



Bassetlaw
DISTRICT COUNCIL
— North Nottinghamshire —

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

AD-REF Responses 001-008

REFERENCE NUMBER	ORGANISATION	PARTICIPATING IN HEARING SESSIONS
AD-REF001	Axis PED Ltd on behalf of FCC Environment Ltd	Yes
AD-REF002	Enso Energy	Yes
AD-REF003	GPS Planning & Design Ltd on behalf of Brooke Planning Consultancy Ltd	Yes
AD-REF004	Network Rail	Yes - but only if required
AD-REF005	Quod on behalf of DHL Real Estate Solutions	Yes - do not intend, but want to reserve the right to do so
AD-REF006	NJL Consulting on behalf of Caddick Developments	Yes
AD-REF007	Townplanning.co.uk	Yes - if required
AD-REF008	Gentina Development	Yes

AD-REF001



[REDACTED]

From: [REDACTED]
Sent: 14 January 2022 12:34
To: The Bassetlaw Plan
Subject: Bassetlaw Local Plan - Publication Version Addendum - Representation FCC
Attachments: FCC - Local Plan Rep 2022 Forms Rep and Enclosures.pdf

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

Good Afternoon

On behalf of FCC, please find attached a representation on the Bassetlaw Local Plan - Publication Version Addendum.

I would be grateful for confirmation that this representation has been received in due course.

Regards,

[REDACTED]
Senior Planning Consultant



Visit our updated website www.axisped.co.uk to see the projects we've been working on.



Disclaimer: Axis shall not be liable for any loss caused from reliance on the contents, or due to any errors, bugs viruses or malicious code. Any enclosure with this content should be checked for viruses before it is opened. The company cannot be held responsible for any failure by the recipient to test for viruses before opening any enclosures. This e-mail and any files transmitted with it are confidential and solely for the use of the intended recipient. If you are not the intended recipient, any unauthorised review, use, re-transmission, dissemination, copying, disclosure or other use of, or taking of an action in reliance upon, this content is strictly prohibited. *Calls to this 0844 number are charged at 5p per minute, plus your telephone provider's access charge. Alternatively, please dial 01244 555001 from mobiles and landlines. Axis is the trading name of Axis P.E.D. LTD. Registered Office: Well House Barns, Bretton, Chester CH4 0DH. Registered in England and Wales Company No. 3872453.



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:

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: 14 January 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): FCC Environment Limited

Address: C/o Agent

Postcode: C/o Agent

Tel: C/o Agent

Fax: C/o Agent

Email: C/o Agent

2. Agent Details (if applicable)

Agent: [REDACTED]

Organisation (if applicable): AXIS

Address: [REDACTED]

Postcode: [REDACTED]

Tel: [REDACTED]

Fax:

Email: [REDACTED]

Part B - Your representation

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

Name or Organisation: FCC Environmental

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

Policy: Please see attached Representation

Paragraph: Please see attached Representation

Policies Map: Please see attached Representation

4. Do you consider the Local Plan is:

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

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

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

Please see attached Representation

Continue on a separate sheet if necessary

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

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

Please see attached Representation

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 ensure that the matters raised in the attached Representation are independently considered.

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



Bassetlaw Local Plan 2020-2037

Publication Version Addendum Representation Form January - February 2022

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

This form has two parts:

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

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

Part B - Your representation

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

Name or Organisation: FCC Environment Ltd

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

Policy: Please see attached Representation

Paragraph: Please see attached Representation

Policies Map: Please see attached Representation

4. Do you consider the Local Plan is:

4.(1) Legally Compliant

Yes X

No ☐

4.(2) Sound

Yes ☐

No X

4.(3) Complies with the Duty to Cooperate

Yes X

No ☐

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

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

Please see attached Representation

Continue on a separate sheet if necessary

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

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

Please see attached Representation

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 ensure that the matters raised in the attached Representation are independently considered.

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

Bassetlaw Local Plan: Publication Version Addendum January 2022

Introduction and Background

1. AXIS has prepared this representation on behalf of FCC Environment (hereafter 'FCC'), in relation to their 8-hectare site at Carlton Forest Quarry and Landfill Site, Blyth Road, Worksop.
2. This representation builds upon representations made to the Draft Local Plan: Publication Version (August 2021) as well as previous versions published in (November 2020, January 2020 and January 2019. For completeness the most recent representation, from October 2021, has been attached to this representation. It also provides a series of figures which assist in identifying the site.

Assessment of Draft Addendum Policies

Policy ST1

3. FCC's site lies to the north of Worksop and adjacent to existing employment sites. Worksop is identified as the most sustainable location to support significant growth and provides the best opportunity to deliver the objectives of regional and local industrial strategies. Whilst the site is located on the edge of Worksop, the entire site is well connected to the existing settlement and the adjacent allocations (HS1, EM005 and EES07). Allocating the site would result in continuous development, and it is therefore suggested that the settlement boundary should be amended to reflect this. In summary, FCC's site is well related to the existing settlement of Worksop and is suitably located to deliver sustainable economic development in correct location, in line with the Council's own spatial strategy.
4. Policy ST1(f) states approximately 169ha of land at General Employment Sites will be allotted to meet the needs for employment during the plan period. This figure does not correlate with Policy ST7 or its supporting text which states there is 128.5ha of developable employment land on the General Employment Sites . It is suggested that the amount of employment land on the General Employment Sites is made consistent.

Policy ST7

5. Policy ST7 is supported by the updated evidence base document 'Site Selection Methodology Update January 2022'. The document identifies the site under reference: 'LAA535 Carlton Forest Quarry, Worksop' and concludes that: *"It would be most appropriate for the site to be integrated with Draft Bassetlaw Local Plan allocation reference EES07 and or HS1 and EM005, and for the site to share associated infrastructure so the site does not become an isolated enclave that would likely encourage movement by private car."* This recommendation does not appear to have been given any further consideration, and there is no justification as to why it has been rejected within the document.
6. The site appears to have been treated differently to land to the south (i.e. allocation EES07) which is described in the site selection document as: *"an existing employment site and part of it has recently been granted planning permission."* The site has benefited from outline planning permission for commercial uses for several years. with a Reserved Matters application submitted in December 2021.
7. Considering the lack of justification for the site's rejection, lack of consideration of the recommendation to share associated infrastructure made in the evidence based document and fact it appears to have been treated differently to an immediately adjoining site it is considered that the approach to Policy ST7 is unsound. It is suggested that the site should be taken forward as an allocation. Whilst FCC contend that the entire 8-hectare site should be allocated for employment uses (on the basis it is suitably located in line with the Councils own spatial / land use strategy), as a very minimum the parcel of land with planning permission should be included within Policy ST10 as an existing employment site.

Policy ST40

8. Policy ST40 seeks to protect and enhance the biodiversity and geodiversity of Bassetlaw. Dialogue between FCC (landowner) and officers at both the Nottingham Biological and Geological Records Centre (attached to this representation) has confirmed that the records centre will remove the site from their Local Wildlife Site (LWS) records / mapping as they always work with landowner consent. On this basis the

Policies Map should also be amended to reflect this. In this regard, it is also relevant to note that a more recent survey of the site by FCC's ecologists has concluded that it does not contain the qualifying features of an LWS. As such, it is unlikely that even if due process is now followed, the site will be suitable for designation.

Conclusion

9. This representation makes several recommendations which are considered necessary to make the emerging Local Plan sound. In accordance with paragraph 35 of the NPPF, plans are 'sound' if they are positively prepared, justified, effective and consistent with national policy. As set out above, we believe that the current draft Local Plan is not sound because it is not justified. Planning policy should provide support for economic development which brings forward significant, good quality inward investment opportunities to the Worksop, which is the focus for development. As drafted the emerging Local Plan fails to maximise this by not allocating the site. As previously stated, FCC would welcome engagement with the Council on this matter to resolve prior to the formal examination and discussion with an Inspector.

Enclosed

10. FCC Representation to the Local Plan Publication Version
11. Correspondence with Notts Biological and Geological Records Centre.

BASSETLAW LOCAL PLAN 2020-2037: PUBLICATION VERSION

1.0 REPRESENTATION ON BEHALF OF FCC ENVIRONMENT

1.1 Introduction / Justification for the Site's Allocation

1.1.1 AXIS has prepared this representation on behalf of FCC Environment (hereafter 'FCC'), in relation to their 8-hectare site at Carlton Forest Quarry and Landfill Site, Blyth Road, Worksop.

1.1.2 This representation has been made pursuant to the allocation of FCC's site for employment use within the Local Plan. In this regard, it is relevant to note that outline planning permission (ref: 18/01093/OUT) has already been granted for employment use on part of the site, with development due to commence in 2022. Positive pre-application discussions have taken place with the Council regarding employment uses on the western part of the site which is available for development. These two areas are shown on Figure 1 below. All of the site is previously disturbed land, part is previously developed, and whilst there are restoration obligations, the entire site is currently underutilised and of low value since the site's former use as a quarry ceased.

