon and renewable energy projects at scale. This is to enable the transition to Net Zero. The proposal for the Green Energy Hub at High Marnham therefore aligns with Midlands Energy Hub objectives and the D2N2 LEP Energy Strategy that Midlands Energy Hub helped to develop and is supporting the delivery of.

There is potential with the proposal to support the decarbonisation of organisations within D2N2 LEP area and the Midlands Energy Hub are eager to explore collaboration opportunities around the development of this site and the production and consumption of low carbon and renewable energy.

Yours Sincerely

[REDACTED]
Head of Midlands Energy Hub
Midlands Energy Hub
Nottingham City Council

[REDACTED]

From:

Sent:

To:

Cc:

Subject:

Attachments:

[REDACTED]

21 October 2021 16:35

The Bassetlaw Plan

Emily Brunt

Representations in response to Policy ST39

Form A - Personal Details.pdf; Form B - Response to Policy ST39.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

Our ref: PJF/fa/PF/10619

Dear Sir/Madam

Bassetlaw Local Plan 2020 – 2037
Representations in response to Policy ST39

Please find attached Representations of today's date submitted on behalf of my Client, JG Pears, to the Bassetlaw Local Plan 2020 – 2037 Consultation.

I welcome confirmation of safe receipt.

With kind regards,

[REDACTED]

BSc (Hons), TP, MRICS, MRTPI

Attach: Form A – Client/Agent details
Form B – Response to Policy ST39



Oriel House
42 North Bar
Banbury
Oxfordshire
OX16 0TH

[REDACTED]

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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 ☒

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 ☐

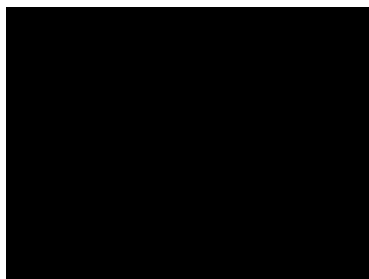
Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Bassetlaw Local Plan.

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

Yes ☒

No ☐

Printed Name:



Signature:

Date:

19/10/2021

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:

Organisation (if applicable): JG Pears (c/o Frampton Town Planning Ltd)

Address:

Postcode:

Tel:

Fax:

Email:

2. Agent Details (if applicable)

Agent:

[REDACTED]

Organisation (if applicable): Frampton Town Planning Ltd

Address: 42 North Bar, Oriel House, Banbury

Postcode: OX16 0TH

Tel:

[REDACTED]

Fax:

Email:

[REDACTED]



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: JG Pears (c/o Framptons Town Planning Ltd)

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

Policy: Policy ST39

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.

ST39 Green and Blue Infrastructure

An **OBJECTION** is submitted to Criterion 2 (c) in its reference to a 'buffer zone' in the sense that there is an objection in principle to development within the specified zones of minimum distance.

Suggested wording to Policy ST39C. It is submitted that Criterion 2 (c) should be reworded:

'All proposals wholly or partly within the minimum buffer zone of a main green corridor (30m width) or a minor green corridor (15m width), should be supported by an Ecological Impact Assessment and a Landscape and Visual Impact Assessment. The Assessment should demonstrate how the proposals have minimised the environmental affect of development upon the identified green corridors'.

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

Amend Criterion 2 (c) as suggested in these 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.

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:

Because the issues raised are very significant to the delivery of this energy hub and employment site.

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.

[REDACTED]

From:

Sent:

[REDACTED]

21 October 2021 16:36

To:

The Bassetlaw Plan

Cc:

[REDACTED]

Representations in response to Policy ST51

Attachments:

Form A - Personal Details.pdf; Form B - Response to Policy ST51.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

Our ref: PJF/fa/PF/10619

Dear Sir/Madam

Bassetlaw Local Plan 2020 – 2037
Representations in response to Policy ST51

Please find attached Representations of today's date submitted on behalf of my Client, JG Pears, to the Bassetlaw Local Plan 2020 – 2037 Consultation.

I welcome confirmation of safe receipt.

With kind regards,

[REDACTED]

BSc (Hons), TP, MRICS, MRTPI

Attach: Form A – Client/Agent details
Form B – Response to Policy ST51



Oriel House
42 North Bar
Banbury
Oxfordshire
OX16 0TH

[REDACTED]

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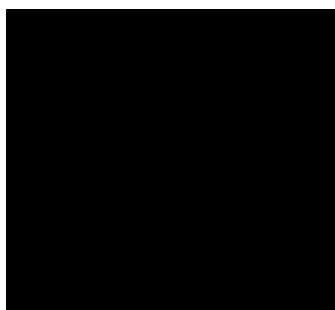
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I would like to opt in to receive information about the Bassetlaw Local Plan.

Yes ☒

No ☐

Printed Name:



Signature:

Date:

19/10/2021

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Part A- Personal Details

1. Personal Details

Name:

Organisation (if applicable): JG Pears (c/o Frampton Town Planning Ltd)

Address:

Postcode:

Tel:

Fax:

Email:

2. Agent Details (if applicable)

Agent:

[REDACTED]

Organisation (if applicable): Frampton Town Planning Ltd

Address: 42 North Bar, Oriel House, Banbury

Postcode: OX16 0TH

Tel:

[REDACTED]

Fax:

Email:

[REDACTED]



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: JG Pears (c/o Frampton Town Planning Ltd)

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

Policy: ST51

Paragraph: 10.23

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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Policy ST51 Renewable and Low Carbon Energy Generation

An OBJECTION is submitted to Policy ST51 for its wording that support for renewable and low carbon energy generation 'is subject to' i.e., it is a material consideration in determining the merits of an application for the Applicant to provide 'details of expected power generation based on yield or local self-consumption of electricity'.

These words are inconsistent with national planning policy. The Framework (158) states:

'When determining planning applications for renewable and low carbon development, local planning authorities should:

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions'.

National planning policy does not require an applicant to provide details of power generation or local self-consumption, which introduces an inappropriate test for applicants to justify investment in renewable and low carbon energy generation.

Furthermore the 'subject to' introduces substantial uncertainty to a developer as to whether the principle of development is supported which will frustrate new investment. It is acknowledged that not all renewable and low carbon energy generation will be acceptable. A planning balance has to be formed between the benefits and the affects of the development on other planning interests. It is submitted that the words 'by demonstrating satisfactory resolution of all wider impacts (including cumulative impacts) should be replaced by ensuring no unacceptable impacts (including cumulative impacts)'.

The benefits may not be confined to power generation, and may for instance include new technologies that are highly innovative – where say the technical performance has not been proven at a commercial scale. High Marnham would provide a suitable location for these new technologies to become established subject to ensure that the wider impacts are acceptable. As with all developments there may be some residual adverse impacts which are outweighed by the overall benefits of the individual proposal.

Paragraph 10.23

This supporting text should not imply that the provision of renewable energy at High Marnham is confined to technologies that require a connection into the high voltage grid. High Marnham has the potential for a range of renewable energy technologies to be developed in generation, sharing transmission and storage. These forms of technology could be electrical, thermal or gaseous.

Continue on a separate sheet if necessary

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Omit the words:

'subject to the provision of details of expected power generation based upon yield or local self-consumption of electricity'.

Replace:

'by demonstrating satisfactory resolution of all wider impacts (including cumulative impacts)'

with

'by ensuring no unacceptable impacts (including cumulative impacts)'.

Continue on a separate sheet if necessary

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[REDACTED]

From:

Sent:

To:

Cc:

Attachments:

[REDACTED]
21 October 2021 16:36

The Bassetlaw Plan

[REDACTED] in response to Proposals Map

Form A - Personal Details.pdf; Plan with cross-hatched area (Proposals Map Reps).pdf; Form B - Response to Proposal Map.pdf; Land Ownership Plan (Plan 1).pdf

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Our ref: PJF/fa/PF/10619

Dear Sir/Madam

**Bassetlaw Local Plan 2020 – 2037
Representations in response to the Proposals Map**

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I welcome confirmation of safe receipt.

With kind regards,

[REDACTED]
BSc (Hons), TP, MRICS, MRTPI

Attach: Form A – Client/Agent details
Form B – Response to the Proposals Map
Plan with area cross-hatched red
Land Ownership plan (Plan 1)



Oriel House
42 North Bar
Banbury
Oxfordshire
OX16 0TH

[REDACTED]

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Yes ☒

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.

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No ☐

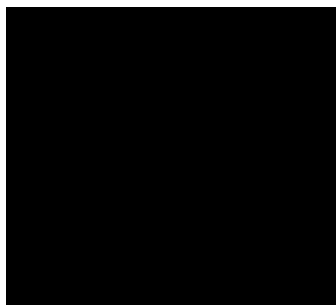
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I would like to opt in to receive information about the Bassetlaw Local Plan.

Yes ☒

No ☐

Printed Name:



Signature:

Date:

19/10/2021

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Organisation (if applicable): JG Pears (c/o Frampton Town Planning Ltd)

Address:

Postcode:

Tel:

Fax:

Email:

2. Agent Details (if applicable)

Agent:

[REDACTED]

Organisation (if applicable): Frampton Town Planning Ltd

Address: 42 North Bar, Oriel House, Banbury

Postcode: OX16 0TH

Tel:

[REDACTED]

Fax:

Email:

[REDACTED]



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Name or Organisation: JG Pears (c/o Frampton Town Planning Ltd).

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Policy:

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.

Attached as Plan 1 is land ownership of JG Pears on the acquisition of the former High Marnham Colliery it is submitted that site allocation should appropriately extend to include the land which is cross-hatched in red on the attached plan. It is submitted that the area of land has the same characteristics of the land surrounding the former colliery site and would form a useful addition to the proposals for renewable energy generation.

As such an objection is submitted to the Proposals Map as drawn.

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

Amend the allocation site boundary to including the land cross-hatched red on the attached plan.

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 ☒

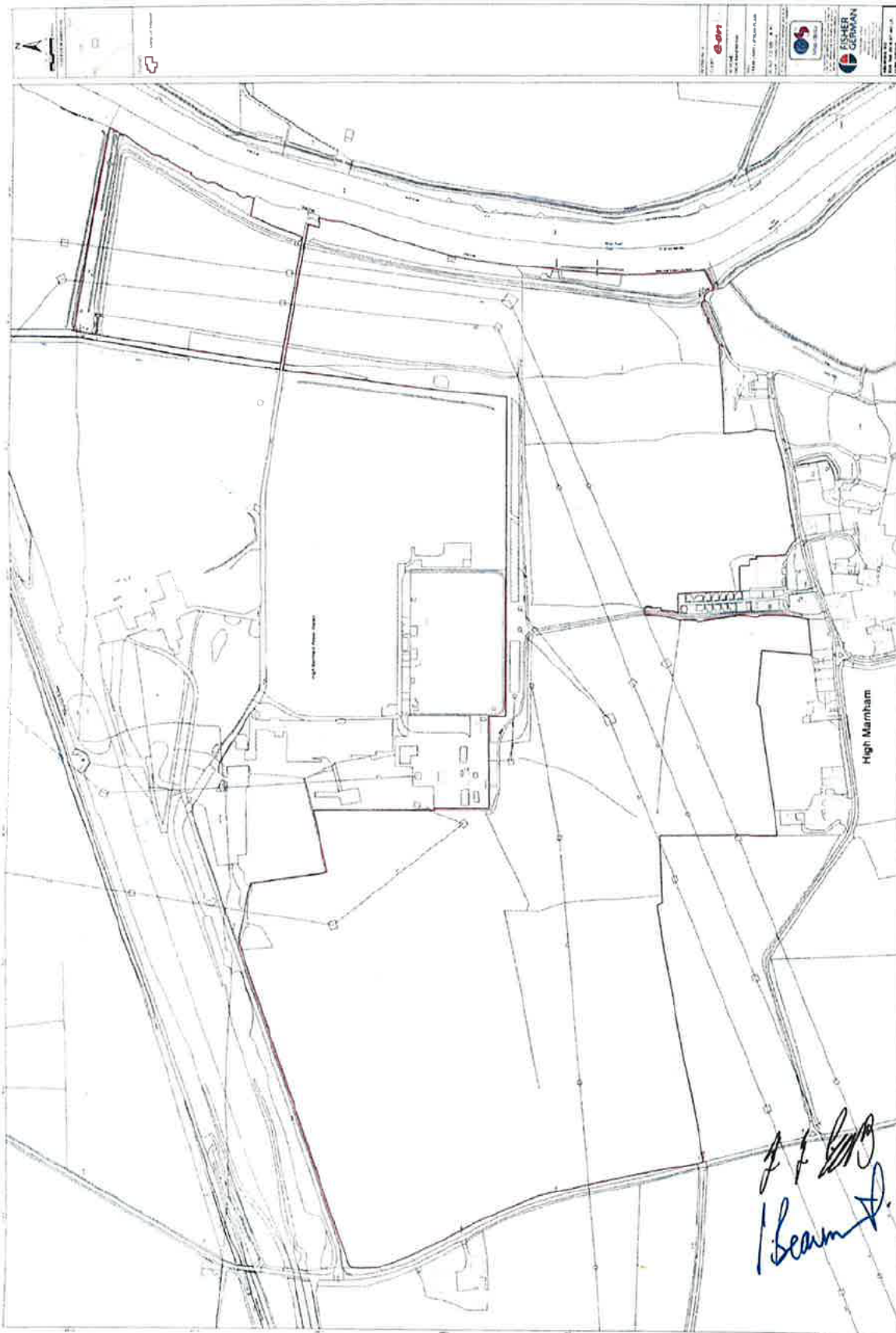
No, I do not wish to participate in hearing session(s)

