

**Bassetlaw Local Plan 2020-2038: Publication Version
Second Addendum Regulation 19 Consultation May 2022 –
June 2022**

SA-REF Responses 001-010

REFERENCE NUMBER	ORGANISATION	PARTICIPATING IN HEARING SESSIONS
SA-REF001	Axis on behalf of FCC Environment Limited	Yes
SA-REF002	Natural England	No
SA-REF003	Twelve Twenty One Planning on behalf of Hamlin Estates	No
SA-REF004	Pegasus Group on behalf of Barratt Homes	Yes
SA-REF005	Barton Willmore (Stanstec) on behalf of Howard (Retford) Limited	Yes
SA-REF006	Grace Machin on behalf of H Machin, J.V.Machin, H.V.Machin and R.G.V.Machin N Grace	Yes
SA-REF007	Historic England	No
SA-REF008	Barton Willmore on behalf of Heyford Developments Ltd	Yes
SA-REF009	Gentina Developments	Yes
SA-REF010	The Coal Authority	No

SA-REF001



[REDACTED]

From: [REDACTED]
Sent: 26 May 2022 09:45
To: The Bassetlaw Plan
Subject: FCC - Local Plan Rep 2022 Forms Rep and Enclosures
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 Morning,

Please find attached a representation on the emerging Local Plan. I hope everything is in order, but do not hesitate to contact me should you wish to discuss further.

Regards,

[REDACTED]
Associate



[REDACTED]
[REDACTED]
www.axisped.co.uk

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



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Bassetlaw Local Plan 2020-2038

Publication Version Second Addendum Representation Form May - June 2022

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

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Responses can be submitted via the electronic version of the comment form which can be found on the Council's web site at:

www.bassetlaw.gov.uk/BassetlawPlan Alternatively this form can be completed and returned as an e-mail attachment to thebassetlawplan@bassetlaw.gov.uk or by post to **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

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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](#)

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Please tick/ delete as appropriate:

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

Yes ☒ x

No ☐

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

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

Yes ☒ x

No ☐

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

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

Yes ☒ x

Printed Name

Signature:

Date:

26 May 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: Camellia House, 76 Water Lane, Wilmslow, Cheshire

Postcode: SK9 5BB

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

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

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

Yes ☒

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

No ☐

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

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

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Part B - Your representation

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Name or Organisation: FCC Environment Ltd

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Policy: Please see attached Representation

Paragraph: Please see attached Representation

Policies Map: Please see attached Representation

4. Do you consider the Local Plan is:

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4.(1) Legally Compliant

Yes x

No ☐

4.(2) Sound

Yes ☐

No x

4.(3) Complies with the Duty to Cooperate

Yes x

No ☐

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Bassetlaw Local Plan: Publication Version Second Addendum May 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. Figures 1 and 2 provided at the end of this representation illustrate the location of the site.
2. This representation builds upon representations made to the Draft Local Plan in January 2022, August 2021 November, January 2020 and January 2019. For completeness the most recent representation, from January 2022, 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 ST40

3. Previous representations have sought to remove the Local Wildlife Site (LWS) designation which was identified across the site. The latest officer comments on this matter stated that the designation could only be removed by the Nottingham Biological and Geological Records Centre.
4. Dialogue between FCC (landowner) and officers at the Nottingham Biological and Geological Records Centre (attached to this representation) has confirmed that the records centre have removed the LWS designation from their records and mapping. On this basis the site is not designated, and the Policies Map should also be amended to reflect this.