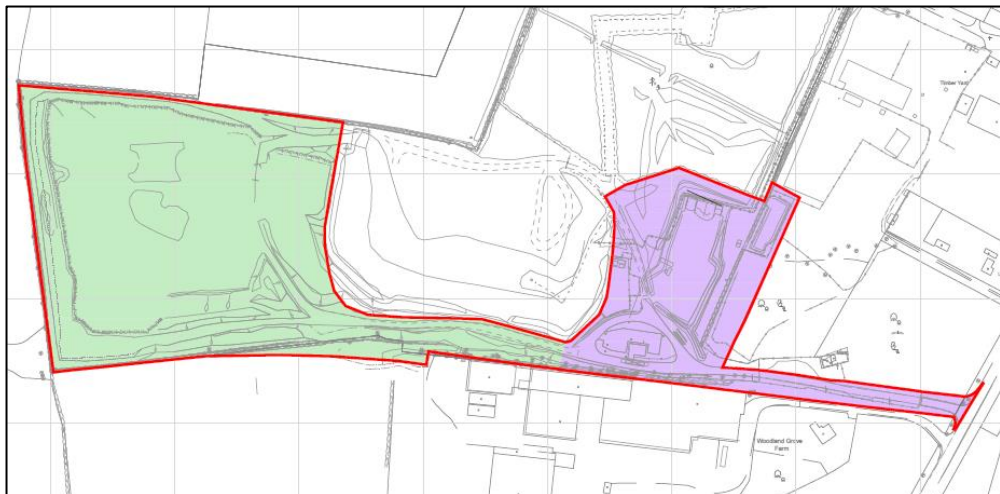


Figure 1 – Site Boundary

1.1.3 Figure 2 below illustrates the site's location and Figure 3 illustrates the latest version of the Policies Map.

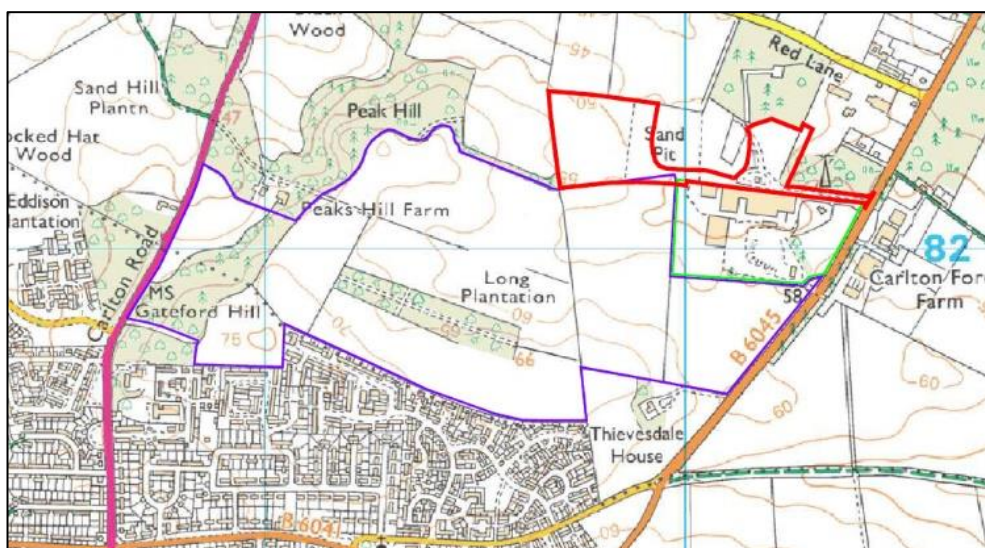


Figure 2 – Site Location

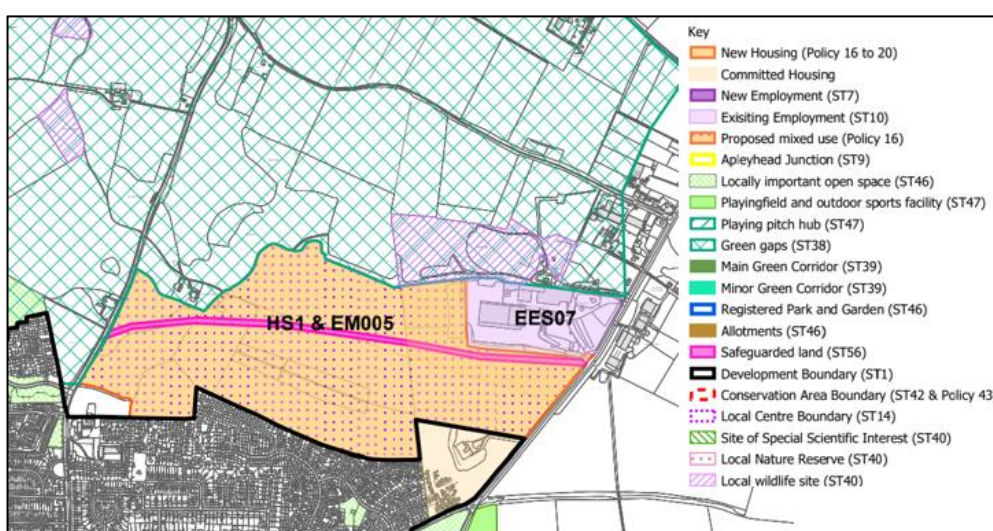


Figure 3 – Policies Map Extract

- 1.1.4 The site is illustrated by the red line boundary in Figure 2. Figure 2 also illustrates that the site is located to the north off an existing employment site (ref: EES07) (shown in green), with Allocation HS1 (Peaks Hill Farm, Worksop) and EM005 (Carlton Forest) (shown in purple). It is clearly well related to and contiguous with other existing and proposed employment land off the B6045.
- 1.1.5 As evidenced in Figure 3 above, the site is in a sustainable location on the edge of Worksop and is suitably located to deliver additional employment development in line with the spatial development strategy that is being promoted through the emerging Local Plan. Moreover, the requirement for

employment land within the emerging plan is only expressed as an approximate target with a number of the sites being brought forward for allocation on virgin greenfield land. Development at the site presents an opportunity to deliver new employment development in line with the Council's aspirations for regeneration in the locality and on previously disturbed, low-quality land.

1.1.6 In this context, the decision to not allocate the site represents a significant failing of the Local Plan, especially as it has been demonstrated through the existing planning permission that employment development would not have a significant detrimental impact on the character and appearance of the area, residential amenity, highway safety or flood risk.

1.1.7 The allocation of FCC's site for employment uses would deliver significant benefits including economic growth; inward investment opportunities; job opportunities; and sustainable development on an underutilised and low value site.

1.2 Assessment of the Emerging Plan

1.2.1 Paragraph 35 of the National Planning Policy Framework (NPPF, 2021) identifies what is required for a plan to be considered sound. To be sound it must be positively prepared; insofar as it is providing a strategy which, as a minimum, provides for the objectively assessed needs, justified; the plan should be based on an appropriate strategy, taking into account the reasonable alternatives, effective; the plan should be deliverable over its plan period and consistent with national policy.

1.2.2 This submission sets out why it is believed the plan in its current form to be unsound, along with measures required to make it sound. It does so by specific reference to a series of policies within the draft plan.

Policy ST1 – Bassetlaw's Spatial Strategy

1.2.3 Policy ST1 sets out that the Council's spatial strategy will focus on delivering sustainable development and growth, this is supported as it is in accordance

with the provisions of the NPPF which seeks to support sustainable development and economic growth.

- 1.2.4 As set out above, FCC's site lies to the north of Worksop and adjacent to existing development and employment sites. Worksop is identified within the policy wording as the most sustainable location to support significant growth and provides the best opportunity to deliver the objectives of regional and local industrial strategies (paragraph 5.1.44).
- 1.2.5 Whilst the site is located on the edge of Worksop, the entire site is well connected to the existing settlement and the adjacent allocation (HS1 and EM005). Allocation of the site would result in continuous development from Worksop to FCC's site, it is therefore suggested that the settlement boundary should be amended to reflect this. Paragraph 5.1.9 confirms that the spatial strategy promotes a 'step change' in the District's economy to: retain employment locally; provide better paid, higher skilled jobs; and increase productivity. The Council's strategy seeks to align economic growth with the housing offer, by providing homes in the right places, this will ensure the sustainability of the area in the future as a place to both live and work. The delivery of employment uses at FCC's site and its inclusion within the settlement boundary would therefore align with this strategy as it is sustainably located on the edge of one of the focus areas for development over the plan period and immediately adjacent to an existing mixed use residential / employment allocation.
- 1.2.6 Section 1A of Policy ST1 promotes the efficient and effective use of land and the re-use of previously developed land in sustainable locations. In accordance with the NPPF this will help to achieve sustainable development including economic growth in the appropriate locations. FCC's site is previously disturbed land, having historically been subject to quarrying activity and part of the site is previously developed. The proposed employment uses would represent an efficient use of the currently underutilised site. Therefore, Section 1A would provide support for the development of the site, subject to demonstrating that there are no overriding amenity, biodiversity or heritage matters that would preclude the development.

- 1.2.7 Section 5 of Policy ST1 confirms the intention to create approximately 9,735 jobs through the provision of approximately 169 hectares of general employment land to accommodate future local employment growth and at least 118 hectares of employment land to accommodate future significant indigenous employment growth. It is considered that the words ‘at least’ should be used rather than ‘approximately’ in line with the previously drafted policy wording.
- 1.2.8 In the absence of any defined targets for the delivery of employment land the opportunity to provide further provision of employment land on previously disturbed land at one of the principal locations for future growth should not be missed, particularly given the number of virgin greenfield sites that are being put forward for allocation within the emerging plan.
- 1.2.9 On a separate but related point, it is also considered that additional wording should be provided within Section 6 to give greater support for sites within the countryside that are sustainably and well located to contribute to the Council’s employment land supply.
- 1.2.10 In summary, FCC’s site is well related to the existing settlement of Worksop and is suitably located to deliver sustainable economic development in line with the Council’s own spatial strategy.

ST7 – Provision of Land for Employment Development

- 1.2.11 Policy ST7 seeks to deliver the Council’s strategy for economic prosperity and inward investment. To support job growth and upskilling of residents, sustainable economic growth will be directed to General Employment Sites and a Strategic Employment Site as identified on the Policies Map. Section 4 of Policy ST7 provides details of General Employment Sites which are made up of those sites with planning permission and site allocations. The total amount of available employment land is just over 169 hectares.
- 1.2.12 FCC’s comments to the January 2020 draft Local Plan questioned why their site was not included under ‘Section 4 – sites with planning permission.’ The Council has responded to these comments by stating: *“Planning permission exists for part of the site and an occupier is in place to develop the remainder*

in 2022. On that basis, there is no need to allocate the site a tenant is lined up to occupy. Therefore there is no need to allocate this land. The planning permission and development management process is addressing the needs of the site.”

- 1.2.13 Whilst it is correct that planning permission exists for part of the site, it is not clear from the Council’s response why some sites with planning permission are allocated as General Employment Sites under Policy ST7, and others, such as FCC’s site are not. FCC’s site forms a logical extension to the existing employment site ref: EES10 ‘Carlton Forest’ and would deliver in the region of 135-300 jobs depending on the final use. FCC’s site could contribute to the Council’s existing supply of employment sites and should be identified within this policy. It is considered that this inconsistent approach to the allocation of sites with planning permission represents a failing of the Plan as it is not justified, especially on the basis the site’s designation as a Local Wildlife Site is to be removed, as discussed later in this representation.
- 1.2.14 The planning permission clearly demonstrates that the site is sustainably located to deliver employment development within the Plan period. In accordance with paragraph 35 of the NPPF, the Plan must be positively prepared and should provide a strategy which as a minimum seeks to meet the area’s needs. Policy ST1 confirms the provision of ‘approximately’ 169 hectares of general employment land should be delivered over the Plan period to accommodate local employment growth. This is not a maximum target and therefore assumes that additional employment development could come forward in appropriate locations over and above the determined employment need; therefore, whilst FCC contend that the entire 8 hectare site should be allocated for employment uses (on the basis it is suitably located in line with the Councils own spatial / land use strategy), as a very minimum the parcel of land with planning permission should be included within Policy ST7.

ST10 – Existing Employment Sites

- 1.2.15 Policy ST10 has been revised and no longer includes for the provision for new employment development outside of allocated employment sites subject to the development satisfying criterion. The revised supporting text confirms

(paragraph 6.4.6) that sustainable economic growth outside of existing employment sites or in the rural area is addressed by Policy ST11.

- 1.2.16 On the basis the site is not identified in ST7 (with planning permission), and that development to commence in 2022, the site should be considered as an existing employment site and identified as such in the Plan.
- 1.2.1 It is recommended that the Council carries out a review of all allocation reference numbers prior to progressing to the next stage in the Plan Preparation Process. For example, the site's allocation 'EES07' does not relate to the site illustrated on the Policies Map. It is believed that the correct reference should be ESS10 'Carlton Forest, Worksop' not ES007 'Retford Road West, Worksop'.