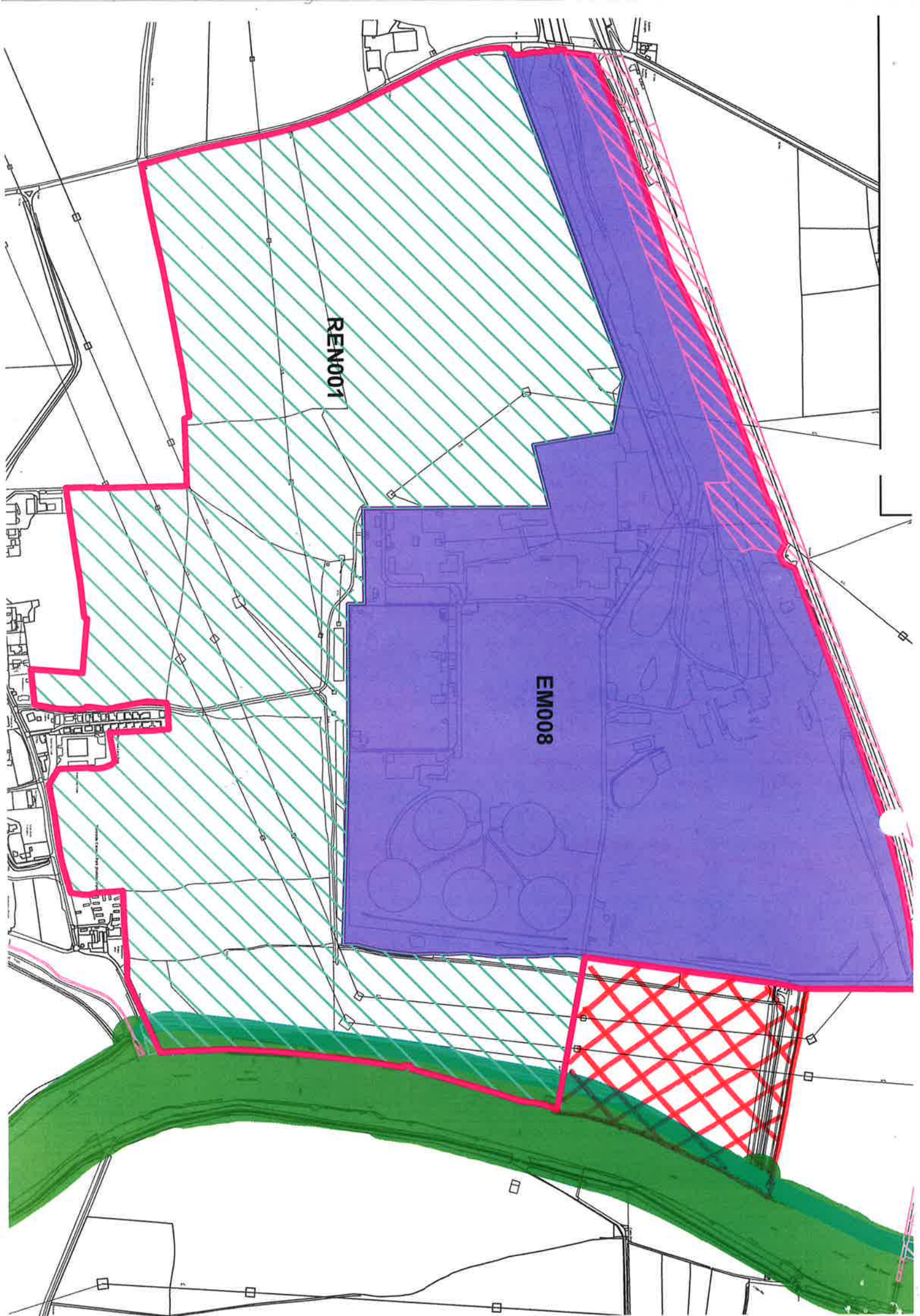
No ☐

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

Because the issues raised are very significant to the delivery of this energy hub and employment site.

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.





REF047



From:

To:

Subject:

Attachments:

21 October 2021 16:49

The Bassetlaw Plan

Local Plan Representations

18.009 JW Bassetlaw Local Plan Submission Version Reps 15102021.pdf; Form A ST1.pdf; Form B ST57.pdf; Form B ST51.pdf; Form B ST50.pdf; Form B ST52.pdf; Form B ST12.pdf; Form B Policy 34.pdf; Form B ST30.pdf; Form B ST29.pdf; Form B ST11.pdf; Form B ST2.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 made on behalf of the Welbeck Estates Company Limited.

Please can you confirm receipt.

Thank you..

Principal Planner

Midlands Office - Planning and Design Group (UK) Ltd, Pure Offices, Lake View Drive, Sherwood Park, Nottingham NG15 0DT
T: 01623 726256 E: midlands@panddg.co.uk

London Office - Planning and Design Group (UK) Ltd, 5 St John's Lane, London EC1M 4BH
T: 020 7549 2858 E: london@panddg.co.uk

Oxford Office - Planning and Design Group (UK) Ltd, Pure Offices, Parkway Court, John Smith Drive, Oxford OX4 2JY
T: 01865 985354 E: oxford@panddg.co.uk

**Come and see us (stand 453) at the Farm Business Innovation Show
NEC Birmingham – 10th & 11th November 2021**

**We are also exhibitors at the East Midlands EXPO Show
De Vere, EMCC, Nottingham - 12th November 2021**



www.panddg.co.uk



Disclaimer

The information in this email is confidential and for use by the addressee(s) only. It may also be privileged. If you are not the intended recipient please notify us immediately on +44(0)1623 726256 and delete the message from your computer. You may not copy or forward it, or use or disclose its contents to any other person.



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 ☐

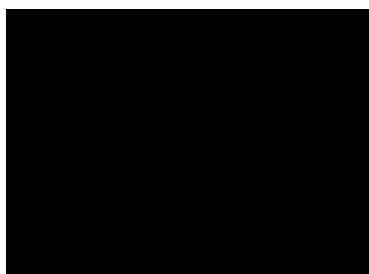
Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Bassetlaw Local Plan.

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

Yes ☒

No ☐

Printed Name:



Signature:

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):

Welbeck Estates Company Limited

Address:

Postcode:

Tel:

Fax:

Email:

2. Agent Details (if applicable)

Agent:

[REDACTED]

Organisation (if applicable):

Planning and Design Group

Address:

Pure Offices, Lake View Drive, Sherwood Park, Notts

Postcode:

NG15 0DT

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: Planning and Design Group Ltd

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

Policy: ST1

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 letter.

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 letter.

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.

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:

Due to the complex nature of the issues.

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: Planning and Design Group Ltd

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

Policy: ST2

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 letter.

Continue on a separate sheet if necessary

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Please see attached letter.

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:

Due to the complexity of the issues.

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.



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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: Planning and Design Group Ltd

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

Policy: ST11

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 letter.

Continue on a separate sheet if necessary

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Please see attached letter.

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:

Due to the complexity of the issues.

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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: Planning and Design Group Ltd

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

Policy: ST12

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 letter.

Continue on a separate sheet if necessary

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Please see attached letter.

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:

Due to the complexity of the issues.

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.



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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: Planning and Design Group Ltd

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 ☒

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 letter.

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 letter.

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:

Due to the complexity of the issues.

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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: Planning and Design Group Ltd

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 ☒

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 letter.

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 letter.

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:

Due to the complexity of the issues.

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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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: Planning and Design Group Ltd

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

Policy: Policy 34

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 letter.

Continue on a separate sheet if necessary

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Please see attached letter.

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:

Due to the complexity of the issues.

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Bassetlaw Local Plan 2020-2037

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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: Planning and Design Group Ltd

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 ☒

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 letter.

Continue on a separate sheet if necessary

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Please see attached letter.

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:

Due to the complexity of the issues.

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: Planning and Design Group Ltd

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

Policy: ST51

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 letter.

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 letter.

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 ☒

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:

Due to the complexity of the issues.

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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: Planning and Design Group Ltd

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

Policy: ST52

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 ☐

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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:

Due to the complexity of the issues.

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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: Planning and Design Group Ltd

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 ☒

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 letter.

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 letter.

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Yes ☒

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

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CONFIDENTIAL

Our ref: 18.009 14-10-2021

20th October 2021

by email only

thebassetlawplan@bassetlaw.gov.uk

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

Dear Sir/Madam

Re: Bassetlaw Draft Local Plan Submission Version Consultation August 2021: Planning and Design Group (UK) Limited Representations Submitted on behalf of the Welbeck Estates Company Limited

Thank you for the further opportunity for Planning and Design Group (UK) Limited (P&DG) to be consulted on the Draft Bassetlaw Local Plan. On behalf of the Welbeck Estates Company Limited, this letter provides the detail of our representations, and we request that P&DG be kept informed with to the forthcoming Examination in Public.

By way of further introduction, Welbeck Estates Company Limited continues to have a significant interest in the emerging Local Plan, not least because of its role as a principal landowner within Bassetlaw, but also due to the importance of existing facilities across the Estate towards the objectives of the plan and the great potential their future has in fulfilling the broadest range of objectives within the Plan.

These comments consider the 'Soundness' of the Plan by stating whether the Plan's policies are:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

Planning and Design Group

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Registered in England No 8329904 VAT No 155486191

General Comments on Proposed Spatial Strategy

In previous consultation responses, we raised concerns over the use of 'caps' for growth in Large and Small Rural Settlements. We were concerned with the blanket cap's lack of flexibility to meeting the overall objective of the National Planning Policy Framework (NPPF) of promoting housing in sustainable locations. The caps would have severely limited the flexibility for new sustainable sites to come forward throughout the Plan Period.

Policy ST2: Residential Growth in Rural Bassetlaw includes the following 'caps':

- 20% for eligible Large Rural Settlements; and
- 5% for eligible Small Rural Settlements.

Large strategic sites are notoriously difficult to keep on track due to legal issues with multiple owners and the high levels of infrastructure need. When they do not come forward as planned, smaller sites in locations lower in the Settlement Hierarchy can play a vital role in providing housing across the district. The caps will jeopardise this ability.

We also remain concerned that caps will prejudice the committed growth in existing Neighbourhood Plans that would already appear to exceed the cap but demonstrate significant community support. We suggested previously that an exemption should be applied to any final cap, so as to not derail the commitments of an existing Neighbourhood Plan or force their review into a downward projection. This has not happened.

Paragraph 69 of the NPPF highlights the important contribution small and medium sized sites can make towards meeting the housing requirement of an area, noting their relatively quick built-out rates. Whilst it is appreciated that the number of dwellings allocated for development across small rural settlements is reflective of their placing within the settlement hierarchy, it is the very construct of this hierarchy that is questioned owing to the inclusion of a significant number of sustainable locations in the 'Small Rural Settlement' category when they would be better represented in all aspects of the plan through a category above. The implementation of such a small cap on these settlements will inhibit the ability for a sufficient amount and variety of land to come forward across the Plan period.

