



Bassetlaw
DISTRICT COUNCIL
— North Nottinghamshire —

**Bassetlaw Local Plan 2020-2037: Publication Version
Addendum Regulation 19 Consultation January 2022 –
February 2022**

AD-REF Responses 017-024

REFERENCE NUMBER	ORGANISATION	PARTICIPATING IN HEARING SESSIONS
AD-REF017	Pegasus on behalf of Barratt Homes	Yes
AD-REF018	IBA Planning	Yes
AD-REF019	Savills UK on behalf of Residents	Yes
AD-REF020	Resident	Not indicated
AD-REF021	National Trust	Yes
AD-REF022	Frampton Town Planning Ltd on behalf of J G Pears	Yes
AD-REF023	ID Planning on behalf of Lidl (GB) Limited	Yes
AD-REF024	Historic England	No

AD-REF017



From: [REDACTED]
Sent: 17 February 2022 10:02
To: The Bassetlaw Plan
Subject: Consultation Response: Bassetlaw Local Plan 2020-2037: Publication Version Addendum
Attachments: R004-LP Consultation Pegasus-MG-Feb2022.pdf; R004a Pegasus reg-19-form-a-b-12pt-jan-2022.docx; R004b reg-19-form-b-12pt-jan-2022.docx

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Dear Sir / Madam,

Please find attached a detailed response and associated forms in relation to the current consultation upon the Bassetlaw Local Plan 2020-2037: Publication Version Addendum.

Kind regards

[REDACTED]
Director

Pegasus Group

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS | HERITAGE

Pavilion Court | Green Lane | Garforth | Leeds | LS25 2AF

T 0113 287 8200 | [REDACTED]

[REDACTED] | DD 0113 468 1206 | EXT 6042

Birmingham | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Edinburgh | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough | Solent



www.pegasusgroup.co.uk

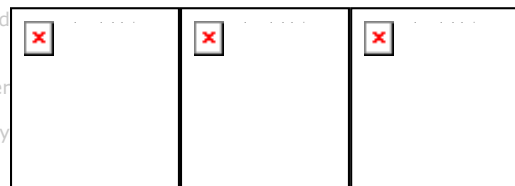
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Bassetlaw Local Plan 2020-2037

Publication Version Addendum Representation Form January - February 2022

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 17th February 2022**. Only those representations received by that time 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
- an e-mail attachment: thebassetlawplan@bassetlaw.gov.uk
- 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:

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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:

[Council's Privacy Notice Webpage](#)

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.

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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: 17 February 2022

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): Pegasus Group

Address: Pavilion Court, Green Lane, Garforth, Leeds

Postcode: LS25 2AF

Tel: 0113 468 1206

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: Pegasus Group

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

Policy:

Paragraph: Figure 7

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.

This response should be read alongside our associated report (ref: R004-LP Consultation Pegasus-MG-Feb22).

Figure 7 of the Local Plan Addendum identifies the various sources of supply which will deliver the housing requirement over the plan period, to 2038. At 1st December 2021 this is identified to include 6,347 dwellings from existing commitments. It is notable that appendix C of the Council's January 2022 '*Land Availability Assessment*' (LAA) identifies a smaller figure of 6,141 dwellings. It is presumed this is due to differing base dates. This should be clarified.

Whichever figure is used it represents a significant proportion of the overall housing supply, up to 49% and nearly 60% of the Local Plan housing requirement. It is, therefore, imperative that the Council provide a positive framework to ensure the delivery of this source of supply.

It is, however, notable that there is no supportive framework should the permission on any of these commitments lapse. There is little reference to individual sites within the Local Plan Addendum, or its previous iteration save a listing within the appendices. The situation with regards to commitments is further exacerbated by the fact that several commitments remain outside of development boundaries. Given that commitments are an intrinsic and important element of the Council's housing land supply this is not only unjustified but would also render any development on identified commitments with a lapsed application to be contrary to several Local Plan policies, such as '*ST2: Residential Growth in Rural Bassetlaw*'.

This approach is considered unsound and provides no certainty that the commitments which contribute 49% of the housing supply will be delivered.

The Local Plan Addendum also identifies that 1,300 dwellings over the plan period will be delivered as windfalls. This equates to 100 per year from 2025/26 onwards. The January 2022 update to the '*Housing Land Supply Position, Housing Trajectory and Windfall Allowance*' background paper identifies that this level of windfall delivery is built upon past trends. Whilst this is not disputed it is far from certain that it will continue over the plan period. To achieve such levels of delivery requires the plan to provide a degree of flexibility. The tightly drawn development boundaries will limit such opportunities and may inhibit such levels of delivery in the future.

In addition, a further 725 dwellings are proposed in the Worksop Central Development Plan Document. Whilst this document was the subject of consultation in June / July 2021 it is still at least two-years away from adoption and as such delivery from this source is not yet certain.

Finally, the Local Plan Addendum paragraph 5.1.61 identifies the delivery of 590 dwellings from the Bassetlaw Garden Village. This represents an increase of 90 dwellings compared to the Publication version of the Local Plan. Appendix 3 of the Local Plan Addendum identifies that to achieve this amount of delivery will require initial housing delivery in 2031/32. Whilst some delivery from this source is not disputed there is significant scope for slippage in the timetable. Prior to development commencing, post Local Plan adoption, a significant amount of work is required to overcome the identified constraints, develop the required masterplan and appropriate infrastructure. There is, therefore, potential that the timescale identified for delivery could slip leading to an under-delivery in the plan period for this site.

Our commentary above identifies varying degrees of uncertainty with numerous elements of the identified supply, which combined make up nearly 2/3rds of the overall supply. Whilst it is anticipated much will come forward it does raise uncertainties as to whether the identified buffer is sufficient to ensure that the proposed housing requirement is met as a minimum.

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

To overcome these soundness issues, it is recommended that the development boundaries are relaxed and as a minimum include the identified commitments. For example, within Langold they should include the red-line boundary of application reference 15/01605/OUT. Ideally to enable the delivery of windfalls they should be greater in scope.

In addition, the Council should consider the inclusion of additional allocations and / or reserve sites. Reserve sites could be held in abeyance until required either due to a failure to meet the housing requirement or other unforeseen issues. This would assist in ensuring that the Local Plan met its housing requirement as a minimum.

Parcels B and C, as identified on figure 1 of our report, would provide an ideal location adjacent an existing commitment for either an allocation or reserve site.

Continue on a separate sheet if necessary

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

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

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

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

Yes ☒

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

No ☐

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

To fully explore the issue and ensure that the Inspector fully understands our position.

In addition, Pegasus Group would like to address any points raised by the Council, in regard to this matter, within any additional evidence or examination hearing statement.

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: Barratt Homes

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

Policy:

Paragraph: 4.1

Policies Map:

4. Do you consider the Local Plan is:

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.

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

This response should be read alongside our associated report (ref: R004-LP Consultation Pegasus-MG-Feb22).

The Local Plan Addendum provides numerous references to the extension of the plan period from 2037 to 2038. This is supported and providing the Local Plan is submitted in for examination 2022 should ensure that the strategic policies in the plan meet the minimum 15-year period identified from adoption required by the NPPF (paragraph 22).

Whilst we support this change and the consequential amendments to the Local Plan requirements for residential development it must be recognised that 15-years is the minimum period advised by the NPPF for strategic policies.

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 more positive strategy would be for the strategic policies to look beyond a 15-year time horizon to 2040 or further. This would provide greater certainty and clarity regarding longer term development within Bassetlaw.

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.

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Yes ☐

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No ☒

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

To fully explore the issue and ensure that the Inspector fully understands our position.

In addition, Pegasus Group would like to address any points raised by the Council, in regard to this matter, within any additional evidence or examination hearing statement.

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BASSETLAW LOCAL PLAN 2020-2037 PUBLICATION VERSION ADDENDUM

CONSULTATION RESPONSE

LAND TO THE WEST OF DONCASTER ROAD / NORTH OF LANGOLD

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**



Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Edinburgh | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough | Solent

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1.0 INTRODUCTION 1

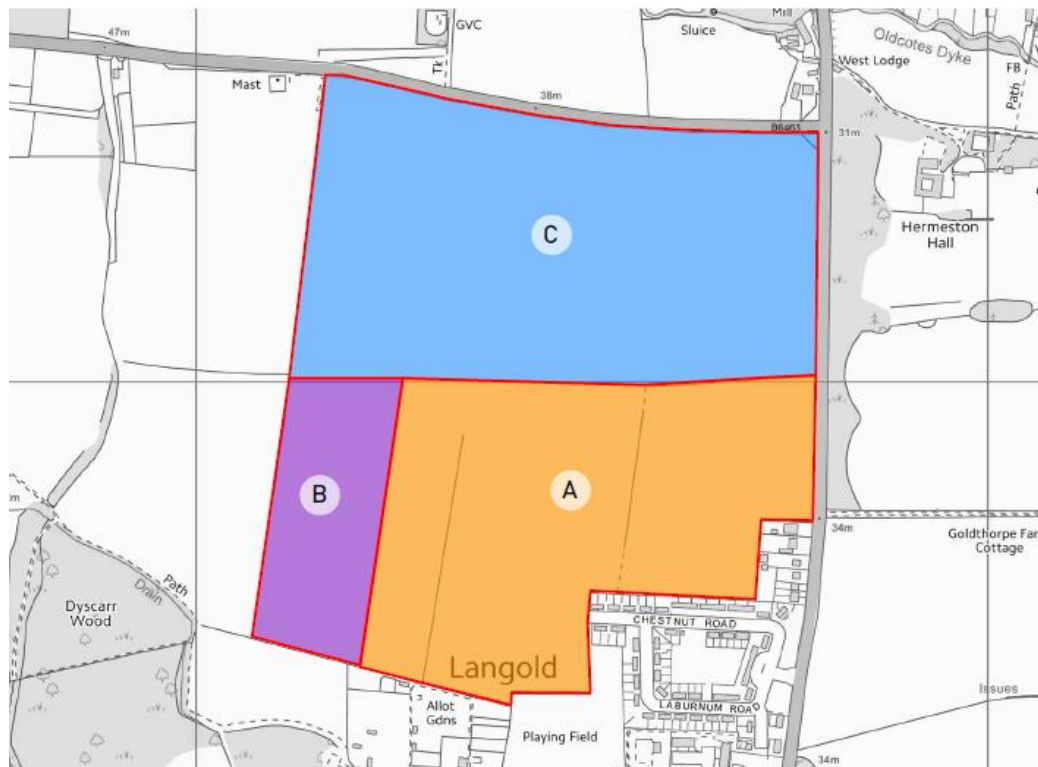
2.0 CONSULTATION RESPONSE 3

3.0 NOTIFICATION OF PLAN PROGRESS 7

1.0 INTRODUCTION

- 1.1 This response is made solely in respect of Land West of Doncaster Road / North of Langold, as identified by parcels B and C, figure 1. These sites are identified in the SHLAA under references LAA209 and LAA312. These sites have previously been promoted throughout the Local Plan process.
- 1.2 A separate representation is made by Pegasus Group in relation to Parcel A. This site benefits from an outline consent for 300 dwellings (ref: 15/01605/OUT) and is the subject of a pending reserved matters application for 300 dwellings (ref: 21/01730/RES).
- 1.3 It is understood that the Bassetlaw Local Plan 2020-2037 Publication Version Addendum relates solely to the proposed amendments to the Publication Version of the Local Plan. Our comments are framed in this regard.
- 1.4 In making these representations we have taken account of the tests of soundness which will be applied to the local plan when it is examined by the local plan inspector. Paragraph 35 of the NPPF confirms that plans would be considered sound if they are:
- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

Figure 1: Site Location



2.0 CONSULTATION RESPONSE

- 2.1 The following comments relate to selected elements of the Bassetlaw Local Plan 2020-2037 Publication Version Addendum (hereafter referred to as the Local Plan Addendum).

Plan Period

- 2.2 The Local Plan Addendum provides numerous references to the extension of the plan period from 2037 to 2038. This is supported and providing the Local Plan is submitted in for examination 2022 should ensure that the strategic policies in the plan meet the minimum 15-year period identified from adoption required by the NPPF (paragraph 22).
- 2.3 Whilst we support this change and the consequential amendments to the Local Plan requirements for residential development it must be recognised that 15-years is the minimum period advised by the NPPF for strategic policies. A more positive strategy would be for the strategic policies to look beyond a 15-year time horizon to 2040 or further. This would provide greater certainty and clarity regarding longer term development within Bassetlaw.

Housing Supply

- 2.4 Figure 7 of the Local Plan Addendum identifies a total supply of 12,938 dwellings over the 18-year plan period, to 2038. This equates to a buffer of 2,300 dwellings over the proposed minimum plan requirement, 10,638 dwellings. Whilst a buffer of nearly 22% over the minimum requirement appears healthy, we do have concerns over delivery from the sources of supply
- 2.5 The various sources of supply which will deliver the minimum housing requirement over the plan period include 6,347 dwellings from existing commitments¹. It is notable that appendix C of the Council's January 2022 '*Land Availability Assessment*' (LAA) identifies a smaller figure of 6,141 dwellings. It is presumed this is due to differing base dates. This should be clarified.

¹ As of 1st December 2021

- 2.6 Whichever figure is used it represents a significant proportion of the overall housing supply, up to 49%, and nearly 60% of the Local Plan housing requirement. The Council is, therefore, heavily reliant upon delivery from this source of supply. As such it is imperative that the Council provide a positive framework to ensure the delivery of this source of supply.
- 2.7 It is, however, notable that there is no supportive framework should the permission on any of these commitments lapse. There is little reference to individual sites within the Local Plan Addendum, or its previous iteration save a listing within the appendices. The situation with regards to commitments is further exacerbated by the fact that several commitments remain outside of development boundaries. Given that commitments are an intrinsic and important element of the Council's housing land supply this is not only unjustified but would also render any development on identified commitments with a lapsed application to be contrary to several Local Plan policies, such as *'ST2: Residential Growth in Rural Bassetlaw'*.
- 2.8 This approach is considered unsound and provides no certainty that the commitments which contribute 49% of the housing supply will be delivered.
- 2.9 The Local Plan Addendum also identifies that 1,300 dwellings over the plan period will be delivered as windfalls. This equates to 100 per year from 2025/26 onwards. The January 2022 update to the *'Housing Land Supply Position, Housing Trajectory and Windfall Allowance'* background paper identifies that this level of windfall delivery is built upon past trends. Whilst this is not disputed it is far from certain that it will continue over the plan period. To achieve such levels of delivery requires the plan to provide a degree of flexibility. The tightly drawn development boundaries will limit such opportunities and may inhibit such levels of delivery in the future.
- 2.10 In addition, a further 725 dwellings are proposed in the Worksoy Central Development Plan Document. Whilst this document was the subject of consultation in June / July 2021 it is still at least two-years away from adoption and as such delivery from this source is not yet certain.
- 2.11 Finally, the Local Plan Addendum paragraph 5.1.61 identifies the delivery of 590 dwellings from the Bassetlaw Garden Village. This represents an increase of 90 dwellings compared to the Publication version of the Local Plan. Appendix

3 of the Local Plan Addendum identifies that to achieve this amount of delivery will require initial housing delivery in 2031/32. Whilst some delivery from this source is not disputed there is significant scope for slippage in the timetable. Prior to development commencing, post Local Plan adoption, a significant amount of work is required to overcome the identified constraints, develop the required masterplan and appropriate infrastructure. There is, therefore, potential that the timescale identified for delivery could slip leading to an under-delivery in the plan period for this site.

- 2.12 Our commentary above identifies varying degrees of uncertainty with numerous elements of the identified supply, which combined make up nearly 2/3rds of the overall supply. Whilst it is anticipated much will come forward it does raise uncertainties as to whether the identified buffer is sufficient to ensure that the proposed housing requirement is met as a minimum.
- 2.13 To overcome these soundness issues, it is recommended that the development boundaries are relaxed and as a minimum include the identified commitments. For example, within Langold they should include the red-line boundary of application reference 15/01605/OUT. Ideally to enable the delivery of windfalls they should be greater in scope.
- 2.14 In addition, the Council should consider the inclusion of additional allocations and / or reserve sites. Reserve sites could be held in abeyance until required either due to a failure to meet the housing requirement or other unforeseen issues. This would assist in ensuring that the Local Plan met its housing requirement as a minimum.
- 2.15 Parcels B and C, as identified on figure 1, would provide an ideal location adjacent an existing commitment for either an allocation or reserve site.

Large Rural Settlements - Langold

- 2.16 The Local Plan Addendum identifies that the Large Rural Settlements of Blyth, Carlton in Lindrick and Costhorpe, Langold/Hodsock, Misterton and Tuxford are the most sustainable and act as service centres for the surrounding rural area. As previously noted, parcels B and C, as identified on figure 1, are located in Langold.

-
- 2.17 Paragraph 5.1.52 of the Local Plan Addendum identifies the delivery of 1,525 dwellings from such settlements. Despite this important role within Bassetlaw the plan does not seek to make any further allocations in these settlements except for Tuxford.
- 2.18 In terms of Langold it is noted that the Neighbourhood Plan was made on 6th May 2021. This plan identifies the current commitments within the settlement which are identified to deliver its requisite growth over the neighbourhood plan period 2020 to 2037. Whilst the Neighbourhood Plan is an important consideration it should not be used as a reason for a moratorium upon future development within the settlement.
- 2.19 Land parcels B and C, as identified in figure 1, represent an opportunity for a sustainable extension to the existing sustainable settlement of Langold. These provide a clear development opportunity to expand the extant outline consent (parcel A) later in the plan period. The delivery of these parcels could be combined with a new landscaped defensible boundary. Using the roads to the north and east of the site, future development parcel to the south and an existing mature hedgerow to the west. Whilst not yet determined the access to these parcels could potentially be accessed via the A60.

AD-REF018



[REDACTED]

From: [REDACTED]
Sent: 17 February 2022 10:45
To: The Bassetlaw Plan
Subject: Bassetlaw Local Plan 2020-2037 - Publication Version Addendum January 2022
Attachments: Representations Form.pdf; IBAPPlanningLP4.doc.pdf; IBAPPlanningLP3.doc.pdf

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Dear Sir/Madam

Bassetlaw Local Plan 2020-2037 - Publication Version Addendum January 2022

Please find attached completed representation form and representations in connection with the above consultation, together with a copy of our previous representations dated 21 October 2021 for completeness.

We would be most grateful if you could confirm safe receipt.

Many thanks.

Kind regards

[REDACTED]

[REDACTED]

iba planning chartered town planners

web: www.ibaplanning.co.uk
email: ask@ibaplanning.co.uk
phone: 01623 822006
mobile: [REDACTED]

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Publication Version Addendum Representation Form January - February 2022

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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:

17/02/2022

-

Part A- Personal Details

Name: [REDACTED]

Organisation (if applicable): IBA Planning LTD

Address: The Studios, Church Farm, Mansfield Road, Edwinstowe

Postcode: NG21 9NJ

Tel: 01623 822006

Fax:

Email: ask@ibaplanning.co.uk

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: IBA Planning

Policy: ST1 and ST2

Paragraph:

Policies Map:

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

Yes ☐

No ☐

Yes ☐

No ☒

Yes ☐

No ☐

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attached letter.

(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

See attached letter.

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.

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

Yes ☒

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

No ☐

To participate in discussions.

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.



Planning Policy
Bassetlaw District Council
Queen's Buildings
Potter Street
Worksop
Nottinghamshire
S80 2AH

IBAPlanningBassetlawLP/3

21 October 2021

Dear Sirs

Draft Bassetlaw Local Plan August 2021

Further to your recent public consultation on the above, please find below our **formal representations** regarding the Publication Version of the Bassetlaw Local Plan August 2021.

We have submitted representations on all previous versions of the Local Plan, including the preceding version published in November 2020¹.

However, our concerns/objections remain largely unaddressed.

The Local Plan acknowledges that evidence shows that the sustainable growth of the Small Rural Settlements would help to sustain these villages in the long term² yet still seeks to stifle the growth of these settlements by limiting their growth to just 5% over the plan period (Policy ST2). We strongly oppose this on the basis that the previous growth cap of up to 20% was a more appropriate figure given the essentially rural nature of Bassetlaw³ and the importance of allowing smaller settlements which have the capacity and/or desire to grow to do so in order to thrive and continue to support a diverse community and contribute to housing growth at a scale proportional to their size.

It is therefore disappointing that the Council have chosen not to revert back to the previously proposed 20% cap which would better support the vitality of the District's rural communities and prevent them from stagnating, and is more in line with the aspirations of paragraph 79 of the NPPF.

¹ See our comments attached for completeness.

² paragraph 5.1.54 of the draft Local Plan

³ Paragraph 8.3.1 of the draft Local Plan

It is also disappointing that the Council has not expanded the number of settlements defined as ‘Small Rural Settlements’ for the purposes of Policy ST2 as we suggested in our previous comments, instead continuing to define these using the amended criteria introduced in the previous version of the Local Plan (increasing both the number of homes and the number of services required in a settlement in order to qualify) for which there appears to be no explanation/justification in either the Local Plan or the background documents. The exclusion of many settlements previously identified as being suitable for growth goes against guidance in the NPPG which acknowledges that a wide range of settlements can play a role in delivering sustainable development in rural areas so blanket policies restricting housing development in some types of settlement will require robust justification of their appropriateness (paragraph 67-009-20190722) – this is referenced in the Publication version of the Local Plan (paragraph 5.2.1) yet clearly ignored when setting the Spatial Strategy.

The Council’s list of ‘Small Rural Settlements’ also continues to exclude Welham, Mattersey Thorpe, Habbleshthorpe and Woodbeck. Again, there appears to be no explanation or evidence as to why these can no longer be considered ‘Small Rural Settlements’ alongside their neighbouring settlements. All are within the same parish as a neighbouring settlement identified as a ‘Small Rural Settlement’, and all are socially and functionally connected to that neighbouring settlement.

The above represents a further way in which the Council’s latest approach to rural housing restricts the growth of small settlements so vital to their long-term survival as affordable, diverse and thriving communities and prevents such settlements from making a contribution to the balanced distribution of growth desired by the Council at a scale proportional to their size, undermining the Council’s purported goals for the Local Plan, the vitality of rural Bassetlaw, and the emerging Local Plan’s conformity with national planning policy.

Turning to Section 3 of Policy ST2, we are pleased to see that the circumstances where additional residential development in Large or Small Rural Settlements will be supported even if the prescribed growth requirement has been achieved has been expanded and has moved away from a reliance on Neighbourhood Plans, thereby no longer prejudicing those communities who do not have a Neighbourhood Plan.

We are particularly pleased that exceptions sites and First Homes exception sites in accordance with Policy ST29 are now explicitly supported in Large or Small Rural Settlement even where this would result in additional dwellings over the prescribed cap.

However, we believe that further categories of housing deserve the same support where the percentage housing requirement for an eligible settlement has been reached – these being specialist housing to help meet a local need for that particular community⁴, community-led housing schemes, housing where it is part of a wider regeneration scheme or on an existing brownfield site within or adjoining a Large or Small Rural Settlement, and residential development essential to enable the redevelopment of a heritage asset⁵.

⁴ often highly valued in rural communities as evident in the HUGS Neighbourhood Plan, the Sturton Ward Neighbourhood Plan, and the Treswell and Cottam Neighbourhood Plan.

⁵ All as included in the list of exceptions contained with the January 2020 Version of Policy ST2.

As such, we ask the Council to reinstate the above circumstances back into the list of exceptions contained within Policy ST2(3).

To **conclude on Policy ST2**, the latest version of the Local Plan does not remedy the concerns raised to the Council's approach to smaller rural settlements contained within Policy ST2 as set in our previous correspondence and we cannot support the Council's approach to rural housing growth which prevents growth in many smaller rural settlements in the District previously considered suitable for limited growth.

As such, our objections to the Council's approach to Small Rural Settlements remain outstanding and should continue to be taken into account during the examination of the Local Plan.

We also have concerns about the lack of a general countryside policy or policy providing guidance on the conversion of buildings within the countryside for non-economic purposes. Policy ST1 [Bassetlaw's Spatial Strategy] of the *emerging* Local Plan states that places not identified in the settlement hierarchy are considered to be part of the wider countryside where development will be supported where consistent with other policies in the plan and to address an identified local need and can be justified through a neighbourhood plan or national policy.

However, the draft Local Plan only contains policies relating to economic, tourist and traveller development in the countryside, and agricultural and forestry workers dwellings⁶ and has no general countryside policy setting out what is acceptable in the countryside or how the Council will consider proposals for those forms of development often found in rural locations such as equestrian uses, leisure and sports uses etc.

This creates a policy vacuum - as national planning policy likewise lacks a policy setting out the forms of development acceptable in the countryside.

Similarly, the draft Local Plan contains no policy relating to the conversion of buildings in the countryside for non-economic purposes – and again this is not rectified by the existence of the NPPF as this equally provides little guidance on the conversion of buildings in the countryside⁷.

The above is at contrary to the Council's adopted Local Plan which contains policies specifically relating to the above forms of development (Policies DM2 and DM3) which provide very useful principles for assessing proposals for such development. The lack of similar policies in the *emerging* Local Plan is concerning as it will create a level of uncertainty as to what is, and what is not, supported in the countryside, potentially resulting in a lack of investment in such areas to the detriment of their vitality and viability and to the well-being of those who live there.

⁶ Policies ST11, ST12, ST33 and ST34

⁷ The NPPF includes reference to the conversion of buildings in the countryside to residential used (paragraph 80) but no guidance on the conversion of buildings in the countryside for other non-economic uses.

The lack of a local policy on which to base planning decisions will also lead to inconsistencies in the approach to development in the countryside, leaving to further confusion and uncertainty and undermining public confidence in the planning system.

Having regard to the above, we would ask the Council to consider adding in policies similar to Policies DM2 and DM3 of the adopted Local Plan into the new Local Plan to prevent the creation of a policy vacuum and the associated uncertainty and inconsistency in decision making.

We trust the above comments will be taken into account during the examination in public and would be grateful if you could confirm safe receipt. Given our outstanding concerns to the Local Plan we wish to participate in the forthcoming examination Hearings as far as relevant to Policy ST2 and the Council's approach to development in the countryside and would like to be notified of the dates of the relevant Hearings in due course.

Yours sincerely



MA(Hons)TP MRTPI



Planning Policy
Bassetlaw District Council
Queen's Buildings
Potter Street
Worksop
Nottinghamshire
S80 2AH

IBAPlanningBassetlawLP/4

16 February 2022

Dear Sirs

Bassetlaw Local Plan 2020-2037 Publication Version Addendum January 2022

Further to your recent public consultation on the above, please find below our **formal representations** regarding the Publication Version Addendum of the Bassetlaw Local Plan August 2020-2037, dated January 2022.

We have submitted representations on all previous versions of the Local Plan, including the preceding version published in 2021¹.