ST11 – Rural Economic Growth and Economic Growth Outside Employment Areas

- 1.2.2 Policy ST11 supports proposals for the growth of businesses in the countryside and outside established employment areas / allocations subject to the development meeting 'all' of the criteria. On the basis that some of the criteria are caveated with the words 'in the case of existing sites' or 'where appropriate the proposal' it is suggested that the word 'all' is removed from Section 1 of Policy ST11.
- 1.2.3 The policy and supporting text focus on providing support for the growth of 'existing' businesses within the countryside or outside established employment areas / allocations. Given that this version of the Local Plan has removed the wording within Policy ST10 in relation to employment development outside of the existing allocated sites and Policy ST11 focuses on supporting for the growth of existing businesses in the countryside, there is limited policy framework for the development of 'B' use classes within locations in the countryside or outside of the established employment areas / allocations. This is a significant failing of the Plan, which makes it unsound. Clearly it should not solely be the case that any economic development within the countryside or outside employment areas would need to support the growth of an existing business, and this should be made clear.

- 1.2.4 Whilst it is acknowledged that the acceptability of a particular proposal will be viewed against other relevant policies of the Plan, it is essential that there is a provision within the economic policies of the Plan to allow sustainable, acceptable, employment development proportionate to its location within the countryside or outside of allocated employment areas. Sites that are located within sustainable rural locations can contribute to the Council's employment land supply and could perform a strategic function in contributing to rural economic growth.
- 1.2.5 Planning policy should seek to secure economic growth to create jobs and prosperity which would bring forward significant, inward investment opportunities to the District. It is considered that the current wording of the policy would not facilitate this in line with national policy. The wording of the policy should be revised to recognise that there are instances when economic development in the countryside or outside established employment areas is acceptable and should not be limited to existing business growth.
- 1.2.6 The NPPF promotes the effective use of land, including providing support for the development of under-utilised land and buildings. Therefore, in line with the NPPF, the policy criteria should be amended to provide support for economic development on under-utilised / previously developed sites in sustainable locations.
- 1.2.7 Criteria a to g provide requirements which development proposals under Policy ST11 are expected to meet. This includes demonstrating a need for the development in terms of business opportunity or operational requirements and demonstrating that the development cannot be accommodated within the curtilage of the existing site. It is considered that these two requirements would not necessarily be applicable to all new development in the countryside, such as for B2/B8 uses at FCC's site. It is therefore welcomed that the revised wording has been added. However, as set out previously the word 'all' should still be omitted from Section 1 of the policy.
- 1.2.8 At present, except for the limited wording within Policy ST1, which promotes the efficient and effective use of land, there is no clear policy framework within Chapter 6 (Delivering Economic Prosperity) of the Local Plan which supports the re-use of land for economic development within the rural area unless it

relates to an existing business. As note previously, this is a failing that fails to accord with the NPPF and should be rectified in order to make the Plan sound.

Policy ST38 – Green Gaps

- 1.2.9 AXIS previously objected to the inclusion of the site within the Green Gap under Policy 34, Landscape Character. The Council have prepared a response to these comments within the Green Gaps Report Second Addendum (April 2021). This document proposes to amend the Green Gap boundary so that it does not include the employment uses along the B6045 and the land, within FCC's site, which benefits from planning permission. However, it stops short of removing the remaining FCC land from the Green Gap.
- 1.2.10 FCC strongly disagree with the inclusion of the remainder of the site within the Green Gap. The main reason is the eminent suitability and acceptability of the land for inclusion as an employment allocation within the emerging plan, in line with the Councils spatial and development strategy. Noting that the allocation of the site and its inclusion in the Green Gap are incompatible.
- 1.2.11 If the Council disagrees with the clear arguments in favour of the site's allocation, the Council has not provided sufficient evidence for its inclusion within the Green Gap.
- 1.2.12 FCC's site is not within the assessment area of Green Gap 3 (Carlton in Lindrick – Worksop North) set out within the Bassetlaw Green Gaps Report (November 2019). The Report describes the boundary as running along Red Lane which is located to the north of the site. FCC's site and the land surrounding it has therefore not been assessed as part of this report and as such it is considered unsound to designate the additional land (south of Red Lane) without fully assessing its landscape value.
- 1.2.13 Were a landscape assessment to be carried out it is relevant to note that,
1. The land is a former quarry which, even after restoration, would do little to contribute to the value of the local landscape;

2. the Council have granted employment development on the eastern part of the site;
3. the Council has excluded other existing employment development to the north of the site from the Green Gap; and
4. they have sought fit to allocate a large swathe of land immediately adjacent to the site for mixed-use development (residential and employment).

1.2.14 On this basis, it is clear that the site and its immediate surroundings are not within an overly sensitive landscape area. In this regard, it is also relevant to note that any development within the western half of the site would be within the base of a former quarry and any visual impacts would be less when compared to the existing, approved, and planned development schemes within the immediate area.

1.2.15 In short, the site should not be included in the Green Gap on the basis of its suitability for allocation in the Plan. Even if the site is not allocated in the plan, it should not be included in the Green Gap given the lack of an evidence base for its inclusion. Moreover, even if an assessment were to be carried out the inherent qualities of the site and the Council's consistent approach to the allocation / exclusion of other land immediately adjacent to the site would suggest it lacks the landscape value to merit inclusion.

1.2.16 For the reasons stated, it is considered there are significant failings with Policy ST38 and the approach to the policy is unsound.

ST40 – Biodiversity and Geodiversity

1.2.17 Policy ST40 seeks to protect and enhance the biodiversity and geodiversity of Bassetlaw. Section 4 confirms that proposals have a direct or indirect adverse effect on a Local Wildlife Site (LWS) will only be supported where there are no reasonable alternatives and the case for development clearly outweighs the need to safeguard the ecological value of the site. The Policies Map extract (see Figure 2) confirms the extent of the LWS designation, noting that it includes the majority of FCC's site.

1.2.18 Dialogue between FCC (landowner) and officers at both the Nottingham Biological and Geological Records Centre (enclosed to this representation) has confirmed that landowner consent should have been granted for the surveying and inclusion of the site as a LWS. Such consent was not obtained and as such, it has been agreed that due process has not been followed and as such the site should not be designated as a LWS. The Policies Map needs to be amended to reflect this.

1.2.19 In this regard, it is also relevant to note that a more recent survey of the site by FCC's ecologists has concluded that it does not contain the qualifying features of a LWS. As such, it is unlikely that even if due process is now followed, the site will be suitable for designation as a LWS.

1.3 Conclusion

1.3.1 This document has been prepared on behalf of FCC in relation to their site at Carlton Forest Quarry.

1.3.2 This document makes several recommendations which are considered to be necessary to make the Plan sound. In accordance with paragraph 35 of the NPPF, plans are 'sound' if they are positively prepared, justified, effective and consistent with national policy. As set out above, we believe that the current draft Local Plan is not sound because it is not justified.

1.3.3 Planning policy should provide support for economic development which brings forward significant, good quality inward investment opportunities to the District. As drafted the Plan does not do this.

Subject:

FW: Carlton Forest Sandpit LWS (Ref: 5/3361)

From: [REDACTED]

Sent: 24 June 2021 11:43

To: Notts Biological & Geological Records Centre

Subject: RE: Carlton Forest Sandpit LWS (Ref: 5/3361)

Hi Peter,

Thanks for getting back. Please remove it from the map, FCC is the landowner and not supportive of the designation.

To put the discussion into context; part of the LWS in question has planning permission for commercial use (sheds), and we are currently undertaking the ground investigation works to enable development – the further quarry area is being promoted for commercial development as a second phase.

Kind regards

[REDACTED]

From: Notts Biological & Geological Records Centre

Sent: 24 June 2021 10:54

To: [REDACTED]

Subject: RE: Carlton Forest Sandpit LWS (Ref: 5/3361)

Hi [REDACTED]

Sorry for the delay in replying. The site was brought to our attention by the Botanical Society Recorder in 2012. See attached survey.

We didn't direct this survey. We cannot say if this person contacted you if you were the owner of the site at that time. If you are unhappy with the sites status as a Local wildlife Site we will remove it from the map as we currently work towards landowner consent in all cases. Please get back to us on this.

<https://www.nottinghamcity.gov.uk/leisure-and-culture/events-markets-parks-and-museums/parks-and-open-spaces/nottinghamshire-biological-and-geological-record-centre-nbgrc/>

Kind regards

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: 24 June 2021 10:20

To: Notts Biological & Geological Records Centre

Subject: RE: Carlton Forest Sandpit LWS (Ref: 5/3361)

Hello,

Grateful if you could confirm receipt and respond to the email below?

Many thanks,

■■■■■

From: ■■■■■
Sent: 23 April 2021 15:10
To: Notts Biological & Geological Records Centre
Subject: Carlton Forest Sandpit LWS (Ref: 5/3361)

Hello,

FCC Environment owns Carlton Forest Sandpit and Landfill, near Worksop.

It has been brought to our attention that the Site is/has been allocated as a Local Wildlife Site.

Understand you may be responsible for the survey and designation of such sites?

I have been unable to find a record internally with regards to the designation.

Could you please provide information and correspondence relating to this Local Wildlife Site, specifically to include:

- 1) Process for designation;
- 2) Survey information supporting designation (and details of survey; dates & approval of access);
- 3) Correspondence with the owner (FCC) regarding the designation;
- 4) Any other information you feel may be helpful.

Send information in digital format where possible.

Grateful if could confirm receipt and I look forward to hearing from you on this matter.

Kind regards

■■■■■ – Estates Development Manager
Mobile: ## | Email: ##
FCC Environment | <http://www.fccenvironment.co.uk/>

Please forward all post FAO Amanda Welsh at FCC Environment, 3 Sidings Court, White Rose Way, Doncaster DN4 5NU



This email is security checked and subject to the disclaimer on web-page:
<http://www.nottinghamcity.gov.uk/privacy-statement> This message has been scanned by Exchange Online Protection.

AD-REF002



From: [REDACTED]
Sent: 03 February 2022 16:51
To: The Bassetlaw Plan
Subject: Enso Energy consultation response to Bassetlaw Local Plan 2020-2038: Publication Version Addendum.
Attachments: Enso Energy Reg 19 Form (Parts A and B) 03022022.docx; Enso Energy Reg 19 Form (Parts A and B) 03022022.pdf
Categories: Red Category

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 a response to the Bassetlaw Local Plan 2020-2038: Publication Version Addendum consultation by Enso Energy which provides comments on Policy ST51: Renewable Energy Generation. I would welcome confirmation that this representation has been received. Thank you,

[REDACTED]
Senior Planner



Enso Energy Limited
[REDACTED]

Mobile: [REDACTED]
Office: [REDACTED]
Website: www.ensoenergy.co.uk



Follow us on Twitter and LinkedIn
Before printing this e-mail, please think about the environment.