Furthermore, the Government's recently revised Standard Housing Methodology has redressed the balance and distribution of housing figures nationwide; in particular where there is not an up-to-date development plan, a cap will be introduced at 40% above whichever is the higher of the projected housing growth in the last adopted Core Strategy (2011) or the 10-year household projections from 2014. From our initial review of this situation in Bassetlaw, it would suggest that either scenario would place the Council in a position where it will need to reforecast its housing requirements in the emerging plan. An inevitable consequence of this, in our view, will be that the Council cannot rely on the

prospective Garden Village and its largest settlements alone. It must have to redress growth in the more sustainable settlements across Rural Bassetlaw as a key part of the reforecasting.

P&DG would therefore continue to express its concerns over the application of a cap, whether at 5% or 20%. As this is an issue which could affect housing delivery, we would say that this part of the Policy ST2 is not:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

With the onus upon delivery and ensuring Plan viability through the course of the plan period, 'under allocating' sufficient housing numbers and sites in rural Bassetlaw will only place further risk and delay to the plan and there is a risk it may not truly grasp the precedent development demands placed upon the current plan at this initial stage.

In paragraph 5.2.5, it states that the figures for existing Parish dwellings are from 13th August 2018. Given that this Plan is not likely to be adopted until Mid-2022, it is vital that the dwelling figures across Parishes are updated to reflect the most up to date data available. We previously asked for clarification on whether the prospective housing numbers for each settlement are inclusive or exclusive of the current commitments consented. This has not been forthcoming. The answer to this will have a particular bearing on the settlements with recent planning consents for residential development, including Nether Langwith and Cuckney.

With reference to the 'Welbeck Colliery', P&DG support its inclusion both as a housing commitment in the trajectory (ref 15/01037/FUL) and as a protected employment site. We would stress however that the site has further capacity and potential for growth that would fall within Bassetlaw's jurisdiction, whilst falling in the Neighbourhood Plan area and that potential must be safeguarded. We would suggest that if and when this could happen during the Plan period, it would be of no prejudice to the Plan overall as an additional site commitment and would offer further potential to target homes towards regeneration and brownfield sites. Local Plans adopted nationally can and do consider potential future site commitments that do not form the overall target but may be permissible to come forward.

The same can be said for Land South of Portland Road which has a commitment for 15 dwellings (ref: 16/01216/FUL).

Settlement Hierarchy – Per Settlement

P&DG is concerned that the Local Plan is being prepared as a departure from the emerging revision to the Cuckney, Holbeck, Norton and Welbeck Neighbourhood Plan (CNHW). The bulk of that document already forms a sound basis as a made Neighbourhood Plan from 2017, and is being brought up to date as per NPPF requirements but only where absolutely necessary. The Local Plan at present contradicts much of the policy approach taken in the Neighbourhood Plan. The Neighbourhood Plan is still the 'development plan' and while much is said about Neighbourhood Plans needing to be in conformity with the Local Plan, Local Plans must also correlate as much as they possibly can with the NP as in this case the more up to date 'development plan'. There is little correlation between the emerging Local Plan and either the made 2017 Neighbourhood Plan or its emerging revision, when referring to settlement hierarchies, the unique position and policy approach necessary for the Welbeck Estate. This for ourselves suggests an issue of soundness.

The Plan's 'Settlement Hierarchy' is set out in Policy ST1: 'Bassetlaw's Spatial Strategy'. Rural settlements are split simply into 'Large' and 'Small'. We have consistently made the point that there should be a further settlement category between large and small rural settlements, to illustrate those with particular importance as a rural hub and to provide consistency with Neighbourhood Plans.

In the case of Cuckney (identified as a small settlement in the Plan), its role in this way is well defined within the made CNHW Neighbourhood Plan, in supporting all of the other settlements in the plan area. Cuckney already includes a number of Neighbourhood Plan allocations that would be prejudiced by the proposed capping of growth in the small rural settlements (see above); its pivotal role as a hub should be reflected through our suggestion towards introducing a new component of the settlement hierarchy. To reiterate the amenity offer, Cuckney has the following:

- Primary school;
- Village hall and café;
- Public house;
- Place of worship;
- Car garage;
- Homeware/interior décor shop;
- Bus service between Edwinstowe and Market Warsop;
- Community garden; and
- Cricket club.

Notwithstanding the above, because of the unique role this settlement has in its relationship with Norton, Holbeck and Welbeck, and the facilities across all four settlements, Cuckney is in proximity to a number of other amenities including the Welbeck Farm Shop, Harley Gallery and Portland Collection, Notcutts Garden Centre, Lady Margaret Hall and adjacent tennis courts. There is also a limited post office at Holbeck Woodhouse. Collectively, this is an above average range of amenities for Cuckney to be considered above a small rural settlement, and similarly to exclude Holbeck and Norton from being considered as part of the open countryside. As such, it is considered Cuckney should sit in a new settlement category between small and large settlements. Many authorities have small, medium, and large settlements as part of the settlement hierarchy as it provides a greater opportunity to ensure that development is directed to the most sustainable settlements within the district. Bassetlaw should adopt this approach also.

In the case of Nether Langwith, P&DG has raised a number of concerns with the assessments made of the sustainability of this settlement. It is assumed that there is a mistake on page 40 of the Plan (Policy ST2) which shows Nether Langwith (along with a number of other settlements) as a large settlement with a 20% growth requirement (Nether Langwith is identified as a small settlement in Policy ST1).

Firstly, we are disappointed in the Council's lack of response on the position of the village given the significance of the number of facilities we have put forward.

We would reiterate that such an assessment of Nether Langwith must absolutely be made in the context of the amenities that lie over the border into Bolsover, encompassing both the amenities of Langwith and Whaley Thorns. If an assessment were to be made in this way, it would undoubtedly change the category of this settlement from a small rural settlement to a large rural settlement. With the Neighbourhood Plan so advanced, it is essential that this corresponds positively with the correct definition in the hierarchy to determine the level of growth and infrastructure needs throughout the plan period.

The settlements combined provide, among others, the following amenities in walking distance of the part of Nether Langwith administratively included within Bassetlaw. This is by no means an exhaustive list, but does illustrate the significant amenity offer commensurate to a 'large rural settlement':

- Railway station with an hourly service each way from Nottingham-Worksop and connections to Sheffield, Retford and Lincoln;
- Regular bus services to Chesterfield, Mansfield, Edwinstowe and Worksop;
- Medical centre;
- Poulter Country Park;
- Primary schools;

- Two post offices and local convenience stores (various);
- Boots Pharmacy;
- Coffee shop;
- Florists;
- Takeaway outlets;
- Hairdressers and beauty salon;
- Public houses (various);
- Places of worship;
- Motor garage;
- Sports and social club;
- Heritage centre;
- Village hall;
- Care home;
- Sports pitches and play area;
- A small but important commercial offer for local businesses; and
- Community allotments.

The above amenity provision (when spatially considered together) suggests a very healthy provision of amenities, many of which are both in walking distance of the part of Nether Langwith located in Bassetlaw and we suggest would likely be used by households there. Alternatives would often require travel beyond the nearest settlements. P&DG again suggest that the District Council reconsider their position to include Nether Langwith as a Large Rural Settlement for Growth.

Within the Bassetlaw Spatial Strategy Background Paper 2020, it states that for a settlement to be considered a Large Rural Settlement, it must have a village shop, a health facility, Post Office, Primary School and village hall. When the wider settlements adjoining Nether Langwith are considered, the settlement will have all the facilities required to make it a Large Rural Settlement.

Even when the wider settlements are not considered, the village demonstrates all of these facilities, and more, save for the direct inclusion of a Primary School which is within reasonable distance.

Furthermore the sustainability merits of this settlement have been extensively proven in favour of existing planning consents 16/01216/FUL and 20/00634/RES south of Portland Road; with Reserved Matters permission granted in October 2020 there is every intention to press ahead with this site and discharge the relevant planning conditions. It will however

mean further sites need to be considered here in the Plan period the context of the adjustments to the settlement hierarchy we consider essential here.

When compared to other settlements within the Large Rural designation, including Misterton and Carlton in Lindrick, the combination of Nether Langwith, Langwith, and Whaley Thorns present a similar, if not greater variety of services and amenities. It is clear that, if viewed in combination with the neighbouring settlements, Nether Langwith has the amenities and services to designate it a Large Rural Settlement. In addition to this, the accessibility of the settlement is much better than other Large Rural Settlements due to its railway station, offering hourly services to Nottingham and Worksop and onward connections.

P&DG also raises concerns with the omission of Norton and Holbeck in the settlement hierarchy, for reasons given throughout our representations. With our suggestion that Cuckney should be considered above that of a 'Small Rural Settlement', the role of Norton and Holbeck within the Parish's made Neighbourhood Plan includes a number of allocations for growth. The emerging Plan's restrictive caps (see above) is incompatible with this shared vision across all settlements within the Neighbourhood Plan and level of growth contained within it, which is being incrementally being delivered on the ground through planning permissions and implementations. It is our view that both settlements should be included as a small rural settlement.

In consideration of these inconsistencies and the fact that the Council has failed to rectify them (despite P&DG's requests in previous consultation responses), we are again of the view that the Plan is not:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

Development within Welbeck Estate

As explained in previous consultation responses, we do not believe that the Plan highlights the importance of the diversification and business growth which occurs on this Estate specifically. We do however welcome the references to support growth where it supports a country estate. In this Plan, the description of Policy ST11: Rural Economic Growth and Economic Growth outside Employment Areas (paragraph 6.5.3) briefly mentions the Estates' rural businesses, including those linked to food production and agriculture.

The wording of the policy itself however is restrictive to economic growth of the Estate and does not provide the Estate with the tools to continue its role as a place of enterprise for business as a whole that may locate themselves there.

The Estate's lack of a specific mention within an economic growth policy is not surprising given that Policy ST1 does not distinguish Welbeck village as a district settlement in Bassetlaw. P&DG must highlight again the made Cuckney, Norton, Holbeck and Welbeck Neighbourhood Plan, which does designate Welbeck as a settlement. This inconsistency again impacts on the soundness of the Plan.

Once more, P&DG states there needs to be alignment to the Neighbourhood Plan in this regard, as the Sustainability Appraisal of the Plan suggests it should do as far as possible, by distinguishing Welbeck as a settlement for growth opportunities on account of its potential for tourism, leisure, limited rural housing and rural enterprise.

To address the potential limitations, P&DG seek to recommend the inclusion of a site-specific policy for rural economic growth across the Welbeck Estate. A policy drafted in this way would allow the Estate to diversify more businesses across the site, employing more local people and contributing towards Bassetlaw's objective of promoting the visitor economy. Notwithstanding this, the current employment offer within the Estate is already significant, with over 300 employees and tens of external businesses located in premises on site.

On those numbers alone, this is profound and easily equivalent to a conventional business park that would ordinarily be considered for allocation. Given the Estate's contribution to the rural and visitor economy within Bassetlaw, a Policy directly relating to Estate and its diversification and reuse of heritage assets on it would be warranted and beneficial. This policy suggestion would be subject to ensuring development meets the expectations of other policies in the Plan and other material considerations.

The suggested wording for the proposed policy could be as follows:

"The District Council will work with the Welbeck Estate and other partners to:

- **Support the diversification of land uses across the site encompassing opportunities for tourism, economic development, leisure and accommodation, limited housing where permitted by the other policies of the Local Plan and community uses;**
- **Support the diversification of land uses on the site that deliver the objectives of the Local Plan for both the rural and visitor economies;**
- **Encourage the development of businesses and companies locally which harness the education potential of the Welbeck Estate or local community, and secures the**

- **long-term future and positive redevelopment of heritage assets;**
- **Ensure that new development, where permitted by this policy, does not prejudice other policies of the Local Plan."**

Development in the Countryside

In previous consultation responses, P&DG have raised concerns with the wording of the "Agricultural and Forestry Workers Dwellings" policy (now Policy 34), stating it is restrictive.

We suggested amending the policy name to "Development in the Countryside", similar to the adopted policy in the Bolsover Local Plan, believing it would be a more comprehensive approach to development in rural Bassetlaw. Planning Policy Officers have previously responded to this comment, stating that Policy ST2, ST11, ST12 and Policy 31 comprehensively address all matters relating to rural areas as identified by National Policy.

P&DG disagree with this opinion. By merging Policy ST11 "Rural Economic Growth and Economic Growth Outside Employment Areas" and Policy 34 "Agricultural and Forestry Workers Dwelling", it would create a comprehensive, concise, and methodical policy relating to all development in the countryside, including those in the smallest settlements in the hierarchy. It would promote modest growth within the rural economy, allowing limited housing and improvements to the local tourist offer, as desired by other policies in the plan. Furthermore, the new combined Policy would complement ST12, particularly part d) which relates to tourism related development which seeks to bring underused or neglected heritage assets back into economic use, furthermore it would be compliant with Paragraph 84 of the NPPF which supports a prosperous rural economy.