Policies ST7, ST10, ST38

5. AXIS, on behalf of FCC, have made numerous representations on the Policies ST7 'Provision of Land for Employment Development', Policy ST10 'Existing Employment Sites' and Policy ST38 'Green Gaps'. The full previous representation on these matters is enclosed at the end of this document, for ease of reference, these relate to:

- a. Although the background Site Section Methodology document has been updated (May 2022), its recommendations still do not appear to appear to have been given any further consideration within the emerging Local Plan. There is no justification as to why the site has been rejected or treated differently to the neighbouring land to the south.
- b. Part of the site now benefits from Reserved Matters and the relevant conditions have been discharged, which enables employment units to be constructed on part of the site. It is still contested that the entire site should be allocated for employment uses, especially as it is not a designated wildlife site and employment uses have been found acceptable.
- c. Whilst there have been amendments to the Green Gap to reflect the commercial premises running along the B6045 Blyth Road the remaining part of the site is capable of accommodating employment uses and is in line with the emerging spatial strategy. The opportunity for local employment on a site should not be disregarded, and the boundary of the Green Gap should be amended to exclude the entire site.

Conclusion

- 6. 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

- 7. Previous Representation and correspondence with Notts Biological and Geological Records Centre.

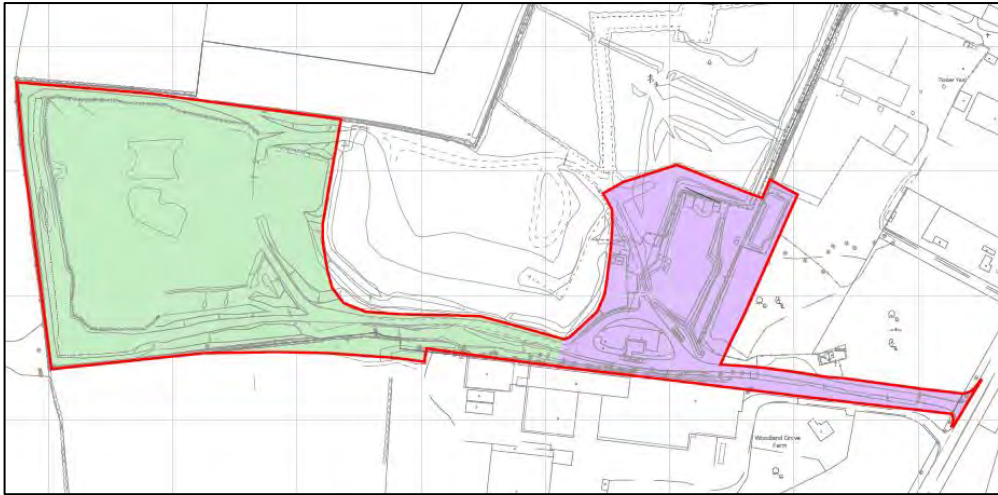


Figure 1 – Site Boundary

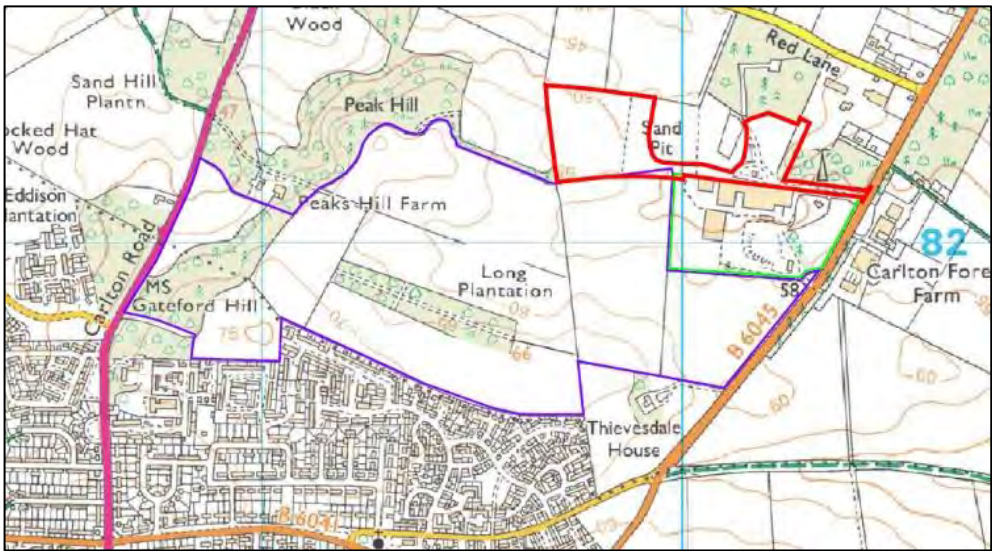


Figure 2 – Site Location

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

From: Notts Biological & Geological Records Centre

Sent: 18 May 2022 13:33

To: [REDACTED]