Disclaimer: The information in this e-mail is confidential and may be read, copied or used only by the intended recipients. If you are not the intended recipient you are hereby notified that any perusal, use, distribution, copying or disclosure is strictly prohibited. If you have received this e-mail in error please advise us immediately by return e-mail and delete the e-mail document without making a copy. Please note that neither Enso Energy Limited nor the sender accepts any responsibility for viruses. It is your responsibility to scan or otherwise check this email and any attachments.

Enso Energy Limited is a company registered in England and Wales. Registered office: The Priory, Top Floor, Long Street, Dursley, Gloucestershire, UK, registration number 09892057.



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:

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: 3rd 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): **Enso Energy Limited**

Address: **The Priory, Long Street, Dursley, Gloucestershire**

Postcode: **GL11 4HR**

Tel: **01452 764 685**

Fax: **-**

Email: [REDACTED]

2. Agent Details (if applicable)

Agent: **N/A.**

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: **Enso Energy Limited**

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

Policy: **Bassetlaw Local Plan 2020-2038: Publication Version Addendum. Policy ST51: Renewable Energy Generation**

Paragraph: **Bassetlaw Local Plan 2020-2038: Publication Version Addendum. 10.2.1 to 10.2.21**

Policies Map: **Bassetlaw Local Plan 2020-2038: Publication Version Addendum. 'Former Marnham Power Station site Area of Best Fit' addition.**

4. Do you consider the Local Plan is:

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

4.(1) Legally Compliant

Yes ☐

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☐

No ☐

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

The National Planning Policy Framework (NPPF) at paragraph 35 sets out there are four parts to the test of soundness which are to be applied when examining plans such as the Bassetlaw District Council Local Plan 2020-2038. One of these parts being that the plan being considered is “d). **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”. For the reasons set out in this representation is considered that Policy ST51: Renewable Energy Generation does not meet this test of soundness.

As currently worded Policy ST51(3) requires renewable energy schemes outside of the ‘Area of Best Fit’ “to demonstrate an operational and/or economic need for the development in that location”. The requirement to demonstrate need is directly contrary to the NPPF which states:

“158. 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; and

b) **approve the application if its impacts are (or can be made) acceptable**⁵⁴. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to **demonstrate that the proposed location meets the criteria used in identifying suitable areas.**” (our emphasis).

The NPPF paragraph 158 a) is very clear there is no requirement for applicants within individual planning application to demonstrate need, of any kind (either locationally, operationally or economically), for renewable energy development. Policy ST51(3) is unsound in this regard. National Policy Statement (NPS) for Energy further set out there is no requirement to demonstrate need.

Consideration of economic need (and viability) is a matter of the applicant as to whether a electricity grid connection can be achieved from the location of a proposed development. It is not necessary for a connection to be “on-site”, only proximate. The draft Policy ST51 should focus on environmental impacts from any connection to the electricity grid which can be assessed through applications.

Further, in terms of locational or operational need, there is no criteria provided within Policy ST51 which outlines why the single ‘Area of Best Fit’ is identified at the former High Marnham power station alone. The supporting paragraphs 10.2.10 and 10.2.11 detail that the ‘Area of Best Fit’ recognises the sites former use, ability to directly connect to the existing on-site electricity grid and make use of existing transmission infrastructure on brownfield land. These do not form a criteria. Any criteria detailed would be expected to be applicable to all subsequent sites/applications to be consistent with the NPPF paragraph 158 b) where a plan has identified an area (note NPPF states “areas”) to be suitable. While paragraphs (such as 10.2.12 and 10.2.14) detail that other locations within the District “will be suitable” this is not sufficient without clarification in the Policy ST51 wording, nor does it provide criteria (as required though paragraph 158 b) which can assess commercial scale proposals in areas not identified within the plan or the single ‘Area of Best Fit’. All sites, where impacts are (or can be made) acceptable, need to be supported in principle if national policy is to be achieved. Policy ST51(3) as worded does not provide the planning balance noted as being necessary in paragraph 10.2.14.

If only the ‘Area of Best Fit’ was developed during the proposed plan period up to 2038 Bassetlaw District Council would not be taking the steps necessary to achieve climate change commitments or the achievement of national policy set out in the NPPF and within other Government policy. Need is not a matter which is to be demonstrated. The wording of ST51 would not aid the achievement of the vision or strategic objectives set out in the Bassetlaw District Council Local Plan 2020-2038. In its current form the Policy ST51 could be utilised to prohibit development outside of all but the single ‘Area of Best Fit’ and not provide the necessary supportive policy required for renewable energy generation where need is not required to be demonstrated and assessed on a local level.

Continue on a separate sheet if necessary

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

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

It is our view that in order to be considered sound it is necessary for the Bassetlaw District Council Local Plan 2020-2038 to be further amended. The requirement for renewable energy schemes outside of the 'Area of Best Fit' "to demonstrate an operational and/or economic need for the development in that location", as currently set out in the wording of Policy ST51(3): Renewable Energy Generation, has to be removed for the plan to be considered sound. The Policy could be worded as follows (text ~~deleted~~, text added):

"POLICY ST51: Renewable and Low Carbon Energy Generation

1. Development that generates, shares, transmits and/or stores zero carbon and/or low carbon renewable energy will be supported in principle at the Area of Best Fit at the former High Marnham power station site, as identified on the Policies Map as a result of the ability of on site development to connect to the on site national electricity grid infrastructure.
2. Proposals for renewable energy development on land at the Area of Best Fit should deliver a scheme in accordance with an agreed masterplan framework, relevant supporting technical assessments, delivery strategy and phasing plan for the site in accordance with Policy ST58, and other relevant policies in this Plan.
3. Outside the Area of Best Fit, development that generates, shares, transmits and/or stores zero carbon and/or low carbon renewable energy including community energy schemes will be supported in principle and expected to demonstrate an operational and/or economic need for the development in that location, and the satisfactory resolution of ~~be supported in principle and expected to demonstrate an operational and/or economic need for the development in that location, and the satisfactory resolution of~~ satisfactorily resolve in the overall planning balance all relevant site specific and cumulative impacts that the scheme could have on the area, taking into account operational and approved developments, as well as any proposed intensification to operational or approved proposals. An assessment should address cumulative visual and landscape impacts, as well as heritage, hydrology, hydrogeology, ecology, traffic and transport, noise, recreation and local amenity impacts.
4. All renewable energy development will be expected to provide details of the expected power generation based upon yield or local self-consumption to enable effective monitoring of the district's contribution to the national zero carbon targets.
5. A decommissioning programme, applied by a Condition to any planning permission granted, will be required to demonstrate the effective restoration of land and/or buildings to their original use (such as agriculture) and condition three years after cessation of operations."

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:

In its current form, without amendment, Policy ST51: Renewable Energy Generation is unsound and the inclusion of such policy wording within the Bassetlaw Local Plan 2020-2038 will prohibit the delivery of urgently needed renewable energy generation schemes and be directly contrary to the NPPF (paragraph 158 a) (and other Government policy) which is clear that applicants are not required to demonstrate need for renewable energy schemes. No criteria is currently explained in the supporting text as to why only a single site is identified within the 'Area of Best Fit', which could be applied to other locations, as is detailed as being necessary within the NPPF in instances where areas are identified (paragraph 158 b).

We would set this conflict out further at examination hearing session(s) should the addendum draft policy wording remain unchanged.

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-REF003



From: [REDACTED]
Sent: 09 February 2022 10:15
To: The Bassetlaw Plan
Subject: Publication Version Addendum Representation on behalf of Brooke Planning Consultancy Ltd
Attachments: BDC PVALP Reps Form Feb 2022.pdf; Letter to BDC reps on PVA Local Plan.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

Please find attached our representations in relation to the above.

Kind regards

[REDACTED]
Chartered Town Planner



Tel: 0115 7270902
Mobile: [REDACTED]
Email: [REDACTED]
Website: www.gpsplanning.co.uk



This email is only for the use of the addressee. It may contain information which is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient you must not copy, distribute or disseminate this email or any enclosure to anyone other than the addressee. If you receive this communication in error please delete it. This email message has been swept for the presence of computer viruses, but does not warrant that the message is virus free. The recipient is responsible for ensuring that this email and any attachment is free from viruses.



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:

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 x ☐

No ☐

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

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

Yes x ☐

No ☐

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

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

Yes x ☐

No ☐

Printed Name:

Signature:

Date: 09.02.2022

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): Brooke Planning Consultancy Ltd

Address: C/O Agent

Postcode:

Tel: C/O Agent

Fax:

Email: C/O Agent

2. Agent Details (if applicable)

Agent: [REDACTED]

Organisation (if applicable): GPS Planning and Design Ltd

Address: The Studio 36 Moore Road, Mapperley Nottingham

Postcode: NG3 6EF

Tel: [REDACTED]

Fax: N/A

Email: [REDACTED]

Part B - Your representation

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

Name or Organisation: GPS Planning and Design Ltd on behalf of Brooke Planning Consultancy Ltd

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

Policy: ST1 and ST2

Paragraph: See cover letter

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.

See attached covering letter

Continue on a separate sheet if necessary

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

(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 covering letter

Continue on a separate sheet if necessary

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

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 discuss the inadequacy of the Plan in light of the comments made above.

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.

Sent via email to: thebassetlawplan@bassetlaw.gov.uk

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

9 February 2022

Dear Sir/Madam

RE: Representation to the Bassetlaw Local Plan 2020-2037: Publication Version Addendum.

We write on behalf of our client Brooke Planning Consultancy Ltd who have land interests in Misterton.

Our comments relate specifically to Policies ST1 and ST2

We consider the Local Plan to be **unsound** for the following reasons:

Housing Supply

Para 5.1.24 explains 'the expected housing delivery rates are expressed as a trajectory for the plan period. Appendix 3 contains the detailed housing trajectory.'

Para 5.1.25 explains that housing land is provided in accordance with the settlement hierarchy as identified in Policy ST1.

We do not have any express concerns with Policy ST1 and the increased number of dwellings set out in figure 7.

Housing Growth

Para 5.1.34 has been amended and also suggests that the Housing Trajectory at Appendix 3 has been revised.

We raise concerns as we have not been able to find an amended version of Appendix 3, which leads on to concerns with regard to Policy ST2.

We question why Policy ST2 has not been revised in the Publication Version Addendum. We note at the bottom of page 113 however in regard to ST2 that the number of dwellings to be delivered in the Large Rural Settlements has been increased from at least 1,496 to at least 1,525 new dwellings, but the

Our client has land interests at Misterton, one of the identified most sustainable Large Rural Settlements. Previously under Policy ST2 the 20% growth requirement at Misterton equated to 194 dwellings.

The housing trajectory was set out in an appendix to the Bassetlaw Local Plan 2020-2037 Publication Version document which for Misterton listed four sites as follows:

[illegible]

[REDACTED]
 neighbourhood Plan however includes allocations at five sites, those being:

Site ref	Allocated number of up to and including new homes.
Policy 6: NP01 Land off Haxey Road	50
Policy 7: NP02 Land off Church Street	12
Policy 8: NP06 Land off Meadow Drive	17
Policy 9: NP11 Land off Grange Walk	60
Policy 10: NP12 Land off Fox Covert Lane	48
Total	187

That said, the emerging housing trajectory is for 194 dwellings in Misterton so taking into account all the Neighbourhood Plan allocations of up to and including 187 dwelling this leaves land for at least a further seven dwellings to

be found. This figure will obviously go up on the back of the increased figures sets out in the addendum made to Policy ST1.