Ideally, Policy 34's wording of "Agricultural and Forestry Workers Dwelling" should be amended to reflect a more comprehensive policy for "Development in the Countryside", as tested on Examination in nearby Bolsover District only recently. The policy could include a more prescriptive set of circumstances in which development would be supported. For instance, the Bolsover Local Plan, only adopted last year, cites one or more of the following:

- Involve a change of use or the re-use of vacant, derelict or previously developed land;
- Are necessary for the efficient or viable operation of agriculture, horticulture, forestry and other appropriate land-based business, including the diversification of activities on an existing farm unit;
- Are small scale employment uses related to farming, forestry recreation, or tourism;
- Secure the retention and/or enhancement of a community facility;
- Secure the retention and/or enhancement of a vacant or redundant building that makes a positive contribution to the character or appearance of the area and can be converted without complete or substantial reconstruction;

- Are in accordance with a made Neighbourhood Development Plan;
- The buildings of exceptional quality of innovative design; and
- In all cases, where development is considered acceptable it will have to respect the form, scale and landscape character, through careful location, design and materials.

Notwithstanding our view that site specific policies should be included in the Plan for the Welbeck Estate, the resulting policy would result in forming a much more concise and methodical policy relating to all development in the countryside. Furthermore, the policy would complement others in the plan that support the rural economy, tourism related development and be 'Consistent with national policy.'

Self-Build

Policy ST30 'Housing Mix' refers to self and custom build housing, stating that the Council will support proposals for self and custom-built housing to help meet the need of those wishing to build their own home.

Part 3 stipulates that allocations of more than 100 dwellings should provide a 2% proportion of plots for self-build projects, which would expire after 12 months of no interest. While it is accepted that schemes of self and custom build homes should be encouraged through the Plan process, it has been proven not to be a sound process in neighbouring and more recent Local Plan Examinations (Bolsover and Mansfield) to put forward a distinct percentage requirement in policy. We would instead recommend a policy which simply promotes self-building in larger developments, and also the role of custom and self-build homes as examples of limited forms of development that would be suitable in the countryside, as opposed to a percentage which may inhibit housing from coming forward. Without this amendment the Policy is not:

- Positively prepared
- Justified
- Effective

Planning Obligations

We recognise that the Council has reduced the level of CiL by £5.00 for residential development (CiL for developments under 20 dwellings has reduced from £25 per m² to £20 per m²) we still believe however that this will disenfranchise small and medium housebuilders who would typically work on smaller sites. Furthermore, it would seem unusual that for larger developments (50 dwellings or more) the CiL rate is zero. We would say that larger developments create the most impact on services facilities so should make a proportionate contribution to CiL as well. It is unfair that small and medium housebuilders

should bear the brunt. Unless this imbalance is addressed, it is considered the CiL charging schedule is not:

- Positively prepared
- Justified
- Effective

We also note that in our January 2020 representations we raised concerns with the wording of Part F of Policy ST52, which states that the local authority will be able to review the section 106 contributions associated and agreed with development. We argued that in this scenario, it should only be right that the developer can also review the contributions required. In the Planning Officer's comments, it appeared they agreed with our proposal. As such, we recommend that Policy ST60 makes provision for the review mechanism to be mutually operative to both the applicant and the local authority. Now Policy ST58 page 200

Policy ST12: Visitor Economy

We support the role of the above policy to include visitor accommodation as it is acknowledged there is great potential for additional amenities in the Dukeries and great untapped potential to enhance the visitor economy here. The individual characteristics that support such proposals in rural Bassetlaw is supported including the recognition in favour of development where it is forming a functional link with a specific local attraction, bringing heritage assets back into use or is necessary to diversify a country estate, farm enterprise or tourism offer in the district.

Affordable Housing

It is our view that the affordable housing policy (Policy 29) is still too restrictive and leaves little scope for meaningful negotiation or dialogue in terms of viability of developments. Paragraph 34 of the NPPF states that Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required. It then states that such policies should not undermine the deliverability of the Plan. The policy does not have any clear criteria or caveat which would ensure that the policy does not undermine the deliverability of the Plan if the situation presents itself (such as developments no longer being viable due to high affordable housing requirements). Therefore, we believe the policy to not be:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

It is noted that the policy, under part '8', recognises the need for market housing to rural exception sites viable and this supported.

Policies ST50 (Reducing Carbon Emissions, Climate Change Mitigation and Adaption), ST51 (Renewable/Low Carbon Energy Generation) and ST57 (Digital Infrastructure)

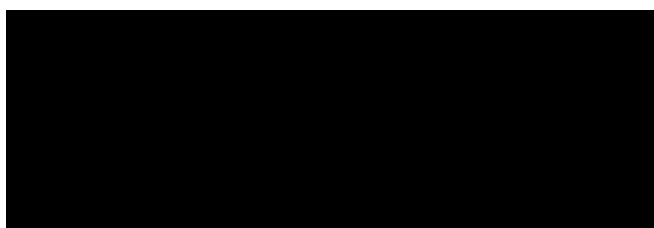
P&DG suggest that for all of the above policies consideration must be given throughout the policy wording to the specific conditions and limitations presented within rural Bassetlaw to deliver the means of the policy requirements via conventional means. Heritage and landscape constraints are just two of the potential reasons. It is suggested that all three policies must be written subject to the proof that they can be viably and practically delivered in the specific context of the proposals concerned. There must be an ability in the policy wording for the applicant to demonstrate if such conditions are unsuitable to deliver the policy aspirations (in part or full). This would ensure the policy is:

- Positively prepared
- Justified
- Effective

In summary, P&DG seek the District Council's full consideration of the above comments made on behalf of the Welbeck Estates Company Limited to ensure soundness of the Plan, and ultimately so it is positively prepared.

Should you require any further information regarding the representations, please do not hesitate to get in contact with us.

Yours faithfully



REF048



[REDACTED]

From: [REDACTED]
Sent: 21 October 2021 16:59
To: The Bassetlaw Plan
Cc: [REDACTED]
Subject: Representations of the Nottinghamshire County Council on Reg 19 Bassetlaw Local Plan and Reg 16 CIL Draft Charging Schedule
Attachments: NottsCC representations BLP Reg 19 Policy ST7 & Policy 9 site SEM1 - Apleyhead Logistics Park.docx; NottsCC representations BLP Reg 19 Policy 16 site HS1+ Peaks Hill Fm and other Worksop allocations .docx; NottsCC representations BLP Reg 19 Policy 21 sites HS13 & HS7 - Ordsall South & Trinity Fm .docx; NottsCC representations BLP Reg 19 Policy ST4 - Bassetlaw Garden Village .docx; NottsCC representations BLP Reg 19 Policy ST58 Provision and Delivery of Infrastructure.docx; NottsCC representations BLP Reg 19 Supplementary Comments .docx; NottsCC representations BDC CIL Charging Schedule 2021.docx; NottsCC representations BLP Reg 19 Policy ST1 - Spatial Strategy.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 Local Plan team

Following internal consultation and consideration, please find attached the representations of Nottinghamshire County Council on the above Plan and CIL consultation.

Forms have been completed for the substantive representations and a supplementary note is attached relating to more detailed observations on the text of other policies and supporting evidence.

We will be happy to discuss these as necessary as the Bassetlaw Plan is progressed to submission.

Regards

[REDACTED]
[REDACTED]
Team Manager, Planning Policy
Nottinghamshire County Council
County Hall, West Bridgford
NG2 7QP

[REDACTED]

The following message has been applied automatically, to promote news and information from Nottinghamshire County Council about events and services:



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: Nottinghamshire County Council

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

Policy: ST1 – 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.

It has yet to be satisfactorily demonstrated that the transport requirements for the site allocations in the Main Towns, Worksop Outer Area, Worksop Central, Retford, and the Garden Village can be accommodated on the highway network with particular concern regarding contributions to funding required improvements to the strategic and road network

Please refer to the comments being made in relation to Policy ST4, Policy 9 SEM1, Policy 16 Site HS1 and Policy 21 site HS13 & 7.

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 refer to the comments being made in relation to Policy ST4, Policy 9 SEM1, Policy 16 Site HS1 and Policy 21 site HS13 & 7 which identify proposals to aid soundness.

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 ☒

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 discuss orally the County Council's representations with the Inspector and others and to answer questions about the response.

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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: Nottinghamshire County Council

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

Policy: ST4 – 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 ☐

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.

The County Council considers that new settlements can contribute to meeting the need for new housing and can often provide benefits over expansion of existing settlements in terms of infrastructure provision. The Council notes however that the Bassetlaw Garden Village is not expected to deliver housing until later in the Plan period which is realistic in terms of the time it takes to achieve the necessary advance planning and infrastructure provision.

The County Council notes that as a result of recent changes to NPPF (para 22 of NPPF introduced in July 2021) :

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.

The County Council is particularly concerned that appropriate studies need to be put in place to establish the framework for funding and delivery of infrastructure to meet the needs of and to mitigate the impacts of development over the timescale for delivery which is likely to be over a 30 year period.

In the context of para 22 of NPPF, the County Council considers that the Plan should be clearly allocating 4000 dwellings at the Garden Village with 500 expected to come forward in the period to 2037. Appropriate technical evidence should accompany this significant proposal to provide understanding of the potential impacts of the full development upon the A1/A57/A614 junction, the A620/B6420 junction, the A57 Corridor and in particular Retford which is the closest town.

The Retford Transport Assessment has not taken into account the potential impacts of the Garden Village, regarding it as “possible development” (para 1.1.3) rather than an allocation rising to 4000 dwellings in time which is likely to have significant impacts on Retford as the closest main town.

The Bassetlaw Transport Study only considers 500 dwellings at the Garden Village but is already citing issues with junctions on the A57 with the Garden Village contributing to these impacts. Whilst it is understood that 500 dwellings may only be delivered in the period to 2037 the potential impacts of the full allocation of development at the Garden Village must be considered by the Plan –together with the other major development allocations at Ordsall South, Peaks Hill Farm and Apleyhead.

The County Council is unable to support the Garden Village allocation until the impacts of the proposal have been fully assessed and in light of the evidence of the Bassetlaw Transport Study in the absence of a credible mechanism to improve the A57 corridor, unless the policy includes a restriction on development until the improvement mechanism has been secured.

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 Plan should include a long term vision as per para 22 of NPPF to ensure that it covers the period during which the Garden Village will be fully delivered

The Plan should be accompanied by evidence of the impacts of the 4000 dwellings on transport and movement in the surrounding area, particularly Retford and the A57 corridor.

In light of paragraph 11.5.8 and 11.6.14 of the BTS, no development of the Garden Village should occur until a credible mechanism for the improvement and developer funding of the A57 has been secured.

Part 2.r should include the removal of the double bends on the B6420 Mansfield Road at the junctions with Green Lane and Old London Road. Also reference Policy ST54 Part 1.i.

Part 2.r)ii. Junction improvements should be secured either by condition or planning obligation.

Part 2.r)iii/iv should include charging for electric buses.

Part 2.r)v should make it clear that the closure of the level crossings should retain pedestrian, cycle, and vehicular movements across the railway line rather than a protracted diversion.

Part 2.r)viii should include appropriate pedestrian/cycle crossing facilities across the A1/ A1 Apleyhead Interchange.

Part 2.r)viii. "demand management measures" is vague. This should be clarified.

Paragraph 5.3.37 The Council advises that Bassetlaw Garden Village itself is not listed as a priority project in the County Councils emerging Strategic Infrastructure Plan. The Garden Village Rail Station and public transport hub is the infrastructure project which is referred to (as well as the A57 corridor improvement project) This should be amended.

The County Council offers to work with Bassetlaw District Council to develop fuller and consistent transport evidence related to the Garden Village and under which all appropriate larger sites make a proportionate and justified contribution towards the A57 Corridor /junction improvements and other strategic transport improvements as set out in the BTS (or further transport assessments). These would be pooled, potentially through S106 mechanisms and the County Council and Bassetlaw DC should also jointly seek to secure other sources of funding during the Plan period to enable the delivery of these improvements .

This will help fulfil the recommendations of the Bassetlaw Transport Study if a zero CIL rate is in fact agreed.

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 ☒

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 discuss orally the County Council's representations with the Inspector and others and to answer questions about the response.