Whilst the Local Plan Addendum makes some minor changes to housing numbers to provided over the plan period (to reflect the fact that the plan period has been extended by one year), we are disappointed to again note that no changes have been made to **the Council's approach toward Small Rural Settlements** and remain concerned that the Local Plan is neither 'Justified' or 'Consistent with national policy' as it does not comprise an appropriate, evidenced-based strategy for rural Bassetlaw which will enable the delivery of sustainable development in accordance with the policies in the NPPF.

It therefore fails the test of *soundness*.

First, the Council has not made any changes to the list of Small Rural Settlements contained within Policy ST1 to re-include those settlements (Welham, Mattersey Thorpe, Habbleshthorpe and Woodbeck) which have, in our opinion, been unfairly and without justification removed from the list. We remain of the view that the exclusion of these settlements previously

¹ See our previous comments dated 21 October 2021 attached for completeness.

identified as being suitable for growth goes against guidance contained within the NPPG which acknowledges that a wide range of settlements can play a role in delivering sustainable development in rural areas (paragraph 67-009-20190722).

Nor has the Council increased the 5% housing growth cap imposed on Small Rural Settlements despite our on-going objections that adopting such a low cap is at odds with evidence acknowledged by the Council itself² that, as with the Large Rural Settlements, the sustainable growth of the Small Rural Settlements is important to help sustain these villages in the long term.

Having regard to the above, the Addendum does nothing to address our concerns regarding the *soundness* of the Council's approach to rural housing growth and we submit that the Council's current approach still unnecessarily stifles the growth of smaller settlements to an extent that may jeopardise the longer-term vitality of these rural communities as affordable, diverse and thriving communities, undermining the Local Plan's conformity with national planning policy.

Our objections to the Council's approach to Small Rural Settlements as set out in our previous letters of representation therefore still stand and we continue to submit that the current plan does not comprise an appropriate strategy or enable the delivery of sustainable development in accordance with the aspirations of the NPPF, and therefore does not meet the required tests of *soundness*. We must, therefore, again ask the Council to reconsider its approach.

There have similarly been no further changes to draft Policy ST2, meaning that many highly desirable forms of housing previously supported in rural communities even if the prescribed growth requirement had already been reached³ would no longer be supported by the Council. This includes specialist housing to help meet a local need for that particular community, community-led housing schemes, housing where it is part of a wider regeneration scheme or on an existing brownfield site within or adjoining a Large or Small Rural Settlement, residential development essential to enable the redevelopment of a heritage asset – or even simply an unallocated greenfield site in the middle of a built up area (which would make no sense at all when the Council is clearly relying on the loss of *countryside* beyond settlements elsewhere to meet its housing obligations)!

In addition, we remain concerned about the lack of a general *countryside* policy within the draft Local Plan which provides much needed clarity as to those forms of development supported in the *countryside* and how the Council will consider proposals for certain types of development often found in rural locations such as equestrian uses, leisure and sports uses etc (in the absence of any such policy at national level).

Similarly, the lack of guidance on the conversion of buildings within the *countryside* for non-economic purposes also remains highly unhelpful given the equally sparse guidance on this in the NPPF⁴.

² See paragraph 5.1.54 of the draft Local Plan

³ See the January 2020 Version of Policy ST2

⁴ The NPPF includes reference to the conversion of buildings in the countryside to residential use (paragraph 80) but no guidance on the conversion of buildings in the countryside for other non-economic uses.

In such circumstances, the Local Plan as currently drafted results in a policy vacuum which the Council is asked to rectify immediately to prevent inconsistencies in decision making going forward, to provide a satisfactory level of certainty for rural communities (ensuring that investors in the rural economy are not unnecessarily discouraged), and to ensure that the Plan is 'Effective', 'Justified' and 'Positively Prepared'.

To summarise, we ask that the Council revisit our objections as set out in our previous representations dated 21 October 2021 and address these prior to submission of the Local Plan for examination to ensure that the Local Plan meets the tests of *soundness*.

In the above connection, we would like to reserve the right to participate in the forthcoming examination Hearings as far as relevant to Policy ST2 and the Council's approach to development in rural Bassetlaw and would like to be notified of the dates of the relevant Hearings in due course.

We trust the above comments will be taken into account during the examination in public and would be grateful if you could confirm safe receipt.

Yours sincerely

A large black rectangular box redacting the signature of the sender.A small black rectangular box redacting the name of the sender.

MA(Hons)TP MRTPI

AD-REF019



[REDACTED]

From: [REDACTED]
Sent: 17 February 2022 13:29
To: The Bassetlaw Plan
Subject: RE: Representations to the Bassetlaw Local Plan Publication Draft Addendum - on behalf of the [REDACTED], in respect of proposed site GT006
Attachments: 220217 Bassetlaw Publication Addendum 2022 - Representations - Traveller site GT006 FINAL.pdf; 220217 Representation Form - Completed.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,

I hope you're well.

Please find enclosed our representations to the Bassetlaw Local Plan Publication Draft Addendum consultation on behalf of our client, [REDACTED], in respect of the proposed allocation of site ref: GT006.

Apologies for any inconvenience coursed in submitting our representation in report format, we have however in addition completed the dedicated representation form.

We welcome the opportunity to maintain engagement in the preparation of the emerging Local Plan and would be happy to discuss any of the points raised within this submission.

Please do not hesitate to contact me at this office should you wish to discuss the submission further.

I would be grateful if you could confirm receipt.

Kind regards,

[REDACTED]

[REDACTED]
Planner
Planning

Savills, 3 Wellington Place, Leeds LS1 4AP
Tel : +44 (0) 113 220 126
Email : [REDACTED]
Website : <http://www.savills.co.uk>



Before printing, think about the environment

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Bassetlaw Local Plan 2020-2037

Publication Version Addendum Representation Form January - February 2022

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

to provide representations on the Bassetlaw Local Plan. Bassetlaw District Council must receive representations by . Only those representations received by that time 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: _____
- an e-mail attachment: _____
- post to: _____

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

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:

[Council's Privacy Notice Webpage](#)

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 [Bassetlaw District Council's Planning Policy Webpage](#)

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: 17/02/2022

-

Part A- Personal Details

Name: [REDACTED] private landowner

Organisation (if applicable):

Address: c/o Savills (UK) Ltd

Postcode:

Tel: c/o Savills (UK) Ltd

Fax:

Email: c/o Savills (UK) Ltd

Agent: [REDACTED]

Organisation (if applicable): Savills (UK) Ltd

Address: 3 Wellington Place, Leeds

Postcode: LS1 4AP

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: Savills (UK) Ltd on behalf of Private Landowner, [REDACTED]

Policy: Policy ST32: Sites for Gypsies and Travellers

Paragraph:

Policies Map:

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

Yes ☐

No ☒

Yes ☐

No ☒

Yes ☐

No ☐

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 written representations.

(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 our written representations.

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.

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

Yes ☒

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

No ☐

Please refer to our written representations.

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.

Objection to Proposed Site Allocation GT006, Brough Lane, Elkesley

Contents

1. Introduction

- 1.1. These representations have been prepared by Savills (UK) Ltd on behalf of a private landowner in response to the Bassetlaw District Council (BDC) Publication Addendum Draft Local Plan (January 2022), with specific concerns in respect of proposed allocation of site ref: GT006 (also referred to as site ref: GT005 on page 82).
- 1.2. My client, [REDACTED], are significant landowners within and therefore have a keen interest in the emerging BDC Local Plan. This representation seeks to object to draft allocation ref: GT006 for reasons including, but not limited to, the site not being sequentially preferable given its location outside of the development boundary of Elkesley and the significant access constraints in respect of Brough Lane (unsuitable and unsafe).
- 1.3. The remainder of this representation sets out our key concerns in respect of proposed allocation ref: GT006, having regard to BDC's draft policy on Traveller and Gypsy sites (Policy ST32); background documents submitted by BDC in support of the emerging Plan and national policy for Traveller and Gypsy sites.
- 1.4. This representation has been prepared in accordance with paragraph 35 of the NPPF which states plans must be:
 - a. [REDACTED] – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b. [REDACTED] – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c. [REDACTED] – 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. [REDACTED] – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 1.5. The following sections of this report are arranged as follows:
 - Section 2: Provides relevant background history;
 - Section 3: Sets out our comments on the Publication Addendum Draft Local Plan;
 - Section 4: Concludes and summarises the report.

2. Relevant Planning History

- 2.1. It is worth setting out the sites planning history to help clarify the current context in terms of planning and enforcement action.
- 2.2. In 2014 planning permission was refused (see application ref: 14/00710/FUL) for the use of a site for one motor home. The committee report noted that:

'The site is located in open countryside .. and is served by Brough Lane which is a single truck access with no street lighting pedestrian facilities or passing places. Site is located in open countryside, outside, where development is strictly controlled except in certain exceptional circumstances. The proposed residential use does not fall within any of the define exceptional circumstances and the access arrangements to the site are unacceptable in highway safety terms. As such the proposal would be country to existing local and national planning policies and the principle is therefore not acceptable.

- 2.3. The highway authority commented as follows *'the highway authority have objected to the proposed development on Highway safety grounds due to the inadequate access width, no street lighting, no pedestrian facilities and no passing places.'*
- 2.4. The above planning application was refused permission on the grounds that the access was unacceptable in highway safety terms. It is worth highlighting that the application (ref: 14/00710/FUL) was for a single motor home which is significantly far less development when compared to the now proposed 9 units which form draft allocation ref: GT006. There is no mitigation proposed within the draft allocation therefore the previous highways concerns remain and can be considered to be even more relevant given the proposed intensified use of the site.
- 2.5. We are aware that the site changed ownership in 2014 and has since had a number of enforcement notices served against it. This is in addition to a number of issues being raised in respect of the site by Elkesley Parish Council.
- 2.6. As far as we are aware, the existing caravan uses on site are unlawful and unauthorised and have been for a number of years. Notwithstanding this, the emerging Local Plan proposes to allocate the site for a Traveller and Gypsy site which therefore seeks to regularise the existing unlawful use on site albeit this directly conflicts with previous comments from both BDC Development Management / Highways Offices and the Parish Council.

2.7. In addition, following a review of BDC's Public Access website, I note that there is currently an outstanding enforcement case in respect of the site, against the '*Unauthorised Change of Use of the Land to Stationing of 8 No Caravans for Residential Purposes and Associated Vehicles*' (18/00265/ENF). The enforcement case further demonstrates concerns in respect of highways matters and the unlawful use of the site for caravans.

2.8. The draft allocation of the site therefore directly contradicts and undermines the current ongoing enforcement action.

2.9. It must also be noted that the planning permission ref: 16/00286/FUL, was granted on appeal in 2016 for the erection of 4 dwellings on the eastern edge of Brough Lane. The Inspector's conclusions are relevant to the proposed allocation of site ref: GT006 in respect of highway matters.

2.10. At paragraph 21 of the Inspector's Report, the Inspector states that:

'the appeal proposal would increase activity on Brough Lane but only on its initial eastern section for a limited distance. Given the modest scale of the scheme for 4 dwellings the increase in the volume of traffic would not be great. Moreover, the appeal scheme incorporates the widening of the site access (including improvements to visibility) and alterations to Brough Lane (including its widening on the north side along the site frontage to allow a passing place, re-surfacing up to the appeal site access, and the provision of a turning head for tankers visiting the sewage works).'

2.11. As outlined above, the associated planning conditions attached by the Inspector required the applicant to upgrade 55.38m of Brough to facilitate access to the proposed 4 no. dwellings. It must therefore be noted that proposed site ref: G006 is located significantly further along Brough Lane, measuring c. 270m west of the land. The proposed allocation seeks to provide a total of 9 caravan pitches and does not include any upgrades to Brough Lane as part of the allocation. The proposed allocation therefore seeks to intensify the use of the existing site with no regard to highways safety despite previous concerns raised by both BDC Highways Offices and indeed the Planning Inspector referred to above. The proposed allocation therefore undermines the wider planning process in this respect and cannot be supported.

3. Publication Addendum Draft Local Plan Commentary

- 3.1. On behalf of our client, the Carr Family, we therefore object to proposed allocation of site ref: GT006 and specifically against points B, C, E, F and G of Draft Policy ST 32 in the emerging Local Plan. These points seek to demonstrate and explain the approach undertaken to inform the selected draft allocations for Traveller and Gypsy sites across the region. Our objection is therefore based on the following considerations:
-
- 3.2. The site is not within the development limits of Elkesley, nor does it adjoin the current development limits of the village, and as such the site should be classed as an 'out of settlement' site, which is noted as the least preferred location for development as per Draft Policy ST 32. This is confirmed through the 'Land Availability Appendices' which describes the site as "*Countryside to all sides. 150 metres away from Elkesley*" confirming the site as 'out of settlement'. Development in this location is therefore considered to be unsustainable and not in line with either local or national policy in this respect.
- 3.3. Draft Policy ST32 states that out of settlement sites should only be considered if alternative suitable sites within / adjoining the settlement limits are not available and even then such sites should be "*evidenced by a sequential assessment*". From a review of the Council's evidence base, it is our understanding that a sequential test has not been undertaken to justify development on the proposed site ref: GT006 as required by part B of Policy ST32 and therefore the proposed allocation contradicts said policy. This approach in itself is concerning given BDC are preparing a plan whereby the detailed draft policies therein contradict one another. In addition, it is considered extremely unlikely that there are no alternative suitable sites across Bassetlaw, either within the development boundary of a settlement or in an edge of settlement location. It is therefore considered that a sequential test should be undertaken by BDC to explore alternative suitable locations prior to proceeding with draft allocation ref: GT006. At present, the draft allocation is not considered to be supported by adequate background evidence and further still, the proposed allocation contradicts other draft policies within the emerging Local Plan.
- 3.4. Moreover, the location of proposed allocation site ref: GT006 directly contradicts national policy in the Planning Policy for Traveller Sites (PPTS) (2015) (paragraph 25) which states that: "*Local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements*". National Policy seeks to promote sustainable development and it is considered that the proposed site allocation ref: GT006 directly conflicts with this given its location in the open countryside.
- 3.5. In short, it is considered that a sequential assessment should be undertaken to determine the location of preferred Traveller and Gypsy Sites in line with the wider emerging Local Plan. In doing so, it is considered that the proposed site ref: GT006 would not pass the sequential assessment and the proposed allocation cannot be evidenced nor supported in this respect. The approach for sustainable development is upheld by national policy and the proposed allocation of site ref: GT006 therefore contradicts national policy in this respect.

- 3.6. The Environment Agency's Surface Water Flood Risk Map demonstrates that the proposed site ref: GT006 is located in an area at high risk of flooding as shown below:-

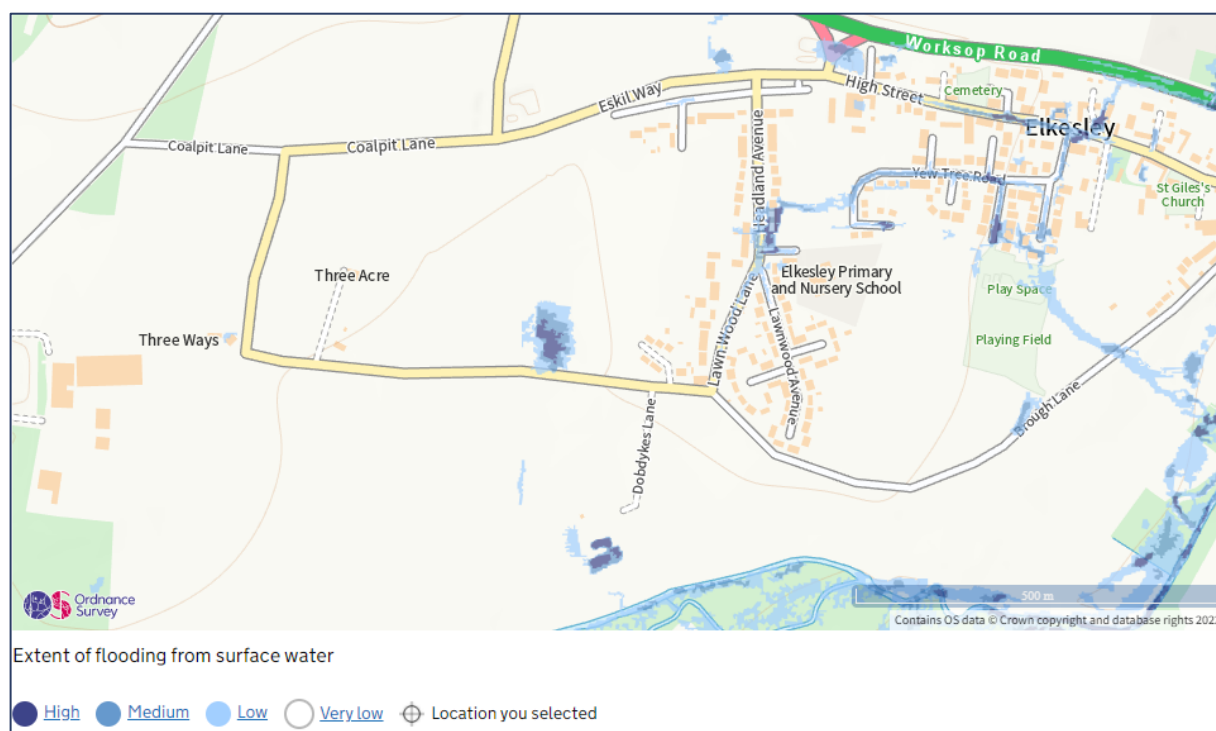


Figure 1: EA Surface Water Flood Risk Map

- 3.7. The proposed location of site ref: GT006 is therefore contrary to the planning policy for travellers 2015 guidance which at para 13a) specifically advises local planning authorities to ensure that their policies '*do not locate sites in areas at high risk of flooding ... given the particular vulnerability of caravans*'. The proposed location therefore once again contradicts national and policy planning policy in this respect.

- 3.8. Building on from the above points in respect of the suitability (or not) of site: GT006, site GT006 is located outside of a Small Rural Settlement, as categorised in the emerging Local Plan. Whilst this allows access to existing services and facilities within Elkesley, including a primary school, open space, and a bus service, the village does not provide access to health services, as specifically required and stated within part E) of Policy ST32. This therefore contradicts national policy (PPTS)(2015) in respect of paragraph 4 which states "*to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure*".

- 3.9. The proposed allocation site ref: GT006 relates to the provision of nine pitches. Firstly the national Government 'Designing Gypsy and Traveller Sites' states *"an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, (or two trailers)"* (paragraph 7.12).
- 3.10. Secondly, the document also states *"some Gypsies and Travellers often have larger than average families"* (paragraph 7.8), and suggests that these needs should be determined by the local authority. As stated in the BDC's Gypsy and Traveller Accommodation Needs Assessment (paragraph 5.6), *"Household size on each pitch varied between 1 person and 10 persons"*. Therefore, national guidance and BDC assessment suggests a pitch, on average, will accommodate more people and space than an average dwelling in comparison.
- 3.11. Elkesley is a village which accommodates circa. 822 people (2011 census), consisting of 328 dwellings (Bassetlaw District Council's Unique Property Reference Number database 2018), and is therefore classed as a 'Small Rural Settlement' in the emerging Local Plan. As point F states, new traveller sites should: *"be of a scale that is appropriate to local character, its local services and infrastructure and would not dominate the nearest settled community"*. Considering the number of extra persons brought by the proposed nine pitches in the wider Elkesley area, the proposed new Traveller Site ref: GT006 could be deemed as inappropriate to the local character of the area and would dominate the nearest settled community: Elkesley. The proposed site ref: GT006 is considered to be disproportionate to the nearby village in this respect.
- 3.12. This viewpoint is also supported through national policy in the PPTS which states *"local planning authorities to have due regard to the protection of local amenity and local environment"* (paragraph 4); and, *"relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density"* (paragraph 10). It is considered that the Council, in proposing site ref: GT0006, have not sufficiently considered the potential effects of a new traveller site on the wider Elkesley area in respect of adverse impacts on the intrinsic nature of the settlement. This therefore contradicts both local and nationally policy in this respect.
- 3.13. It must be noted that the existing vehicular access to the site via Brough Lane, is considered to be unsatisfactory for a number of reasons. We set this out in detail below.
- 3.14. Brough Lane is categorised as a 'Byway open to all Traffic' (BOAT) which is defined as *'a way where there is a right for vehicular and all other traffic, but the way is used mainly for the purposes for which footpaths and bridleways are used.'*
- 3.15. The below image confirms the narrow nature of Brough Lane.



Figure 2: Image looking west along Brough Lane, towards proposed site GT006

- 3.16. The highway issues in respect of Brough Lane are well established and understood. These issues have been highlighted in various previous planning applications, the most relevant of which we detailed at Chapter 2 of this report, which referred to an application which was refused on the proposed site ref: GT006 as well as the approved consent for 4 residential dwellings on Brough Lane. Both of these applications confirmed on-going issues from a highways and safety perspective in regards to Brough Lane. It cannot be denied that vehicular access on Brough Lane is unacceptable in highway safety terms and is insufficient to serve the proposed 9 pitches at site ref: GT006. This is particularly important noting the above Point F which confirms the anticipated number of residents which may result from the 9 caravan pitches proposed.
- 3.17. It must also be noted that issues with respect to vehicle access on Brough Lane were also considered in respect of other potential development schemes such as Elksley Fields during which it became apparent that Brough Lane was not suitable as a vehicular access point. As such, it was agreed that the proposed scheme would instead utilise Coalpit Lane as the single vehicular access point with Brough Lane restricted to pedestrian/ cycle access only.
- 3.18. In considering this, it must also be noted that proposed site ref: GT006 is located significantly further along Brough Lane, measuring c. 270m west of the lane as demonstrated on the map below: -



Figure 3: Showing the distance along Brough Lane of Site GT006

- 3.19. Issues in respect of the proposed access are also acknowledged and accepted by the Bassetlaw District Council (BDC), with the Land Availability Assessment Appendices (January, 2022), stating that Brough Lane is not of adequate standard to serve additional development:

“Brough Lane is a byway open to all traffic... The standard of Brough Lane is consistent with that designation as it lacks footways, is off insufficient width to allow two vehicles to pass, lacks passing space for vehicles, and has no street lighting. It is therefore not of an adequate standard to serve additional development that would generate vehicular traffic. In this case, that would likely include vehicles towing caravans”. (pg. 480).

- 3.20. The Council’s own evidence base does not therefore support the proposed allocation ref; GT006.

Emergency Vehicles

- 3.21. From reviewing the proposed allocation site ref: GT006 it is also evidently clear that there is no secondary access to the site therefore vehicles, including emergency service vehicles, can only access the site via Brough Lane. The council has not provided any evidence to demonstrate that the views of the Land Availability Assessment (January 2022) have been overcome and as such there is no evidence that safe access can be achieved from Brough Lane.

- 3.22. It is therefore considered that the proposed site ref: GT006 cannot be safely accessed in its current form. This is particularly relevant to access by emergency services and therefore the proposed allocation also poses a risk to life to any prospective residents.

Refuse Vehicles

- 3.23. In addition, the aforementioned access to the site is also too narrow for refuse vehicles, preventing sufficient refuse collection from the site. As stated in 'Designing Gypsy Sites':

"Standard domestic waste disposal arrangements must be provided for each pitch in accordance with local authority requirements for the disposal of domestic waste. A key element in designing the layout of the site is to ensure that sufficient space exists for local authority refuse collection vehicles to reach an appropriate point from which waste can be collected from individual pitches, as well as any communal refuse areas".

- 3.24. Given the width of Brough Lane, refuse vehicles would be unable to access the site directly and therefore the road would require substantial highways improvements in order to make the site safely accessible for refuse collection. To our knowledge, such highways improvements are not proposed alongside proposed site allocation ref: GT006.

Pedestrians/ Cyclists

- 3.25. Furthermore, Brough Lane is not considered to be safe for pedestrians to walk along given there are no separate footways for pedestrians. As a result, an increase of traffic on this road would cause danger to any pedestrians who wish to use this byway. By promoting a Traveller Site only accessible via Brough Lane, vehicular and pedestrian traffic will increase on this unsafe byway. This is in direct contradiction to point G of Policy ST32 which stipulates that sites should "*have suitable, safe and convenient access to the highway network*". It is clear therefore, that the allocation of this site is unsuitable on access and highways grounds.
- 3.26. The access into the site would consequently require extensive improvements to make it accessible for emergency vehicles, refuse vehicles, and to cope with the increase in vehicular traffic that the proposed use as a Gypsy and Traveller Site would bring from the nine pitches proposed. We note that BDC have not provided any evidence which demonstrates the site will see improvements to its access as part of the proposed allocation therefore, it is considered that the existing access to the site is insufficient for the proposed use.

4. Summary and Conclusions

- 4.1. These representations have been prepared by Savills (UK) Ltd on behalf of a private landowners in response to the Bassetlaw District Council (BDC) Publication Addendum Draft Local Plan, with specific concerns in respect of the proposed allocation of site ref: GT006.
- 4.2. Savills, on behalf of the Carr Family, object to the proposed allocation ref: GT006 due to the following reasons:
- i. The proposed site does not constitute a sequentially preferable location given its location outside of the current settlement limits of Elkesley;
 - ii. The proposed allocation contradicts policies within the wider emerging Local Plan;
 - iii. The scale of the proposed site is not to a scale appropriate to the local character and has potential to dominate the settled community;
 - iv. Brough Lane is an unsuitable for vehicular access as it is regarded as a byway, it is too narrow for vehicular access (including emergency and refuse) and is therefore not of adequate standard to serve additional development;
 - v. Previous applications confirm that Brough Lane as a vehicular access is unacceptable in highway safety terms; and
 - vi. The proposed site is at a high risk of surface water flooding.
- 4.3. It is therefore considered that the proposed site allocation ref: GT006 cannot be supported.
- 4.4. We welcome the opportunity to maintain engagement with BDC in the preparation of the new Local Plan and we would be happy to discuss any of the points raised within this report further.

AD-REF020



[REDACTED]

From: [REDACTED]
Sent: 17 February 2022 15:14
To: The Bassetlaw Plan
Subject: Bassetlaw Plan - OBJECTION
Attachments: reg-19-form-a-b-12pt-jan-2022.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

Please see attached completed documentation to continue to lodge my formal objections.
Regards
[REDACTED]



Bassetlaw Local Plan 2020-2037

Publication Version Addendum Representation Form January - February 2022

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 17th February 2022**. Only those representations received by that time 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
- an e-mail attachment: thebassetlawplan@bassetlaw.gov.uk
- 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:

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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:

[Council's Privacy Notice Webpage](#)

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 [Bassetlaw District Council's Planning Policy Webpage](#)

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: 17 February 2022

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:

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.

I continue to remain extremely concerned regarding the processes that BDC are undertaking in relation to the planning and delivery of this Bassetlaw Plan. It is public knowledge that it has been identified as being unsound by the Local Authority.

The Prime Minister himself is aware of the concerns that local Bassetlaw residents have in relation to the number of homes that are being planned – that the government requires each authority to make space and plan for 10,000 homes when in fact the requirement is 4896. The number of homes in this latest proposal has now increased from the initial quota. This is, and continues to remain, unacceptable.