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

Hi again [REDACTED]

I'm fine and hope you are too. Just spotted the site number in the *subject* of your last email. I can confirm this site is no longer a LWS.

Kind regards

From: [REDACTED]

Sent: 18 May 2022 13:10

To: Notts Biological & Geological Records Centre

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

Hi [REDACTED]

Hope you are keeping well.

Further to the emails below, message to confirm the Carlton Forest LWS was removed from the map?

Looked at what I think is the map, screenshot below, where it appears to have been removed.



Grateful if you could confirm.

Thanks in advance,



From: [REDACTED]
Sent: 24 June 2021 11:43
To: Notts Biological & Geological Records Centre <NBGRCG@nottinghamcity.gov.uk>
Subject: RE: Carlton Forest Sandpit LWS (Ref: 5/3361)

Hi [REDACTED]

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 [<mailto:NBGRCG@nottinghamcity.gov.uk>]
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]

NBGRC
[REDACTED]

From: [REDACTED]
Sent: 24 June 2021 10:20
To: Notts Biological & Geological Records Centre <NBGRCG@nottinghamcity.gov.uk>
Subject: RE: Carlton Forest Sandpit LWS (Ref: 5/3361)

Hello,

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

Many thanks,

[REDACTED]

From: [REDACTED]
Sent: 23 April 2021 15:10
To: nbgrcg@nottinghamcity.gov.uk
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

[REDACTED]

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.

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Carlton Forest LWS



Key

Local Wildlife Site

Produced by Peter Adon NBGRIC Team 15/05/2022

SA-REF002



[REDACTED]

From: [REDACTED]
Sent: 06 June 2022 12:53
To: The Bassetlaw Plan
Subject: Bassetlaw Local Plan Publication Version Second Amendment - NE response
Attachments: 391716 Bassetlaw Local Plan rep form section 8.6.pdf; 391716 Bassetlaw Local Plan rep May addendum para 4.6.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

F.A.O [REDACTED], Planning Policy Manager

Dear [REDACTED]
Please find attached Natural England's response to the consultation on the Bassetlaw Local Plan Publication Version Second Amendment, set out on the two attached representation forms.
Regards
Roslyn Deeming

[REDACTED]
Senior Planning Adviser
East Midlands Area
Ceres House
2, Searby Road
Lincoln
LN2 4DT
[REDACTED]

www.gov.uk/natural-england.

During the current coronavirus situation, Natural England staff are working remotely and from some offices to provide our services and support our customers and stakeholders. Although some offices and our Mail Hub are now open, please continue to send any documents by email or contact us by phone to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.

Wash hands. Cover face. Make space.



This message has been sent using TLS 1.2



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Yes ☒

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

Yes ☒

No ☐

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

Yes ☒

No ☐

Printed Name: 

Signature: 

Date: 06/06/2022

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): Natural England

Address: Ceres House, 2 Searby Road, Lincoln

Postcode: LN2 3LP

Tel: [REDACTED]

Fax:

Email: [REDACTED]

2. Agent Details (if applicable)

Agent:

Organisation (if applicable):

Address:

Postcode:

Tel:

Fax:

Email:

Part B - Your representation

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

Name or Organisation: Natural England

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

Policy:

Paragraph: 4.16

Policies Map:

4. Do you consider the Local Plan is:

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

4.(1) Legally Compliant

Yes ☒✓

No ☐

4.(2) Sound

Yes ☒✓

No ☐

4.(3) Complies with the Duty to Cooperate

Yes ☒✓

No ☐

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

Strategic Objectives – 11

Natural England supports new strategic objective 11 as it will strengthen the Plan's approach to increasing the resilience of the impacts of climate and change and encourage the use of integrated water management.