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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: Nottinghamshire County Council

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

Policy: Policy ST7 and Policy 9 SEM1

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.

Whilst the County Council is supportive of the principles of Policy ST7 for the development of a site at Apleyhead Junction for strategic employment purposes on economic grounds, there is currently no Worksop Transport Assessment. The road network within and around Worksop has therefore not received the same level of scrutiny as Retford.

The large Worksop allocations at Peaks Hill Farm site reference HS1, and the Apleyhead site reference ST7 / site SEM01 are likely to have a material traffic impact on local junctions. The scope and possibility of mitigation has yet to be established.

The County Council is unable to support in full the Apleyhead allocation until this is addressed, and which should also consider the implications of the proposed Garden Village (GV).

The BTS identifies that the A57 between the B6034 and A614/A1 would operate with significant stress with the addition of the BLP developments (BTS para.11.5.7) and acknowledges that the link connects several key BLP allocations (BTS para. 11.5.8), notably the GV and Apleyhead site reference SEM01.

The BTS goes on to recommend that an 'Improvement Plan' for the A57 corridor be agreed with partners to address growth with a credible mechanism for delivery (para. BTS 11.6.14) as the cost of an improvement scheme is likely to be beyond the affordability of developer contributions (BTS para. 11.6.13).

In the absence of a credible mechanism to improve the A57 corridor, the County Council is unable to support the allocation of the Garden Village and Apleyhead sites (BLP Policy 4 and 9) at least without the policies including a restriction on development until the improvement mechanism has been secured.

It is noted that both the strategic employment development proposal and the Garden Village are both zero CIL rated, and therefore there is no funding available from this source.

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 9 site SEM001 should be amended as follows

Under Transport and Connectivity

Part a)ii. Should include improvements to link capacity on the A57 as identified in the Bassetlaw Transport Study.

No development of Apleyhead should occur in light of paragraph 11.5.8 and 11.6.14 of the BTS until a credible mechanism for the improvement of the A57 has been secured. This should be referenced in the Policy.

The County Council is proposing to include the A57 Corridor improvement as a project within its emerging Strategic Infrastructure Plan. The project is in a highly formative stage and has no committed funding.

The County Council is therefore offering to work with Bassetlaw District Council to develop an agreed Improvement Plan and developer funding mechanism under which appropriate larger sites including Apleyhead, can make a proportionate and justified contribution towards the A57 Corridor /junction improvements including those specified in the IDP . These would be pooled, potentially through S106 or other mechanisms

It is proposed that the County Council and Bassetlaw DC also jointly seek to secure other sources of funding during the Plan period to enable the delivery of these improvements . This will help fulfil the recommendations of the Bassetlaw Transport Study

This approach will help resolve this objection.

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 ☐

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 discuss orally the County Council's representations with the Inspector and others and to answer questions about the response.

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

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/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 Name]

Signature:

[Redacted Signature]

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:

[REDACTED]

Organisation (if applicable):

Nottinghamshire County Council

Address:

County Hall, West Bridgford

Postcode:

Tel:

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: Nottinghamshire County Council

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

Policy: HS1

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.

The County Council notes that there is currently no Worksop Transport Assessment.

Local roads within Worksop have therefore not received the same level of scrutiny as at Retford.

The large Worksop allocations at Peaks Hill Farm site reference HS1, and the Apleyhead site reference SEM01 are likely to have a material traffic impact on local junctions. The scope and possibility of mitigation has yet to be established.

The County Council as highway & transport authority is unable to support the Peaks Hill Farm and Apleyhead allocations until this is addressed, and which should consider the implications of the proposed Garden Village (GV).

The BTS identifies that the A57 between the B6034 and A614/A1 would operate with significant stress with the addition of the BLP developments (BTS para.11.5.7) and acknowledges that the link connects several key BLP allocations (BTS para. 11.5.8), notably the Garden Village and Apleyhead site reference SEM01.

The BTS goes on to recommend that an 'Improvement Plan' for the A57 corridor be agreed with partners to address growth with a credible mechanism for delivery (para. BTS 11.6.14) as the cost of an improvement scheme is likely to be beyond the affordability of developer contributions (BTS para. 11.6.13). Nottinghamshire County Council has identified the A57 Corridor between the A1 and Shireoaks as a project for delivery in its emerging Strategic Infrastructure Plan but the project is in its formative stages and no other funding is presently identified.

Policy HS1 (and other site policies in Worksop) do not include any requirement for this development to contribute to A57 junction improvements, despite the Bassetlaw Transport Study indicating that it is one of a number of allocated sites which will contribute to junctions being over stressed.

This should be addressed

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

A mechanism should be identified in as part of the adoption of the Bassetlaw Local Plan to ensure that relevant development sites in Worksop of which HS1 is the main one, to contribute to A57 improvements. The County Council is aware that it is proposed that no CIL be collected from all allocated sites and is making separate representations on this matter.

The following policy changes are requested to HS1 (and other larger sites in Worksop)

Policies should include a restriction on development until the improvement mechanism has been secured.

Policy HS1 should be amended as follows. Under Transport and Connectivity.....

- Part 2.i) A marked cycle lane may not be appropriate to accord with DfT LTN1/20. A cycle lane is only appropriate where the speed limit is up to 20mph and there are less than 4000 Passenger Car Units (PCU) in any 24-hour period. It would also be required on both sides of the carriageway to serve both directions. As a minimum, a stepped cycle track should be provided where adjacent a carriageway.
- Part 2.iii). should include connections for all modes where possible (vehicular traffic) including to Carlton Forest Industrial Estate to the north.
- Part 2.vii) improvements should be secured by condition, agreement, or obligation as necessary if not to be funded by CIL.

The County Council offers to work with Bassetlaw District Council to develop an agreed improvement plan and mechanism under which larger sites make a proportionate and justified contribution towards the A57 Corridor /junction improvements and other strategic transport improvements as set out in the BTS. These would be pooled, potentially through S106 mechanisms. The A57 Corridor is to be included in a Strategic Infrastructure Plan prepared by the County Council. The County Council and Bassetlaw should jointly seek to secure other sources of funding during the Plan period to enable the delivery of these improvements. This will help fulfil the recommendations of the Bassetlaw Transport Study if a zero CIL rate is agreed.

This approach will help resolve this objection.

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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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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Part B - Your representation

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Name or Organisation: Nottinghamshire County Council

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

Policy: Policy 21 Site HS13 Ordsall South and Site HS7 Trinity Farm

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.

The Local Plan policy 21 proposes 800 dwellings at Ordsall South, site reference HS13, with the potential to increase to 1250 dwellings in the next plan period.

The Bassetlaw Transport Study (BTS) similarly assumes that the site would be allocated for 800 dwellings in the plan period. The Retford Transport Assessment assesses 1250 dwellings.

To inform the BLP, it would seem most appropriate for the Retford Transport Assessment to assess the impact of 800 dwellings, potentially with a sensitivity test to cover the addition of a further 450 dwellings in the next plan period.

The Garden Village proposal appears in both the BLP and BTS for 500 dwellings and 10 hectares of employment but there is no assessment of longer-term development impacts, unlike at Retford.

The Garden Village proposal however is not taken into account at all in the Retford Transport Assessment (RTA). However, the site is located roughly midway between the Worksop and Retford conurbations. It is therefore reasonable to assume that a large proportion of the traffic generated by the development would gravitate to and from Retford. In the absence of the Garden Village proposal, the RTA is not capable of assessing the cumulative impact of the BLP allocations within Retford.

It would be a challenge to achieve the conservative vehicle trip rates that appear in the RTA (RTA para. 7.1.2) when compared to person trips and existing Ordsall travel to work census data. The rates are only likely to be achievable by providing a high frequency bus service, exemplar walking and cycling connections into Retford, and smarter choices/travel planning. Whilst the County Council strongly supports development of a cycling and walking network to form a key part of transport in our market towns, there appears very little opportunity to provide good connected cycling facilities to Retford town centre.

Nor is it possible to bring Retford town centre to within what would be a reasonable 2km walking distance (RTA 3.4.4).

Junctions that are like to experience capacity issues are identified in the RTA within Table 18. Due to the lack of a feasible means of physical improvement, the RTA proposes that unspecified demand management measures be employed to mitigate the traffic impact of the Retford allocations at the A620 Amcott Way / Bridlegate / A620 Hospital Road / A638 North Road / Hallcroft Road roundabout (RTA para 11.9.2), and the A620 Amcott Way / A620 Moorgate / A638 Arlington Way (RTA para. 11.10.3 and 11.10.4), the A638 Arlington Way / Grove Street (RTA para. 11.11.3 and 11.11.4), and the A638 Arlington Way / A638 London Road / Carolgate (RTA 11.12.3 and 11.12.4) junction complex.

Continue on a separate sheet if necessary

Continued

However, the predicted traffic impact at these junctions is based on vehicle trip rates that are considered low for Ordsall. It is unlikely that, undetermined, demand management measures would be capable of reducing the use of the private car any further than already predicted, particularly given existing walking distances and the inability to provide connected cycling facilities towards Retford. The identified capacity issues would also be compounded by the introduction of the Garden Village traffic which have not been accounted for at all in the Study.

The County Council as highway authority is therefore currently unable to support the allocation of Ordsall South BLP Policy 27 as it has not been established whether the allocation of 800 dwellings (and beyond this to 1250 dwellings) would remove these capacity concerns and whether that would remain the case if the Garden Village was included in the assessment.

The Retford Transport Assessment also raises serious doubt as to whether it would be possible to accommodate a further 3,500 dwellings on the Garden Village site in the next plan period without major investment in transport infrastructure to remove traffic from the town.

The Transport Assessment is a global assessment of all proposed allocations in Retford. It is therefore not possible to determine whether the allocation of Trinity Farm site reference HS7 for 244 dwellings, in the absence of Ordsall South, could be accommodated on the existing highway network without generating a materially traffic impact on the above mentioned roundabout and signal junction complex with no scope for physical improvement.

The County Council is therefore currently unable to support the allocation of Trinity Farm BLP Policy 21.

- 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.**

The Retford Transport Assessment (RTA) must include an assessment of the potential impacts of the Garden Village proposal on junctions and traffic flows in Retford in order for the County Council to understand the mitigation required.

Paragraph 7.14.17 The Retford Transport Assessment does not include the Garden Village (in the plan period or beyond) and assesses 1250 dwellings rather than the proposed 800 in the Plan period. This needs to be corrected.

Paragraph 7.14.18 The proposed demand management measures, if intended to mitigate for the lack of junction capacity, would need to be effectively demonstrated by evidence.

Policy 21 site HS13 – Ordsall South - the following changes need to be made.

Part 2 (l) NCC notes that serviced land to accommodate a 1.0 Form Entry primary school and early years facility and associated supporting infrastructure; and an appropriate financial contribution towards enabling primary school education to address pupil growth associated with the development is proposed (p.116). NCC advises that the quoted 2.5ha is over provision and provision should be 1.5ha for the anticipated size of the school.

Part 2.n)i The RTA only includes 1 point of access to the eastern parcel of land.

Part 2.n)ii Providing meaningful DfT LTN 1/20 compliant cycling facilities on Ollerton Road/West Hill Road beyond Ordsall Primary School and within the wider highway network appears unlikely due to the road space available.

Part 2.n)iii The junctions requiring improvement should be preferably secured by condition, potentially split with the other larger Retford allocations, North Road, and the Garden Village. Where appropriate pooled contributions via S106 or other means may be used.

Part 2.o) The demand management measures are not defined, nor has it been demonstrated that they would be effective.

Part 2.p)c. A financial contribution towards a marked cycle lane along Brecks Road is pointless if it does not fit or is parked on. In any event this should otherwise be secured by condition. Most people would be comfortable cycling with mixed traffic where the speed of traffic is <20mph and there are <2000 vehicles/day

Part 2.p)e. A financial contribution towards a marked cycle lane into Old Ordsall Village is pointless if it does not fit or is parked on. In any event this should otherwise be secured by condition.

Policy 21: site HS7: Trinity Farm, Retford

Part K should include reference to bus services.

Part 2.k)iii should include a cycle track to connect to existing facilities to the south.

Part 2.k)vii improvement should be preferably secured by condition.

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 ☒

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 discuss orally the County Council's representations with the Inspector and others and to answer questions about the response.

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: Nottinghamshire County Council

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

Policy: ST58 – Provision and Delivery of Infrastructure

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.