Given that a greater minimum quantum of new housing is required at Misterton, it is our opinion that **further land needs to be allocated for housing now to meet the expected minimum housing delivery rates envisaged by the Plan at Misterton.** As the development boundary has been so tightly drawn, it is our considered opinion that further land on the edge of the settlement needs to be allocated. Our clients land fronting Grovewood Road between the Primary school and Gravelholes Lane represents a logical and ideal parcel of land for such an allocation to deliver the increased quantum of housing required at Misterton.

In light of the above we therefore question **why Policy ST2 and the housing trajectory appendix has not been amended at this stage and we therefore argue that the plan should be found unsound.**

As we are seeking modification to the Plan, we consider it necessary to participate in the examination hearing sessions to allow our concerns to be elaborated upon further.

Your sincerely



Director

AD-REF004



From: [REDACTED]
Sent: 14 February 2022 09:29
To: The Bassetlaw Plan
Subject: Representations to the Publication Version Addendum 2022
Attachments: 2186_001.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

OFFICIAL

Please find enclosed a representation of support for the 2022 Addendum

Yours Faithfully



[REDACTED]
Town Planning Manager LNE/EM
Network Rail Property (Eastern)
George Stephenson House
Toft Green, York, YO1 6JT

E [REDACTED]

www.networkrail.co.uk/property

The content of this email (and any attachment) is confidential. It may also be legally privileged or otherwise protected from disclosure.

This email should not be used by anyone who is not an original intended recipient, nor may it be copied or disclosed to anyone who is not an original intended recipient.

If you have received this email by mistake, please notify us by emailing the sender, and then delete the email and any copies from your system.

Liability cannot be accepted for statements made which are clearly the sender's own and not made on behalf of Network Rail.

Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN.



Bassetlaw
DISTRICT COUNCIL
— North Nottinghamshire —

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:

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:

[Redacted Name and Signature]

14th 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):

Network Rail (Infrastructure) Ltd.

Address:

Floor 3a George Stephenson House Toft Green York

Postcode:

YO1 6JT

Tel:

Use e-mail

Fax:

Email:

townplanning.LNE@networkrail.co.uk

2. Agent Details (if applicable)

Agent:

Organisation (if applicable):

Address:

Postcode:

Tel:

Fax:

Email:

Part B - Your representation

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

Name or Organisation: Network Rail (Infrastructure)

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

Policy: ST4

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 write on behalf of Network Rail to place our support for the policies and proposals put forward in the Plan; we consider them (in the context of policies and proposals that affect our infrastructure) to be positively prepared, justified, effective and consistent with national policy.

We have entered into a statement of common ground with the Authority as requested the duty to co-operate required by the Act. This has been refined to specifically address our concerns over level crossings in particular. We are pleased to note the revised wording of Bassetlaw Garden Village policy ST4 maintains the requirement to close certain crossings within a prescribed period. We also note the changes to the wording as regards Botany Bay level crossing in relation to the housing allocation HS7 (Trinity Farm). This revised wording is supported.

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)

(IF REQUIRED)

No ☐

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

If, in the unlikely event that any specific issues relating to rail infrastructure provision is raised during the hearing process, NR is happy to attend in a neutral/supporting role.

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-REF005



[REDACTED]

From: [REDACTED]
Sent: 14 February 2022 12:26
To: The Bassetlaw Plan
Subject: Representation: Bassetlaw Local Plan 2020-2037: Publication Version Addendum
Attachments: Vertical Park -reg-19-form-a-b-jan-2022 JG.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 our representation for the Bassetlaw Local Plan 2020-2037: Publication Version Addendum Consultation.

Please could you confirm receipt?

Thank you

[REDACTED]



[REDACTED]
Associate Director
[REDACTED]

Main: 020 3597 1000
Mobile: [REDACTED]
Direct: 020 3597 1075
www.quod.com

8-14 Meard Street
London
W1F 0EQ

Disclaimer

This e-mail message and any attached file is the property of the sender and is sent in confidence to the addressee only. Internet communications are not secure and Quod is not responsible for their abuse by third parties, any alteration or corruption in transmission or for any loss or damage caused by a virus or by any other means.

Quod Limited, company number: 07170188 (England).

Registered Office: 8-14 Meard Street, London, W1F 0EQ

For our privacy policy go to <http://www.quod.com/privacy-policy/>



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:

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: 14 Feb 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: N/A

Organisation (if applicable): DHL Real Estate Solutions

Address: C/o Agent

Postcode:

Tel:

Fax:

Email:

2. Agent Details (if applicable)

Agent: [REDACTED]

Organisation (if applicable): Quod

Address: 8-14 Meard Street, London

Postcode: W1F 0EQ

Tel: [REDACTED]

Fax: N/A

Email: [REDACTED]

Part B - Your representation

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

Name or Organisation: DHL Real Estate Solutions

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

Policy: Policies ST1, ST7

Paragraph: N/A

Policies Map: Employment allocations

4. Do you consider the Local Plan is:

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

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☒

No ☐

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

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

DHL welcome and are fully supportive of the Bassetlaw Local Plan 2020-2037: Publication Version Addendum January 2022, in particular the approach to Policy ST7 (Provision of Land for Employment Development) – which now includes the extant consent (09/05/00002) at Bevercotes Colliery.

It is noted the Land Availability Assessment January 2022, which forms part of the evidence base updated in January 2022, now correctly includes reference to Bevercotes Colliery. It is however still noted that the A1 Corridor Logistics Assessment: Bassetlaw Council (August 2021) will require updating to reflect the up-to-date position.

As per our representations submitted last year, DHL, alongside the existing landowner Gladman, have been in positive discussions with Officers at Bassetlaw regarding the delivery of Bevercotes Colliery for employment use. It is considered to have a very reasonable prospect of being delivered, and we are pleased to see it included in both the evidence base and the emerging Local Plan under reference EM008a as a General Employment Site under Policy ST7.

It is imperative that Bevercotes Colliery is included in the Local Plan as a General Employment Site given it is extant and expected to be delivered.

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:

DHL/Quod do not intend to participate in hearing sessions, but reserve the right to do so.

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-REF006



[REDACTED]

From: [REDACTED]
Sent: 14 February 2022 19:25
To: The Bassetlaw Plan; [REDACTED]
Subject: Bassetlaw Local Plan 2020-2037: Publication Version Addendum - Representations on behalf of Caddick
Attachments: Publication Addendum - NJL Consulting on behalf of Caddick - Response Form.pdf; Publication Addendum - NJL Consulting on behalf of Caddick - Representations.pdf

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

Dear [REDACTED],

Please see attached representations on behalf of Caddick.

As ever, happy to discuss matters as necessary.

Regards

[REDACTED]

[REDACTED]

BA(Hons) DipTP MRTPI
Senior Associate Director

NJLConsulting
Planning+Development

Park House, Park Square West, Leeds, LS1 2PW

T: 0113 357 1347 | [REDACTED] | [REDACTED]



Privacy Policy

This email is sent for and on behalf of NJL Consulting (Manchester) Limited registered in England and Wales registered number 08874172
Registered office 8 Ashbrook Office Park Longstone Road Manchester M22 5LB

This email and any attachments are confidential and intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient of this communication you should destroy it without copying disclosing or otherwise using its contents. Please notify the sender immediately of the error. Internet communications are not necessarily secure and may be intercepted or changed after they are sent. We do not accept liability for any such changes. If you wish to confirm the origin or content of this communication please contact the sender using an alternative means of communication. This communication does not create or modify any contract.

[You can follow the latest news from the Team here](#)



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:

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:

14 / 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:

Organisation (if applicable): Caddick Developments Ltd

Address: (c/o Agent)

Postcode:

Tel:

Fax:

Email:

2. Agent Details (if applicable)

Agent:

[REDACTED]

Organisation (if applicable): NJL Consulting

Address: Park House, Park Square West, Leeds

Postcode: LS1 2PW

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: Caddick Developments

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

Policy: ST1 / ST7 / ST54

Paragraph:

Policies Map: SEM001

4. Do you consider the Local Plan is:

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

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

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

Please refer to the enclosed representations letter.

Continue on a separate sheet if necessary

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

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

Please refer to the enclosed representations letter.

Continue on a separate sheet if necessary

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

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

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:

Caddick is the promoter and developer of local plan Site SEM001 which is the single largest employment allocation and therefore critical to the plan.

Caddick wishes to attend the Hearings in order to support the allocation of the site and to provide further evidence and justification for necessary policy changes to ensure the site remains deliverable.

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.

Our Ref: 2017-233

Your Ref: Bassetlaw Local Plan

Park House, Park Square West, Leeds, LS1 2PW

T: 0113 357 1347 | **F:** 0870 130 5579

E: info@njlconsulting.co.uk

www.njlconsulting.co.uk

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

14th February 2022

Dear Sir / Madam,

**Draft Bassetlaw Local Plan 2020-2037: Publication Version Addendum (January 2022)
Representations on behalf of Caddick Developments**

These representations are submitted on behalf of Caddick Developments ('Caddick'), regarding the 'Draft Bassetlaw Local Plan 2020-2037: Publication Version Addendum (January 2022)'. The representations largely replicate those submitted to the Publication Version consultation in October 2021, aside from additional comments as set out in this letter.

Caddick continues to support the emerging plan and particularly the allocation of Apleyhead (site SEM001). The allocation of the site is entirely sound, and the site is deliverable within the plan period. Notwithstanding this, Caddick consider that certain plan policies (Policy 9 in particular) would benefit from revised and simplified wording.

Apleyhead Junction site update

Caddick's representations to the Publication Version plan consultation provided further evidence the site is available, suitable, and deliverable (and entirely appropriate) for major employment led development and has no insurmountable constraints. The site remains controlled by Caddick, as a willing and established developer and operator of major developments across the UK.

The council has consistently supported the principle of development on the site through the previous and latest local plan consultation documents and has correctly followed its evidence base in allocating the site for development, and then proposed for allocation in previous draft local plans (January and November 2020).

Since the previous Publication plan consultation further technical work has been undertaken which reaffirms the site is deliverable. Both the pre-application and EIA Scoping Opinion processes have been completed, which, when combined with the further technical work, means a planning application for employment uses could be submitted in the short term.

Notwithstanding the progress made towards a planning application, as a means of further demonstrating the site is deliverable, Caddick require continued confirmation, through a Local Plan allocation, that the Council fully supports this key opportunity.

Representations

Overall, and as outlined at the start of this letter, Caddick continues to support the emerging plan and particularly the allocation of Apleyhead (site SEM001). The allocation is entirely sound, and the site is deliverable within the plan period. Caddick also considers that certain plan policies (Policy 9 in particular) would benefit from revised and simplified wording.