Continue on a separate sheet if necessary

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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: 06/06/2022

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): Natural England

Address: Ceres House, 2 Searby Road, Lincoln

Postcode: LN2 3LP

Tel: 

Fax:

Email: 

2. Agent Details (if applicable)

Agent:

Organisation (if applicable):

Address:

Postcode:

Tel:

Fax:

Email:

Part B - Your representation

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

Name or Organisation: Natural England

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

Policy:

Paragraph: 8.6.10 to 8.6.12

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.

Section 8.6 Recreational Impact

Natural England supports the amendments that section 8.6 includes (detailed in paragraphs 8.6.10 – 8.6.12) which make changes associated with the withdrawal of the Bassetlaw Garden Village and potential recreational impact.

We agree that any housing development that falls within the Impact Risk Zone (IRZ) for Clumber Park SSSI should give full consideration to the potential recreational impact on the SSSI when developing proposals and include appropriate mitigation measures.

Natural England will continue to work with the Council and other interested organisations to understand and monitor recreational impact of future development on designated nature conservation sites in Sherwood Forest.

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

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

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

Yes ☐

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

No ☒

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

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.

SA-REF003



[REDACTED]

From: [REDACTED]
Sent: 07 June 2022 11:10
To: The Bassetlaw Plan
Subject: Reg 19 Reps - Hamlin Estates.
Attachments: reg-19-form-a-b-14pt-may-2022.docx; reg-19-form-b-14pt-may-2022.docx

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

Please find attached representations submitted on behalf of Hamlin Estates.

Please confirm receipt.

[REDACTED]

[REDACTED]



Bassetlaw Local Plan 2020-2038

Publication Version Second Addendum Representation Form May - June 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 21st June 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 Alternatively this form can be completed and returned as an e-mail attachment to thebassetlawplan@bassetlaw.gov.uk or by post to **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

Please note:

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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](#)

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For more information on how Bassetlaw District Council's Planning Policy department processes personal information about you, please see our main privacy notice at [Bassetlaw District Council's Planning Policy Webpage](#)

Please tick/ delete as appropriate:

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

Yes ☒x

No ☐

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

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

Yes ☒x

No ☐

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

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

Yes ☒x

No ☐

Printed Name:

[REDACTED]

Signature:

Date:

06.06.22

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): Hamlin Estates Ltd

Address: Herdewyke House, Watery Lane, Chadshunt

Postcode: CV35 0EJ

Tel:

Fax:

Email:

2. Agent Details (if applicable)

Agent:

[REDACTED]

Organisation (if applicable): TwelveTwentyOne Planning

Address: 37 Woodlea Drive, SOLIHULL

Postcode: B91 1PQ

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:

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

Policy:

Paragraph: 5.1.14

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 ☒X

4.(2) Sound

Yes ☐

No ☒X

4.(3) Complies with the Duty to Cooperate

Yes ☐

No ☒X

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

The Plan fails to properly account for employment needs. There is an allowance introduced for 'double jobbing'. This is wrong in a raft of ways, as follows:

1. There is no statistical basis for a double jobbing allowance;
2. Inclusion of double jobbing as an aspiration for the Plan to achieve is actually making employment misery an essential tenet of the Plan. This is at odds with the Aim of the Plan which is to improve the lives of residents across the District – as opposed to this provision which has more than a whiff of the workhouse about it.
3. This is at odds with the Government's aim of upskilling and improving the employment and working conditions of society.

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

Remove any allowance for double jobbing and increase the provision for employment to a more appropriate level.