I have already submitted various concerns regarding the logistics of the proposed Bassetlaw development at Peaks Hill Farm.

Since the initial plans were produced, this latest amendment does now see an increase of the proposed number of houses at this development.

I remain extremely concerned regarding the feasibility of the sustaining of the local infrastructure: already plans have been changed on the B6045 and Thievesdale Lane for traffic calming measures such as filter lanes, extensions of the 30mph zone and traffic lights – these were in the initial plans for the Edge development however post-approval being granted, these have now been removed.

The area is home to a number of species of wildlife, including deer, fox, birds of prey, pheasants etc. This continues to be an erosion on green spaces around Worksop.

My other objections include:

- Deletion of the word 'infrastructure' from the plan – therefore no constructive support behind the plans.
- The concept plan has been deleted.
- The green woodland area in the centre has now been reduced in size from 18.3 hectares to 7.6. This in turn will facilitate further houses being built.
- There has been a deletion of the maintaining hedgerows (in essence these will be lost).
- An on-site primary school has now been changed to an off-site facility. Current local primary schools remain oversubscribed, and children are now having to access secondary school education in adjacent towns. This remains unacceptable.

I continue to find the whole process regarding submitting objections laborious and to be frank, obstructive in nature. All objections raised should stand: residents should not be continually asked regarding their objections to the plan – it does feel that the Council have made this process bureaucratic and obstructive in nature.

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:

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.

AD-REF021



[REDACTED]

From: [REDACTED]
Sent: 17 February 2022 15:50
To: The Bassetlaw Plan
Subject: National Trust response to Bassetlaw Local Plan Addendum
Attachments: National Trust response Bassetlaw LP Addendum 02-22.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 a response from the National Trust to the Bassetlaw Local Plan Addendum.

Many thanks,



[REDACTED]
Planning Adviser

National Trust
Hardwick Consultancy Office
[REDACTED]

-- The National Trust is a registered charity no. 205846. Our registered office is Heelis, Kemble Drive, Swindon, Wiltshire SN2 2NA. The views expressed in this email are personal and may not necessarily reflect those of the National Trust unless explicitly stated otherwise. This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify me immediately. If you are not the intended recipient of this email, you should not copy it for any purpose, or disclose its contents to any other person. Senders and recipients of email should be aware that, under the Data Protection Act 2018, the contents may have to be disclosed. The National Trust has scanned this email for security issues. However the National Trust cannot accept liability for any form of malware that may be in this email and we recommend that you check all emails with an appropriate security tool.



Bassetlaw Local Plan 2020-2037

Publication Version Addendum Representation Form January - February 2022

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- an e-mail attachment: thebassetlawplan@bassetlaw.gov.uk
- post to: **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

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Please tick/ delete as appropriate:

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

Yes Y

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 Y


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 Y

No ☐

Printed Name: 

Signature: 

Date: 17/02/2022

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):

National Trust

Address:

Hardwick Consultancy Office, Doe Lea, Derbyshire

Postcode:

S44 5QJ

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: National Trust

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

Policy: Spatial Strategy (ST1)

Paragraph: 5.1.12 – 5.1.16

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.

National Trust notes the re-framing of the strategy in relation to economic development away from a 'supply led' approach, to refer to a 'completions trend scenario' (paragraph 5.1.12). Nevertheless the strategy remains largely unchanged and many of our previous comments continue to be relevant.

Paragraph 5.1.14 refers to 'national planning policy which states that future employment needs can be based on the past take-up of employment land and property and/or future property market requirements...'. We believe that this may refer to national Planning Practice Guidance for housing and economic needs assessment, which contains a section on how needs should be assessed. This lists a range of factors to be taken into account. If so then the guidance does not seem to suggest that a single factor (past take-up in this case) should be taken as a proxy for need.

Paragraph 5.1.15-5.1.16 refer to the A1 Corridor Logistics Assessment in justifying a proposal for large-scale logistics development at Apleyhead. Even if this evidence of need is considered to be robust, and if the proposal is not considered likely to impact on regeneration of other sites and areas, it does not negate the need for the Local Plan to take account of other factors that may undermine sustainable development, such as transport impacts (road capacity issues and travel patterns) and excessive greenfield development for employment and housing.

- 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.**

National Trust suggests that the assessment of housing and employment needs is reviewed to achieve reduced targets that represent reasonable, sustainable growth for the district. Proposed housing and employment allocations should then accordingly be reviewed against the Local Plan evidence base with unnecessary greenfield land allocations being removed from the plan.

- 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

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

To ensure that any discussions about changes to the overall strategy, and key policies relating to strategic allocations including Apleyhead and the Garden Village, have proper regard to the potential impacts of those schemes and the transport interventions required to achieve them. This includes potential road widening which may impact on National Trust inalienable land.

Part B - Your representation

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

Name or Organisation: National Trust

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

Policy: ST3 - Garden Village design and development principles

Paragraph: 5.3.12

Policies Map:

2. 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 ☐

- 3. 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.

Paragraph 5.3.12 states that 'a 400m green infrastructure buffer will be implemented by Policy ST4'. Policy ST3 Part 2d(i) goes on to state that the development scheme will 'take into account relevant mitigation to manage potential recreational disturbance upon the nearby Clumber Park SSSI...' including:

- i. ensuring that housing development is situated outside the 400m exclusion zone of the Clumber Park SSSI and the Sherwood Forest ppSPA boundaries;

We think that these statements are unclear and potentially mis-leading. We are uncertain whether the intention is to require the developer to create an additional 400m green infrastructure buffer within the site, or whether, as Clumber Park SSSI is more than 700m from the site at its closest point, these policy statements are essentially passive?

We welcome the inclusion of Part 2d(ii) to avoid creating habitats suitable for breeding by ground nesting birds associated with Clumber Park SSSI / Sherwood Forest ppSPA, which has been clarified relative to the previous wording in Policy ST4.

- 4. 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.**

Bearing in mind the existing distance between the site and Clumber Park SSSI, we consider that the stated distance of 400m should either be increased or replaced with a stated landscape buffer within the Garden Village site in order to be a meaningful mitigation measure.

- 5. 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

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

To ensure that any discussions about changes to the overall strategy, and key policies relating to strategic allocations including Apleyhead and the Garden Village, have proper regard to the potential impacts of those schemes and the transport interventions required to achieve them. This includes potential recreational impacts on Clumber Park SSSI and Sherwood Forest ppSPA.

Part B - Your representation

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

Name or Organisation: National Trust

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

Policy: ST7 - Provision of land for Employment Development

Paragraph: 6.1.11

Policies Map:

2. 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 ☐

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

We note the change to how the strategy is framed from a 'supply led' approach to a 'completions trend scenario' (paragraph 6.1.11). Paragraph 6.1.11 contains a similar statement to the Spatial Strategy, i.e. that 'national planning policy states that future needs can be based on the past take-up of employment land and property and/or future property market requirements....'. We believe that this may refer to national Planning Practice Guidance for housing and economic needs assessment, which contains a section on how needs should be assessed. This lists a range of factors to be taken into account. If so then the guidance does not seem to suggest that a single factor (past take-up in this case) should be taken as a proxy for need.

We also note that the overall employment allocation has decreased from 169 to 128 hectares. However, many of our concerns about the high growth levels promoted by this plan remain. Please therefore refer to our response to previous consultations.

The new policy wording for ST7 Part 5 relating to the strategic employment site at Apleyhead Junction is very similar to that in the Publication version Local Plan. Even if the A1 Corridor Logistics Assessment is considered a robust assessment of the need for large-scale logistics development in the region/sub-region, and if the proposal is not considered likely to impact on regeneration of other sites and areas, it will still be necessary for the Local Plan to take account of other factors that may undermine sustainable development, such as transport impacts (road capacity issues and travel patterns) and excessive greenfield development for employment and housing, as set out in our response to the Publication version Local Plan.

- 4. 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.**

National Trust suggests that the assessment of housing and employment needs is reviewed to achieve reduced targets that represent reasonable, sustainable growth for the district. Proposed housing and employment allocations should then accordingly be reviewed against the Local Plan evidence base with unnecessary greenfield land allocations being removed from the plan.

- 5. 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

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

To ensure that any discussions about changes to the overall strategy, and key policies relating to strategic allocations including Apleyhead and the Garden Village, have proper regard to the potential impacts of those schemes and the transport interventions required to achieve them. This includes potential road widening which may impact on National Trust inalienable land.

Part B - Your representation

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

Name or Organisation: National Trust

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

Policy: ST40A – Recreational disturbance Avoidance and Mitigation Strategy (RAMS)

Paragraph: 8.6.17, 8.6.9

Policies Map:

2. 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 ☐

3. 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.

National Trust supports Policy ST40A in principle, subject to assurances from the Council about the early progress and adoption of a Supplementary Planning Document containing RAMS for Clumber Park SSSI.

We welcome the commitment to mitigation of the recreational impact on Clumber Park SSSI associated with new residential development in the plan area. Part 3 of the policy is important as the preparation of a RAMS to inform Part 2 will require collaborative working and may take some time, particularly bearing in mind that paragraph 8.6.17 states that this will be formally adopted by

the Council as a Supplementary Planning Document. Unfortunately Part 3 is currently unclear and therefore requires re-drafting.

Firstly where the policy refers to 'the completion of a long term strategic solution' we believe that this should more explicitly refer to the 'adoption of a Supplementary Planning Document containing RAMS'. Where the policy refers to 'residential development of 50 or more dwellings' we believe that this should be clarified to ensure that larger sites cannot be split and considered as less than 50 dwellings. Finally, the mitigation is expected to be evidenced within 'the project level Habitats Regulations Assessment for each proposal'. This is problematic because the trigger for a shadow HRA contained within Policy ST40(b) is that it is within a 5km buffer zone of Sherwood Forest ppSPA. Clumber Park SSSI is not of itself an international site and is not therefore subject to the Habitats Regulations, while its main recreational zone of influence is stated to be 24.7km. Thus neither an HRA nor a 5km zone are likely to adequate as a mechanism for supporting negotiations on developer contributions.

There is also a discrepancy in Part 2 of the policy which refers to Birklands and Bilhaugh SAC being subject to RAMS, whereas paragraph 8.6.9 of the supporting text appears to contradict this stating that there is no requirement for a RAMS for Birklands and Bilhaugh SAC.

4. 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.

Cross check Policies ST40, ST40A, supporting text and evidence base for consistency when referring to various national and international wildlife sites that are mentioned. Clarify which designations are subject to shadow HRA and which are subject to RAMS.

Suggestions for changes to the wording of Part 3 are as follows:

"3. Prior to the ~~completion of a long term strategic solution~~ adoption of a Supplementary Planning Document containing a RAMS, the Council will negotiate bespoke site-specific mitigation and/or financial contributions from all residential development sites with capacity for of 50 or more dwellings across the whole site (whether brought forward as a whole or in parts) in the district within the identified Clumber Park SSSI zone of influence and/or Birklands and Bilhaugh SAC/Sherwood Forest NNR Zone of Influence, as evidenced by the project level Habitats Regulations Assessment for each proposal. This will be informed by outline costings for mitigation measures and benchmarked against similar strategic RAMS in other districts."

5. 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

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

Policy ST40A has direct implications for the future management of Clumber Park, of which National Trust is the owner.

Part B - Your representation

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

Name or Organisation: National Trust

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

Policy: ST51 – Renewable Energy Generation

Paragraph:

Policies Map:

2. 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 ☐

- 3. 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.

National Trust considers that the identification of the former High Marnham Power Station as an Area of Best Fit for Renewable Energy may be more appropriate than identifying the site as a Green Energy Hub (as previously). This is on the basis that a scheme such as a low level solar PV development may be able to make good use of the existing grid connections without generating the levels of traffic on rural roads that may be associated with a more intensive employment generating use.

We therefore continue to support Policy ST51 in principle. However, all of the requirements that are included in Part 3 of the policy relating to the impacts of the scheme should also be applied to the Area of Best Fit (High Marnham). The individual impacts of a site must be assessed as well as any cumulative impacts. The version of the policy contained in the Publication version contained some useful provisions in this regard, which we have drawn on in our suggested modifications below.

- 4. 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.**

Re-introduce the protections contained within this policy in the Publication version Local Plan, along with flood risk and residential amenity, ensuring that they apply to the Area of Best Fit as well as other sites. For example:

Applications for all sites including the Area of Best Fit should demonstrate the satisfactory resolution of relevant impacts (including cumulative impacts) having regard to:

- a) location, setting, landscape and visual impacts;
- b) the historic environment, natural environment and ecology;
- c) best and most versatile agricultural land;
- d) air and water quality, hydrology and hydrogeology;
- c) impacts associated with noise, light, glare, smell, dust, emissions or flicker;
- d) traffic and transport;
- e) flood risk both on and off the site.

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

No

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

Part B - Your representation

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

Name or Organisation: National Trust

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

Policy: ST54 – Transport Infrastructure

Paragraph:

Policies Map:

2. 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 ☐

- 3. 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.

National Trust remains concerned about the scope, scale and deliverability of interventions required on the A57 corridor as a result of proposed site allocations – please refer to our response to the Publication version Local Plan.

We welcome the fact that Policy ST54 does now refer to the need to ensure that impacts on the strategic and local road network including the A57 and A1 are identified and addressed (for example part 1.C) and that the delivery/phasing of developments may be constrained if necessary by Part 4 of the policy. However, the Transport Assessment Update provides no clarity around the potential need for widening/dualling the A57, or the cost or deliverability of any such intervention.

We are also concerned that the Transport Assessment Update may not have factored in the redevelopment of former Bevercotes colliery as an employment site which has been introduced to the plan, and any additional impact that this may have on the A57 corridor and junctions. Does former Bevercotes colliery need to be incorporated into Table 25 (Local Plan Development Sites) and the assessments of impacts and mitigation that follow?

- 4. 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.**

Clarity is required around the transport impacts of proposed site allocations including Apleyhead strategic employment site, the strategic interventions that would be required to mitigate these impacts, and the cost and deliverability of those interventions.

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

Yes

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

To ensure that any discussions about changes to the overall strategy, and key policies relating to strategic allocations including Apleyhead and the Garden Village, have proper regard to the potential impacts of those schemes and the transport interventions required to achieve them. This includes potential road widening which may impact on National Trust inalienable land.

Part B - Your representation

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

Name or Organisation: National Trust

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

Policy: ST58 – Provision and Delivery of Infrastructure

Paragraph:

Policies Map:

2. 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 ☐

- 3. 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 Infrastructure Delivery Plan that supports this policy currently refers to improvements to junctions/roundabouts but does not refer to the potential need to widen the A57 for a significant stretch as a result of proposed development. This is a major oversight having regard to the findings of the Transport Assessment Update 2022, which identifies significant stress on the route under future development scenarios. There are unresolved questions around the cost, funding mechanism and deliverability of dualling, if required, on a road that is flanked by woodland comprising a Local Wildlife Site to the north and National Trust inalienable land to the south.

- 4. 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.**

Clarity is required around the transport infrastructure improvements that would be required to mitigate the impacts of development of the proposed site allocations including Apleyhead strategic employment site, and the cost and deliverability of those interventions.

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

Yes

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

To ensure that any discussions about changes to the overall strategy, and key policies relating to strategic allocations including Apleyhead and the Garden Village, have proper regard to the potential impacts of those schemes and the transport interventions required to achieve them. This includes potential road widening which may impact on National Trust inalienable land.

AD-REF022



[REDACTED]

From:

Sent:

To:

Cc:

Subject:

[REDACTED]
17 February 2022 16:11

The Bassetlaw Plan

[REDACTED]
Representations to Bassetlaw Local Plan 2020 – 2037 January - February 2022
Consultation

Attachments:

Representations February 2022.zip

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

Publication Version Addendum Consultation January – February 2022

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: Completed Response Form

Representations on behalf of JG Pears

ENCLOSURE 1 – Representations submitted in October 2021 on Policy ST8 EM008, Policies Map, Policy ST51, Policy ST39

ENCLOSURE 2 – Prospectus for High Marnham

ENCLOSURE 3 – EM007 (pages 55 – 58)

ENCLOSURE 4 – Local Plan Reps submission February 2020

ENCLOSURE 5 – Concept Plan

ENCLOSURE 6 – Vision Statement

ENCLOSURE 7 – Email to BDC Jan 2021

ENCLOSURE 8 – Proposed Zoning Plan



Oriel House
42 North Bar
Banbury
Oxfordshire
OX16 0TH

Tel: 01295 672310 Fax: 01295 275606

Email: [REDACTED]



Bassetlaw Local Plan 2020-2037

Publication Version Addendum Representation Form January - February 2022

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

to provide representations on the Bassetlaw Local Plan. Bassetlaw District Council must receive representations by . Only those representations received by that time 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: _____
- an e-mail attachment: _____
- post to:

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

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:

[Council's Privacy Notice Webpage](#)

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 [Bassetlaw District Council's Planning Policy Webpage](#)

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:

17/02/2022

Part A- Personal Details

Name:

Organisation (if applicable): JG Pears

Address: c/o Frampton Town Planning Ltd

Postcode:

Tel:

Fax:

Email:

Agent:

Organisation (if applicable): Frampton Town Planning Ltd

Address: Oriel House, 42 North Bar, Banbury

Postcode: OX16 0TH

Tel: 01295 672310

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: JG Pears

Objection to deletions in the Publication Version Addendum

- i. The deletion of High Marnham Green Energy Hub from the allocation as a General Employment Site
- ii. The deletion of Section 6.2 paragraphs 6.2.1 – 6.2.12
- iii. The deletion of Policy ST8
- iv. The deletion of the Policies Map identifying the allocation EM008 and the allocation assumed to be for a solar array under provision REN001

Objections to additions/amendments in the Publication Version Addendum

- i. The Identification of High Marnham Power Station within the revised wording of Policy ST51
- ii. The wording of paragraphs 10.2.9 – 19.2.21 as proposed to be changed from the Publication Version August 2021
- iii. The inclusion of the Policies Map addition 'Former Marnham Power Station Site'. Area of Best Fit.

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

Yes ☐

No ☐

Yes ☐

No ☐

Yes ☐

No ☐

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 accompanying documentation.

(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 accompanying documentation.

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.

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

Yes ☒

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

No ☐

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 Addendum - Publication Stage Representations

High Marnham on behalf of JG Pears

1. INTRODUCTION

1.1 The following submissions are made on behalf of JG Pears. The Council's website states:

'The Bassetlaw Local Plan 2020 – 2038¹ Publication Version Addendum, January 2020 should be read in conjunction with the Bassetlaw Local Plan 2020 – 2037: Publication Version August 2021'.

1.2 These submissions are hence to be read in conjunction with the submissions made to the Publication Version August 2021 which are attached for convenience as **Appendix 1**.

1.3 JG Pears objections are made in respect of:

Objection to deletions in the Publication Version Addendum

- i. The deletion of High Marnham Green Energy Hub from the allocation as a General Employment Site
- ii. The deletion of Section 6.2 paragraphs 6.2.1 – 6.2.12
- iii. The deletion of Policy ST8
- iv. The deletion of the Policies Map identifying the allocation EM008 and the allocation assumed to be for a solar array under provision REN001

¹ The document is dated 2020 - 2037

Objections to additions/amendments in the Publication Version Addendum

- i. The Identification of High Marnham Power Station within the revised wording of Policy ST51
- ii. The wording of paragraphs 10.2.9 – 19.2.21 as proposed to be changed from the Publication Version August 2021
- iii. The inclusion of the Policies Map addition 'Former Marnham Power Station Site'. Area of Best Fit.

2. SUBMISSIONS MADE IN RESPECT OF THE OBJECTIONS TO DELETIONS IN THE PUBLICATION VERSION ADDENDUM

i. The deletion of High Marnham Green Energy Hub from the allocation as a General Employment Site.

2.1 The High Marnham Energy Hub has been proposed and supported with an allocation as a general employment site in Local Plan drafts dated January 2020, November 2020 and August 2021. Its presence in the draft local plan had been continual and consistent until local plan addendum version January 2022.

2.2 The Draft Bassetlaw Local Plan January 2020 stated (6.1.14):

'In addition, Policy ST6 makes a positive policy intervention to ensure the regeneration of two former coal fired power station sites at High Marnham and Cottam. Their closure directly affects employment in the rural area, and indirectly affects local supply chains. New employment land is regarded as essential to support those local communities and make best use of these significant brownfield sites in the longer term'.

2.3 In January 2020 the Council acknowledged that it was 'essential' for High Marnham (and Cottam) to provide new employment land in order to address the harm caused to local communities through the adverse loss of rural employment and harm to local supply chains. There has been no material change in planning circumstances to suggest the essential requirement for new employment land at High Marnham is no longer required.

2.4 The deletion of High Marnham as an employment allocation fails the tests of soundness (NPPF paragraph 35) in no longer being:

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

ii. The deletion of Section 6.2 paragraphs 6.2.1 – 6.2.12

2.5 Paragraph 6.2.1 of the August 2021 Version of the Local Plan, similarly acknowledged that allocating High Marnham as employment allocation provides a *‘long term opportunity to positively re-use High Marnham for employment purposes, and the harm caused by the closure of the power station to rural employment and local supply chains’*. The significance of High Marnham as an employment location is unchanged.

2.6 Paragraph 6.2.3 refers to the *‘opportunities to link operations and their supply chain with nearby, education establishments’*. The submissions made by JG Pears within the emerging local plan process have emphasised the importance of the employment allocation in meeting the development needs and strategic objectives of JG Pears as a local business, enabling JG Pears to link their operation between High Marnham and the existing operation at Low Marnham. Diversification into green energy and attracting associated partners will be supported by the continued recruitment and development of skilled graduates from a variety of technical engineering and agricultural schools. JG Pears provides apprenticeships through its close

relationship with colleges that specialise in education which is aligned to JR Pears diversified activities.

- 2.7 High Marnham is considered to provide an ideal opportunity to provide a source of employment land within the rural area of the District, partly to meet the needs of the owners, JG Pears, and in part in order to meet the locational needs of other businesses (with no relationship to JG Pears). Both higher skilled engineering labour associated with energy generation, and lower skilled labour linked to zero energy usage (e.g., vertical farming) will be attracted to the site.
- 2.8 JG Pears is one of the largest employers in the District, employing some 280 staff based at Low Marnham out of 412 people employed across the whole of the JGP Group. The former High Marnham Power Station and adjoining agricultural land was purchased purposefully to enable some business activities related to the JG Pears rendering business to be relocated and updated with emerging best available techniques at the High Marnham Site. The decanting of activities to the High Marnham Site 'frees up' the existing site at Low Marnham in order to improve operational efficiency, enhance environmental benefits and to provide a safer working environment for staff (particularly in reducing conflict between the movement of personnel and vehicles). There are no proposals to move the rendering process to High Marnham. The physical proximity of the former power station site to the existing operations at Low Marnham enhances productivity and quality for JG Pears. The movement of some activities to High Marnham would in fact reduce transport movements on the Low Marnham site securing net additional environment benefits.
- 2.9 The Framework paragraph 81 emphasises the importance for planning policies to take account of 'local business needs'. The former High Marnham power station provides locational synergy for JG Pears industrial activities. For example, the export of meat and bone meal and oil products into

Europe and beyond requires veterinary inspections of vehicles to be undertaken. JG Pears seek to make substantial investment at High Marnham Power Station site in the provision of a building to hold finished goods and onward bound HGVs deliveries pending quality and regulatory inspections, and to hold HGVs in an enclosed and abated building while awaiting product collection from the main plant at Low Marnham. In addition, High Marnham provides a convenient location for an HGV workshop for JG Pears, to service its own bulk collection wagons and trailers in a better suited environment.

2.10 The Framework (paragraph 83) states that:

‘Planning policies and decisions should recognise and address the specific locational requirements of different sectors’.

2.11 The former High Marnham Power Station site with the on-site electricity sub-station is considered to be locationally attractive for other industries which require large energy connections. High Marnham would also be locationally attractive to companies who seek to secure all or a large part of their energy source from renewable energy. The Policies Map proposals in the August 2021 Publication Version identified agricultural land adjoining High Marnham for a large-scale solar array. Such an array could potentially provide circa 48MW of renewable energy. The approach now proposed in the Addendum will frustrate inward investment that provides employment and fails to provide a positive policy framework for future expansion of JG Pears as a local business need (Framework 51 and 85), and also alienate the ‘to be expected’ infill of energy generation to make use of the installed grid connection assets following the decommissioning of the former coal fired power station.

2.12 Policy ST11 Rural Economic Growth and Economic Growth Outside Employment Areas provides a measure of policy support for employment development at High Marnham. It is evident that an applicant would have to show that such a proposal satisfied all of the criteria to Policy ST11 – including a ‘proven need’ and ‘no adverse impact’ on a range of environmental considerations. The reliance upon Policy ST11 Imposes a substantial restraint on new employment investment being secured at High Marnham.

2.13 Companies seeking new locations to invest for their operational requirements will typically not shortlist a site where the principle of development is not settled by the provisions of planning policy. As a consequence, sites, where there is uncertainty regarding the planning process or potentially a protracted delay in meeting policy requirements will not feature on a shortlist of potential locations. The planning system would then present too great a risk for a company seeking to fulfil its investment plans. Other locations will be chosen where such constraints are not in existence. The opportunity for companies to gain from the proximate source of substantial electrical power, or the utilisation of renewable energy at the former High Marnham power station will be thwarted. All of the third-party interest in the site to date has been on the basis of the Local Plan as drafted prior to the Addendum Version – the amendments to the Local Plan now proposed risk losing most if not all of this inward investment into the District.

iii. The deletion of Policy ST8 EM008 High Marnham Green Energy Hub

2.14 The deletion of Policy ST8 should be abandoned from the Addendum Version of Local Plan and Policy ST8 reinstated with the amended provision as identified by JG Pears in the response to the Publication Version August 2021. All the original elements of EM008 and ST8 proposed by the Local Authority and supported through subsequent representations by local business and regional bodies

still hold true – nothing has changed to mean the site should not have an employment allocation. By deleting Policy ST8, no allowance for meeting local and regional business needs is being catered for. Employment to be gained from users of green energy are not included – hydrogen production (now a national requirement), vertical farming – feeding ourselves within the local community, and data centres – ensuring the effective storage, management and security of information which is key to developing society.

2.15 JG Pears has made submissions to the August 2021 version of the Local Plan response to the proposed criteria. The deletion of ST8 EM008 cuts across the planned prospectus of JG Pears for significant investment in new buildings at High Marnham required by JG Pears and the opportunity for other companies to invest at High Marnham to take benefit of the availability of power and renewable energy. A copy of the prospectus is attached as **Appendix 2**.