Bassetlaw's Spatial Strategy (ST1)

Caddick welcomes the revised supporting text at 5.1.9 to 5.1.17 as it reflects the clear advice in the local plan evidence base and pro-actively sets a positive framework for employment needs, and from there supports the significant benefits of the allocation.

However, the plan should remain flexible and responsive to change and therefore the council should be mindful of not overly restricting the preferred employment uses on the site. For example, it is not unrealistic that a major inward investor or occupier may require a mixed employment use (including B2 or research uses for example) yet still require a large unit of upwards of 1m sqft. In that instance, Apleyhead would be the prime location for such a use, yet the supporting text does not allow for such an eventuality. Hence, other employment use requirements which can be reasonably accommodated within the site without compromising other local plan objectives and policies.

We note the employment land aspects of ST1 are not included in this Addendum Plan consultation, and comments on those policies are not invited by the council. Caddick's position therefore remains as set out in their Publication Plan representations (October 2021).

Promoting economic growth (ST7)

Caddick's following comments on policy ST7 and its revised supporting text mirror those set out above regarding policy ST1.

Caddick support the overall direction of the policy changes but have concerns with the prescriptive nature of certain aspects of policy and supporting text. For example, Addendum Plan paragraph 6.1.25 correctly notes pre-application discussions have taken place. However, rather than referring to a 'policy compliant scheme' the text should refer to a 'commitment to deliver the site in an appropriate manner in the short term'.

Turning to policy ST7 itself. Caddick has been consistent in representations to each stage of the plan that, as the council's clear stated intention is ST7 is the strategic employment policy, ST7 should set out the overall employment land requirement (expressed in hectares) along with

a list of identified and allocated sites (as currently drafted). However, ST7 should not include additional detail and site specific requirements for Apleyhead as the sole strategic site.

ST7 should instead identify Apleyhead as the Strategic Employment Site but then defer all detailed policy requirements to Policy 9 which is the site specific policy. Section 5 of ST7 should refer only to Apleyhead as a Strategic Employment Site and criteria (a) to (h) should be revised to remove superfluous criteria and the remaining criteria moved to Policy 9. These refinements, as set out in Caddick's representations to the Draft Plan and Publication Version Plan, would create a more streamlined set of strategic and site specific policies that in turn are easier and cleaner to understand and implement.

Transport Infrastructure (ST54)

Caddick consider the ST54 amendments potentially introduce unnecessary risk to the delivery of development and therefore the plan. In particular, ST54 part 1(c) states the council will work with NCC and others to:

'Ensure that the impacts of new development on the strategic and local road network, including the A57 and A1, are adequately identified through a vision statement and Improvement Plan, and are appropriately and proportionately mitigated through partnership working with the Local Highways Authority, relevant neighbouring planning and highways authorities, and National Highways;'

However, it is unclear who would be responsibility for a 'vision statement' and 'Improvement Plan' nor is it clear how and when such a statement / plan would be implemented. The acceptance that mitigation is appropriate and proportionate is welcomed, although it is unclear to what extent 'partnership working' is to be required nor who would lead the process.

The policy should be amended to remove references to; (1) the A57 and A1; (2) the vision statement and Improvement Plan; and (3) partnership working. This part of the policy should instead simply state development should include appropriate and proportionate mitigation to address identified severe effects (in line with National Planning Policy wording).

Evidence base representations

Sustainability Appraisal

Caddick welcomes the updated Bassetlaw Sustainability Appraisal Report ('SA') (document PUB-016) findings, and particularly in respect of Apleyhead where the SA notes the potential for the site to contribute to strategic sustainability goals and being capable of being served by sustainable transport. These changes reflect the factual position of the site, in that it is close to nearby residential populations in Worksop and is positioned on a key route (the A57) meaning it is accessible by a range of means of sustainable transport (including cycling and walking, as well as public transport).

Infrastructure Delivery Plan (January 2022)

Caddick notes the findings in the updated Infrastructure Delivery Plan ('IDP'), and that its conclusions differ slightly from previous versions. In particular, the updated IDP identifies costs

associated with various infrastructure improvements and these are seemingly linked to the development at Apleyhead.

Caddick does not object to the principle of financial contributions to new infrastructure, nor delivering new infrastructure as part of a development. However, any contributions must pass the tests set out in Part 122 of the Community Infrastructure Levy Regulations. Therefore, further detail is needed on how the costs in the latest IDP have been arrived at and how the costs are apportioned to the various development sites, noting the draft plan and IDP indicate a number of allocations (not just this site) may necessitate infrastructure improvements.

Summary

These representations on behalf of Caddick Developments comment on the Publication Plan Addendum consultation. As per the consultation documents these comments relate to the changes between the Publication and Addendum plans, but they should also be read alongside previous local plan representations.

The Apleyhead site (draft plan policy 9; SEM001) is available, suitable, and ultimately deliverable, and is controlled by Caddick as a willing and established developer with a proven track record of delivering major employment sites. The progress toward submission of a planning application for the site reinforces the certainty around expected delivery.

Caddick support the emerging plan and the allocation of Apleyhead. However, they consider certain plan policies (Policies ST7 and 9 in particular) would benefit from revised and simplified wording. The suggested changes are detailed in the representations. Comments are also made against certain evidence base documents.

We trust the representations are clear. However, should officers require any further clarification then please do not hesitate to contact me.

We look forward to working with officers to support a sound and deliverable plan.

Yours sincerely,



Senior Associate Director
On behalf of NJL Consulting

AD-REF007



[REDACTED]

From: [REDACTED]
Sent: 15 February 2022 10:17
To: The Bassetlaw Plan
Subject: Representation on Bassetlaw Local Plan 2020-2037: Publication Version Addendum
Attachments: LP Mods Rep Form (High Marnham).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

Representations on Bassetlaw Local Plan 2020-2037: Publication Version Addendum

Please find attached a representation made on High Marnham.

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

Kind regards

[REDACTED]

[REDACTED]
Executive Director

TOWN-PLANNING.CO.UK

South View, 16 Hounsfield Way, Sutton on Trent, Newark, Nottinghamshire, NG23 6PX

Tel: 01636 822528

Mobile: [REDACTED]

Email: mail@town-planning.co.uk

Website: www.town-planning.co.uk

*TOWN-PLANNING.CO.UK; NEIGHBOURHOOD-PLAN.CO.UK and Anthony Northcote Planning are trading names of Anthony Northcote Planning Ltd.
Company Registered in England and Wales (6979909)*



TOWN-PLANNING.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

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:

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: 15/02/2022

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): TOWN-PLANNING.CO.UK

Address: South View, 16 Hounsfield Way, Sutton on Trent, Newark

Postcode: NG23 6PX

Tel: 01636 822528 / [REDACTED]

Fax:

Email: mail@town-planning.co.uk

2. Agent Details (if applicable)

Agent:

Organisation (if applicable):

Address:

Postcode:

Tel:

Fax:

Email:

Part B - Your representation

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

Name or Organisation: TOWN-PLANNING.CO.UK

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

Policy: Policy ST7 – Provision of Land for Employment and Policy ST8: EM008: High Marnham Green Energy Hub and Policy ST51: Renewable and Low Carbon Energy Generation

Paragraph:

Policies Map: Figure 6 Key Diagram

4. Do you consider the Local Plan is:

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

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☒

No ☐

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

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

The removal of the Marnham Renewable Energy and Low Carbon Technology Hub from the Key Diagram is supported. The deletion of site EM008 from Policy ST7 as an employment site is supported as this addresses the matters we set out in our objection to the Publication Plan. Furthermore, the deletion of Policy ST8: EM008: High Marnham Green Energy Hub is supported.

Policy ST51: Renewable and Low Carbon Energy Generation is supported in principle in identifying High Marnham as an 'Area of Best Fit'.

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:

On the basis of the proposed modification as the basis for the examination we should not need to attend a hearing session. However, if there are objections from parties to the proposed modifications, then as an objector to the publication plan we would want to exercise the right to appear and be heard by the Inspector at a hearing session as a person defined in section 20 (6) of the Planning and Compulsory Purchase Act 2004 to allow our concerns to be stated.

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-REF008



[REDACTED]

From: [REDACTED]
Sent: 15 February 2022 16:01
To: The Bassetlaw Plan
Subject: Local Plan Representations
Attachments: reg-19-form-a-b-Submission_2022 AM_HARWORTH_15022022.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 Bassetlaw Local Plan Team,

I am pleased to attach representations on the publication version Addendum.

I would be happy to discuss these representations and the site contained within this with you should you consider it an appropriate site for development.

Please can you confirm receipt of this email and attachment?

Kind Regards,

[REDACTED]

[REDACTED]
Planning Director

[REDACTED]
01962 460150
[REDACTED]



London Office: [2 Stephen Street, London, W1T 1AN](#)

Winchester Office: [Trafalgar House South, Trafalgar St, Winchester, SO23 9DH](#)

www.gentiandevelopment.com



The Gentian Development Group is a trading name for Gentian Projects Ltd and other Gentian companies. Gentian Partnerships Asset Management Limited (Registered in England and Wales; Company no: 10537906; Registered address: 146 New London Road, Chelmsford, Essex, CM2 0AW) is agent for the Gentian Development Group of companies.

Emails and the internet are not 100% secure but we have all feasible security measures in place. If you are not the intended recipient, please notify the sender and delete all copies. All personal data herein are processed in accordance with UK data protection legislation. Further details are available from the Company.



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:

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:

15/02/2022

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):

Gentian Developments

Address:

Trafalgar House, Trafalgar Street, Winchester,

Postcode:

SO23 9DH

Tel:

01962 460150

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: **Gentian Developments**

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

Policy: **ST7 – Provision of Land for Employment Development (which includes the employment land as proposed through ST4 Garden Village)**

Paragraph: **ST7 – General Employment Sites**

Policies Map: **Harworth & Bircotes**

4. Do you consider the Local Plan is:

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

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

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

Thank you for the opportunity to provide comment on the Bassetlaw Local Plan 2020 – 2037 Publication Version Addendum January 2022.

I have reviewed the updated documents published on the Council's website and I consider that the employment strategy and economic growth options is inconsistent with the approach required by the NPPF and as such is **unsound**.

National Planning Policy Framework Considerations

Paragraph 22 of the NPPF notes that '*Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery*'.

Paragraph 35 of the NPPF sets out the 4 tests of which 'sound' local plans should meet. Point c) the NPPF notes that Local Plans are required to be:

'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'*

Paragraph 82 outlines what Planning Policies should seek to achieve. Para 82-point d) notes that policies should '*be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and enable a rapid response to changes in economic circumstances*'.

What the Local Plan is Proposing

Undeliverable and premature Employment site through Garden Village Allocation

Policy ST4 and ST7 allocates 10ha of employment land by 2038 to provide for approximately 1,200 jobs through the Garden Village allocation.