Continue on a separate sheet if necessary

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

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

Yes ☐

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

No ☒X

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

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Bassetlaw Local Plan 2020-2038

Publication Version Second Addendum Representation Form May - June 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: Hamlin Estates Ltd via TwelveTwentyOne Planning

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

Policy:

Paragraph: 5.1.61

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 ☐X

4.(2) Sound

Yes ☐

No ☐X

4.(3) Complies with the Duty to Cooperate

Yes ☐

No ☐

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

The plan fails to make proper provision for Custom and Self-Build (CSB) housing as required by both the NPPF and NPPG. Sustainable smaller villages are ideal locations for small scale CSB developments. The aim of not specifically allowing such development on the edge of Built-Up Boundaries will unduly and unnecessarily restrict such development as it will force CSB housing to compete with market housing sites.

Continue on a separate sheet if necessary

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

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

To make it clear and explicit that CSB housing will generally be supported on sites adjoining built up boundaries around named growth villages.

Continue on a separate sheet if necessary

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

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

Yes ☐

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

No ☒X

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

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SA-REF004



From:

Sent:

To:

Cc:

Attachments:

08 June 2022 11:01

The Bassetlaw Plan

Bassetlaw Local Plan 2020-2038: Publication Version Second Addendum

R005v01.Barratt.LocalPlan2ndAddendum.May 22.pdf; R005a Pegasus reg-19-form-a-b-14pt-may-2022.docx; R005b Pegasus reg-19-form-a-b-14pt-may-2022.docx

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

Dear Sir / Madam,

Please find attached response to the current consultation on the Bassetlaw Local Plan. The attached response forms should be read in conjunction with our detailed response set out within the accompanying report.

I would be grateful if you could confirm safe receipt in due course.

Kind regards

Director

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



Expertly Done. [LinkedIn](#) | [Twitter](#) | [Instagram](#) | [Our Charity](#) | [Our Website](#)

[DESIGN](#) | [ECONOMICS](#) | [ENVIRONMENT](#) | [HERITAGE](#) | [LAND & PROPERTY](#) | [PLANNING](#) | [TRANSPORT & INFRASTRUCTURE](#)

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Bassetlaw Local Plan 2020-2038

Publication Version Second Addendum Representation Form May - June 2022

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www.bassetlaw.gov.uk/BassetlawPlan Alternatively this form can be completed and returned as an e-mail attachment to thebassetlawplan@bassetlaw.gov.uk or by post to **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

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Please tick/ delete as appropriate:

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

Yes ☒

No ☐

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

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

Yes ☒

No ☐

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

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

Yes ☒

No ☐

Printed Name:

[REDACTED]

Signature:

[REDACTED]

Date:

08/06/2022

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): Barratt Homes

Address: C/O Agent

Postcode:

Tel:

Fax:

Email:

[REDACTED]

2. Agent Details (if applicable)

Agent:

[REDACTED]

Organisation (if applicable): Pegasus Group

Address: Pavilion Court, Green Lane, Garforth, Leeds

Postcode: LS25 2AF

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: Pegasus Group

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

Policy: ST1: Bassetlaw's Spatial Strategy

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

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

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

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

This response should be read alongside our detailed report which accompanies these submissions (R005v01.Barratt LocalPlan2nd Addendum.May22). The relevant paragraphs are 2.2 to 2.29.

The proposed housing requirement is unsound as it is not justified or consistent with national policy.

The Local Plan 2nd Addendum identifies an increase in planned jobs from 9,735 to 9,852 over the plan period yet suggests a reduction in the housing requirement over the same period. The reduction over the plan period relates to 162 dwellings (10,638 to 10,476) or a reduction of 9 dwellings per annum (dpa) (591dpa to 582dpa). Whilst the reduction in the housing requirement is not substantial it is considered unsound. Our reasoning for this conclusion is summarised below (the full text is provided in our accompanying report).

Employment Growth

The derivation of the amended housing requirement is set out within the Bassetlaw Housing & Economic Needs Assessment: Addendum, published April 2022 (HEDNA 2022). It is understood that this report provides a focused update to the 2020 HEDNA.