The County Council notes that it is BDC's intention to apply a zero CIL charge to Local Plan allocations of 50 dwellings and above owing to matters of viability on larger sites.

This will have a serious impact on the level of CIL which can be accrued over the plan period of the Local Plan.

The estimated funding gap is £89 million.

Paragraph 4.1 of the Draft Charging Schedule confirms that 3639 units will be delivered through Local Plan allocations to 2037 (consistent with figure 8 of the Local Plan) and 4.2 then calculates some £18 million of CIL funding to be accrued over the Plan Period from the LP housing trajectory

This calculation does not appear to have deducted the effect of zero Levy on the largest sites which the charging schedule proposes.

The largest sites involving developments of 50 or more (as listed in Table 24 Bassetlaw LP Transport Study update) will deliver some 2996 units.

This will only leave 643 allocated dwellings eligible for CIL resulting in only £1.1m to be generated by CIL from Local Plan sites (based on BDC's own assumptions about average floorspace per dwelling). Obviously, there will be other windfall developments which will add to this amount, but this calculation does not deduct affordable dwellings which are similarly exempt, nor is the element passed to local communities deducted.

The County Council is very concerned since the Bassetlaw Transport Study (BTS) (para 1.5.6) explicitly recommends that CIL contributions are sought from future development within the District towards the strategic improvements that have been identified. These improvements are set out in the Transport Study and include Cycling and Walking, Public Transport and Highway Infrastructure (the latter listed in Appendix G.)

Table 28 of the BTS identifies the key junctions where improvements are needed. This Appendix and Table identifies the concentration of improvements on and around the A57 and its junctions which are needed during the Plan period. Whilst the County Council is supportive of this corridor as a project for highway and transport improvements over the Plan period and has identified it in the emerging Nottinghamshire Strategic Infrastructure Plan, there are at present no sources of funding to contribute to the improvements which are necessary to help mitigate the impact of Local Plan allocations.

Continue on a separate sheet if necessary

Continued.....

The largest allocations have been judged to be unable to afford CIL as well as the level of site-specific infrastructure requirements identified in the IDP . The IDP does not reference the strategic highway improvements identified in the Bassetlaw Transport Study but does reference contributions to secondary education (which are currently CIL funded). There is thus no mechanism to enable developer contributions from the largest allocations towards strategic highway improvements (which make the greatest impact on the highway network)

Notwithstanding the stated preference of the highway authority to obtain highway improvements by S278/38, this mechanism is mainly connected with highway improvements closely linked to development sites. The County Council wishes to see a mechanism established to enable proportionate developer contributions from the largest allocations in the Worksop area towards strategic highway improvements focussing on the priority interventions along the A57 corridor as set out in the Bassetlaw Transport Study.

As it stands therefore the County Council objects to the current proposals for CIL, since the proposal reduces considerably the level of CIL available to implement strategic highway improvements.

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 County Council offers to work with Bassetlaw District Council to develop an agreed mechanism (similar to that established for the A52 corridor in Rushcliffe) under which larger sites make a proportionate and justified contribution towards the A57 Corridor /junction improvements and other strategic transport improvements as set out in the BTS. These would be pooled, potentially through S106 mechanisms and the County Council and Bassetlaw also jointly seek to secure other sources of funding during the Plan period to enable the delivery of these improvements. This will help fulfil the recommendations of the Bassetlaw Transport Study if a zero CIL rate is in fact agreed.

This approach will help resolve this objection.

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 ☒

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 discuss orally the County Council's representations with the Inspector and others and to answer questions about the response.

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 REG 19 STAGE

NOTTINGHAMSHIRE CC

SUPPLEMENTARY COMMENTS

POLICY ST2: Residential Growth in Rural Bassetlaw

Part 2 should require a need for suitable access for all people including appropriate connections and improvements to existing infrastructure to promote walking, cycling, and the use of public transport.

POLICY ST5: Worksop Central

Part 2j) It is envisaged that the regeneration of the area would be likely to come forward by way of multiple planning applications, many of which could be of a minor nature. The Council would hope that the envisaged integrated area-wide transport network be funded by CIL. Reference to a “comprehensive network of cycling routes” needs to take account of the limited space available for such routes within the built-up area?

POLICY ST6: Cottam Priority Regeneration Area

The supporting text does not set a scale of development and acknowledges that significant work is needed to demonstrate how any additional traffic can be accommodated.

Cottam is remotely located and therefore beyond what could be considered as an acceptable walking or cycling distance from the majority of everyday services and amenities. The nearest town offering key services is Retford, approximately 9 miles to the west by car. Bus services in the area are very limited. Due to the absence of any transport choice, most travel to/from the development is likely to be made by private car. Whilst Part 3f) requires opportunities to reduce transport movements by private vehicles to be minimised (sic), and, opportunities to access the site via bus, cycling and walking to be maximised, the scale and mix of development capable of sustaining a high frequency bus service would also be likely to significantly increase peak period traffic flows on rural roads through local villages with consequential negative effects in terms of vehicle emissions, air quality, noise, traffic capacity, road safety and local amenity. It is difficult to see how this could be effectively dealt with through the rural villages without bypassing them due to land constraints. There are also likely to be a number of junctions requiring improvement.

POLICY ST8: EM008: High Marnham Green Energy Hub

There is no mention of transport requirements including provision for walking cycling, and public transport.

POLICY ST14: Management of Town Centres

Part 4.c)i The need for the provision of a pedestrian crossing point should be established. There is already a zebra crossing outside the Health Centre. There are few obvious desire-lines on Scrooby Road where pedestrians may wish to cross as the shops are laid out in a linear fashion. Should such a need for a crossing then be identified, this should be secured by condition.

POLICY 20: Site HS5: Talbot Road, Worksop (15 dwellings)

Part 2.g) A Transport Statement will not be required for less than 50 units.

Part 2.g)ii. Two footways will be required to serve both sides of the carriageway.

POLICY 22: Site HS8: Milnercroft, Retford (5 dwellings)

The access doesn't appear sufficiently wide. The County Council would be seeking a width of 4.8m plus 0.5m clearance on both side for the first 8.0m from Leafield for a private drive serving up to 5 dwellings. Extra space would be required for a communal bin store at the back of the footway.

Part 2.d) A Transport Statement will not be required for schemes less than 50 units.

POLICY 23: Site HS9: Former Elizabethan High School (46 dwellings)

Part g)iv. The technical specification and improvements listed and referenced in the IDP are subject to agreement with the Highway Authority. The site will be subject to developer contributions towards highway improvements from those developments that have a material traffic impact with the improvements secured preferably by condition, but through pooled contributions where necessary. A proportionate highway infrastructure cost contribution put towards public transport to be provided by the larger sites, and from which this site would benefit, may be more appropriate.

POLICY 24: Site HS10: St Michael's View, Retford (20 apartments)

Part 2.g) A Transport Statement will not be required <50 units.

Part 2.g)iii. The technical specification and improvements listed and referenced in the IDP are subject to agreement with the Highway Authority. The site will be subject to developer contributions towards highway improvements from those developments that have a material traffic impact with the improvements secured preferably by condition, but through pooled contributions where necessary. A proportionate highway infrastructure cost contribution put towards public transport to be provided by the larger sites, and from which this site would benefit, may be more appropriate.

POLICY 25: Site HS11 Fairygrove, Retford (61 dwellings)

Part 2.g) A Transport Statement would be required >50 and <80 dwellings. A Travel Plan will not be required.

Part 2.g)ii. The Highway Authority is likely to seek two points of access. One of the main principles promoted by Manual for Streets (MfS) is to create networks of streets that provide permeability and connectivity to main destinations with a choice of routes. The principle is to ensure that new developments enhance the existing movement framework of an area rather than disrupting or severing it. MfS suggests that internal permeability is important but that the area also needs to be properly connected with adjacent street networks because developments with poor links to the surrounding area create enclaves which encourage movement to and from them by car rather than by other modes. MfS recommends that pedestrians and cyclists should share streets with motor traffic as this generally provides a more secure environment than connecting pathways as streets can more easily be designed to be overlooked with active frontages. Connected or permeable networks also lead to a more even spread of motor traffic throughout an area and so avoid the need for distributor roads with no frontage development. Furthermore, the avoidance of cul-de-sacs reduces the concentration of traffic on a smaller number of dwellings, negates the need for turning heads which are wasteful in land terms and lead to additional vehicle travel and emissions, particularly by service vehicles.

Part 2.g)vi. The technical specification and improvements listed and referenced in the IDP are subject to agreement with the Highway Authority. The site will be subject to developer contributions towards highway improvements from those developments that have a material traffic impact with the improvements secured preferably by condition, but through pooled contributions where necessary.

A proportionate highway infrastructure cost contribution put towards public transport to be provided by the larger sites, and from which this site would benefit, may be more appropriate.

POLICY 26: Site HS12: Station Road, Retford (5 dwellings)

Part 3.a) (after 2b?) A Transport Statement will not be required <50 units.

POLICY 28: Site HS14: Ollerton Road, Tuxford (75 dwellings)

The Highway Authority would wish the policy to secure internal street infrastructure that provides the capability of serving future development to the west and south to reduce the potential for further isolated enclaves coming forward in the next plan period.

POLICY ST46: Delivering Quality, Accessible Open Space and POLICY ST47: Promoting Sport and Recreation

The policies should include adequate provision for car and cycle parking where the facilities are likely to attract visitors from beyond the development or immediate local area.

POLICY ST50: Reducing Carbon Emissions, Climate Change Mitigation and Adaptation

The policy should include the need for the provision of the infrastructure for the charging of electric buses.

SECTION 11.0 Transport Infrastructure and Improvement Schemes

Paragraph 11.1.6 The Highway Authority would not normally require all development to be supported by a Travel Plan. For instance, the threshold for residential development is 80 dwellings.

Paragraph 11.1.7 should now refer to National Highways rather than Highways England.

POLICY ST55: Promoting Sustainable Transport and Active Travel

Part 2.c) should include the securing of a Travel Plan Coordinator, the payment of monitoring fees, and to pay for the delivery of additional sustainable travel measures/initiatives if modal share targets are not achieved.

POLICY ST56: Safeguarded Land

There is likely to be other land that requires safeguarding such as the double bends on the B6420 Mansfield Road at the junctions with Green Lane and Old London Road to facilitate a road realignment to create safe and suitable access to the GV, and the B6420 Mansfield Road, A620 junction to facilitate capacity improvements.

SECTION 12.3 Provision of Infrastructure

Paragraph 12.3.3 and 12.3.15 should now refer to National Highways rather than Highways England.

Paragraph 12.3.14 The Highway Authority's preferred method of securing highway infrastructure is by planning conditions to be delivered under Section 38 and 278 legal agreements Highways Act

1980. Whilst the County Council does not generally support the proposed delivery of highway infrastructure through S106 agreement , it supports the use of S106 agreements to secure funding for bus service and public transport infrastructure contributions, and potentially traffic management and traffic calming measures such as those identified but not specified for Ordsall which would likely require community engagement and where the scale and extent can be managed to reflect available funds. Section 106 funding can also be used to obtain justified and proportionate contributions to strategic transport improvements such as the A57 corridor improvements and the provision of the proposed railway station serving the proposed Garden Village.

Comments on the Infrastructure Delivery Plan

Minor observations relating to Appendix 2 of the Infrastructure Delivery Plan (Infrastructure Schedule per Site Allocation), as follows:

1. Several sites are earmarked to contribute to extended bus services through S38/S278. However, contributions towards bus service extensions should be made as financial contributions to NCC through S106. Agreements through s278/s38 relate to physical works to the highway and are not used to secure funding. The relevant sites are: HS1, HS7, HS13, GV, SEM001, EM008.
2. Site HS3 (Radford Street) is earmarked to contribute to secondary education through CIL, however this site is for 120 dwellings and therefore is one of the major sites (50+ dws) that would be CIL-exempt. The funding mechanism should therefore be S106.
3. There is some discrepancy between the Plan wide Viability Study and the IDP. The Viability Study lists £7.3m as the contribution sought towards secondary school places at Peakshill Farm , whereas the IDP has the correct NCC POS sourced figures. The Viability Study does not refer to the provision of a school at Ordsall South which is referenced in the IDP.

Bassetlaw Local Plan 2021 Transport Study Update August 2021

Detailed comments on text.

Paragraph 1.5.7 should include and/or transport infrastructure improvements.

Paragraph 4.7.2 – Nottinghamshire instead of Nottingham.