2.16 The deletion of Policy ST8 is considered not to accord with the tests of soundness. Absent Policy ST8, the employment strategy is not positively prepared to meet employment needs. The deletion of ST8 is not justified as there is no alternative strategy to meet the development needs of JG Pears. *The omission of Policy ST8 is not consistent with national planning policy, which requires ‘planning policies... should help create the conditions in which businesses can ‘invest, expand and adapt’ (NPPF paragraph 81). The deletion of Policy ST8 is directly in conflict with the ‘significant weight [that] should be placed on the need to support economic growth and productivity taking account of both local business needs and wider opportunities for development’ (NPPF paragraph 81).*

2.17 JG Pears has purposefully acquired High Marnham to enable the group to diversify and adapt between the existing site at Low Marnham and High Marnham. The provision for investment will enhance productivity because of the geographical proximity of High Marnham to the existing

operations at Low Marnham. Wider environmental improvements will be achieved in the Local Plan in reinstating High Marnham as an employment land allocation particularly in respect of the operations of JG Pears at Low Marnham. The acquisition of High Marnham was made to enhance wider employment opportunities to the local and regional community beyond JG Pears activities.

iv. The deletion of the Policies Map identifying the allocation EM008 and the allocation assumed to be for a solar array under provision REN001.

2.18 The proposal map appropriately identified the former High Marnham Power station for employment development and the land to the south and west for the purposes of a solar array (albeit no such reference is made for REN001 in the plan). JG Pears is making substantial investment in bringing forward a solar array on this land which has the distinct locational advantage of an immediate Grid connection on the ex-power station land at High Marnham. The allocations shown on the Policies Map made an effective use of land using the brownfield land for employment purposes, including other activities that may require large power sources, or utilising the by-products from other industries.

3. SUBMISSION MADE IN RESPECT OF OBJECTIONS TO ADDITIONS/AMENDMENTS TO THE PUBLICATION VERSION ADDENDUM

i. The identification of High Marnham Power Station within the revised wording of Policy ST51

3.1 An objection is raised to the identified of the entire brownfield site at High Marnham as the Area of Best Fit for Renewable Energy Generation. The Sustainability Appraisal (SA) does not provide any rational land use assessment to justify the deletion of High Marnham as a strategic employment location. The SA does not establish the identification of High Marnham as an Area of Best Fit for renewable energy. No evidence is provided that this allocation is justified and effective.

3.2 It is considered that such an allocation is not an effective use of this large-scale brownfield site. The allocation will frustrate JG Pears in securing new built development to meet its operational needs, to facilitate and stimulate regeneration and employment opportunities, and secure environmental enhancement. The allocation will frustrate investment by other companies who would be attracted to the former Power Station site for the plentiful supply of electrical power; the opportunity to co-locate so as to utilise the by-products of other industries; and to use the power source from a substantial renewable energy development.

3.3 National Planning Policy (NPPF) emphasises the need for planning measures to address climate change mitigation and adaptation (NPPF 20d and 154a). The particular characteristics of High Marnham, scale of brownfield land and the extensive on-site power connection has already been identified to a range of industrial sectors including new technologies who can utilise the by-products of other co-located industries and renewable energy generation. The ability of High Marnham for locational synergy between industrial and power operations should be emphasised

by ensuring that Policy ST51 Criterion 2 cross-references the allocation of High Marnham as not to exclude the opportunity for employment development on the site.

- 3.4 Criterion 5 of Policy ST51 requires a decommissioning programme to *‘demonstrate the effective restoration of land and/or building to their original use’*. Such a provision is clearly inappropriate in the context of a brownfield site which is redundant for its original purpose. Criterion 5 in the context of brownfield land is not consistent with national planning policy NPPF 119.
- 3.5 Strategic policies should set out a clear strategy for accommodating objectively assessed needs, including land for employment that makes as much use as possible of previously developed land (PDL). High Marnham is a significant brownfield land asset with the ‘USP’ of on-site power connection to which additional sources or users of power may be connected. This asset should be used effectively for employment development.
- 3.6 The supporting text at paragraph 10.2.13 states that *‘proposals within the Area of Best Fit should be judged by a ‘comprehensive masterplan framework... Community Consultation and Council approval will be required prior to the submission of a planning application’*.
- 3.7 There is no provision with the planning system for a local planning authority to approve components of a development outside the process of determination of a planning application. Policy ST51 is considered to be not consistent with national planning policy (NPPF paragraph 16 d) as to how the decision-maker will consider the provisions of a masterplan.
- 3.8 It may indeed be the case that new technologies in renewable energy development are attracted to High Marnham with the support of the Grid connection, or otherwise to provide local energy

generation to companies located at High Marnham. Policy ST51 criterion 2 should make reference to the allocation of High Marnham for employment development (Policy ST8) so as not to exclude the Opportunity for employment development on the site. Such a provision would then be consistent with the supporting text at paragraph 10.2.13.

3.9 The Local Plan refers to two other former power station sites (10.2.18 Cottam and West Burton).

The Council states that *'it will continue to work with landowners and site promoters to ensure that the opportunities for regeneration of both sites, and potentially zero-energy generation are maximised through the review of the Local Plan'*. High Marnham has been decommissioned for many years. JG Pears consider that the Council in deterring High Marnham as an employment allocation has not worked effectively with them as site owners on the future development of the site. The confinement of new development to renewable energy development has been advanced by the Council contrary to the understanding of JG Pears and indeed contrary to their local business needs, and the opportunity for new businesses to locate at High Marnham, and contrary to the plans put forward by the Local Authority in previous versions of the Local Plan and fully supported by local and regional bodies e.g., D2N2 LEP and Midlands Energy Hub, submitted in previous representations.

3.10 No satisfactory explanation has been provided to JG Pears as to why High Marnham should now no longer be allocated for employment development. The opportunity for High Marnham to host *'low-carbon energy generation'* – which in itself can make a positive contribution towards the low carbon agenda is lost by the proposed policy provision. Further removal of REN001 as an area of renewable energy production consistently identified and put forward by the Local Authority in previous versions of the Local Plan proposed, will not help achieve the Local Authority's aim of being a net contributor of zero carbon and low carbon renewable energy (10.2.5).

ii. **The wording of paragraphs 10.2.9 – 10.2.21 as proposed to be changed from the Publication Version August 2021.**

3.11 Paragraph 10.2.9 seeks to introduce a sequential test to the location of renewable energy projects by requiring developers to *'first consider whether the proposal could be located within the Area of Best Fit'*. It is submitted that this approach is inconsistent with national planning policy that states *'Local Planning Authorities... should approve the application if its impacts are (or can be made) acceptable'* (NPPF 158 b). National planning policy does not seek to restrict renewable energy developments outside areas identified in a development plan. Such developments should meet the criteria for identifying suitable areas.

3.12 The wording of paragraph 10.2.9 is considered inconsistent with the wording of paragraph 10.2.12 and 10.2.14 which are consistent with national planning policy, where suitable criteria are met by renewable energy development.

3.13 The identification of the entire former High Marnham Power Station as the Area of Best Fit for renewable energy development undermines the development potential of the site for:

1. The provision of development needs for JG Pears
2. The development needs of businesses that are interested in High Marnham for the access to Grid capacity and the opportunity to utilise by-products from other activities.
3. The opportunity to provide significant local employment.

3.14 It is considered that the identification of High Marnham wholly for renewable energy is not justified (NPPF 36 b) and is not consistent with national planning policy (NPPF 35d). Such an allocation does not make an effective use of land and fails to place significant weight on the need to support economic growth and productivity taking into account both local business needs and wider opportunities or development (NPPF paragraph 81). The locational strengths of High Marnham to attract new businesses, including businesses within research and development, those requiring substantial power output, for example data centres and hydrogen generation, and the local business needs of JG Pears are frustrated by the identification of the Area of Best Fit.

3.15 Paragraph 10.2.12 states that *'it does not mean that land within the area must be developed for renewable energy exclusively'*. The Framework states at paragraph 16d that plans should contain policies that are clearly written and unambiguous so it is evident how a decision maker should react to development proposals. It is equally important that those seeking to propose new developments require a clear understanding of the provisions of relevant development plan policies in order to have the confidence to invest in the planning system.

3.16 The statement at paragraph 10.2.12 will not provide sufficient confidence to companies that High Marnham is a location where investment in employment development will be supported. There is no such provision for employment development within the text of Policy ST51.

3.17 Local Planning Authorities need to understand that the planning system imposes substantial risk to investment decisions. A company seeking to invest in new buildings to meet its operations requirements will exclude locations where the policy provisions for the principle of development is ambiguous. Companies increasingly seek to avoid protracted negotiations with local planning authorities and will simply locate on sites where the policy provision is clearly supportive of the

principle of their development. The ambiguity in Policy ST51 regarding the accommodation of employment development on the site counters the Local Authority stated requirements to deliver regional employment needs. High Marnham is well placed and has been put forward, in previous draft versions of the Local Plan by the Local Authority as referenced earlier in these representations.

3.18 The lack of clarity in Policy ST51 and the supporting text will undermine investment decisions at High Marnham frustrating the effective use of this land by businesses who would make efficient use of the Grid connection and opportunities to co-locate with other businesses.

3.19 Paragraph 10.2.13 states that *'community consultation and Council approval will be required prior to the submission of a planning application'*.

'The planning system does not provide a mechanism for approval of plans and documents prior to the submission of a planning application. A comprehensive master plan may be sought with the submission of a planning application. The provision of paragraph 10.2.13 lacks clarity'. (NPPF paragraph 10.2.13).

3.20 At paragraph 10.5.15 it is stated that:

'The Council will continue to work with landowners and site promoters to ensure that the opportunities for regeneration of both sites (Cottam, West Burton) and potentially zero energy generation are maximised'.

3.21 JG Pears reasonably expect the same approach by the Council to maximising the regeneration opportunities at High Marnham for employment purposes. Policy ST8 was in principle compatible

with the regeneration opportunities identified by JG Pears. The deletion of High Marnham as employment site has occurred without any effective explanation of the reasoning for the changed policy position, and appears to be unfair and inconsistent in comparison to the treatment of the Cottam and West Burton sites.

3.22 The aspirations of JG Pears for High Marnham have not changed, employment development is needed at High Marnham to improve existing operations at Low Marnham within the limitations of its Environmental Permit issued by the Environment Agency. JG Pears has no aspirations to undertake rendering operations e.g., cooking and drying animal by-products at High Marnham.

iii. The inclusion of the Policies Map addition 'Former Marnham Power Station Site Area of Best Fit'

3.23 An objection is raised to the Policies Map which identifies High Marnham as being for renewable energy development. The allocation is considered not to be justified and is inconsistent with national planning policy in making effective use of land particularly, brownfield land.

3.24 High Marnham presents an ideal location for co-located industries that are energy intensive in their operations by reasoning of the on-site Grid connection. The electricity substation may even be enlarged by the National Grid and land is to be safeguarded for this purpose. Other industries have expressed a locational interest in High Marnham with the potential ability to use the by-products of energy generating processes and use the renewable energy itself.

3.25 These locational advantages of High Marnham are additional to the specific locational advantage of High Marnham to meet the development needs of JG Pears. High Marnham will be an ideal

location for new start-up businesses involved with new technologies that seek locations where 'the circular economy' can be practically delivered, for example vertical farming and industrial scale glasshouses using the waste-heat output from other businesses.

4. JG PEARS ENGAGEMENT IN THE EMERGING LOCAL PLAN PROCESS

- 4.1 JG Pears completed the acquisition of the former High Marnham power station which operated until 2003, in December 2020. In January 2020 a draft Regulation 18 version of the Local Plan was published. Policy ST6 Provision of Land for Employment Development identified High Marnham as an employment location for B1, B2 and B8 development. The draft Plan identified provision for a solar array on the agricultural land to the south of the former power station. Policy ST7 Site EM007 made a specific allocation for High Marnham as an employment allocation which is attached as Appendix 3.
- 4.2 Submissions were made on behalf of JG Pears attached as Appendix 4 making reference to the District being part of the D2N2 Local Economic Partnership which seeks to deliver a more prosperous better connected and increasingly resilient and competitive economy.
- 4.3 The submissions stated at paragraph 3.3:

'Our client's land interest at the Former High Marnham Power Station and prospective proposals provides an opportunity to realise the development potential of this major previously developed site; well connected to the strategic highway network adjacent to the village of High Marnham where proportionate development will be supported and offers a significant opportunity for sustainable redevelopment making use of readily available energy from J G Pears nearby CHP plant. The inclusion of this site as an employment allocation provides a significant opportunity to the LPA to meet its low carbon agenda in a sustainable and appropriate manner whilst also delivering on the

wider D2N2 aspirations to improve economic prosperity of the region which must be supported’.

4.4 JG Pears in response to a request from BDC provided a concept plan for the future generation of the former High Marnham power station which is attached as **Appendix 5**. In August 2020 a High Marnham Local Plan Vision Statement was provided to BDC, which is attached as **Appendix 6**.

4.5 In November 2020 BDC published a further version of the Draft Local Plan. The draft plan referred to the Council Plan being committed to *‘diversifying the economy further by attracting inward investment and helping businesses thrive’* (6.1.1).

4.6 This version of the Local Plan states (6.1.17)

‘In addition, Policy ST8 makes positive policy intervention to ensure the regeneration of the former coal fired power station site at High Marnham. Its closure directly affected employment in the rural area, and indirectly affected local supply chains. New specialised employment uses in the green energy sector is regarded as essential to support those local communities and the wider District, and make optimum use of this significant brownfield site in the longer term’.

4.7 The former High Marnham Power Station was included as employment allocation under Policy ST8 Provision of Land for Employment Development and a site-specific policy ST9: EM008 High Marnham Green Energy Hub.

- 4.8 JG Pears responded positively to this draft version of the Local Plan but sought clarity which are attached as **Appendix 7**. The submissions stated:

‘The positive and proactive approach to the delivery of our client’s land at the Former High Marnham Power Station within this and the next plan period, is welcomed and it is considered that J G Pears is well placed to support the opportunity to realise the development potential of this major previously developed site; well connected to the strategic highway network adjacent to the village of High Marnham where proportionate development will be supported and offers a significant opportunity for sustainable redevelopment making use of readily available energy from J G Pears nearby CHP plant. The inclusion of this site as an employment allocation provides a significant opportunity for the LPA to meet its low carbon agenda in a sustainable and appropriate manner whilst also delivering on the wider D2N2 aspirations to improve economic prosperity of the region which must be supported’.

- 4.9 In August 2021 BDC issued the publication version of the Local Plan. This version states ‘*Additional employment land is allocated to support accessibility to economic growth through the regeneration of High Marnham power station site...*’. High Marnham is allocated as an employment site under Policy ST7 Provision of Land for Employment Development Policy ST8: EM008 High Marnham Energy Hub and REN001 provides a specific allocation for employment.

- 4.10 Representations made on behalf of JG Pears did not object to the principle of the allocation for employment development. Rather the submissions made were consistent with the employment allocation but sought revisions to the wording of policies to achieve soundness within the meaning of the NPPF paragraph 35. A Proposed Zoning Plan accompanied the submission attached as **Appendix 8**. JG Pears considers that it has been consistent in its promotion of High Marnham as an

employment location to maximise the benefit of regeneration by facilitating opportunities for inward investment, so as to meet its local development needs and to provide for investment by other companies which would benefit from the Grid capacity at High Marnham – including those companies which can use the by-products from other industries, including these in renewable energy development.



Bassetlaw Local Plan 2020-2037

Publication Version Representation Form September to October 2021

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

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)

Policy: ST8 EM008

Paragraph:

Policies Map:

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

Yes ☒

No ☐

Yes ☐

No ☒

Yes ☒

No ☐

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.

5.

(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.

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.

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

Yes ☒

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

No ☐

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

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

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

20th October 2021

Dear [REDACTED]

-

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,

[REDACTED]

Interim Chief Executive
D2N2 LEP

Chair: Elizabeth Fagan The Local Enterprise Partnership for Derby, Derbyshire, Nottingham and Nottinghamshire 8 Experian Way ng2 Business Park Nottingham NG2 1EP



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 Signature]

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

Office Use Only
Date:
Ref:
Ack:



Bassetlaw Local Plan 2020-2037

Publication Version Representation Form September to October 2021

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

Policy:

Paragraph:

Policies Map: ✓

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

Yes ☒

No ☐

Yes ☐

No ☒

Yes ☐

No ☒

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.

5.

(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.

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.

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

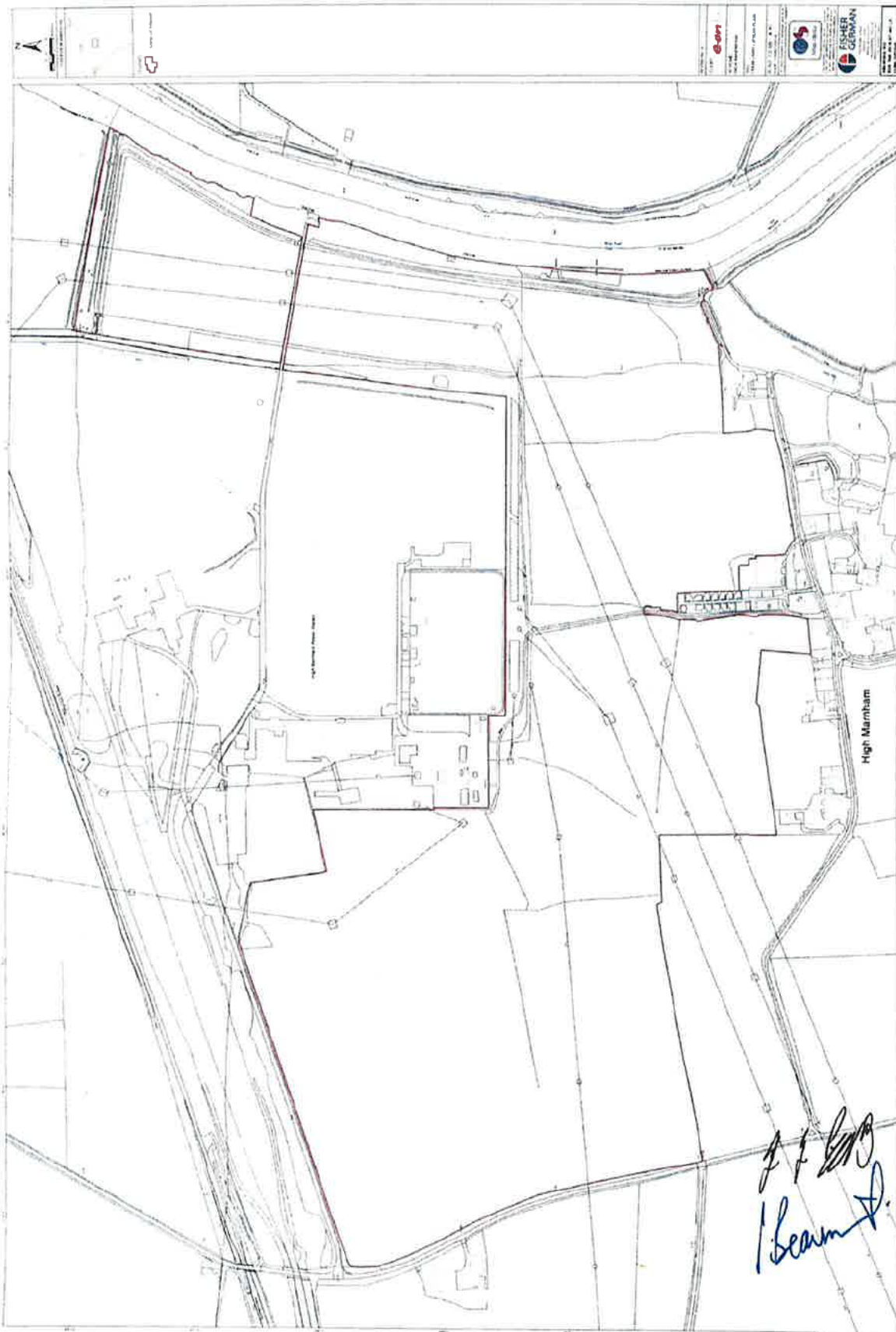
Yes ☒

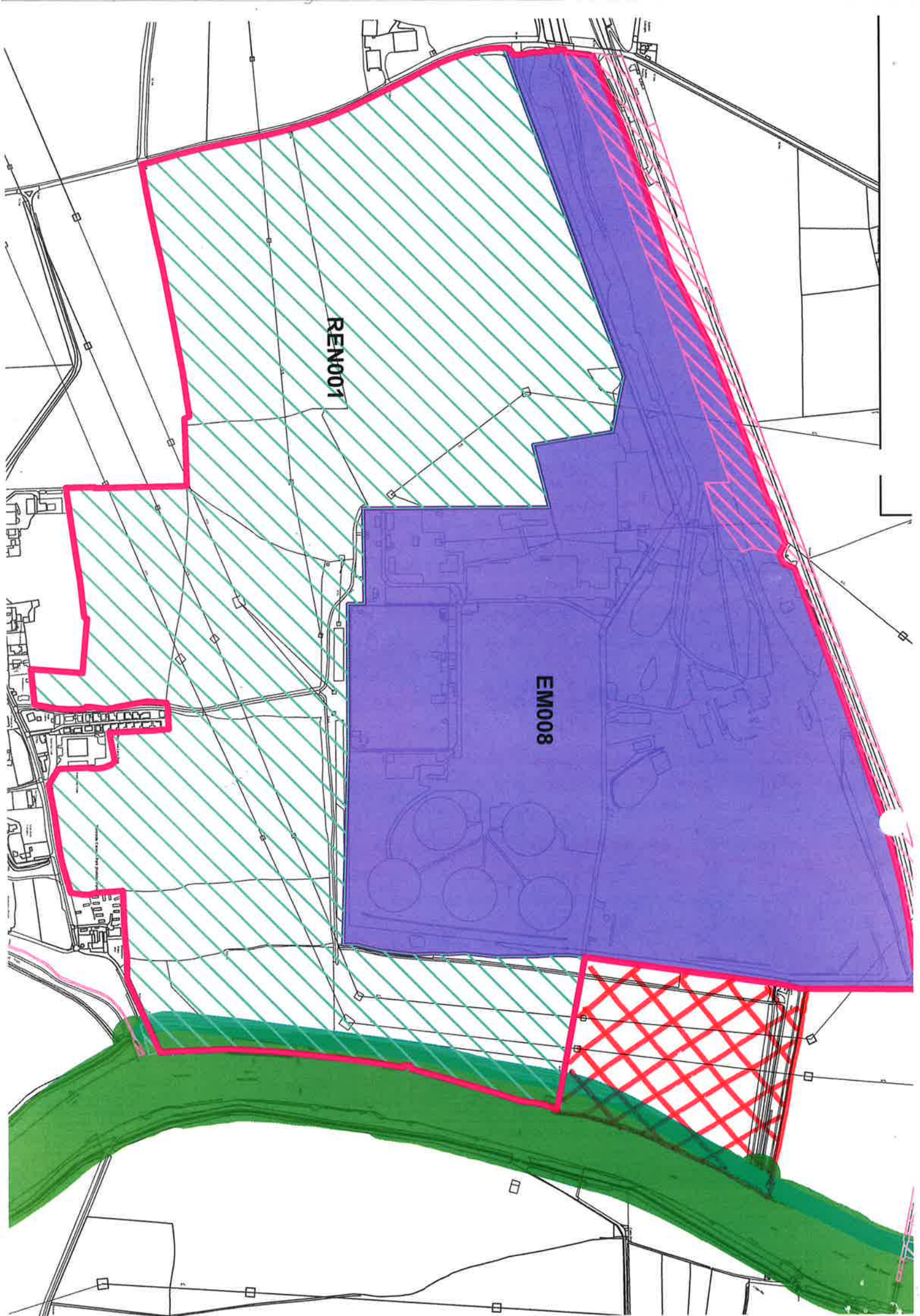
No, I do not wish to participate in hearing session(s)

No ☐

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

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

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)

Policy: ST51

Paragraph: 10.23

Policies Map:

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

Yes ☒

No ☐

Yes ☐

No ☒

Yes ☒

No ☐

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 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.

5.

(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

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)'.

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.

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

Yes ☒

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

No ☐

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

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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Publication Version Representation Form September to October 2021

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

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)

Policy: Policy ST39

Paragraph:

Policies Map:

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

Yes ☒

No ☐

Yes ☐

No ☒

Yes ☒

No ☐

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'.

5.

(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.

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.

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

Yes ☒

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

No ☐

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

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.

JGPears.com

HIGH MARNHAM GREEN ENERGY HUB

DELIVERING THE CIRCULAR ECONOMY FOR BASSETLAW

JGP
Group

1. INTRODUCTION

The Government has committed the UK to making sure we end our contribution to global warming by 2050 by delivering a 'Green Industrial Revolution'. This ambitious action plan will create growth and jobs in clean technologies, infrastructure and energy.

But national ambition will only be delivered with local action.

The High Marnham Green Energy Hub is a prime example of how the UK can transition to a low carbon, sustainable economy in a way that will benefit the people of Bassetlaw with skilled local green jobs and long-term investment to create a sustainable future.

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2. THE CIRCULAR ECONOMY

Creating a green industrial revolution will be vital to achieving a circular economy. This means moving from our current production model of 'take-make-waste' to a system where waste is eliminated, resources are circulated, and nature is regenerated.

2. THE CIRCULAR ECONOMY

The circular economy model gives us the opportunity to grow prosperity, jobs, and resilience while cutting greenhouse gas emissions, waste, and pollution.

High Marnham Green Energy Hub will play a role in achieving a more circular model by turning the sun's energy into power, using waste heat (for heating or cooling) and carbon dioxide for food production and by delivering a net gain for biodiversity to the community and environment.



3. THE DEVELOPMENT

The High Marnham Green Energy Hub will rejuvenate a redundant former coal-fired power station, replacing an old polluting source of power with green energy generated by solar PV, hydrogen gas generation, battery storage and developing technologies such as liquefied air energy storage systems.

NB For illustrative purposes only

3. THE DEVELOPMENT

As well as being exported to the National Grid, the green energy and the by-products of the generation process, such as waste heat or oxygen, will power onsite sustainable businesses. These will include vertical farms and glasshouses growing a variety of produce with minimal impact on the environment, helping deliver a revolution in the way we feed ourselves.

The site will also provide warehousing and industrial facilities that will not only support the running of the JG Pears plants at Low Marnham, but also attract other businesses to the area. The Low Marnham site already makes a major contribution to the green industrial revolution by using processed category 1 animal by-products (ABP) to generate renewable heat and power to process Category 3 ABP's into a range of ingredients for the animal and aqua feed industries and renewable fuels.

In addition to powering business on the site High Marnham Green Energy Hub will export low carbon energy to the National Grid, making a contribution to achieving the UK's ambition of net carbon zero.

“High Marnham Green Energy Hub will export low carbon energy to the National Grid.”



4. ECONOMIC BENEFIT

The High Marnham Green Energy Hub will deliver significant economic benefits to the local economy. Work is already well underway and JG Pears Group has already invested £7m in purchasing and progressing the development of the site.