Table 2.3 of the HEDNA 2022 identifies that additional plan period (2020 to 2038) jobs are likely to fall within the range 9,852 and 11,354 jobs. The 2022 HEDNA converts this jobs range into the housing requirement using three main assumptions, these being: double-jobbing, community ratio and claimant count. The key difference between the 2020 HEDNA and 2022 HEDNA is understood to relate to the claimant count.

The 2022 HEDNA Figure 1.3 of Appendix A identifies the large spike in the claimant count which occurred in quarter 1 of 2020. This is to be expected given the economic impact of the first 'lockdown' due to the Covid-19 pandemic. This impact was not modelled in the 2020 HEDNA but it was noted that: *"...unemployment will have increased in 2020 due to COVID 19, with August 2020 claimant count at 5.3% albeit lower than the national average of 6.5%. The Office for Budget Responsibility's central COVID scenario indicates around 4 year to return to near pre COVID unemployment levels"* (2020 HEDNA, paragraph 5.4). Despite this understanding the 2020 HEDNA concluded in relation to unemployment that no changes to the number of people who are unemployed moving forward to 2037.

In contrast the 2022 HEDNA adjusts the housing need calculation based upon the fact that: *"...1,870 people not working in 2020 who might be expected to return to employment in the future (taken to be over the period to 2038 for consistency with other analysis in this report)." (paragraph 3.14).* The impact of the pandemic was, therefore, known at the time of the 2020 HEDNA and as can be seen in figure 1.3 of the 2022 HEDNA the recovery to date has been swift. The recovery in many of these jobs are likely to be in the trades and hospitality sectors which were particularly hard hit during the early part of the pandemic. These types of business are now re-opening and once again seeking employees. Indeed, it has recently been widely reported that UK unemployment edged down to 3.7% in quarter 1 2022. This is the lowest reading since 1974 with fewer unemployed people than job vacancies.

Given this information it appears that the 2022 HEDNA is unduly pessimistic in terms of the ability of those unemployed during the pandemic to get suitable work in those sectors within which they previously worked. Given these recent changes it is considered that the discount applied to the housing requirement on the basis of those unemployed is unjustified and effectively dampens the economic-led housing need figure.

Furthermore, it is noted that if the commuting ratio were to be held constant to that most seen in the census then the economic led housing need would be 590dpa, approximately the same as that within the previous iteration of the submitted plan.

Continue on a separate sheet if necessary

Past rates of Delivery

The council has in recent years delivered significantly more housing than the 582dpa identified within Policy ST1. Indeed, paragraph 5.1.23 of the Local Plan 2nd Addendum acknowledges an average supply of 644dpa. This is 62dpa or nearly 11% greater than the proposed housing requirement. Setting the housing requirement below these average levels which include a pandemic are contrary to the ethos of the NPPF and its requirement to boost significantly the supply of housing.

Housing Supply

Figure 7 of the Local Plan 2nd Addendum identifies a total supply of 12,551 dwellings over the 18-year plan period, to 2038. This equates to a buffer of 2,075 dwellings over the proposed minimum plan requirement, 10,476 dwellings. The council will be aware that our previous response to the first addendum raised concerns over the supply. The reduction in the supply is largely due to the deletion of the Bassetlaw Garden Village proposals, following withdrawal by the landowner. The reduced supply and available buffer increase these concerns.

Within our previous representations we raised the issue of a lack of a supportive framework should the permission on any of these commitments lapse. There is little reference to individual sites within the Local Plan Addendum, or its previous iteration save a listing within the appendices. The situation with regards to commitments is further exacerbated by the fact that several commitments remain outside of development boundaries. Given that commitments are an intrinsic and important element of the Council's housing land supply this is not only unjustified but would also render any development on identified commitments with a lapsed application to be contrary to several Local Plan policies, such as 'ST2: Residential Growth in Rural Bassetlaw'.