The Garden Village will also provide land for a substantial level of quality housing that will deliver around 4000 new homes over its lifetime, 590 dwellings by 2038. Given the complex nature of delivering a Garden Village, the housing trajectory clarifies that the Plan is not reliant on housing development coming forward for approximately 10 years, and no completions have been identified on site until 2031-2032 at the earliest.

The *Economic Development Need Assessment Part 3: Economic growth form a Garden Village development (January 2019) Produced by GL Hearn [Document SS-010]* discusses the

potential economic growth associated with a garden village within Bassetlaw. This document explores the degree of employment land associated with a garden village and whether it could act as a drive to attract new inward investments capable of providing employment and businesses currently under-represented in Bassetlaw and the wider Functional Economic Market Area.

The report discusses and calculates the potential employment land requirement from a garden village settlement. Paragraph 3.3 states –

As a result, and assuming proximity to the A1 a settlement might achieve 100 sqm per dwelling or over 10ha in total for a settlement of 1,000 dwellings. This should be balanced with consideration of the proposed locations existing employment hinterland, which may already have a high level of employment provision that could absorb a proportion of the gross estimated requirement. Settlements above this scale may achieve a greater level of employment take up in the long term however 10ha is considered suitable for any initial development allocation as part of a mixed-use opportunity.

From the above, it is clear that the allocation of 10ha of employment land within the Bassetlaw Garden Village has been evidenced as being required to service the population increase brought about by that allocation. The Local Plan is therefore **unsound** through allocating the employment floorspace proposed through this development as part of this local plan.

Paragraph 22 of the NPPF is important when considering this. It states “*Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery*”

The fact that the wider garden village allocation is at draft stage, does not benefit from planning permission or is supported by a phasing plan or evidence produced in terms of specified times by which the required infrastructure is to be installed to bring the site forward, does not give much strength this is policy being achieved. To bring the required infrastructure which is being suggested (such as new train station) and road junctions etc, will require significant delivery timescales before development can even begin on any employment site.

Notwithstanding the above, there is nothing to suggest that the employment land will be brought forward and constructed in the first phase. Without prejudicing the policy, a reasonable reader would assume that if the site is being promoted or allocated for a new settlement, it would be the developer's preference to build houses first rather than the employment space. Again, no phasing plan has been put forward to suggest the tangible policy aims (i.e., delivery of housing and employment floorspace) can be achieved by 2038.

Overall, it is considered that the allocation of the 10ha of employment space within this plan period is premature and undeliverable given the significant works required (both gaining planning permission and implementing and delivering the infrastructure to bring the site

forward) within the next 15 years and does not comply with the provisions as set out within the NPPF. The proposed employment floorspace within the new settlement is intended to meet the demand from that development and as such should form part of the next plan period, and not seek to be delivered to meet the demand within this plan period.

Large Scale Warehousing and Distribution Centres (Use Class B8) rather than General Employment Sites.

Interestingly, the employment land need has increased from 63ha in the 2019 to 84ha in the 2020 Housing Economic Development Needs Assessment. This notes that and that the future provision of B2/B8 land could be met almost completely through planning permission.

The development at Snapes Lane is acknowledged at para 4.34 of the *Bassetlaw Housing and Economic Development Needs Assessment (2020)*. This notes that the development at Snape Lane would not typically be taken up by local businesses. This is confirmed at para 9.12 where it notes that the site has been reengineered towards strategic large-scale warehousing (from 350,000 sqft - 1.2 Million sqft). This is important as while the site will provide district wide jobs, it is also a niche market which the site benefits from being so close to the A1.

The new allocation of the former Bevercotes Colliery is another consented large scale warehousing scheme (2,700,000sqft) which is currently being marketed.

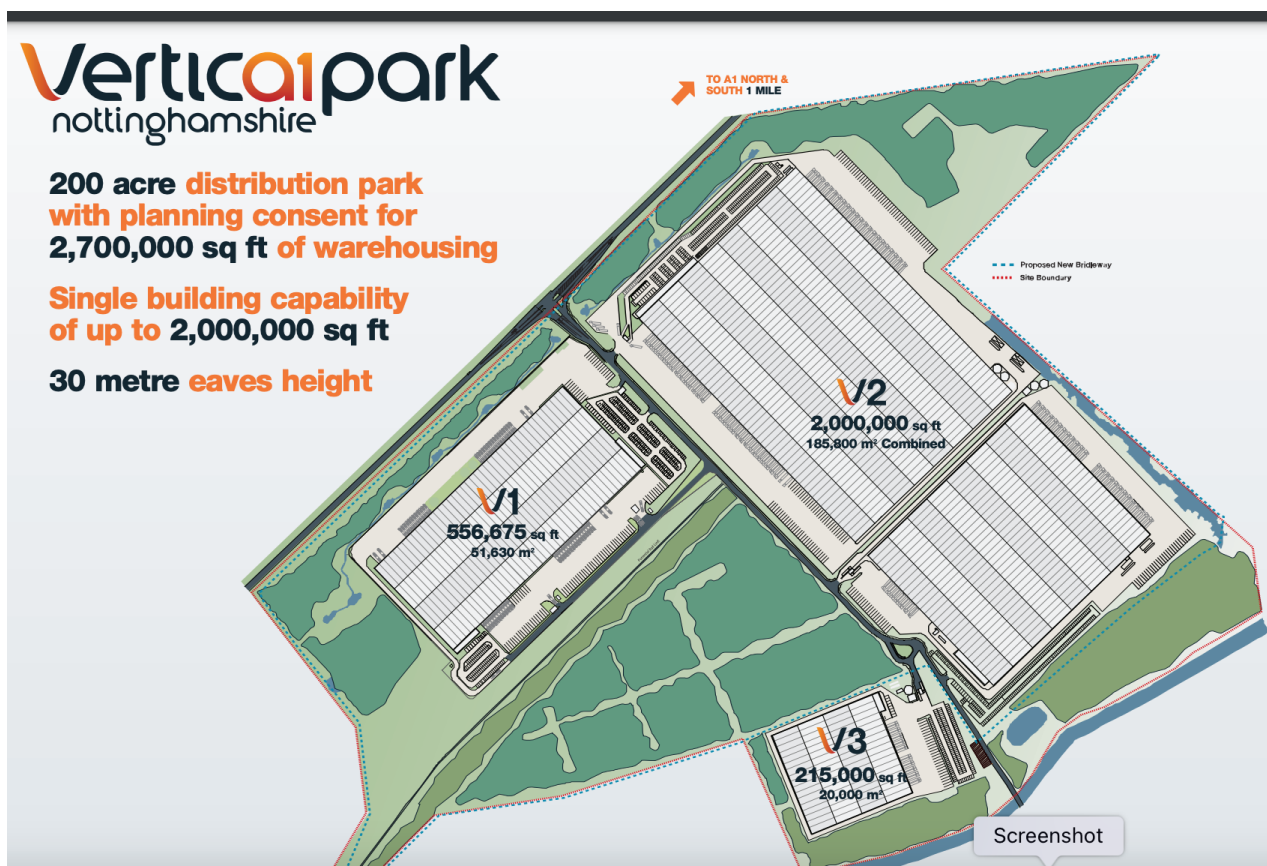
The emerging allocation at Apleyhead is again an allocation relating to B8, large scale warehousing and has come about from research undertaken through the Bassetlaw A1 Corridor Logistics Assessment 2021 and is a significant regional/sub regional application. A scoping application has been submitted to the LPA under application under 20/01426/SCO and is proposing 4,560,000sqft of floorspace.

This allocation does not appear within the General employment sites land allocations calculation within the revised local plan. It is assumed that this is not the case as the Apleyhead site is of a sub-regional importance and as such does not meet the criteria of being classed as meeting the local employment floorspace needs given it is a specialist site required to be the sub-regional demand. The same approach should be applied to the Snape Lane and Former Bevercotes Colliery Allocations given they are being developed with the specialist large scale warehousing/Storage and distribution market in mind and not necessarily accessible or functional general employment floorspace as the policy allocation would suggest, but rather niche large scale distribution centres.

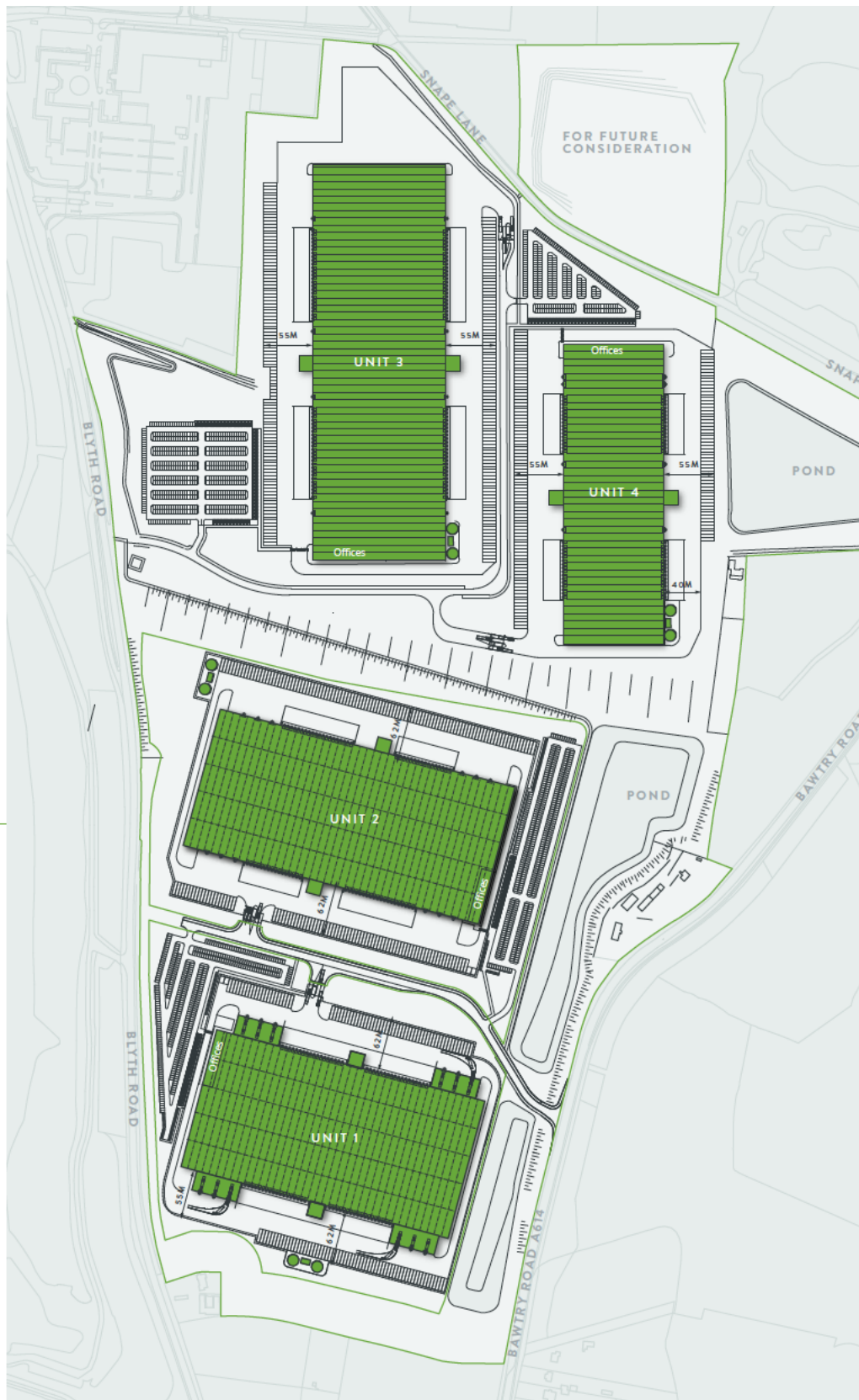
In total these three allocations (2 of which are under general employment sites allocations) will deliver up to 8.4 million sqft of storage and distribution floorspace, rather than a mix of employment uses which would help accommodate the D2N2 growth sectors and support local employment growth.