JG PEARS GROUP
HAS ALREADY
INVESTED

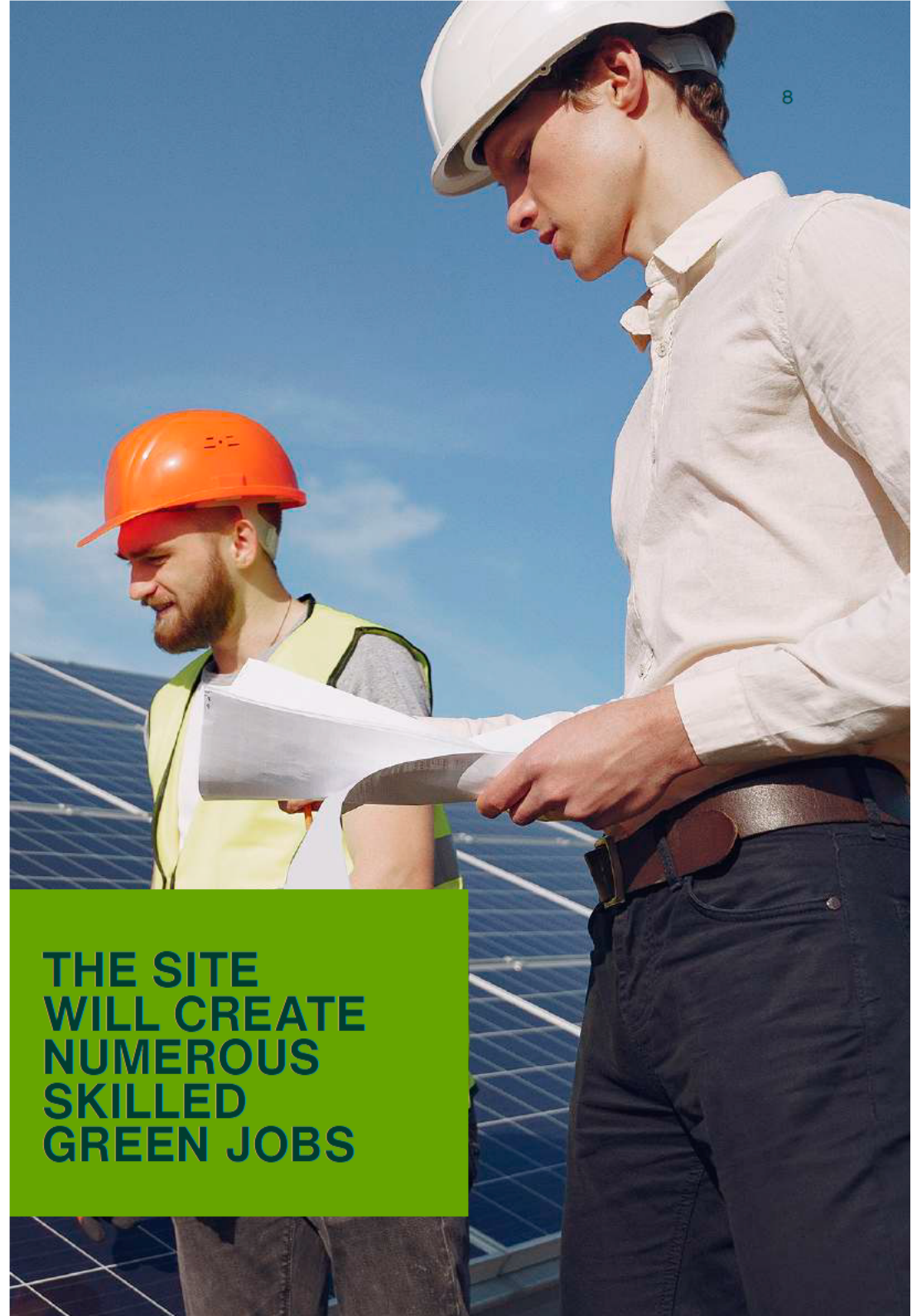
£7M

4. ECONOMIC BENEFIT

The full development of the Green Energy Hub will generate millions of pounds of investment and create many jobs during the development phase. When complete the site will create several hundred skilled green jobs for a variety of roles including technicians, agronomists, staffing production and warehouses, maintenance engineers and site managers and security staff, dependent upon the final mix of technologies and industries on site

In-line with previous versions of the Bassetlaw Local Plan, these jobs meet the aims of the D2N2 Recovery and Growth Strategy 2021: “to support low carbon growth; promote productivity, particularly around employment and skills; business growth and innovation; and endorse connectivity and inclusion, including integrated infrastructure and place shaping.”

“to support low carbon growth; promote productivity, particularly around employment and skills; business growth and innovation; and endorse connectivity and inclusion, including integrated infrastructure and place shaping.”



**THE SITE
WILL CREATE
NUMEROUS
SKILLED
GREEN JOBS**

5. GREEN ENERGY PRODUCTION

The High Marnham Green Energy Hub is uniquely positioned to take advantage of significant National Grid substation assets that service both the regional and national power network infrastructure.

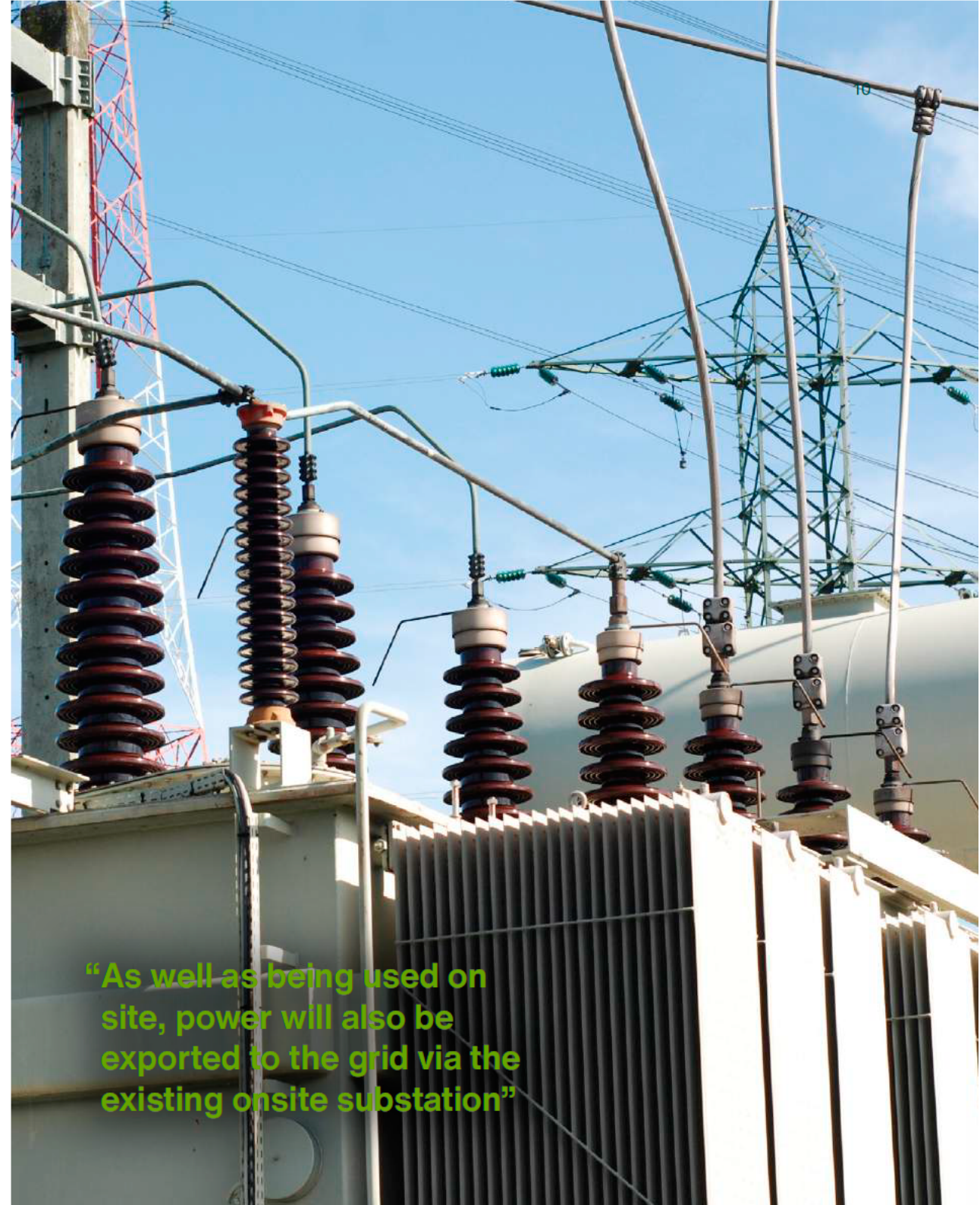


5. GREEN ENERGY PRODUCTION

The decommissioning of the coal fired power station some 20 years ago makes the site attractive to alternative and renewable energy generation to take advantage of this readily available grid connection capacity.

National Grid sees High Marnham as a major part of its network infrastructure by bringing power into, away from and through the substation assets.

The site will generate and store energy from a variety of green, renewable and transition technologies. As well as being used on site to power a range of sustainable businesses, the power will also be exported to the grid via the existing onsite substation. A range of energy technologies will be deployed on the JG Pears owned land at High Marnham. These include:



“As well as being used on site, power will also be exported to the grid via the existing onsite substation”

5. GREEN ENERGY PRODUCTION

SOLAR POWER



As one of the UK's fastest-growing energy technologies, solar is already playing a vital role in the drive to meet the UK's ambitious carbon-reduction targets. Solar

energy is generated from photovoltaic (PV) panels installed on buildings and surrounding ground spaces, turning daylight into energy, even on cloudy days.

Following a techno-commercial feasibility assessment, the proposed solar project at the High Marnham site is at the advanced stage of development.

The grid connection is in place for exporting green electricity to the utility infrastructure.

The development will comprise approximately 74,000 solar Photovoltaic (PV) modules, giving some 48MW of installed capacity. Once commissioned, it will generate green electricity to support the net-zero transition of the electricity network locally and nationally. The proposed solar PV system will be in place serving the site and power networks for 35 years.



BATTERY STORAGE

Battery storage technologies are essential to speeding up the replacement of fossil fuels with renewable energy. Battery storage systems will play an increasingly pivotal role between green energy supplies and responding to electricity demands. Battery storage, or battery energy storage systems (BESS), are devices that enable energy from renewables, like solar to be stored and then released when customers need power most. Also offering grid support services batteries can be used to offer fast frequency response to support the nation grid network particularly when the nation needs its power. Batteries also serve as backup support to on-site industrial processes.

THE SITE WILL HAVE THE CAPACITY FOR MANY MWs OF BATTERY STORAGE.

HYDROGEN GAS GENERATION



Gas-fired electricity generation will continue to play a vital role in the years ahead as the UK transitions to renewable energy sources. Future proofed, hydrogen ready systems, will

facilitate the journey to net zero as this energy revolution takes place. Renewable clean energy on-site will create green hydrogen based zero emission fuel which is later converted to electrical power or heat at a time and place where that power is most needed.

A 17.5MW POWER DEMAND PLANT WOULD CREATE CIRCA. 335KG/HR OF HYDROGEN. FUEL DERIVED IN SUCH A WAY IS CIRCA. SIX TIMES MORE EFFICIENT THAN HISTORIC DIESEL GENERATORS ON A WEIGHT FOR WEIGHT BASIS.

DEVELOPING TECHNOLOGIES

The site could also use emerging energy technologies such as Liquid Air Energy Storage (LAES). They use electricity generated on site to cool air until it liquefies. The liquid air is expanded back into a gas to turn a turbine and generate electricity.

The installation and maintenance all these power systems will create skilled local employment in operations and maintenance.

THE SITE IS LARGE ENOUGH TO CATER FOR OTHER, AS YET UNKNOWN, FUTURE RENEWABLE ENERGY GENERATION AND STORAGE TECHNOLOGIES WHICH WILL CREATE FURTHER EMPLOYMENT OPPORTUNITIES.

6. SUSTAINABLE HORTICULTURE

By 2050, the world's population is expected to grow to 9.7 billion people and feeding everyone will be a huge challenge. Sustainable horticulture will play a key role in ensuring we have enough food.

The site intends to host an innovative vertical farming facility and an industrial scale agricultural glasshouse, growing produce all year round in the UK, reducing road miles from imported produce.

These will only be possible by sitting on the back of waste heat from renewable energy generation processes, reusing that waste heat to grow food.

CONTROLLED ENVIRONMENT AGRICULTURE

Controlled Environment Agriculture (CEA) or vertical farming will play a vital role in ensuring we have enough food. CEA provides a new and highly innovative method for UK food production, a supply chain which offers greater food security, less reliance on overseas imports, higher quality products, less wastage, local production, reduced supply chains and improved product sustainability. The site

owner, JG Pears is currently finalising plans with a UK developer for establishing a 1,000 tonne per year vertical farm at High Marnham. The cladded production facility will use hydroponic horticulture and has a growing space nearing 160,000 ft². The fresh produce will be grown in a completely controlled internal environment on layers stacked from floor to ceiling. The vertical farm will



have the potential to grow almost any type of fresh food, but initially plans are to focus on herbs and leafy greens.

AGRICULTURAL GLASSHOUSE

JG Pears is partnering to develop an industrial scale agricultural glasshouse. The £15m glasshouse, which will be the size of nine football pitches is designed initially to produce up to 700 tonnes per year of soft fruit, which equates to 2.8 million punnets of strawberries, for the UK wholesale food market.

Production at both facilities will rely on access to the renewable energy generation at High Marnham which is seen as an excellent location for this type of production, given proximity to main UK road arteries, the access to renewable energy and highly skilled local horticultural labour.



7. SUPPORTING INFRASTRUCTURE AND FUTURE GENERATIONS

To ensure it operates efficiently, the site will attract and require supporting infrastructure including, amongst other things warehouse space for packing of produce and storage of vital materials.



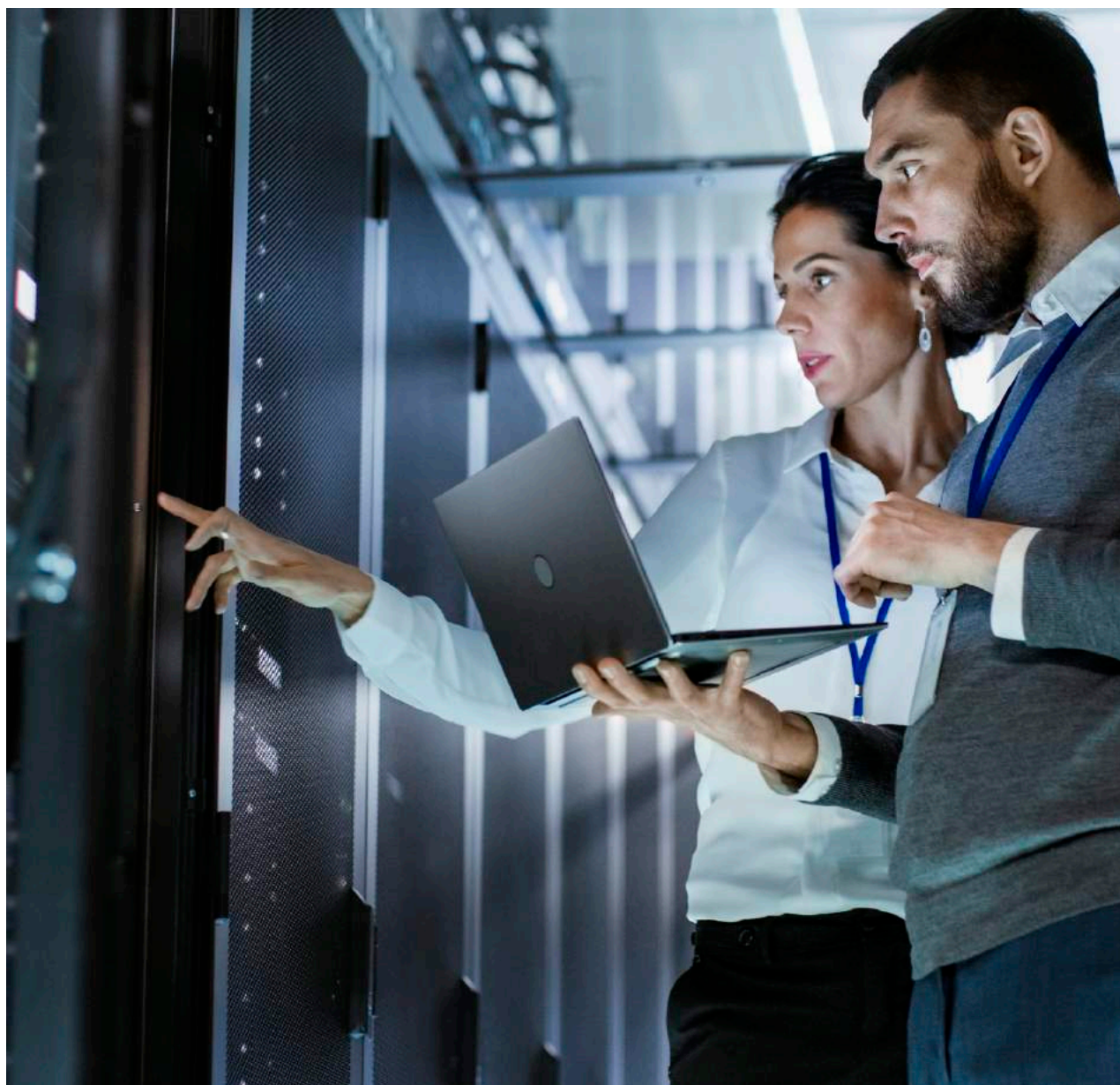
7. SUPPORTING INFRASTRUCTURE AND FUTURE GENERATIONS

16

The site will also feature parking for lorries and a gatehouse to ensure access to the site is properly regulated.

Once the facilitating services are commissioned, the High Marnham Green Energy Hub will bring in additional small scale employment opportunities such as start-up and storage units.

The site is suitably located and resourced to facilitate data centres, to put Bassetlaw at the centre of the information management, security and storage highway. Data centres at High Marnham can be supported by multiple layers of on-site redundancy – from connectivity to renewable energy sources, supported by direct Grid connection and on-site batteries.



8. BIODIVERSITY NET GAIN AND SOCIAL BENEFIT

In regenerating this large brownfield site, redevelopment will be undertaken to achieve a net biodiversity gain, with extensive provision of new ecological habitats that will connect with the surrounding countryside.



8. BIODIVERSITY NET GAIN AND SOCIAL BENEFIT

It is also proposed to provide a small car park for community use to enable walkers and cyclists to safely access the nearby Sustrans trail route that provides access to the National Cycle Network.



9. CONCLUSION

Work on The High Marnham Green Energy Hub is well underway. When complete it will create a regionally significant investment in the UK's low carbon future.

With green energy generation in place, the site will attract more investment and skilled jobs, leading to the transformation of a redundant former power station into a model of how we can create a green industrial revolution and deliver the circular economy.

To realise its full potential all elements of the site have been designed to work in harmony to deliver the greatest benefit in terms of employment opportunities, investment in emerging food production technology and low carbon energy generation.

The project has also received support from key regional stakeholders including the The Midlands Energy Hub and The D2N2 LEP.

“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,”



Michael Gallagher, Head of Midlands Energy Hub.

“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,”



Will Morlidge, Interim Chief Executive D2N2 LEP.

ABOUT JG PEARS

The owner and developer of the High Marnham Green Energy Hub site JG Pears is acknowledged as a leader in sustainable business practices.

The company is a leading UK rendering operator, having a reputation as a trusted supplier and business partner. It operates several rendering plants across the UK, offering national hygienic and bio-security processing of all animal by products categories.

It provides safe, natural, and sustainable products, which positions it as an established global supplier of fats, oils and proteins meals into pet food, aquaculture and other specialty sectors.

JG Pears is committed to reducing its carbon footprint, and recently commissioned its combined heat and power plant, generating renewable energy by providing steam and electricity to its existing businesses as well as exporting its excess electrical power to the National Grid. Along with its wind farm assets, the JGP Group has acquired the High Marnham site to further its green energy and circular economy strategic developments.



CONTACT

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[JGPears.com](https://www.jgpears.com)



2020



Bassetlaw
DISTRICT COUNCIL
— North Nottinghamshire —

6.2 Site EM007: High Marnham Energy Hub

- 6.2.1 The Former High Marnham Power Station is predominately brownfield with a legacy of contamination due to its historical association with a coal fired power station and associated infrastructure. Agricultural land lies between this 60.0ha site and High Marnham village to the south. This site is located to the south of the A57 and east of Tuxford. Supporting its comprehensive redevelopment is a Local Plan objective and a key Council Plan priority⁶.
- 6.2.2 Its proximity to the River Trent means that the site partly lies within Flood Zone 3 and Flood Zone 2, although the land benefits from significant flood defences. A Flood Risk Assessment will be required to ensure that the development can be safely accommodated and that it generates no increase in flood risk elsewhere.

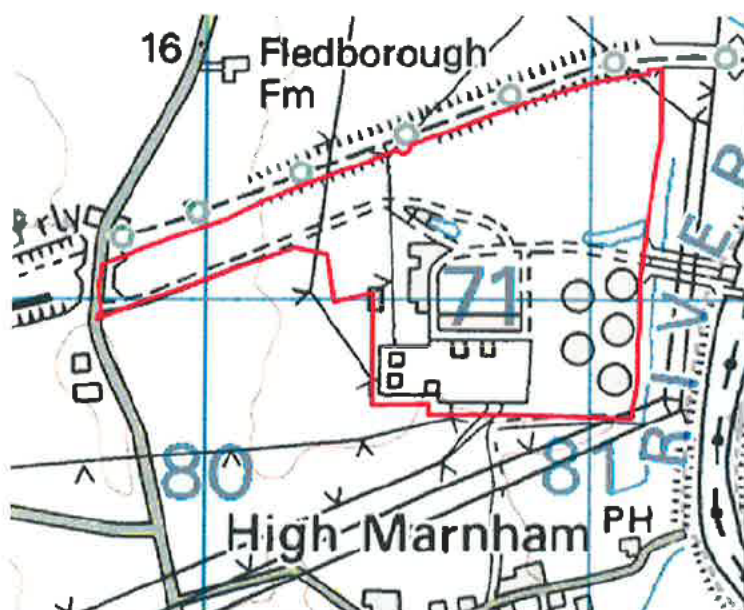


Figure 11: High Marnham Energy Hub

- 6.2.3 The National Planning Policy Framework⁴ encourages the identification of suitable areas for renewable and low carbon energy sources and supporting infrastructure, where this would help secure their development.
- 6.2.4 Providing land for this sector is also a priority of the D2N2 Strategic Economic Plan² and emerging Local Industrial Strategy⁶. This site provides a unique opportunity to support this expanding market given its optimal location: the site has direct connection to the national electricity grid from the high voltage electricity infrastructure that remains on site.
- 6.2.5 To capitalise on the unique opportunities this site offers, Policy ST7 identifies this site for employment uses in the renewable and low carbon sector only, such as battery and data storage, and associated power generation. Proposals must also be fully compliant with the principles and zoning set out in the masterplan framework for the site. The site will comprise:
- Zone A – Low Carbon Energy production and storage creating an 'energy hub';
 - Zone B – Low Carbon and energy efficient business area;
 - Zone C – Business area harnessing power and heat from the 'energy hub';
 - Zone D – Solar Energy and green energy Production area;
 - Zone E – Green Buffer, including tree planting and biodiversity enhancement.
- 6.2.6 This is supported by the site promotor, who has significant experience in using energy generation and low carbon uses to minimise the carbon emissions from their current business operations. Capitalising on this, the site promoters are in early discussions with interested parties to take forward land on site.

- 6.2.7 There is work to do to improve existing infrastructure to the site and ensure impacts upon nearby communities are minimised. This will be guided by an approved masterplan framework for the site to be agreed with the Council, following consultation with the local community. The masterplan framework should detail how the local community have been consulted, a summary of the responses received and how these have been addressed.

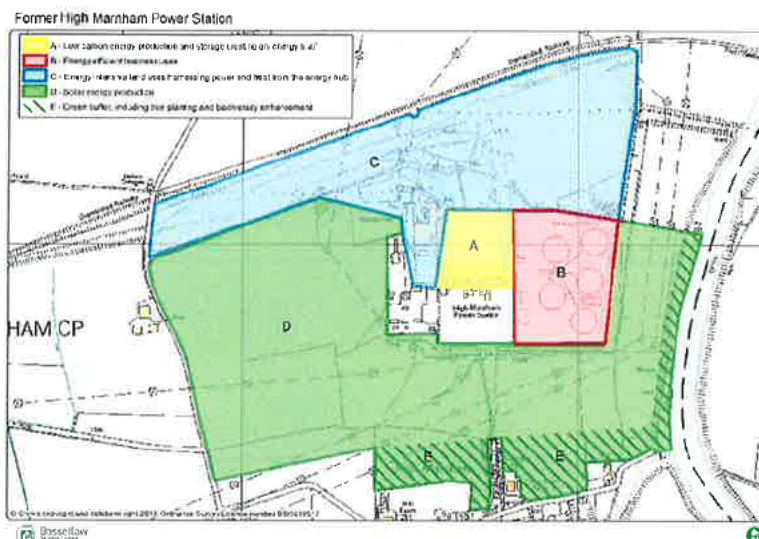


Figure 12: High Marnham Energy Hub: Development Zones

- 6.2.8 The Bassetlaw Transport Study: Part 2⁹ sets out recommendations for transport mitigation measures. These include capacity improvements to the A57 junction at Dunham on Trent/Ragnall crossroads. A Transport Assessment will provide a more detailed assessment of the impact of development on the highways network.
- 6.2.9 The development will be sensitive to the Fledborough to Harby Local Wildlife Site on the site which should remain outside the developable area, as well as the adjoining Old Trent Local Wildlife Site. Their nature conservation interests must be preserved during and post-construction.
- 6.2.10 The development should be seamlessly integrated into the wider landscape and should promote opportunities for biodiversity net gain. Proposed external lighting will be strictly controlled to ensure minimal impact on biodiversity assets and nearby residents, together with controlling the impact of the appearance of the proposed site when viewed from the east.
- 6.2.11 The Habitats Regulations Assessment⁹ have identified that any development at High Marnham will need to be subject to a project level Habitats Regulations Assessment screening to determine potential impacts on the Sherwood Forest ppSPA.
- 6.2.12 To achieve sustainable development, the Council will require developers, in conjunction with infrastructure partners, to provide the necessary improvements to infrastructure identified for this site in the Infrastructure Delivery Plan¹¹. Infrastructure identified in Policy ST7 will be secured through on site provision and developer contributions.