Table 5- Fatal and Slight need to be switched around.

Table 6 - Needs to be 2016/2017 instead of 2019.

Table 7 – Should include more up to date data.

Paragraph 4.8.1 should refer to National Highways (NE) rather than Highways England (HE).

Paragraph 4.8.4 NH instead of HE.

Paragraph 4.8.5 should state Nottinghamshire, Yorkshire, and Derbyshire rather than Nottinghamshire and Yorkshire Derbyshire.

Paragraph 4.8.9 “(because half of the weekday peaks will have flows higher than average demand flow and half lower)”. This does not make sense.

Paragraph 4.10 Data Sources - Route and timetable information is available from Traveline East not East Midlands.

Note: The East Midlands traveline website was closed last year and consolidated with the existing arrangements within the national website.

Paragraph 4.10.12 “service” not services.

Paragraph 4.10.20 “In addition, Bassetlaw is one of the areas with the highest limiting long-term illness percentages **among** in the country”.

Paragraph 4.10.21 Fifth bullet point should read “‘My Journey’ based in Mansfield is developing door-to-door and dial a ride services”.

Paragraph 4.10.21 Should read around Retford and Worksop town centres. The final sentence is not necessary.

Paragraph 4.10.24 Final bullet point should read “Car ownership increases”.

Paragraph 4.10.25 “2.5” requires deleting.

Paragraph 4.10.29 – The bus station in Worksop opened to the public in August 2015.

Paragraph 4.10.30 “noted 98% of the satisfaction with the passenger transport facilities”.

Yearly passenger numbers at Worksop and Retford bus stations should be added to be consistent with rail statistics.

Paragraph 4.11.9 Table 11 states that the Retford Station parking cost is £5 not £10.

After 5.4.2 Title HS2?

Paragraph 5.5.9 Surely the draft 2017-18 Nottinghamshire Integrated Transport Programme is not draft anymore if it exists. The Goosemoor bridge improvement has been completed.

Table 12 Why does the Harworth Colliery development not appear in full?

The sites in Table 24 Worksop Central Area are not consistent with the sites in the Draft Worksop Central Development Plan Document 2021 Infrastructure Delivery Plan June 2021.

Paragraph 8.5.2 The route assignment has been described as “all or nothing”. There are destinations in the Retford TA with a potential choice of routes being similar in terms of travel time/distance. This is also likely to be true for other areas.

Paragraph 9.6.1 for ease of refence, a supporting plan would be useful to identify locations.

Paragraph 11.5.3 should refer to National Highways.

Paragraph 11.6.13 – This is going to be a very important study. The A57 requires a major upgrade and will be curtail if the BLP is to be delivered.

Paragraph 11.6.4 TA 79/99 and TA 46/97 has been withdrawn without replacement.

Figures 17 and 18 – The figures require checking. Are these meant to show AADT as in Figure 6? This in turn will change all the line colours if incorrect.

Table 32 – Has the VISUM model run included improvements already made to A57?

Paragraph 11.7.5 The junction upgrade costs should be checked for robustness. Cumulative shortfalls could be significant these are under estimates.

Retford Transport Assessment (RTA) August 2021 Version 2

Detailed comments on text

Paragraph 1.1.2 The Draft Bassetlaw Local Plan (BLP) proposes 800 dwellings at Ordsall with the potential to increase to 1250 in the next plan period. The Bassetlaw Transport Study (BTS) similarly assumes that the site would be allocated for 800 dwellings in the plan period. Therefore, to inform the BLP, it would seem most appropriate for the RTA to assess the impact of 800 dwellings, potentially with a sensitivity test to cover the addition of a further 450 dwellings.

Paragraph 1.1.3 The GV appears in both the BLP and BTS for 500 dwellings and 10 hectares of employment. The RTA is not capable of informing the BLP with the omission of the GV.

Paragraph 2.3.2b) The Highway Authority would wish to see junction improvements secured by planning condition, potentially split between the large urban extensions and GV unless to be delivered by CIL. There is no certainty that pooled contributions would be sufficient, particularly if third party land is required. Nor would there be sufficient certainty as to when a particular improvement could be delivered if funding is awaited from other development yet to commence. Any mitigation would then likely be retrospective.

Paragraph 2.3.2b) There is no indication as to what the proposed “traffic management scheme in Ordsall Old Village” is for. Potential issues on High Street, All Hallows Street, and at the Goosemoor Lane bridge could occur with a significant increase in through traffic. A route assessment should be included that demonstrates that any issues can be mitigated rather than a vague statement and such that traffic is not likely to divert through Eaton.

Paragraph 2.3.2c) A marked cycle lane on Brecks Lane, and along Ollerton Road/West Hill Road and Ordsall Park Road to Ordsall Primary School, Retford Leisure Centre and Retford Oaks School via West Carr Road is not achievable in compliance with DfT LTN1/20.

Table 3 The summary of bus services stopping near the site is incorrect.

Paragraph 3.6.6 The Sherwood Arrow offers only a semi-frequent service.

Paragraph 3.8.5 To central Newark, Google Maps suggests London Road to A1 via Markham Moor (30mins 19.3m) or London Road, B6387, A616 (41mins 22.7m). However, if the route is adjusted onto A1 Jockey Lane the journey time is 31mins 20.8. I suspect that may be as equally attractive as London Road to A1 Markham Moor. It is easier with less junctions, avoids High Street which can be restricted by parked vehicles, and the Goose Moor Lane junction that lacks forward visibility.

Paragraph 3.8.6 According to Google Maps, Eaton is the preferred route choice.

Paragraph 3.8.8 The A620 to Mansfield Road is just as likely a route as the A1. There's nothing in it in terms of time or distance and the A1 is avoided.

Paragraph 3.9.1 The 7th July 2021 traffic counts will require adjustment to consider the difference in travel patterns due to Covid.

Paragraph 4.2.1 We would expect a 0.5 margin adjacent the shared use cycle track.

Paragraph 4.2.1 and Appendix D - The land available for the southern of the two roundabouts has necessitated a couple of geometric quirks. Firstly, the bend to the south at the boundary of the site sharpens up to move the junction westward into the land available for building it. This might make the bend radius quite sharp for northbound drivers arriving from the rural section. This would need to be checked to see if it meets geometric standards. Secondly the northbound entry probably meets the entry deflection requirements, however it arrives at a slightly shallow angle. This looks likely to be due to a) the short distance from the aforementioned bend, so it hasn't had time to align without having a nasty reverse curve, and b) this may be to accommodate the fourth arm off to the east. This slightly slack entry is OK if it meets the entry deflection criterion, except that northbound traffic may find the exit a bit tortuous, resulting in a succession of vehicles exiting the carriageway on the nearside of the northbound exit. There does not appear to be many options to tweak without making something else worse without additional land even though this is only a concept plan. The lack of land availability to the southeast could be a major problem.

Paragraph 4.2.2 The first sentence should be the last bullet point in 4.2.1.

Paragraph 5.1.2 quotes the 'Grey to Green Retford Walking and Cycling Audit' prepared by Tetra Tech in December 2020. There is a June 2021 version that is being considered.

Paragraph 5.1.5 It is unlikely that DfT LTN 1/20 compliant cycling facilities could be provided from the site beyond Ordsall Primary School. Once you go over the bridge there is nothing you can implement that would be worthwhile as the road is constrained on both sides, as is High Street. Whilst there may be some potential for improvements on Babworth Road and London Road. There would be a substantial disconnect from the site. It is also unlikely that the aforementioned routes could extend into the town centre.

Paragraph 7.1.2 These trip rates are challenging for Ordsall when compared to person trips and travel to work census data. The rates are only likely to be achievable by providing a high frequency bus service, exemplar walking and cycling connections into Retford, and smarter choices/travel planning. There does not appear to be any possibility of providing connected cycling facilities to Retford town centre and walking is unlikely to be an attractive option for most people due to the distances involved.

Paragraph 8.1.4 Note comments in relation to 3.8.5 and 3.8.8

Paragraph 8.2.1 Note comments in relation to 3.8.5 and 3.8.8. These could be 50/50 split.

Paragraph 8.2.2 Are examples available where the VISUM model has been adjusted to reflect observed driver behaviour?

Paragraph 8.2.4 appears to conflict with para 8.2.1 and the "all or nothing" assignment but does address the point re paragraph 3.8.5 and journeys to Markham Moor.

Table 18 – "Capacity Assessment Results" is incomplete.

Paragraph 10.2 The A620 Amcott Way/A620 Moorgate/A638 Arlington Way junction, the A638 Arlington Way/Grove Street junction, and the A638 Arlington Way/A638 London Road/Carolgate junction are absent from the text despite appearing in 10.2.2 as junctions shown to experience capacity issues.

Paragraph 10.2.3 The performance of the A620 Babworth Road/A6420 Mansfield Road/A620 Straight Mile/Sutton Lane junction (Junction 6) would be much worse if the GV was included in the RTA.

Paragraph 11.2.2 Challenging trip rates have been included in the RTA. To achieve these rates would require a high frequency bus service, and exemplar walking and cycling connections into Retford from the development outset. The latter is unachievable. It is difficult to see what bond payments could then achieve if Travel Plan target are not met.

Paragraph 11.3 Bus Transport

it is suggested that the following text be inserted:

In March 2021 the government published its document 'Bus Back Better (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/980227/DfT-Bus-Back-Better-nation): National Bus Strategy for England', as part an initiative to build back better services post pandemic. The County Council has published its intention to implement an Enhanced Partnership in April 2022 and provide a Bus Service Improvement Plan by 31st October 2021. These arrangements will cover all services and infrastructure in Nottinghamshire including Bassetlaw.

Paragraph 11.3.1 Bus services should also meet the aspirations of the National Bus Strategy and supporting agreements.

Paragraph 11.3.3 Typically a bus service enhancement and access into the site should be introduced from early occupancy, with temporary turning facilities where required, with the service introduction potentially phased.

After 11.3.9 the following text is suggested:

In spring 2021 Nottinghamshire County Council were successful with a £1.5m bid to the Department of Transport Rural Mobility Fund. This funding will be used to pilot flexible Demand Responsive Transport (DRT) services across Nottinghamshire using new route planning and booking software and new vehicles. The areas to be served in Bassetlaw will be based on a revised network of services in the Ollerton Area with a new hub for interchange to mainline services. The services are expected to commence in 2022.

Paragraph 11.4.1 In accordance with LTN 1/20 (paragraph 6.5.4), the conversion of footways to shared use cycle tracks should be considered as a last resort. To achieve the suggested vehicle trip rate, exemplar cycle facilities would be required.

A marked cycle lane along Brecks Road is unlikely to fit and would be parked on. Most people would be comfortable cycling with mixed traffic where the speed of traffic is <20mph and there are <2000 vehicles/day

Providing meaningful DfT LTN 1/20 compliant cycling facilities on Ollerton Road/West Hill Road beyond Ordsall Primary School and within the wider highway network appears unlikely due to the road space available

Paragraph 11.4.4 On carriageway cycle lanes are not appropriate in areas where the speed of traffic is ≥ 30 mph.

Part 11.9 A620 AMCOTT WAY / BRIDLEGATE / A620 HOSPITAL ROAD / A638 NORTH ROAD / HALLCROFT ROAD

Paragraph 11.9.3 The RTA already assumes a significant modal shift from existing travel patterns that currently occur in Ordsall. It is therefore unlikely that a switch to sustainable transport could reduce trips any further than already assessed to minimise the traffic impact at the junction.

The BTS at paragraph 10.5.4 states:

It should be reasonable to assume that, as an initial target, car use should aim to be reduced from the existing level (81%) to the same level as the County average (77%), equivalent to a 5% reduction in car use (or a 4% modal shift). A 4% modal shift to public transport would achieve this if the walking and cycling modal share remained constant at 14%, taking public transport use to approximately 6% and approximately equal to the County average of 7%.

From the RTA Table 8; 68% and 76% of residents will travel by vehicle in the AM and PM peak hours respectively.

Part 11.10 A620 AMCOTT WAY / A620 MOORGATE / A638 ARLINGTON WAY

Paragraph 11.10.3 and 11.10.4 The use of demand management measures as the sole means to mitigate the traffic impact at the junction is not realistic, see comment in relation to 11.9.3. The trips that could potentially be managed have already be removed from the assessment due to the low trip rate. It is likely that housing numbers would need to be revised downwards to a level where there is not a material impact. It would need a dramatic Retford public transport policy to achieve nil detriment at this and the following junctions where demand management is suggested.