Above: Site plan from 20/01426/SCO – Scoping Opinion for Apleyhead Junction allocation



Above – marketing particulars for Former Bevecotes Colliery site



Above: Extract from Mulberry Logistics Park (Snape Lane Development) Brochure

Assessment and Conclusions

This assessment has identified three sites which have been included within the General Employment sites calculations which are considered to be either undeliverable within the plan period, or do not meet the general employment considerations which seeks to continue to deliver high quality employment floorspace within the District to support sustainable economic growth.

The most salient points are:

The allocation and delivery of the required employment floorspace within this local plan period is considered to be unsound.

The Economic Development Need Assessment Part 3: Economic growth from a Garden Village development (January 2019) Produced by GL Hearn [Document SS-010] notes that a garden village of the size proposed through this local plan would require 10ha of employment land to meet the potential job creation from a new settlement of this size.

It would therefore appear that by delivering the employment floorspace within this plan period would be pre-mature, given the Council's evidence suggests that this floorspace is required to meet the employment needs of the new settlement. By delivering this 10ha, it could leave a gap in the next plan period when the delivery and growth of the settlement would be increasing as there could be potential that the new floorspace is met by demand within this plan period.

Notwithstanding this, it is questionable as to whether the garden village will be in a position to commencement works within this plan period. A planning application has not been submitted and there is no information regarding the potential phasing of the development and when infrastructure to service the site will be installed. Whilst 15 years is a long time; strategic developments such as a garden village require significant infrastructure provision before the delivery of tangible housing/commercial stock. This is notwithstanding the time spent in planning/procurement/legal processes. As such, it is questionable as to whether the delivery of the early elements of the garden village can actually be delivered in this plan period, given the site doesn't even benefit from a planning permission. Paragraph 22 of the NPPF is of particular note to this approach. It states that *"where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescales for delivery."*

The Former Bevercotes Colliery has been added as a general employment site with no reference to the fact that it is another strategic storage and distribution hub and is clearly being marketed with those end users in mind.

The Snape Lane allocation is currently under construction and will be operational within the plan period. However, the site has been re-engineered towards strategic warehousing, akin to that of the Apleyhead Junction allocation, which does not feature within the General

Employment sites calculation. Given the size, scale and nature of the Snape Lane and Bevercotes Colliery allocations, which will be primarily focused on large distribution sector and as such, will not be suitable to a large number of local operators or businesses for general business space and as such, should not be counted towards the General Employment sites which seek to achieve the 8 areas of economic focus of the D2N2.

Taking all of the above into account, the employment allocations within the local plan are t **unsound** and needs reconsidering. Policy ST7 does not make adequate provision for the delivery of general employment land over the plan period. The Garden Village Employment Land allocation as identified above is not deliverable over the plan period and as such does not comply with points c) and d) of paragraph 35 of the NPPF. The allocations of the employment floorspace within the Garden Village should therefore be removed given the Council's own evidence shows this floorspace is required to meet the future population of the new settlement and as such should not be forming part of the delivery of employment floorspace in this local plan.

The Snape Lane and Former Bevercotes developments should not be classed as a general employment site, when it is being positioned for a strategic distribution hub (B8 only - akin to the Apleyhead allocation). Whilst it will provide for some local employment, it would seem it would be likely to assist meeting the future economic and sub-regional need for logistics. As such, it does not provide general employment floorspace for local occupiers which Policy ST7 seeks to encourage.

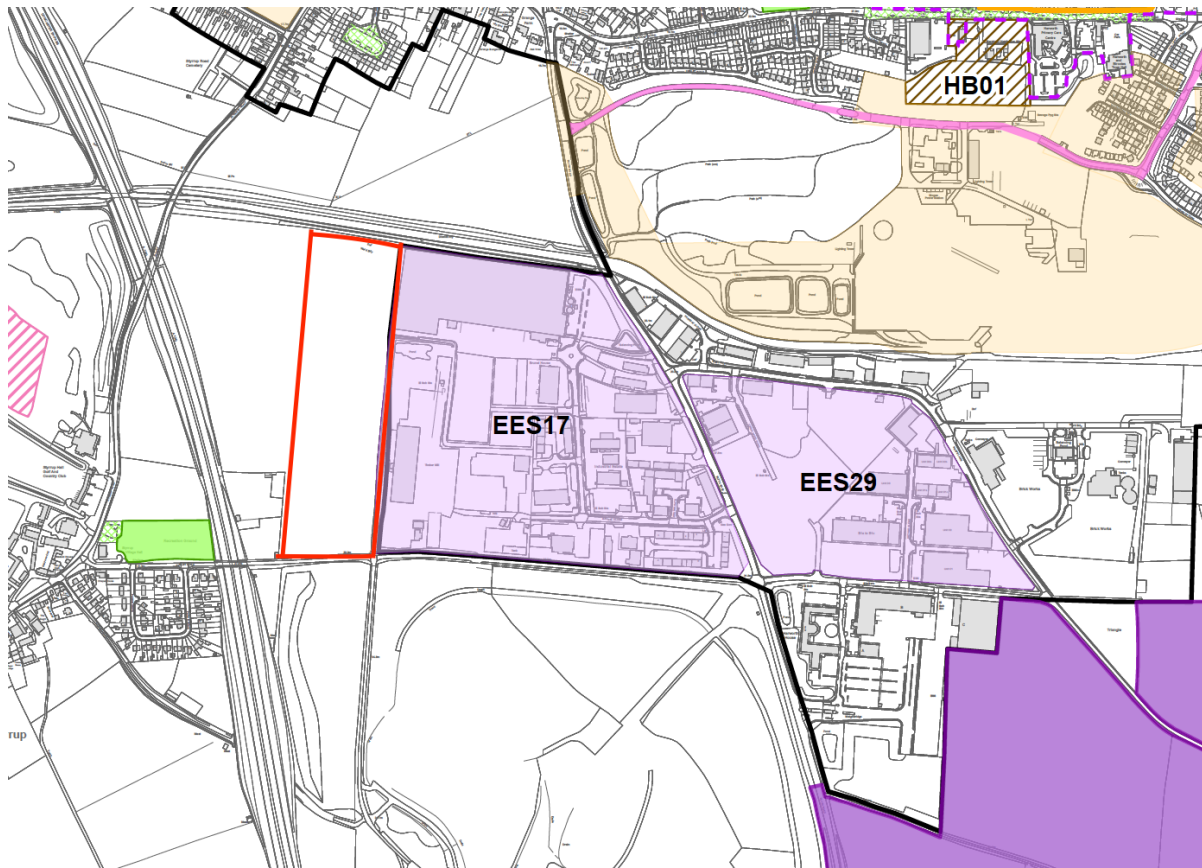
6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(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

There should be a clear distinction between the general employment sites (that can accommodate a range of general employment uses) and the strategic distribution sites which have been granted/allocated (i.e., B8 Storage and distribution hubs).

Given the identified short fall of general employment land through the pre-mature allocation of the Garden Village employment site, The Local Plan needs to consider the delivery of additional employment land, ideally close to existing settlements and the potential for industry clusters where possible.

The below site (Red outline) located off Serlby Road, Harworth is available to help meet the identified need for additional employment floorspace within the district over the local plan period.



The site is adjacent to the existing settlement boundary of Harworth and Bircotes, and is also adjacent to the existing Blyth Road West employment area.

As you can see from the above extract from the Emerging Policies Map, the site does not have any allocations and is currently arable fields. The site is deliverable and if allocated an application could be submitted and approved and the scheme be built out and occupied long before the Garden Village will be in a position to be brought forward. The relatively flat topography of the site would again allow it to be delivered quicker than other sites as there would be less cut and fill and site preparatory works.

This 7 hectare/18 acre site would be able to accommodate a range general employment generating uses in the E(g), B2, B8 and sui generis (i.e. builders merchant) use classes and help achieve the wider D2N2 Growth and recovery strategy.

By allocating the site for general employment uses, it will help with providing employment land within the plan period and as such, help the Council to meet local employment needs within the plan period, given the shortfall identified above.

The site's location at Harworth and Bircotes can also help with providing employment opportunities for the new residents of the various residential development which are on-going around the wider town. Its location close to the A1, will also be appealing to future occupiers.

Access to the site would likely be off Serlby Road through the existing agricultural access. However, there may be potential for secondary access through the adjacent employment site to the east.

Surface water drainage would ideally be through on-site mitigation through the use of rain water gardens and the use of SUDs, whilst also providing the potential for biodiversity improvements.

The buildings on site would be expected to meet a minimum of BREEAM 'very good' which would not only improve the sustainability of the business park, but it would also help local occupiers who wish to upgrade their premises, know that their premises come with a sustainability approval through BREEAM compliance.

There may be potential for the site to be able to accommodate some form of health and wellbeing improvements for the workers on site. Dedicated grassland/amenity space would help achieve this.

In terms of wording of any policy, we would consider the following as being an appropriate basis for any further policy wording:

Policy [XYZ]

Land off Serlby Road

The land off Serlby Road as identified within the proposals map will be brought forward by 2030 to meet the additional need for general employment floorspace within this plan period. The proposal will consist of a mix of employment generating uses within Classes E(g), B2, B8 and sui generis uses (i.e., builders merchants etc).

The site will deliver approximately 6 hectares of general employment floorspace within the uses identified above. Proposals should:

- a) achieve good quality design through the use of high-quality materials that support the positive development of the site
- b) be supported by an appropriate landscaping buffer to the west which will support biodiversity improvements and mitigate any visual impact from the development.
- c) Be constructed to a minimum BREEAM very good standard
- d) Incorporate SUDs principles throughout the surface water drainage scheme
- e) secure safe access and egress off Serlby Road
- f) provide appropriate servicing and parking provision for each development parcel

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:

I am responsible for the promotion of this site and would be willing to answer any questions in terms of deliverability. It is appreciated that the site has not been in front of any planning officers before throughout the local plan preparation process and as such, may need to be discussed in person with the inspector. Likewise, I would be willing to discuss this site with policy officers if they feel that this would be beneficial.

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.