POLICY ST7: Site EM007: High Marnham Energy Hub

- A. The Council will support the delivery of the Former High Marnham Power Station, as identified on the Policies Map for a minimum of 38.4ha of employment land in this plan period, with 21.6ha thereafter, for B1, B2, B8 economic uses within the renewable energy and low carbon sector.
- B. Other employment uses will be supported if they can demonstrate a link with the uses identified in Part B1a below, if they are supporting low carbon operations or if they require close proximity to the on-site electricity switching station;
- C. To support this Policy, a comprehensive Masterplan will be produced in partnership with the developers, for the design, development and delivery of the site. This should make provision for:

1. **Good Quality Design and Local Character**

- a) High quality design which adds value to the local area and endures over time, which distinguishes between buildings of primary and secondary function, in terms of their siting, scale and height, reflects the design principles in Policy ST32 and the Design Quality SPD and which relates to the identified development zones:
 - i. Zone A: Low Carbon Energy production and storage creating an 'energy hub';
 - ii. Zone B: Low Carbon and energy efficient business area;
 - iii. Zone C: Business area harnessing power and heat from the 'energy hub';
 - iv. Zone D: Solar Energy and green energy production area;
 - v. Zone E: Green Buffer only such as for tree planting and biodiversity enhancement.
- b) A scheme of an appropriate scale, layout and form which would not result in an increase in flood risk to this site and land elsewhere, informed by a Flood Risk Assessment, and Environment Agency and Lead Local Flood Authority advice;
- c) A layout and design informed by the landscape character and ecological value of the site, supported by an archaeological desk based assessment to positively incorporate and enhance existing features;
- d) Renewable and decentralised and low carbon energy, with the proposed gain in renewable energy generation (MW) identified for each development parcel;
- e) Standards to promote climate resilience in accordance with Policy ST45;
- f) A comprehensive sustainable drainage system and maintenance arrangements;
- g) A suitable lighting scheme that minimises light pollution to the surrounding communities and biodiversity;
- h) Measures to ensure amenity of local communities from noise, light, glare, smell, dust, or emissions are in accordance with relevant environmental standards.

2. **Transport and Movement**

- a) A scheme of an appropriate scale, layout and form supported by a Transport Assessment and Travel Plan, and advice of the Local Highways Authority, which further details:
 - i. Contributions towards improvements to the A57 junction at Dunham on Trent/Ragnall crossroads;
 - ii. That vehicular traffic generated by the development, including lorry movements can be safely accommodated;
 - iii. Appropriate servicing and parking provision for each development parcel.

3. **Landscape, biodiversity and Green Infrastructure**

- a) The protection of Fledborough to Harby Disused Railway Line Local Wildlife Site on the site as well as the adjoining Old Trent Local Wildlife Site to enhance biodiversity value in accordance with an ecological survey;

- b) Green infrastructure connectivity within the site and to neighbouring green infrastructure assets to support climate resilience;
- c) The protection of the water quality of the River Trent;
- d) An appropriate landscape scheme to avoid significant adverse effects on the integrity and setting of the River Trent and surrounding settlements of High and Low Marnham, Fledborough, Ragnall and Skegby;
- e) A project level Habitats Regulation Assessment screening in accordance with Policy ST36.



6.3 Strategic employment sites

- 6.3.1 The National Planning Policy Framework⁴ requires policies to recognise and address specific locational requirements of different sectors, including provision for storage and distribution operations at a variety of scales and in suitably accessible locations.
- 6.3.2 Policy ST8 identifies sites capable of accommodating significant indigenous growth and national and regional investment to meet exceptional, unanticipated needs over the plan period. Consistent with national planning practice guidance¹¹ this Plan recognises that the logistics industry has distinct locational requirements that should be considered separately from those relating to general employment land.
- 6.3.3 On that basis, Bassetlaw's existing employment land portfolio and allocations in Policy ST6 must remain the focus for the District's general business development. This will ensure this Plan delivers a sustainable spatial strategy and a balanced approach to housing and economic growth.
- 6.3.4 The Economic Development Needs Assessment² recognises the need for further land to support strategic distribution in the District. Bassetlaw benefits from being within the A1 and the A57 corridors and in relatively close proximity to the M1: a logistically favourable location. This is reinforced by the Sheffield City Region who identify Harworth as being within the Doncaster Airport Growth Area for logistics as well as the A1 logistics corridor¹.
- 6.3.5 Market interest also reinforces the policy approach. There is a growing demand for transport and distribution in the District: DHL are developing 50,005sqm of distribution floorspace on the A57, close to the A1; a speculative development of 32,377 sqm B8 floorspace was completed at EM004: Symmetry Park, Harworth; and full planning permission has recently been approved for logistics at SEM2: Snape Lane, Harworth.
- 6.3.6 On that basis, Policy ST8 allocates two sites to provide for strategic distribution operations, specifically non rail served provision. This will help diversify the District's economy, increase local employment and reduce unemployment levels locally. Evidence² indicates that SEM2: Snape Lane, Harworth should be considered as meeting a sub-regional level of demand which is attributable to the A1M, spilling over from the Doncaster market / M18 interchange. Meanwhile SEM1: Apleyhead Junction (Policy 9) forms a logical extension to the existing longstanding and expanding logistics sector along the A57 corridor, at a key junction with the A1.
- 6.3.7 An important part of planning for strategic logistics investment is consideration of the functional economic market area (FEMA). The FEMA reflects the way the economy works; it is not constrained by administrative boundaries the relationships between where people live and work, the scope of service market areas and catchments.



Draft Bassetlaw Local Plan – Regulation 18 Consultation February 2020

Representations on behalf of J G Pears Property
Ltd

Emery Planning project number: 19-057

Project : 19-057

Client interest : Former High Marnham
Power Station

Client : J G Pears Property Ltd

Date : February 2020

Author : [REDACTED], Associate
Director

Approved by : [REDACTED],
Director

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Emery Planning Partnership Limited
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Appendices

- EP1. Photograph and aerial images of former power station and site as existing
- EP2. Photographic study of local area

1. Introduction

- 1.1 These representations have been prepared by Emery Planning on behalf of our clients, J G Pears Property Ltd, in relation to the Draft Bassetlaw Local Plan 2020.
- 1.2 Bassetlaw District Council is undertaking public consultation to engage with interested parties about the future growth of Bassetlaw District in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) 2012.
- 1.3 In response to the consultation we make the following representations on behalf of J G Pears who are a significant local employer and have a leasehold and option interest in the Former High Marnham Power Station, Fledborough Road, High Marnham.
- 1.4 The site is a major previously developed site with a lawful use for employment purposes. Planning permission was recently granted at the site for erection of a storage building (application reference: 19/00818/FUL).
- 1.5 Emery Planning previously made representations on behalf of our clients to the Draft Bassetlaw Local Plan Part 1: Strategic Plan for the period 2018 to 2035 promoting the site as a major previously developed site with potential to be developed for employment purposes.
- 1.6 Since this time various correspondence and meetings with the planning policy team has culminated in the allocation of our client's land interest under Policy ST7 - High Marnham Energy Hub. We welcome this allocation and look forward to working with the LPA to secure delivery of this site. We are also in communication with the land owners, E-on, who have advised they are also supportive of the allocation and will be making separate representations to that effect. This joint commitment to the delivery of the site as allocated serves to provide certainty that it can be delivered and assist the Council in meeting its aims and objectives as set out through the Plan.
- 1.7 Having reviewed the document as a whole, together with the supporting evidence base, we would like to support the strategy put forward and welcome the Draft Plan which plans positively and proactively for the future of the District to ensure the delivery of sustainable development.
- 1.8 In our view, the Plan as presented is fundamentally sound and provides clear and evidenced justification for the strategies and objectives included which are consistent with national policy,

particularly with regard to the reuse of previously developed land and the transition to a low carbon future.

- 1.9 Notwithstanding the above, we reserve the right to make further representations, including oral representations to the Examination in Public, if so required.

2. Response to the Draft Bassetlaw Local Plan (DBLP)

- 2.1 The DBLP is supported by an evidence base which includes, amongst other things:

- Sustainability Appraisal;
- Habitats Regulation Assessment;
- Equality Impact Assessment;
- Draft Infrastructure Delivery Plan, and;
- Viability Assessment

- 2.2 In preparation of our representations we have had regard to all relevant evidence base documents and in our view the Plan as drafted identifies clear and positive visions and objectives which provide the overall aims of the 52 policies which will seek to ensure the delivery of sustainable development.

- 2.3 In setting the context to the vision and objectives the Plan highlights a substantial level of out-commuting to work and the key importance of the local economy in redressing this situation and in shaping Bassetlaw as a successful and growing location.

- 2.4 Bassetlaw is part of the D2N2 Local Economic Partnership which seeks to deliver a more prosperous, better connected and increasingly resilient and competitive economy. Five priority sectors have been identified by D2N2 based on their high productivity and future job creation potential and this includes renewable energy and low carbon energy production. The DBLP proposals for our client's site at allocation ST7 are key to delivering D2N2's Strategic Economic Plan in spatial planning terms at the District level.

- 2.5 The Plan promotes a step-change in the local economy: by encouraging growth and investment across the District so that more people will be able to live and work in Bassetlaw, and more residents will have access to better paid, higher skilled jobs, both in the towns and rural area with the aim of reducing out-commuting to work. We support this positive approach

and highlight that our client's land interest at the Former High Marnham Power Station, and the prospective proposals of JG Pears for the site, as now reflected and allocated by policy ST7, offers the Council a significant opportunity to help achieve its key objectives in a sustainable manner. This includes making best use of previously developed land (Strategic Objective (SO) 1 and 3); encouraging and supporting economic growth (SO3); promoting rural Bassetlaw as a living and working landscape (SO6); and, supporting Bassetlaw's transition to a low carbon District (SO12).

Policy ST1 Bassetlaw Spatial Strategy

- 2.6 This Policy seeks to set out the Spatial Strategy for development in Bassetlaw over the Plan period. We support the focus of the policy on delivering sustainable development and growth through, amongst other things, promoting the efficient and effective use of land and the re-use of previously developed land, something which our client's site is well placed in assisting with. We note and welcome the fact that housing and employment targets set out are identified as minimums.

Section 6 Delivery of Economic Prosperity

- 2.7 We welcome the recognition in the Plan of the importance of local businesses as an integral factor in creating and sustaining a diverse and strong local economy. Such businesses are essential to the continued prosperity of the District and a strong local economy is vital to improving living standards and quality of life for Bassetlaw's residents. J G Pears is one such business which is ideally placed to assist the Council in enhancing its economic prosperity.
- 2.8 We note a typographical error with the referencing of the High Marnham Energy Hub allocation which is referred to at paragraph 6.1.12 and within Policy ST6 as site reference 'EP006', however, in Section heading 6.2 and within Policy ST7 (which allocates the land at the Former High Marnham Power Station as an 'Energy Hub') the site reference is given as 'EM007'. This drafting error is also reflected in other evidence base documents such as the Draft Infrastructure Delivery Plan. For clarity and consistency this matter needs to be addressed across the full suite of documents.

Policy ST6 Provision of Land for Employment Development

- 2.9 We support the allocation of the land at the Former High Marnham Power Station as an employment allocation for B1, B2, B8 - Energy Hub energy and low carbon generation related business.

- 2.10 The requirement for development proposals in employment allocations to enter into a site related Construction Job Employment Strategy in order to support local employment and skills in the construction industry is noted and J G Pears are committed to enhancing local employment opportunities and increasing skill levels across the workforce.
- 2.11 We note the reference to the use of Planning Performance Agreements and whilst these can be a useful tool in some circumstances these should not be a mandatory requirement of development proposals.

Section 6.2 Site EM007 High Marnham Energy Hub

- 2.12 Paragraph 6.2.1 of the Plan highlights that “*Supporting its [Former High Marnham Power Station] comprehensive redevelopment is a Local Plan objective and a key Council Plan priority*” this is welcomed and supported by both our clients, who have a leasehold and option interest in the site, and the land owners, E-on. E-on's representatives at Cushman & Wakefield have written separately in support of the site's inclusion as an allocation in the Plan. This joint support of the allocation helps to provide certainty as to its future delivery.
- 2.13 The allocation of this site is in line with the NPPF's encouragement of LPA's to identify suitable areas for renewable and low carbon energy sources and supporting infrastructure, where this would help secure their development (NPPF, paragraph 151).
- 2.14 We would support the comment that the site provides a unique opportunity to support this expanding market given its optimal location: with direct connection to the national electricity grid from the high voltage electricity infrastructure that remains on site. This is further supported by J G Pears own direct grid connection from their nearby combined heat and energy (CHP) plant at Low Marnham, which currently inputs surplus energy into the grid, but could potentially be harnessed directly by future development on this site.
- 2.15 The allocation also serves to meet a priority of the D2N2 Strategic Economic Plan and emerging Local Industrial Strategy.
- 2.16 At paragraph 6.2.5 we would suggest that the word ‘only’ in the first sentence “... *employment uses in the renewable and low carbon sector only, such as battery and data storage, and associated power generation*” is superfluous and should be removed – the aims of the policy are clear and any development proposals would need to demonstrate their low carbon/renewable credentials as part of any planning submission. Likewise, we would suggest

the requirement for proposals to be 'fully compliant' in the second sentence "*Proposals must also be fully compliant with the principles and zoning set out in the masterplan framework for the site*" is unnecessarily restrictive as there would be no harm arising if uses compliant with the aims of the policy were to come forward within the previously developed part of the site but outside of the 'zone' locations identified in figure 12. In such a case each application should be considered on its own merits in accord with the relevant material considerations.

- 2.17 The reference made at paragraph 6.2.10 with regard to integration of proposed development into the wider landscape is noted and initial landscape work undertaken on behalf of J G Pears by Randle Thorp, Landscape Architects, has concluded that the site as a whole is very well screened from the wider landscape with only very limited views into it. For information a photograph of the site with operational and historic and present aerial photographs, together with a copy of the photographic study of the site and local area prepared in support of the recent planning application for the storage building is provided at Appendix **EP1** and **EP2**.
- 2.18 Given the scale of the site as a whole it is considered opportunities for biodiversity net gain will be able to be harnessed in line with local and national policy requirements at the time of any application.
- 2.19 The requirement for a project level Habitats Regulations Assessment (HRA) screening to determine potential impacts on the Sherwood Forest ppSPA is noted. As is, the requirement for developers of the site to contribute to necessary infrastructure works. At present these are considered likely to be primarily limited to road improvements at the A57 junction at Dunham on Trent crossroads and possible water supply improvements. However, it is noted there is an established mechanism for developers under the Water Industry Act 1991 to pay Anglian Water directly to supply water to their site.

Policy ST7 Site EM007 High Marnham Energy Hub

- 2.20 The inclusion of the Former High Marnham Power Station site as a strategic employment allocation is strongly supported by both J G Pears as lease and option holder and E-on as landowner. This is a major previously developed site and we welcome the recognition of the LPA that its development would be in full accord with the aims of the NPPF to make best use of land and deliver sustainable development.
- 2.21 The overall positive approach to the delivery of the site for employment purposes within this and the next plan period, is welcomed and it is considered that J G Pears is well placed to support

the initial development of the site as specified for uses within the renewable energy and low carbon sector.

- 2.22 The requirement of the policy for a comprehensive masterplan to be produced is noted and supported. However, it is also important to acknowledge that the timing of production of such a masterplan, indeed, also the timing of adoption of this Local Plan, should not prohibit planning applications which are compliant with the principles of the Policy and overall objectives of the Plan coming forward on this brownfield site prior to adoption.

Section 10 reening Bassetlaw

- 2.23 This Section of the Plan seeks to promote opportunities to improve energy efficiency and minimise CO2 emissions.
- 2.24 Policy ST45 seeks to secure the reduction of greenhouse gases in accordance with the provisions of the Climate Change Act 2008. We support the aims and objectives of this policy as well as, the recognition at Paragraph 10.2.3 of the significant potential for renewable energy and low carbon generation on site at High Marnham. This positive strategy, to be delivered through Policy ST46 (and ST7), supports the NPPF emphasis to promote energy from renewable and low carbon sources, with policies designed to maximise the development of low carbon energy.
- 2.25 The Former High Marnham Power Station site provides an excellent opportunity to positively and actively meet the aims of this Section of the Plan with its accessibility to the national Grid connection and critically, potential for reuse of excess power, heat and hot water from J G Pears Low Marnham CHP. Again, this is supported at paragraph 151 of the NPPF which states Local Plans should “... *identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for collocating potential heat customers and suppliers.*”
- 2.26 We are pleased that this unique opportunity has been recognised and is being grasped by the LPA to realise the opportunity for sustainable reuse of this existing energy efficient site which already provides opportunities for decentralised energy.

3. Summary and conclusions

- 3.1 As set out throughout these representations the overall positive thrust of the Plan is welcomed and whilst there are some minor matters where reconsideration of wording is required in our view, the Plan is fundamentally sound, positively prepared, effective and consistent with National Policy.
- 3.2 Significant consideration has been given to how major previously developed sites can be reused to ensure most effective use of existing infrastructure.
- 3.3 Our client's land interest at the Former High Marnham Power Station and prospective proposals provides an opportunity to realise the development potential of this major previously developed site; well connected to the strategic highway network adjacent to the village of High Marnham where proportionate development will be supported and offers a significant opportunity for sustainable redevelopment making use of readily available energy from J G Pears nearby CHP plant. The inclusion of this site as an employment allocation provides a significant opportunity to the LPA to meet its low carbon agenda in a sustainable and appropriate manner whilst also delivering on the wider D2N2 aspirations to improve economic prosperity of the region which must be supported.
- 3.4 We look forward to continuing to work with the LPA to deliver our mutual objectives for the site in providing sustainable economic development within the District.

Appendices

Appendix EP1

**Photograph and aerial images of former power station and site as
existing**

Figure 1: Photograph of Former High Marnham Power Station prior to demolition.



Figure 2: Aerial image of site when operational.

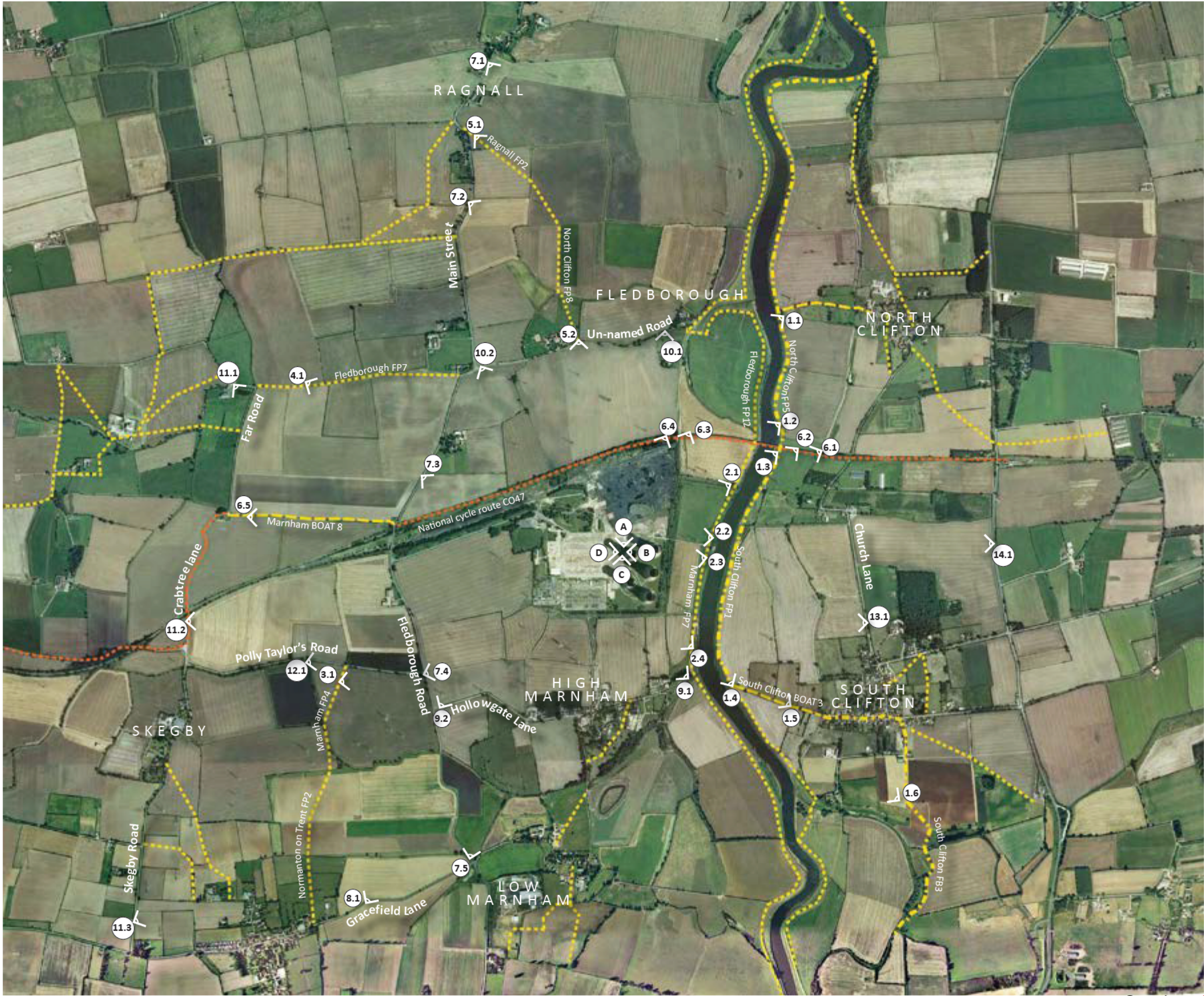


Figure 3 – Aerial image of site as existing



Appendix EP2

Photographic study of local area



KEY:

- Public Right of Way Long Distance Footpath
- National Cycle Route 647
- BOAT Route
- Viewpoint Location
- Public Right of Way

JG Pears Ltd.

**Proposed Storage Building,
High Marnham**

Figure 1
Photograph Location Plan

Drwg No: 739A-01
Drawn by: AG
Rev by: JF
QM Status: checked
Scale: NTS @ A3

Date: 09.05.19
Checker: JF
Rev checker: CW
Product Status:
Confidential Review



Photo A - Site



Photo B - Site

JG Pears Ltd.

Proposed Storage Building, High Marnham

Figure 2

*Viewpoint Photographs
A-B*

Drwg No: 739A-02
Drawn by: AG
Rev by: JF
QM Status: checked
Scale: NTS

Date: 09.05.19
Checker: JF
Rev checker: CW
Product Status:
Confidential Review



Photo C - Site



Photo D - Site

JG Pears Ltd.

Proposed Storage Building, High Marnham

Figure 3

*Viewpoint Photographs
C-D*

Drwg No: 739A-03
Drawn by: AG
Rev by: JF
QM Status: checked
Scale: NTS

Date: 09.05.19
Checker: JF
Rev checker: CW
Product Status:
Confidential Review



Photo 1.1 - View from the Trent Valley Way (PRoW North Clifton FP5) looking south west

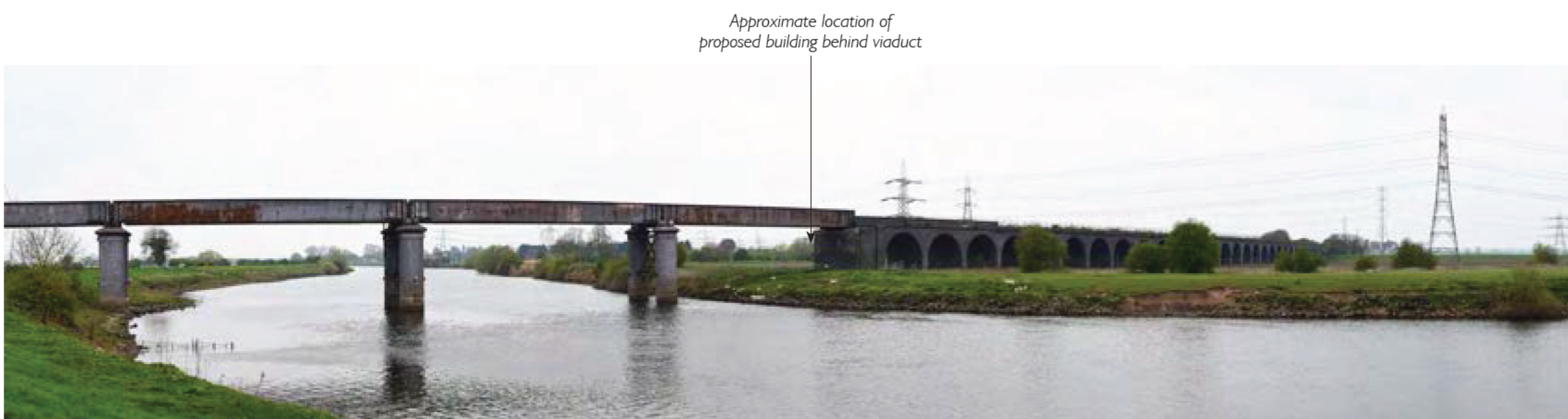


Photo 1.2 - View from the Trent Valley Way (PRoW North Clifton FP5) looking south west



Photo 1.3 - View from the Trent Valley Way (PRoW South Clifton FP1) looking south west

JG Pears Ltd.

Proposed Storage Building, High Marnham

Figure 4

Viewpoint Photographs 1.1-1.3

Drwg No: 739A-04
Drawn by: AG
Rev by: JF
QM Status: checked
Scale: NTS

Date: 09.05.19
Checker: JF
Rev checker: CW
Product Status:
Confidential Review

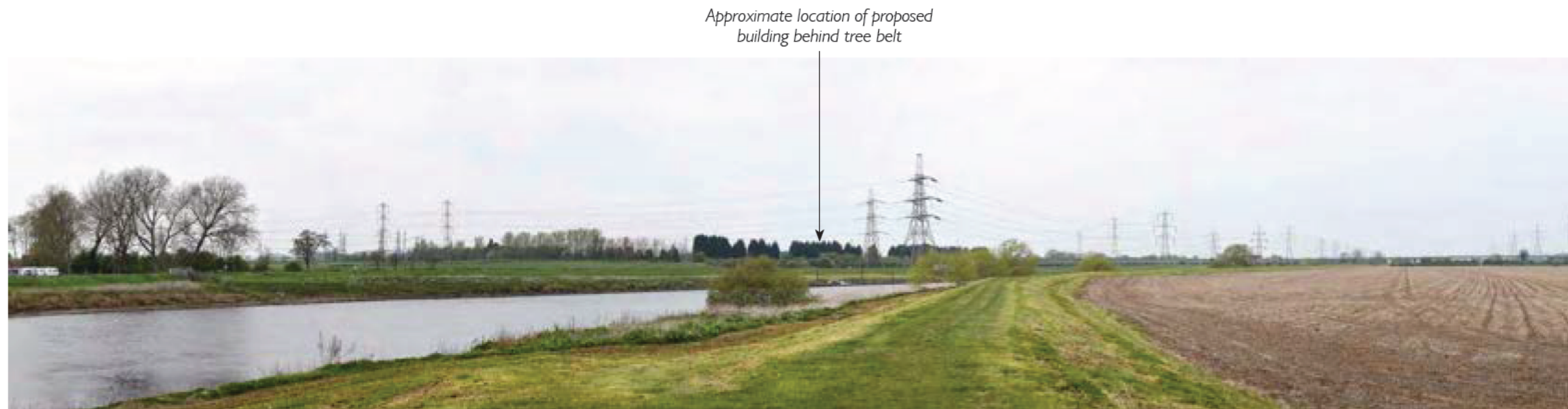


Photo 1.4 - View from the Trent Valley Way (PRoW South Clifton FP1) looking north west



Photo 1.5 - View from the Trent Valley Way (South Clifton BOAT 13) looking west



Photo 1.6 - View from the Trent Valley Way (South Clifton FP3) looking north west

JG Pears Ltd.