Paragraph 11.11.3 and 11.11.4 A638 ARLINGTON WAY / GROVE STREET

The use of demand management measures as the sole means to mitigate the traffic impact at the junction is not realistic, see comment in relation to 11.9.3.

Paragraph 11.12.3 and 11.12.4 A638 ARLINGTON WAY / A638 LONDON ROAD / CAROLGATE

The use of demand management measures as the sole means to mitigate the traffic impact at the junction is not realistic, see comment in relation to 11.9.3.

Part 11.14 LONDON ROAD / WHINNEY MOOR LANE / BRACKEN LANE

Paragraph 11.14.3 There is no plan at Appendix K

Paragraph 11.14.4 The pine and other deciduous trees are providing a very high level of visual amenity and are maintained and managed as a collection of trees rather than individually. If for example the first few trees are to be removed nearest to the junction, this may impact upon the long-term safe retention of the remaining trees as these may not be able to withstand exposures of strong winds etc.

Paragraph 11.15 Main Road (Eaton)

Paragraph 11.15.3 There is no plan at Appendix K. A quiet lane scheme may be appropriate.

Paragraph 12.1.9 NCC will seek junction improvements to generally be delivered in full secured by condition if not to be delivered by CIL. It may be necessary to split which junctions are improved by development. S106 pooled contributions may fall short, there is little control of when the full level of funding would be available, and it would be likely that the improvements could only be implemented after the respective junctions have exceeded capacity due to development being built out prior to being in a position to fund the delivery of an improvement scheme.

Junction layouts

Babworth Road/ Mansfield Road:

- The junction layout is too stretched out, it would be better to try to square up Mansfield Road and Sutton Lane (requiring land from the corners) to form a more conventional crossroads arrangement
- The radius from Babworth Road East into Mansfield Road is far too slack. Speeds will not be moderated leading to potential accidents. The radius is similar to how it is at the moment, but the current junction does not have vehicles waiting in the direct line of anyone losing control on the corner as they are further forward at the give-way line
- No consideration has been given to the private access to the east of Sutton Lane. This is not a minor access, it serves what looks to be a couple of sizeable private properties and All Saints Church, Babworth. It is not clear how it is to be treated other than it is not signalised meaning that there could be a significant traffic demand going in and coming out uncontrolled into the centre of a traffic signalled junction whenever there is a church service.
- Squaring up the junction takes the signals away from this access point.
- No consideration is given to pedestrian facilities – maybe not a priority at this mainly rural site.
- A tracking exercise should be submitted for larger vehicles. There is doubt as to whether large vehicles serving the farms on Sutton Lane could still make the left turn with the proposed refuge in place.
- The westbound A620 offside (ahead) lane will be a major component of the A620 flow so this should be the default lane so that unfamiliar drivers don't end up in the left lane by mistake. This would lead to an ad hoc two into one merge on the westbound exit and probable braking/weaving collisions. A smooth alignment into the ahead lane looks feasible, with the left turn lane peeling off for use by those who want to go left.
- The right turn to Sutton Lane (east to north) will block the A620 ahead flow, which may lead to shunts, as well as queues and unusual undertaking manoeuvres. The movement would have to be insignificant, or some form of place to sit will be required while waiting for a gap in traffic, assuming the A620 arms aren't running separately.
- The small refuge on the A620 eastern arm could be tweaked to offer some assistance for pedestrians
- Street Lighting and high friction surfacing will be required.

Modelling analysis

Existing priority junction:

- Modelled on Picady.
- Geometry reasonable except for main road (Babworth Road) width which is modelled as 6m in total. Measuring from Google (not the most accurate measure I know) I measure the width as approximately 8.0m.

- With corrected geometry, the performance improves. In the AM the worst movement (Mansfield Rd RT to Babworth Rd – to Retford) the RFC goes up from 0.61 to 0.83. This is a worsening of performance, however it is still just about working. In the PM the RFC on Mansfield Road goes up to 1.13 which is significantly over capacity (but better than the WYG model) justifying the need to suggest mitigation measures. Please note that it is only Mansfield Road which is suggested to be over capacity.

Proposed mitigation traffic signals junction:

- Modelled on Linsig3.
- Staging is sensible with both directions of the main road running together in stage 1 and the side roads running separately. The pedestrians across Sutton Lane run separately and appear every second cycle in the model which, for this site is a legitimate approach to take.
- The lane saturation flows look to be reasonable.
- Overall, the modelling looks to have been well carried out – I have adjusted a number of intergreen and phase minimum values, however, I still get a positive result so do not doubt TT's conclusion with regard to the junction's predicted capacity performance.
- My main issues still lie with the geometry as per my previous comments above.

Babworth Road/ Ordsall Road:

- A simple signalised T-junction is proposed to replace the existing mini roundabout. This appears to be a slightly expanded version of what was considered for the Persimmon development in Ordsall.
- This version looks to take land off the east corner. Is this available?
- No pedestrian facilities are provided. The previous version had pedestrians across Babworth Road east side to link to the bus stop from Worksop to Retford.
- The right turn from A620 onto Ordsall Road may be best separately signalled given the rural setting and potential high speeds of opposing westbound ahead traffic.
- The westbound A620 bus stop will block westbound traffic. This may be acceptable in an urban environment. However, following A620 drivers are unlikely to wait patiently behind a bus whilst watching the westbound green signal. This would be likely to encourage drivers to venture into the hatching or opposing A620 flow to get past, possibly at speed, which may lead to head-on collisions with eastbound motorcyclists for example.
- Street lighting and high friction surfacing would be required.

Modelling analysis

Existing mini-roundabout junction:

- Modelled on Arcady.
- Geometry looks to be reasonable/ slightly pessimistic.
- Performance indicates junction to be at total capacity in 2021 AM base flow conditions. Junction reaches practical capacity in PM peak at 2031 base + committed flows. Ordsall devt takes the junction over capacity in 2031 PM.

Proposed mitigation traffic signals junction:

- Modelled on Linsig3.
- Staging is sensible with the exception of the omission of pedestrian facilities across Babworth Road (included in previous Persimmon development mitigation proposal which

was subsequently dropped). Pedestrian facilities are required here due to the proximity of housing and bus stops.

- The lane saturation flows look to be reasonable.
- I have adjusted a number of intergreen and phase minimum values with minimal effect on the performance.
- My main issues with the modelling are the lack of pedestrian facility mentioned previously, and the cycle times. TT have used 120 seconds for a single cycle which is really too long, especially for a significant gap seeking right turn flow. My suggestion would be a maximum single cycle time of 90 seconds. Modelled this way the junction is predicted to be just over its practical capacity in the 2031 AM design flow scenarios. PM is not predicted to be an issue
- Modelled with a pedestrian stage added in and run every second cycle (using the same assumptions as at Sutton Lane with regard to pedestrian usage) the performance in 2031 goes negative in terms of practical reserve capacity in the AM peak.
- Overall, the modelling looks to have been well carried out - however, I do have issues with the predicted performance when pedestrian facilities are factored in.
- I also still have concerns regarding the geometry as per previous comment.

London Road/ Whitehouses Road:

- A simple signalised T-junction is proposed to replace the existing mini roundabout.
- The widening is to the west side of London Road where there is a significant level difference between the current road level and the fields at the back of the highway.
- The proposed kerb line alignments and tie ins are crude. These will need refining considerably before they can be accepted.
- Staggered pedestrian facilities are shown across Whitehouses Road and London Road south. They should be provided across all arms and the simplest form will be to have them all straight across, running a separate all-round pedestrian stage.
- The refuge on London Road south has been placed directly in line with the access to/ exit from the Whitehouses pub and pedestrians are landed in the middle of this access.
- There is a private access for the property next to the Whitehouses which will come out in the middle of the signalled junction.
- In addition to the pedestrian issues at the pub access, people driving into and out of the pub car park will have to be considered in the signal design and operation.
- Street lighting and high friction surfacing would be required.

Modelling analysis

Existing mini-roundabout junction:

- Modelled on Arcady.
- Geometry looks to be reasonable overall although I have amended a couple of geometric values.
- Performance indicates junction to be at total capacity in both 2021 base flow peaks. The critical approach in the AM is Whitehouses Lane, in PM it is London Road south.
- Junction is predicted to be significantly over capacity in the design flow scenarios.

Proposed mitigation traffic signals junction:

- Modelled on Linsig3.

- Staging has the right turn from London Rd north into Whitehouses Lane fully signalled rather than a right turn indicative arrow and the pedestrian facilities provided (across London Rd south and Whitehouses Lane only) are split. I would want to see pedestrians across all approaches and to have these provided straight across rather than staggered, running in a separate pedestrian stage.
- The model runs at a cycle time of 120 seconds which is excessive, I would prefer to see a cap of 90 seconds for a single cycle. Even allowing for this long cycle time the PM performance is not stellar – it's better than the predicted performance of the mini-roundabout, but still negative in the PM (PRC of 23.6% in the AM and -6.5 in the PM, 2031 base+committed+Ordsall).
- I have run an edited version with peds across all 3 arms, running in a separate stage with this stage coming up every second cycle (at a multiple of a 90 seconds cycle) – consistent with the TT model at Ordsall Road and my modelling across the board. Not surprisingly, the results are not as good as those reported by TT: PRC of 10.4% in the AM and -17.8% in the PM 2031 base+committed+Ordsall.
- I also still have concerns regarding the geometry as per previous comment.

REF049



From: [REDACTED]
Sent: 21 October 2021 17:02
To: The Bassetlaw Plan
Subject: HE response to Reg 19 Bassetlaw Plan
Attachments: reg-19-form-a-b-12pt.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 [REDACTED] and team

Please find HE's comments attached for information.

Kind regards, Ros

[REDACTED]
Team Leader (Development Advice) (South)
Midlands Region

Historic England | The Foundry
82 Granville Street | Birmingham | B1 2LH

[REDACTED]
www.HistoricEngland.org.uk

Please note that due to pandemic restrictions I am working from home and can be contacted as per 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

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-notices/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: 

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):

Historic England

Address:

The Foundry, 82 Granville Street, Birmingham

Postcode:

B1 2LH

Tel:

Fax:

Email:

e-midlands@HistoricEngland.org.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: Historic England

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

Policy: Evidence Base CD-009 and CD-010

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.

Further to Historic England's previous concerns in relation to the approach of the Plan to the historic environment we welcome the updated Site Assessment (historic environment) methodology of July 2021 (CD-010) in addition to the Bassetlaw Garden Village Archaeological Assessment of June 2021 (CD-009) which addresses concerns previously raised.

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

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:

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REF051





Bassetlaw
DISTRICT COUNCIL
— North Nottinghamshire —

Bassetlaw Local Plan 2020-2037

Publication Version Representation Form September to October 2021

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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: 14/10/21

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):

Address:

Postcode:

Tel:

Fax:

Email:

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:

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

Policy: 16: Site HSI Peaks Hill Farm, Worksop

Paragraph: pages 85-91

Policies Map: Worksop

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.

- The proposed development will have a negative impact on the local environment. It will destroy the habitat of roe deer, buzzards and numerous other wildlife and birds who live in the woods that will be cut down to make the 'new' link road from Blyth road to Carlton road. Trees should be protected not chopped down.
- It will have a negative impact on local transport. The roads leading to the A1 and M1 are only country lanes which are already very busy. The A51 has already seen an increase of traffic because of the building of houses at Gateford and Shireoaks. These roads pass through villages (Blyth and Anston) which will continue to be 'bottle necks'.
- Schools are already full. Parents are struggling to get their children into secondary schools. Building more houses will make this worse. There are no definite plans to build more schools.
- Doctors, dentists and health centres are already overloaded.
- The hospital is busy and cannot cope with much more.
- Government has said Bassetlaw needs 5000 houses between now and 2037 but Bassetlaw is doubling this.
- The feeling that the community affected have been 'shut out'. The majority of the publicising of the BDC plans have been through social media and a lack of real public engagement. At one of the last consultations online due to Covid all participants were kept muted and questions could only be typed! In the January 2020 consultation none of my neighbours knew about it. Neighbours had to inform neighbours.

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

Rethink where you are proposing to build.
Use more brownfield sites instead of using good farm land.

Infrastructure should be improved.

The Garden village to take more housing as it's designed specifically for the purpose of extended housing and would relieve pressure on the development and infrastructure the Peaks Hill Farm proposal would make on the community of Worktop.

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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- 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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