Proposed Storage Building, High Marnham

Figure 5

Viewpoint Photographs 1.4-1.6

Drwg No: 739A-05
Drawn by: AG
Rev by: JF
QM Status: checked
Scale: NTS

Date: 09.05.19
Checker: JF
Rev checker: CW
Product Status:
Confidential Review

Approximate location of proposed
building behind tree belt



Photo 2.1 - View from the PRoW on the western banks of the River Trent (Marnham FP7), looking south west

Approximate location of proposed
building behind tree belt



Photo 2.2 - View from the PRoW on the western bank of the River Trent (Marnham FP7), looking west

Approximate location of proposed
building behind tree belt



Photo 2.3 - View from PRoW on the western bank of the River Trent (Marnham FP7), looking west

JG Pears Ltd.

Proposed Storage Building, High Marnham

Figure 6

Viewpoint Photographs 2.1-2.3

Drwg No: 739A-06
Drawn by: AG
Rev by: JF
QM Status: checked
Scale: NTS

Date: 09.05.19
Checker: JF
Rev checker: CW
Product Status:
Confidential Review



Photo 2.4 - View from PRow on the western banks of the River Trent (Marnham FP7), looking north west



Photo 3.1 - View from the PRow to the south west (Marnham FP4), looking east

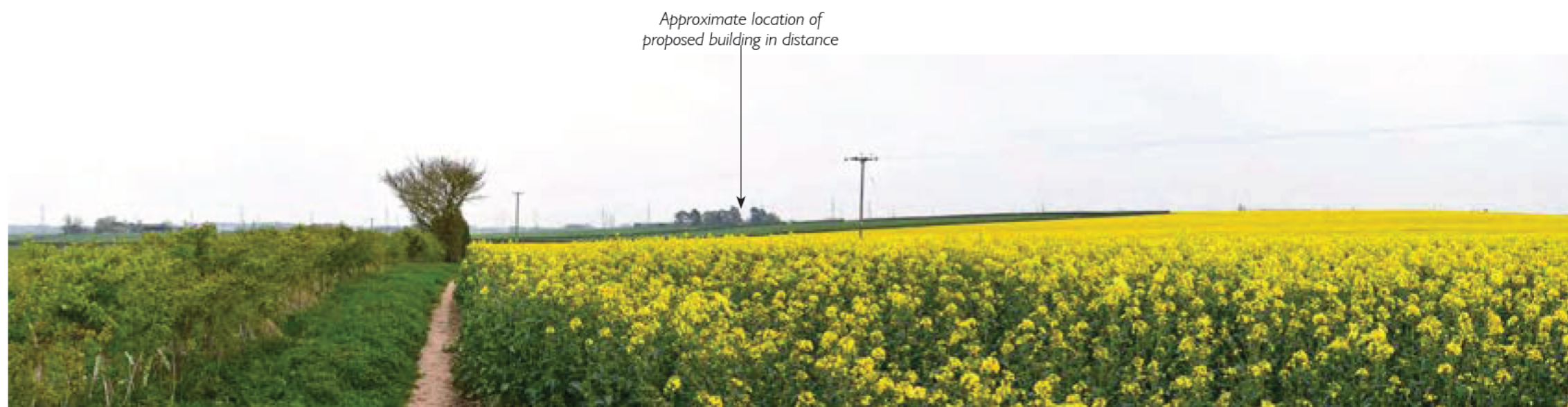


Photo 4.1 - View from PRow to the north west (PRow Fledborough FP7) looking south east

JG Pears Ltd.

Proposed Storage Building, High Marnham

Figure 7

Viewpoint Photographs 2.4-4.1

Drwg No: 739A-07
Drawn by: AG
Rev by: JF
QM Status: checked
Scale: NTS

Date: 09.05.19
Checker: JF
Rev checker: CW
Product Status:
Confidential Review

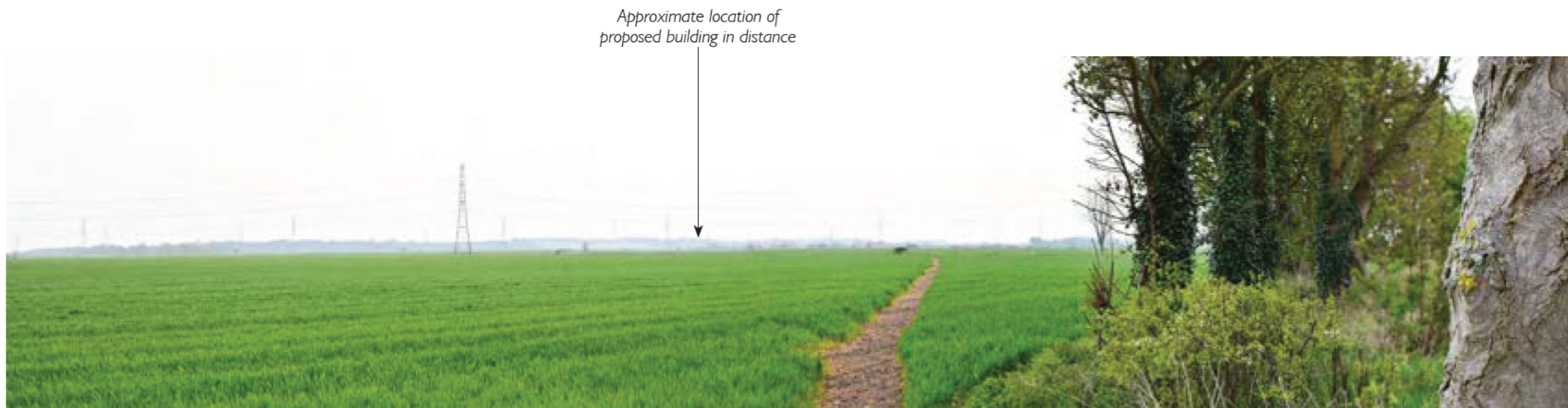


Photo 5.1 - View from PRow to the north (Ragnall FP2) looking south



Photo 5.2 - View from PRow to the north (North Clifton FP8) looking south

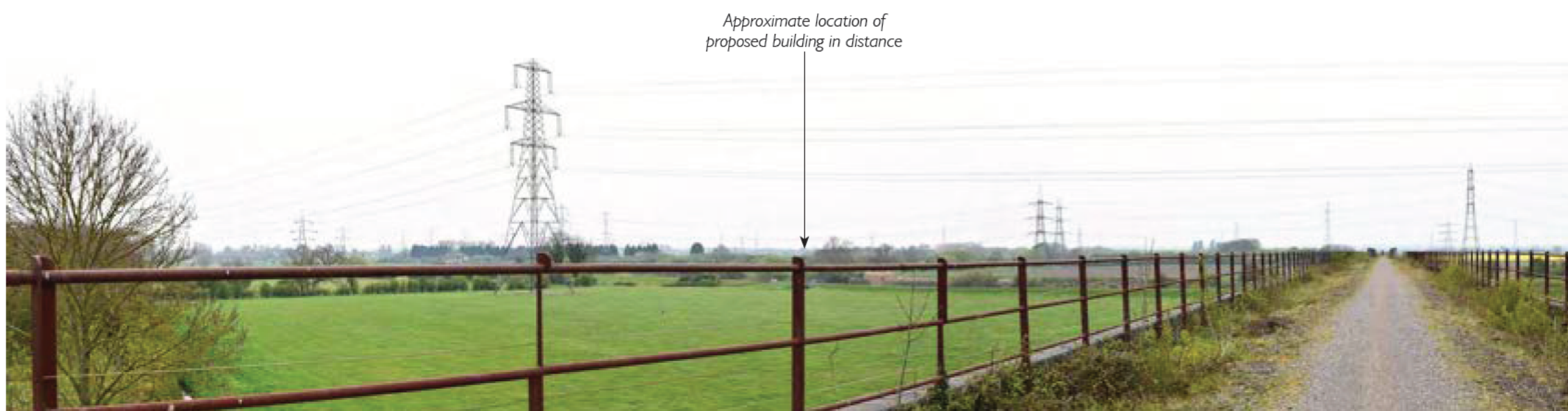


Photo 6.1 - View from National Cycle Route 647 looking south west

JG Pears Ltd.

Proposed Storage Building, High Marnham

Figure 8

Viewpoint Photographs 5.1-6.1

Drwg No: 739A-08
Drawn by: AG
Rev by: JF
QM Status: checked
Scale: NTS

Date: 09.05.19
Checker: JF
Rev checker: CW
Product Status:
Confidential Review



Photo 6.2 - View from National Cycle Route 647 looking south west



Photo 6.3 - View from National Cycle Route 647 looking south west



Photo 6.4 - View from National Cycle Route 647 looking south west

JG Pears Ltd.

Proposed Storage Building, High Marnham

Figure 9

Viewpoint Photographs 6.2-6.4

Drwg No: 739A-09
Drawn by: AG
Rev by: JF
QM Status: checked
Scale: NTS

Date: 09.05.19
Checker: JF
Rev checker: CW
Product Status:
Confidential Review

Approximate location of
proposed building in distance



Photo 6.5 - View from National Cycle Route 647 (Marnham BOAT 8) looking east

Approximate location of
proposed building in distance



Photo 7.1 - View from Main Street near Ragnall looking south east

Approximate location of
proposed building in distance



Photo 7.2 - View from Main Street looking south east

JG Pears Ltd.

Proposed Storage Building, High Marnham

Figure 10

Viewpoint Photographs 6.5-7.2

Drwg No: 739A-10
Drawn by: AG
Rev by: JF
QM Status: checked
Scale: NTS

Date: 09.05.19
Checker: JF
Rev checker: CW
Product Status:
Confidential Review

Approximate location of proposed
building behind the tree belt



Photo 7.3 - View from unnamed to the west looking south

Approximate location of proposed
building beyond the electric substation



Photo 7.4 - View from Fledborough Road to the west looking east

Approximate location of
proposed building in the distance



Photo 7.5 - View from Fledborough Road looking north east

JG Pears Ltd.

Proposed Storage Building, High Marnham

Figure 11

Viewpoint Photographs 7.3

Drwg No: 739A-11
Drawn by: AG
Rev by: JF
QM Status: checked
Scale: NTS

Date: 09.05.19
Checker: JF
Rev checker: CW
Product Status:
Confidential Review

Approximate location of proposed
building beyond the tree belt



Photo 8.1 - View from Gracefield Lane looking north east

Approximate location of proposed
building beyond the tree belt



Photo 9.1 - View from Hollowgate Lane looking north west

Approximate location of proposed building
beyond the electric substation



Photo 9.2 - View from Hollowgate Lane looking north east

JG Pears Ltd.

Proposed Storage Building, High Marnham

Figure 12

*Viewpoint Photographs
8.1-9.2*

Drwg No: 739A-12

Drawn by: AG

Rev by: JF

QM Status: checked

Scale: NTS

Date: 09.05.19

Checker: JF

Rev checker: CW

Product Status:
Confidential Review

*Approximate location of proposed building
beyond the trees*



Photo 10.1 - View from unnamed road to the north looking south

*Approximate location of proposed building
beyond the trees*



Photo 10.2 - View from unnamed road to the north looking south

*Approximate location of proposed building
beyond the trees*



Photo 11.1 - View from Far Road looking east

JG Pears Ltd.

Proposed Storage Building, High Marnham

Figure 13

Viewpoint Photographs 10.1-11.1

Drwg No: 739A-13
Drawn by: AG
Rev by: JF
QM Status: checked
Scale: NTS

Date: 09.05.19
Checker: JF
Rev checker: CW
Product Status:
Confidential Review

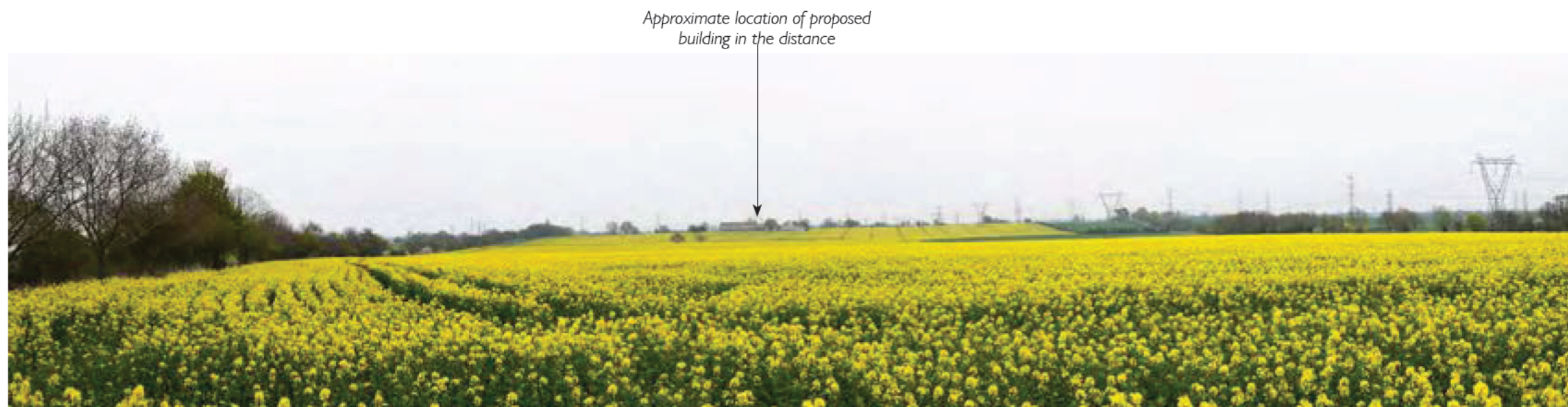


Photo 11.2 - View from Crabtree Lane looking east



Photo 11.3 - View from Skegby Road looking north east



Photo 12.1 - View from Polly Taylor Road looking east

JG Pears Ltd.

Proposed Storage Building, High Marnham

Figure 14

Viewpoint Photographs 11.2-12.1

Drwg No: 739A-14
Drawn by: AG
Rev by: JF
QM Status: checked
Scale: NTS

Date: 09.05.19
Checker: JF
Rev checker: CW
Product Status:
Confidential Review

Approximate location of proposed
building beyond the tree belt



Photo 13.1 - View from Church Lane looking west

Approximate location of proposed
building beyond the tree belt



Photo 14.1 - View from the A1133 looking west

JG Pears Ltd.

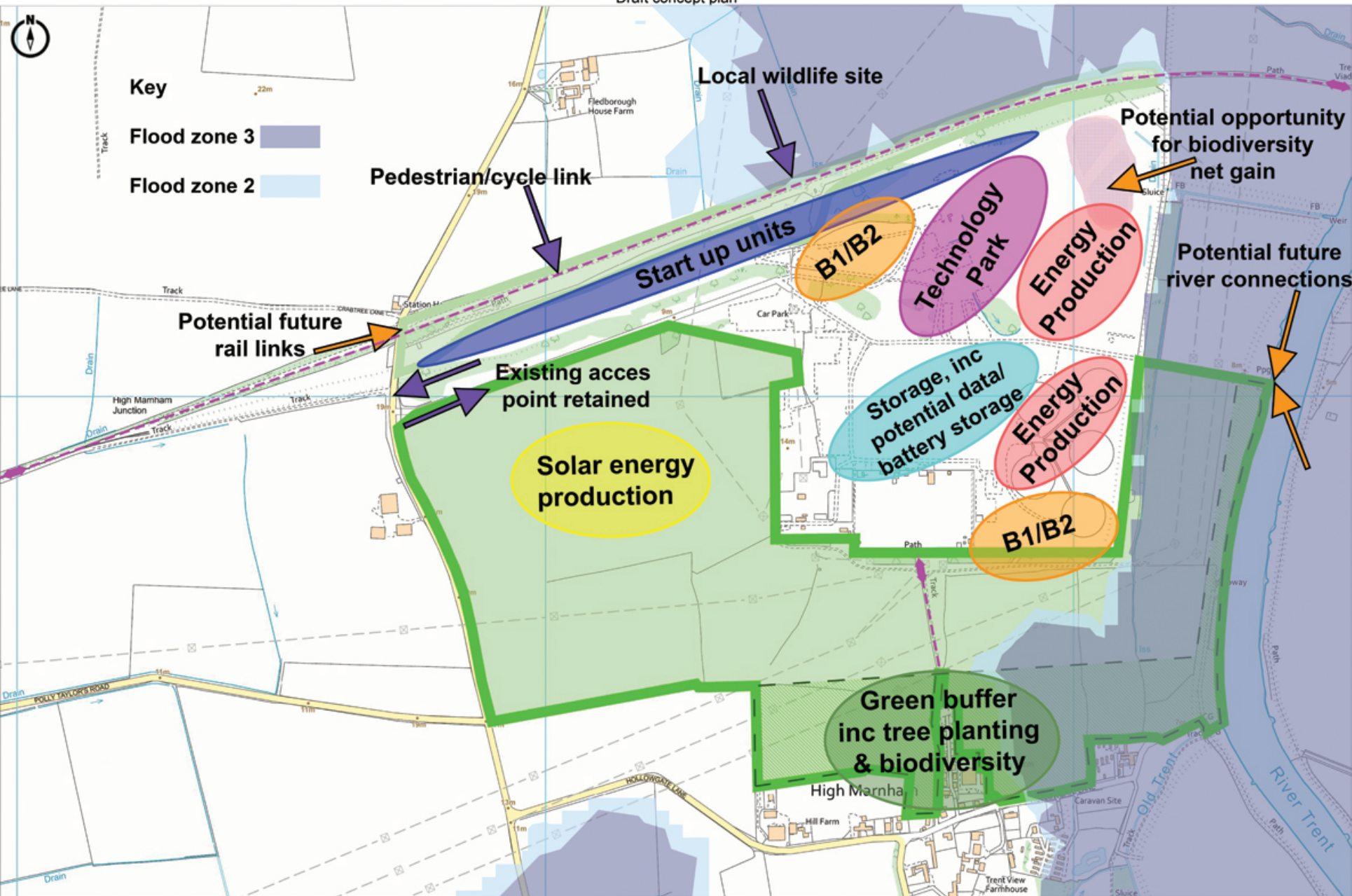
Proposed Storage Building, High Marnham

Figure 15

Viewpoint Photographs 13.1-14.1

Drwg No: 739A-15
Drawn by: AG
Rev by: JF
QM Status: checked
Scale: NTS

Date: 09.05.19
Checker: JF
Rev checker: CW
Product Status:
Confidential Review





High Marnham - Local Plan Vision Statement_Version One

Former High Marnham Power Station, Fledborough Road,
High Marnham, Nottinghamshire, NG23 6SH

for J G Pears Property Ltd

Emery Planning project number: 19-057

LPA ref: Draft Local Plan Policy ST7: Site EM007

Project : 19-057

Site address : Former High Marnham
Power Station,
Fledborough Road,
High Marnham,
Nottinghamshire,
NG23 6SH

Client : J G Pears Property Ltd

Date : August 2020

Author : [REDACTED]

Approved by : [REDACTED]

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7. Appendices	13

1. Introduction

- 1.1 This document has been prepared in support of the draft allocation of our client's (JG Pears Property Ltd, hereafter known as the 'Site Promotor') land interest at the Former High Marnham Power Station. It seeks to set the framework for the future development of the site providing an initial vision and objectives which will evolve through the Local Plan process and in support of the allocation of the site under Policy ST7 - High Marnham Energy Hub, in the draft Local Plan.
- 1.2 This first iteration of 'the vision' has regard to the comments received from the Council's Regulation 18 consultation on the draft Local Plan in January/February 2020 which included the allocation of this site. It is accompanied by an initial draft concept plan for the site. It is intended that this will be a working document that will evolve to form a guide to a Masterplan structure for the site's long-term development across the plan period. Alongside progressing technical matters, this document is intended to capture and share the vision for the site and present the positive impacts it will have on the site and wider area.
- 1.3 Whilst Bassetlaw Council, unlike many others across the country, has not yet declared a Climate Emergency, it has stated that climate change is one of the most poignant threats to both our economy and prosperity. Accordingly, it acknowledges actions to decrease emissions must be taken.
- 1.4 The Government's approach to adapt and mitigate these circumstances includes targets of cutting greenhouse gas emissions by 34% by 2020 and 80% by 2050. In a bid to help meet such ambitious targets the National Planning Policy Framework encourages identification of suitable areas for renewable and low carbon energy sources and supporting infrastructure, where this would help secure their development. Accordingly, the proposed allocation of this predominately brownfield site offers an opportunity to address the national climate change and planning agenda.

2. Site Vision

- 2.1 The Site Promoter's vision for this site is to facilitate its delivery as a world class hub for both business and low carbon energy production, creating sustainable jobs and inward investment from national and international companies facilitating economic growth and long-term opportunities.
- 2.2 The vision for the site currently includes, but may not be limited to, the following uses to be determined both by occupier interest and the planning process to provide in the region of 80,000sqm of floor space for:
- A mixture of space for businesses, including space to grow local businesses.
 - On-site energy generation, including solar power generation.
 - Data centre and disaster recovery suite.
 - Battery storage.
 - High power HGV vehicle charging.
 - Storage (including refrigerated).
 - Energy and technology park potentially with education, training and research facilities.
 - Green space, infrastructure and wildlife habitat.
- 2.3 The unique opportunity of the site with its National Grid connection and potential for reuse of excess power, heat and hot water from the Site Promoter's Combined Heat and Power Plant at neighbouring Low Marnham (which also benefits from a direct grid connection) is a significant inherent advantage to this site. The Site Promoter envisages this as perfect for businesses with high energy requirements who need a constant, resilient and cost-effective supply of electricity and heat, such as highly-automated businesses, certain manufacturing firms, and data centres.
- 2.4 This site can offer clean, reliable energy, at significantly less cost than the market for on-site users; energy can also be sold back to the grid. Because of this unique proposition, it is envisaged multi-national and national business will be drawn to the site, indeed some initial interest in the site has already been shown. It is the vision that the site will be a strategic development that will benefit the regional economy and drive innovation across the data and energy sectors that in terms of inward investment will provide a distinct competitive advantage for the District over competing areas and putting the Bassetlaw on the map. The development will undoubtedly generate a

significant number of employment opportunities for local people and attract new investment into the area.

- 2.5 Through better use of existing energy supplies (including surplus non-electrical energy), new low carbon production and battery storage, the site can help to reinforce the grid supply, allowing release of power back into the network at the right time providing grid stabilisation and helping deliver Bassetlaw's low carbon objectives.
- 2.6 The scale of the site allows opportunities for not only high-quality employment opportunities but also creation of green infrastructure and new wildlife habitat. This would provide biodiversity net gain including extensive woodland planting as a buffer to the neighbouring settlement of High Marnham. The vision for this site is one where nature is embraced alongside the most modern of sustainable technologies providing a brighter future for all.
- 2.7 It is the Site Promoter's intention to work in partnership with Bassetlaw District Council and bring all stakeholders along with them through appropriate engagement and consultation as the plans develop to create a flagship development which maximises the benefits for local people, while being sympathetic to its surroundings.

3. Site Objectives

3.1 The key objectives for the site are:

- 1) To capitalise on the unique opportunity offered by this site to deliver renewable and low carbon energy sources, supporting business and infrastructure whilst making best use of land to deliver sustainable development within this and potentially into the next local plan period.
- 2) To support the expanding low carbon market and to seek opportunities to utilise surplus heat and power generation from the Site Promoter's nearby combined heat and energy (CHP) plant at Low Marnham, to meet the energy demands of future development on this site.
- 3) To create a thriving environment for delivery of new high skilled jobs to support the local economy.
- 4) To achieve a high quality of design which integrates the proposals into the wider landscape as appropriately as possible and harness opportunities for biodiversity net gain in line with local and national policy requirements.
- 5) To provide protection of Fledborough to Harby Disused Railway Line Local Wildlife Site on the site as well as the adjoining Old Trent Local Wildlife Site.
- 6) To minimise flood risk to this site and land elsewhere and build in climate resilience to the site's development utilising sustainable urban drainage systems where suitable. This will incorporate appropriate measures to protect the water quality of the River Trent.
- 7) To include in the site's development, green infrastructure connectivity within and outside of the site.
- 8) To ensure protection of amenity of local communities from noise, light, glare, smell, dust, or emissions in accordance with relevant environmental standards.
- 9) To maximise opportunities for sustainable highway development which will not adversely affect the local or wider highway network and deliver network improvements through contributions towards improvements to the A57 junction at Dunham on the Trent/Ragnall crossroads.

- 10) To promote access to the site by modes of transport other than the private car, the development will amongst other things seek to create pedestrian and cycle links to the village of High Marnham with an aim to supporting local and national ambitions to achieve healthier communities and deliver on sustainable development principles.

4. Response to Regulation 18 consultation January/February 2020

- 4.1 We are informed by the Local Planning Authority that the consultation was in the main, well received with over 750 responses being received.
- 4.2 There was positive feedback in terms of the principle of the redevelopment of this major previously developed site. Particular points raised during the consultation are set out below and we have provided an initial response to these. We will seek to address them in more detail as appropriate, through this evolving document:

Consultation response received	Site Promoter response
The Local Wildlife site to the north of the site should be removed from the "developable area" to avoid conflict with existing policy.	The importance of the Fledborough to Harby Disused Railway Line Local Wildlife Site (LWS) is acknowledged and this area will be protected through any development proposals. Where any disturbance to the LWS is unavoidable mitigation measures in accordance with policy ST36 of the Draft Local Plan and the mitigation hierarchy will be ensured.
The established lagoons and wetlands to the NE of the site should also be removed from any "developable area".	It is envisaged that this area of the site could offer potential opportunities for delivery of Biodiversity Net Gain. Any development proposals will be supported by full ecological assessments and seek to retain and enhance areas of ecological/biodiversity benefit and where any loss of/harm to such areas is unavoidable, to provide appropriate mitigation.
Concern over the impact of increased HGV traffic to and from the site.	It has been identified by the Local Highways Authority and the Site Promoter's retained highway consultants, SCP, that there is sufficient capacity in the local highway network to accommodate the proposed development. The future development of the site will contribute towards improvements to the A57 junction at Dunham on the Trent/Ragnall crossroads which will improve road safety and convenience on the wider highway network. Future development proposals will be supported by Transport Assessments and a Travel Plan to ensure appropriate highway considerations and maximise opportunities for sustainable highway development management and choices.

<p>Concern over the height of new buildings and visual impact.</p>	<p>The Site Promoter's retained landscape consultants, Randall Thorp, previously undertook a photographic survey and identified potential visual receptors as part of the application for a meal storage building on the site. These photographs demonstrate that the site is well enclosed by planting originally designed to screen the very much larger and extensive former power station use of the site. The buildings and structures envisaged for this site would reflect the context of the wider site and the buildings and other structures which once sat within it. Potential broad scale parameters are discussed within Section 3 of this document. The photographic record provided at Appendix EP1 to this document clearly shows that from outside of the wider site, the scale of buildings envisaged would be largely imperceptible and would certainly not be out of context to their setting. Although the former power station buildings and most of the structures (such as the cooling towers) have been demolished, the retention of the large electricity switching station and other electricity infrastructure, such as the pylons, together with the structural landscaping, continue to put the site in a developed context. The minimal views of the future buildings that would be afforded from outside the site would be seen within that context and would not be inappropriate or out of keeping and would not be harmful to local visual receptors. Section 3 of this document gives further consideration as to how these points will be demonstrated at the appropriate time in the Local Plan/planning application process.</p>
<p>Flood risk impact to the east.</p>	<p>Initial flood risk assessment work undertaken by the Site Promoter's retained Consultants, Betts Associates, have indicated that the site can be delivered without flood risk to this site or land elsewhere. Any development proposals will seek to build in climate resilience and utilise sustainable urban drainage systems where appropriate.</p>
<p>Impact to existing properties in Fledborough, Ragnall, Grassthrope and High Marnham.</p>	<p>The impact upon the local community arising from the development of the site has been given careful consideration in preparation of the concept proposals for the site. It is however, important to recognise that much of the site is previously developed land. The parts of the site that are not previously developed are proposed for solar energy production and will have minimal impact. All development proposals will be informed by an appropriate Landscape and Visual Appraisal. This work will accord with the requirements of the draft allocation policy and will be accompanied by an appropriate landscape scheme to avoid significant adverse effects on the integrity and setting of the River Trent and surrounding settlements. Furthermore, development proposals will be</p>

	<p>accompanied by all the relevant environmental technical data to demonstrate that the proposals would not adversely affect local residents; this may include full Environmental Impact Assessment (EIA). Whilst the allocation of this site will establish the principle of redevelopment of this major previously development site and provide certainty to the delivery of Bassetlaw's low carbon future, each element of the site future development will be subject to a planning application which will be assessed on its own merits at that time.</p>
<p>Possible car park at the entrance of the site so people can park and use the adjoining cyclepath.</p>	<p>Potential exists to incorporate a car park as suggested.</p>
<p>Support for low carbon and renewable energy development.</p>	<p>The comments in support to the development proposals are noted and welcomed.</p>
<p>Support for solar power generation.</p>	<p>The comments in support to the development proposals are noted and welcomed.</p>
<p>Support for local employment opportunities.</p>	<p>The comments in support to the development proposals are noted and welcomed.</p>
<p>Support for the "green buffers".</p>	<p>The comments in support to the development proposals are noted and welcomed.</p>

5. Contextual analysis

- 5.1 The former High Marnham Power Station site comprises 138 hectares of land on the eastern edge of the District, on the banks of the River Trent and around 10 miles north of Newark-on-Trent. A large proportion of the site area is previously developed land, formerly used for power generation.
- 5.2 National Grid continue to occupy approximately 5.5 hectares of the site for a large switching station and there remain extensive areas of hardstanding, site infrastructure and structural landscaping.
- 5.3 Access to the site is from Fledborough Road, approximately 2 miles from the A57 and 7 miles from the A1. The site previously had rail access which could, if economically viable, potentially be reinstated to serve future uses of the site. There is also river access which is navigable.
- 5.4 The surrounding area is rural in character. The small settlement of High Marnham, located south of the site includes residential dwellings, a small holiday park and some agricultural/business uses.
- 5.5 Much of the previously developed area of this large site is well screened and there is an opportunity to develop a green buffer with greater tree planting and biodiversity enhancement adjacent to the village of High Marnham; this will also improve connectivity with wider opportunities for biodiversity net gain in accordance with the aims of the National Planning Policy Framework.
- 5.6 The Vision and objectives for the future development of the site have been set out above.
- 5.7 Below we set out some of the key issues for consideration as this Vision Statement evolves into a masterplan for the delivery of the site and its many associated benefits.

Broad scale parameters

- 5.8 These will emerge as the 'Vision Statement' evolves. However, it is relevant to note that only long distance views of the site are seen against the context of the surrounding trees and the numerous taller and more visually intrusive electricity pylons and cables that run through the site and surrounding countryside crisscrossing the area (these are up to 55m high).
- 5.9 It is also important when considering scale parameters to consider the context of the site. Up until 2012, two 150m high chimneys and five 110m high cooling towers existed on this site all against the backdrop of the electricity pylons that continue to crisscross the site. It is clear that the

proposals will be of a completely different scale to that which once existed on this site and will not cause anywhere as near a level of harm to the visual appearance of the surrounding countryside as did the power station which was only demolished 8 years ago back in 2012.

- 5.10 By virtue of what was previously on this site and the fact that an electricity substation still exists on it, it is clear that this parcel of land is more industrial rather than rural in character. Due to the distance between the site and the surrounding residential properties and having regard to other landscape features, it is not considered that the building scales should be unnecessarily constrained.

Strategic design principles

- 5.11 These will emerge as the 'Vision Statement' evolves. Again, having regard to the location and visual context of the site these should not be overly prescriptive.

Visual impact consideration

- 5.12 As much of the site is previously developed land, as described above, the effects on the landscape character are not likely to be significant. However,
- 5.13 The Site Promoter's retained landscape consultant Randall Thorpe have already undertaken a photographic study of the site and surrounding area which will be used in the preparation of a Zone of Theoretical Visibility to assess the potential visual envelope of any tall structures. A copy of the photographic study is provided at **Appendix EP1**. A Landscape and Visual Appraisal (LVA), based on current best practice guidelines published by the Landscape Institute and Institute of Environmental Management and Assessment, will support any future planning application.
- 5.14 Working with Randall Thorp, the principles of the landscape strategy will be agreed in partnership with the LPA. Mitigation proposals would be developed as appropriate to the character of the site and wider area. Mitigation proposals would include measures such as consideration of the potential of site planting, landforms, or other measures in response to local visual issues. Preparation of a landscape masterplan to show the concept for proposed planting and the provision of any additional planting required to mitigate visual effects will be undertaken.
- 5.15 In due course and in association with individual planning applications, detailed planting plans would be prepared which would ensure compensation for the loss of any existing vegetation and to reinforce the existing planting around the site boundaries. It is of note that none of the trees within or adjacent to the site are subject to Tree Preservation Orders.

Employment opportunities

- 5.16 Whilst the number of likely job opportunities arising from the development of this site will be ultimately dependent upon the mix of uses achieved it is guaranteed to create significant inward investment and career opportunities both in construction and use. It is envisaged the site could potentially provide in excess 80,000sqm of employment space across a range of sectors, primarily B1, B2, B8 and sui generis.
- 5.17 Employment opportunities arise during both the construction period which could last in the region of 10 years and create not only direct construction jobs on site, but also significant indirect off-site jobs over a construction phase.
- 5.18 We note the emerging Local Plan requires development proposals in employment allocations to enter into a site related 'Construction Job Employment Strategy' in order to support local employment and skills in the construction industry. The Site Promoter is committed to targeting employment from the local area and will set apprenticeship targets through the supply chain to create long term job prospects for young people locally and increasing skill levels across the workforce.
- 5.19 Moving into the operational period the site would create career opportunities both directly and indirectly across a range of sectors which may include, but are not limited to:
- Electricity, gas and air conditioning
 - Manufacturing
 - Construction
 - Transportation and storage
 - Information and communication
 - Real estate
 - Education
 - Administrative and support services
 - Finance and insurance
- 5.20 It is envisaged that a proportion of the jobs created will also be bespoke and high skill.

Land ownership information

- 5.21 The site is owned by E-on who operated the former power station on the site. The Site Promoter has a leasehold and option interest over the site.

Deliverability

- 5.22 As previously advised the Site Promoter and Emery Planning are in communication with the landowners, E-on, who are supportive of the allocation. This joint commitment to the delivery of the site as allocation serves to provide certainty that it can be delivered and assist the Council in meeting its aims and objectives as set out through the Local Plan.

6. Summary

- 6.1 This document serves to act as a base of an on-going vision for opportunities for the prospective proposals for the site to realise the development potential of this major previously developed site. It is also well connected to the strategic highway network adjacent to the village of High Marnham where proportionate development will be supported and offers a significant opportunity for sustainable redevelopment making use of readily available energy from J G Pears nearby CHP plant.
- 6.2 The site provides a significant opportunity to the Council to meet its low carbon agenda in a sustainable and appropriate manner whilst also delivering on the wider aspirations to improve economic prosperity of the region.
- 6.3 Working in partnership with the LPA and in consultation with stakeholders as the local plan preparation moves forward and the ongoing technical work on the site progresses, the document will evolve to form the master planning document for the future of the site.
- 6.4 The Site Promoter and development team look forward to continuing to work with the LPA to deliver our mutual objectives for the site in providing sustainable economic development within the District.

7. Appendices

- EP1. Photographic study of the site and surrounding area

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F: 01625 511457

info@emeryplanning.com
www.emeryplanning.com

20 January 2021

EP ref: 19-057

[REDACTED]
T: 01625 442 781
[REDACTED]

Dear Sir or Madam

Re: Draft Bassetlaw Local Plan November 2020 – Regulation 18 Consultation:
Representations on behalf of J G Pears Property Ltd

These representations have been prepared by Emery Planning on behalf of our clients, J G Pears Property Ltd, in relation to the Draft Bassetlaw Local Plan November 2020.

Background/Introduction

Bassetlaw District Council is undertaking public consultation to engage with interested parties about the future growth of Bassetlaw District in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) 2012.

In response to the consultation, we make the following representations on behalf of J G Pears who are a significant local employer and owners of the Former High Marnham Power Station, Fledborough Road, High Marnham as well as other nearby sites.

The site is a major previously developed site with a lawful use for employment purposes. Planning permission exists at the site for erection of a storage building (application reference: 19/00818/FUL).

Emery Planning made representations on behalf of our clients to the previous two Regulation 18 consultations on the Draft Bassetlaw Local Plan initially promoting the site as a major previously developed site with potential to be developed for employment purposes and latterly supporting its proposed allocation as a GreenEnergy Hub.

Emery Planning is proud to support the Keaton Emery Memorial Foundation. To find out more about the charity, please visit www.keatonemeryfoundation.com



Throughout this time, we have worked collaboratively with the planning policy team to enable the delivery of the site which is identified in the most recent iteration of the Draft Plan as “High Marnham Green Energy Hub” (Policy ST9, Site reference EM008).

We welcome this allocation and look forward to working with the LPA and other stakeholders to secure delivery of this site.

Since the previous round of consultation, J G Pears have completed the purchase of the whole site from the former landowners, E-on. This is a significant investment for our client's and serves to demonstrate their commitment to the delivery of the site as allocated and to provide certainty that it can be delivered and assist the Council in meeting its aims and objectives as set out through the Plan.

Having reviewed the document as a whole, together with the supporting evidence base, we would like to support the strategy put forward and welcome the Draft Plan which plans positively and proactively for the future of the District to ensure the delivery of sustainable development.

In our view, the Plan as presented is fundamentally sound and provides clear and evidenced justification for the strategies and objectives included which are consistent with national policy, particularly with regard to the reuse of previously developed land and the transition to a low carbon future.

Notwithstanding the above, we reserve the right to make further representations, including oral representations to the Examination in Public, if so required.

Response to the Draft Bassetlaw Local Plan (DBLP)

We welcome the recognition in the Plan of the importance of local businesses as an integral factor in creating and sustaining a diverse and strong local economy. Such businesses are essential to the continued prosperity of the District and a strong local economy is vital to improving living standards and quality of life for Bassetlaw's residents. J G Pears is one such business which is ideally placed to assist the Council in enhancing it's economic prosperity.

High Marnham Green Energy Hub is identified within both Policy ST8: Provision of Land for Employment Development and Policy ST9: EM008: High Marnham Green Energy Hub. We strongly support the identification of the site within the employment land policy, in recognition of the significant opportunities it offers to aid the economic prosperity of the District, and within its own allocation in order to ensure and focus its delivery.

We support the reference at paragraph 6.1.17 (p58) to the “positive policy intervention” that Policy ST8 makes to ensure the regeneration of the former coal fired power station site at High Marnham and the acknowledgement that its closure directly affected employment in the rural area, and indirectly affected local supply chains. J G Pears are committed to facilitating the delivery of new specialised employment uses on this site and agree that this will be essential to support those local communities and the wider District, and make optimum use of this significant brownfield site in the longer term.

J G Pears have already engaged with the Service Director of Investment and Growth and Nottinghamshire County Council and look forward to working together with the District and Country Councils as well as D2N2 and other stakeholders to see the comprehensive delivery of the site drawing significant inward investment to the area.

Section 6.2 Site EM008: High Marnham Green Energy Hub

The allocation of this site is in line with the NPPF's encouragement of LPA's to identify suitable areas for renewable and low carbon energy sources and supporting infrastructure, where this would help secure their development (NPPF, paragraph 151).

We would support the comment that the site provides a unique opportunity to support this expanding market given its optimal location: with direct connection to the national electricity grid from the high voltage electricity infrastructure that remains on site. This is further supported by J G Pears own direct

grid connection from their nearby combined heat and energy (CHP) plant at Low Marnham, which currently inputs surplus energy into the grid, but could be harnessed directly by future development on this site.

The allocation also serves to meet a priority of the D2N2 Strategic Economic Plan and emerging Local Industrial Strategy. We endorse D2N2's recognition of the 'significant potential' the site can make to the green economy, whilst contributing to national and local objectives to reduce carbon emissions, reduce energy demand through on-site efficiencies, and reduce excess energy waste through the site's circular energy potential.

We acknowledge the need for careful consideration of the impacts arising from the redevelopment of the site, particularly upon local communities, the environment and the highways network and our clients have already commissioned extensive technical work in order to ensure any potential impacts are minimised and where necessary mitigated. J G Pears are committed to working with the LPA and other stakeholders to see the successful delivery of this site.

The proactive approach to the development of the site now taken by the LPA in their commitment to delivering the site rapidly through a Local Development Order (LDO) is strongly supported. An LDO will provide an appropriate mechanism for the management of such a specialist employment site enabling growth by positively and proactively shaping sustainable development.

We welcome the fact an LDO will serve to incentivise development by simplifying the planning process and making investment more attractive to businesses in the green energy sector. The landowner will work proactively with the LPA to complete the draft LDO by the end of 2021 and facilitate delivery of the site from early in the plan period.

Other matters

We note typographical errors with the referencing of the High Marnham Green Energy Hub allocation on pages 182 and 212 where the site reference is given as 'EM007'. At page 190 the site reference is given as 'EM006', each of these errors should be corrected to read 'EM008'.

These drafting errors are also reflected in other evidence base documents such as the Sustainability Appraisal and Habitat Regulations Assessment.

Summary

As set out throughout these representations the overall positive thrust of the Plan is welcomed and in our view, the Plan is fundamentally sound, positively prepared, effective and consistent with National Policy.

Significant consideration has been given to how major previously developed sites can be reused to ensure most effective use of existing infrastructure.

The positive and proactive approach to the delivery of our client's land at the Former High Marnham Power Station within this and the next plan period, is welcomed and it is considered that J G Pears is well placed to support the opportunity to realise the development potential of this major previously developed site; well connected to the strategic highway network adjacent to the village of High Marnham where proportionate development will be supported and offers a significant opportunity for sustainable redevelopment making use of readily available energy from J G Pears nearby CHP plant.

The inclusion of this site as an employment allocation provides a significant opportunity for the LPA to meet its low carbon agenda in a sustainable and appropriate manner whilst also delivering on the wider D2N2 aspirations to improve economic prosperity of the region which must be supported.

The allocation will support the Council in meeting the aims and objective of the Plan as a whole, including making best use of previously developed land (Strategic Objective SO1); encouraging and supporting economic growth (SO3); promoting rural Bassetlaw as a living and working landscape (SO6); and, supporting Bassetlaw's transition to a low carbon District (SO12).

We look forward to continuing to work with the LPA and other stakeholders to deliver our mutual objectives for the site in providing sustainable economic development within the District.

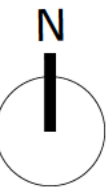
Yours sincerely
Emery Planning

A black rectangular redaction box covering the signature of the Associate Director.A black rectangular redaction box covering the name of the Associate Director.

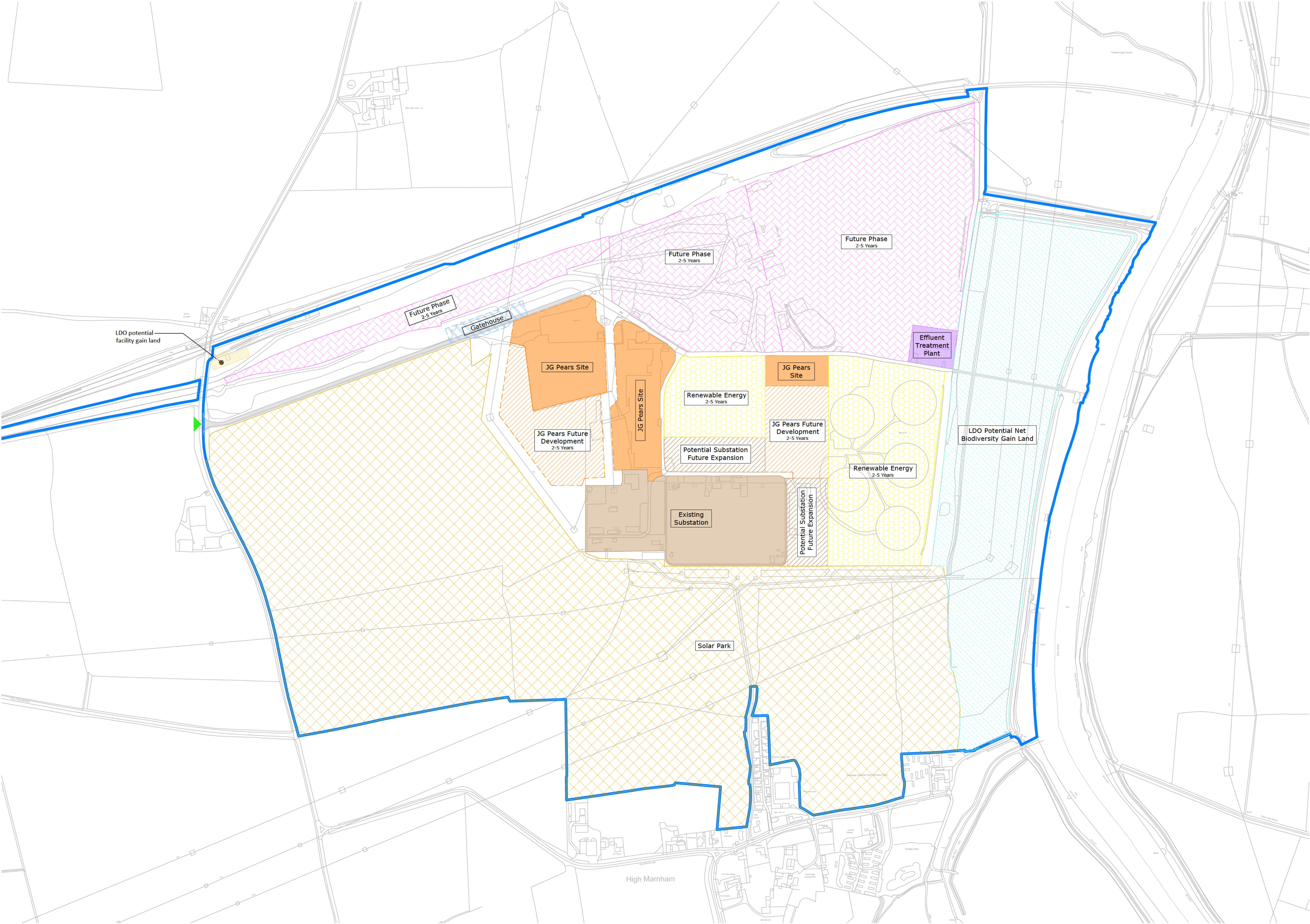
Associate Director

NOTES:

1. If this drawing has been received electronically it is the recipients responsibility to print the document to the correct scale.
2. All dimensions are in millimetres unless stated otherwise. It is recommended that information is not scaled off this drawing.
3. This drawing should be read in conjunction with all other relevant drawings and specifications.



Key	
	- Site Ownership (398.1 Acres / 161.1 Ha.)
	- Site Access
	- Existing Roads to be retained
	- Site Gatehouse
	- Solar Farm
	- JG Pears Site
	- JG Pears Future Development
	- Renewable Energy
	- LDO Potential Facility Gain Land
	- LDO Potential Net Biodiversity Gain Land
	- Effluent Treatment Plant
	- Future Phases
	- Existing Sub-station
	- Potential Substation Future Expansion Area



Proposed Plan
(Scale 1:2500)



P04	RB	SJP	SJP	18/11/21
Drawing Updated				
P03	RB	SJP	SJP	18/11/21
Drawing Updated to suit comments.				
P02	RB	SJP	SJP	16/11/21
Drawing Updated				
P01	RB	SJP	SJP	28/10/21
First Issue				
Rev	Drawn By:	Checked By:	Approved By:	Date:
Amendments				
Project: High Marnham				
Title: Proposed Zoning Plan				
Drawing Number:				
Identification / Location:			Sheet Number:	
Project Code:	Originator Code:	Vol / Zone:	Level:	Type:
Code:				Role:
				Number:
HIGH	BED	ST	ZZ	SK
				A
				0010
Rev Description:		Status Code:	Model Ref:	Rev No:
Preliminary		S0	N/A	P04
Scale:	Sheet:	Discipline:	BED Project Number:	
1:2500	A1	Architectural	NWK 210001	
Client:				



AD-REF023



[REDACTED]

From: [REDACTED]
Sent: 17 February 2022 16:47
To: The Bassetlaw Plan
Subject: Bassetlaw Local Plan Consultation
Attachments: reg-19-form-a-b-12pt-jan-2022.pdf; L024 - Local Plan Reps - February 2022.pdf

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

Good afternoon,

Please find attached representations prepared on behalf of Lidl (Great Britain) Limited.

I'd be grateful if you could confirm receipt of our submission which includes:

- Representation Form
- Cover Letter

Kind regards

[REDACTED]
[REDACTED]
Senior Planner

t: 0114 354 0220

a: 32 Eyre Street, Sheffield S1 4QZ

w: www.idplanning.co.uk



Bassetlaw Local Plan 2020-2037

Publication Version Addendum Representation Form January - February 2022

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

to provide representations on the Bassetlaw Local Plan. Bassetlaw District Council must receive representations by . Only those representations received by that time 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: _____
- an e-mail attachment: _____
- post to: _____

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:

[Council's Privacy Notice Webpage](#)

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 [Bassetlaw District Council's Planning Policy Webpage](#)

Please tick/ delete as appropriate:

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

Yes X ☐

No ☐

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

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

Yes X ☐

No ☐

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

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

Yes X ☐

No ☐

Printed Name: [REDACTED]

Signature: [REDACTED]

Date: 17/02/2022

-

Part A- Personal Details

Name: c/o Agent

Organisation (if applicable): Lidl (Great Britain) Limited

Address: c/o Agent

Postcode:

Tel:

Fax:

Email:

Agent: 


Organisation (if applicable): ID Planning

Address: 32 Eyre Street, Sheffield

Postcode: S1 4QZ

Tel: 01143540220

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: Lidl (Great Britain) Limited

Policy:

Paragraph: 12.3.14

Policies Map:

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

Yes ☐

No X☐

Yes ☐

No X☐

Yes X☐

No ☐

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 cover letter

(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 cover letter

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.

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

Yes X ☐

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

No ☐

Please see supporting cover letter

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.



Our Ref: JWID3103/L024

17th February 2022

Planning Policy
Bassetlaw District Council
Queen's Buildings
Potter Street
Worksop
S80 2AH

By Email Only

Dear Sir/ Madam

We act on behalf of Lidl (Great Britain) Limited and have been instructed by them to make representations to the Bassetlaw Local Plan: Publication Version Addendum consultation.

As you may recall, comments prepared by ID Planning and Cushman & Wakefield were previously submitted on behalf of our client in response to the Publication Draft (Reg 19) Local Plan consultation and the Community Infrastructure Levy Draft Charging Schedule.

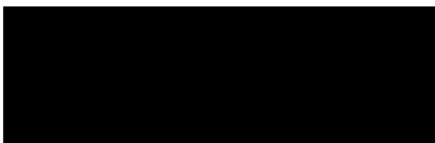
A review of the Evidence Base accompanying the Publication Version Addendum consultation has been undertaken, including consideration of the Bassetlaw Whole Plan & Community Infrastructure Levy Viability Assessment, December 2021 and the Infrastructure Delivery Plan, December 2021.

Following this review, Cushman & Wakefield have confirmed the comments previously submitted (dated 20th October 2021) in respect of the Community Infrastructure Levy Draft Charging Schedule still apply as there have been no changes to assumptions contested in respect of the CIL and viability.

It is also unclear whether the assumptions have appropriately accounted for the requirement for biodiversity net gains for commercial development. Our comments (dated 20th October 2021) submitted in respect of the Publication Draft (Reg 19) Local Plan (August 2021) also still apply in respect of the Viability Assessment evidence.

On that basis, our previous objections set out in the letter prepared by Cushman & Wakefield, dated 20th October 2021, and the letter drafted by ID Planning, dated 20th October 2021, still stand and we therefore write to request attendance at examination to discuss these matters.

Yours faithfully



[REDACTED]



AD-REF024



From: [REDACTED]
Sent: 17 February 2022 16:51
To: The Bassetlaw Plan
Subject: FYI and ACTION: Historic England response to Draft BLP Addendum information of Jan 2022
Attachments: reg-19-form-a-b-12pt-jan-2022.docx

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Dear [REDACTED] and colleagues

Please see HE's response attached.

We have no issues to raise and I have responded separately to Hanna regarding the draft SoCG.

Kind regards, [REDACTED]

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

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

t. 0121 625 6893
[REDACTED]

www.HistoricEngland.org.uk

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



Historic England

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Bassetlaw Local Plan 2020-2037

Publication Version Addendum Representation Form January - February 2022

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 17th February 2022**. Only those representations received by that time have the statutory right to be considered by the inspector at the subsequent examination.

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- an e-mail attachment: thebassetlawplan@bassetlaw.gov.uk
- post to: **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

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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:

[Council's Privacy Notice Webpage](#)

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 [Bassetlaw District Council's Planning Policy Webpage](#)

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: 17 February 2022

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: Y

Paragraph: Y

Policies Map:Y

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.

N/A

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

N/A

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:

N/A

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