In addition, a further 635 dwellings are proposed in the Worksop Central Development Plan Document. Whilst this document was the subject of consultation in June / July 2021 it is still at least two-years away from adoption and as such delivery from this source is not yet certain. It is also notable that whilst only 3 months have passed since the previous Local Plan consultation 90 dwellings have been removed from this source of supply.

- 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

Housing Requirement

Based upon our assessment the reduction in the economic-led housing need figure is unjustified and should as a minimum be retained at the level identified in the previous iteration of the plan. Indeed, we would argue that given the increase in potential job creation there is a justified argument to increase the housing requirement.

Housing Supply

It is recommended that the development boundaries are relaxed. As a minimum this should include the identified commitments. For example, within Langold they should include the red-line boundary of application reference 15/01605/OUT. Ideally to enable the delivery of windfalls they should be greater in scope.

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

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

Continue on a separate sheet if necessary

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

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

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

Yes ☒

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

No ☐

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

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

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

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



Bassetlaw Local Plan 2020-2038

Publication Version Second Addendum Representation Form May - June 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: Pegasus Group

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

Policy: ST2: Residential Growth in Rural Bassetlaw

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.

This response should be read alongside our detailed report which accompanies these submissions (R005v01.Barratt LocalPlan2nd Addendum.May22). The relevant paragraphs are 2.30 to 2.35.

The Local Plan 2nd Addendum paragraph 5.1.53 identifies that the Large Rural Settlements of Blyth, Carlton in Lindrick and Costhorpe, Langold/Hodsock, Misterton and Tuxford are the most sustainable and act as service centres for the surrounding rural area.

Despite the deletion of 590 dwellings at the Garden Village none of these settlements are identified to deliver further growth over and above existing commitments and the allocation at Tuxford. Figure 8, as amended, identifies that all of the additional growth required to meet the removal of the Garden Village appears to have been located in Harworth and Bircoates. Given the important role that Large Rural Settlements play within Bassetlaw this is considered unjustified.

Policy ST2 (parts 2 and 3) effectively place a moratorium on development if cumulatively the 20% growth figure is met or surpassed through allocations and commitments. The only exception is where a proposal: "...has the support of the community through the preparation of a neighbourhood plan (including a review), or in the absence of a Neighbourhood Plan, through a developer-led pre-application community consultation..."

In terms of Langold it is noted that the Neighbourhood Plan was made on 6th May 2021. This plan identifies the current commitments within the settlement which are identified to deliver its requisite growth over the neighbourhood plan period 2020 to 2037. Whilst the Neighbourhood Plan is an important consideration it should not be used as a reason for a moratorium upon future development within the settlement. In addition, the 20% figure is an arbitrary figure which pays no regard to opportunities or constraints. Such an approach is considered contrary to the ethos of the NPPF.

Continue on a separate sheet if necessary

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

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

Given the withdrawal of the Garden Village proposals additional allocations should be identified in Large Rural Settlements such as Langold.

Our client's interests (Land parcels B and C, as identified in figure 1 of the accompanying report), represent an opportunity for a sustainable extension to the existing sustainable settlement of Langold. These provide a clear development opportunity to expand the extant consent (parcel A) later in the plan period. The delivery of these parcels could be combined with a new landscaped defensible boundary. Using the roads to the north and east of the site, future development parcel to the south and an existing mature hedgerow to the west. Whilst not yet determined the access to these parcels could potentially be accessed via the A60.

Continue on a separate sheet if necessary

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

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

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

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

Yes ☒

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

No ☐

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

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

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

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

Bassetlaw Local Plan 2020–2038 Publication version 2nd Addendum.

Consultation Response.

LAND TO THE NORTH OF CHESTNUT ROAD, LANGOLD.

On behalf of Barratt Homes.

Date: 26 May 2022 | Pegasus Ref: P19-3130

Author: MG

Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
01	26/05/22	MG	MG	



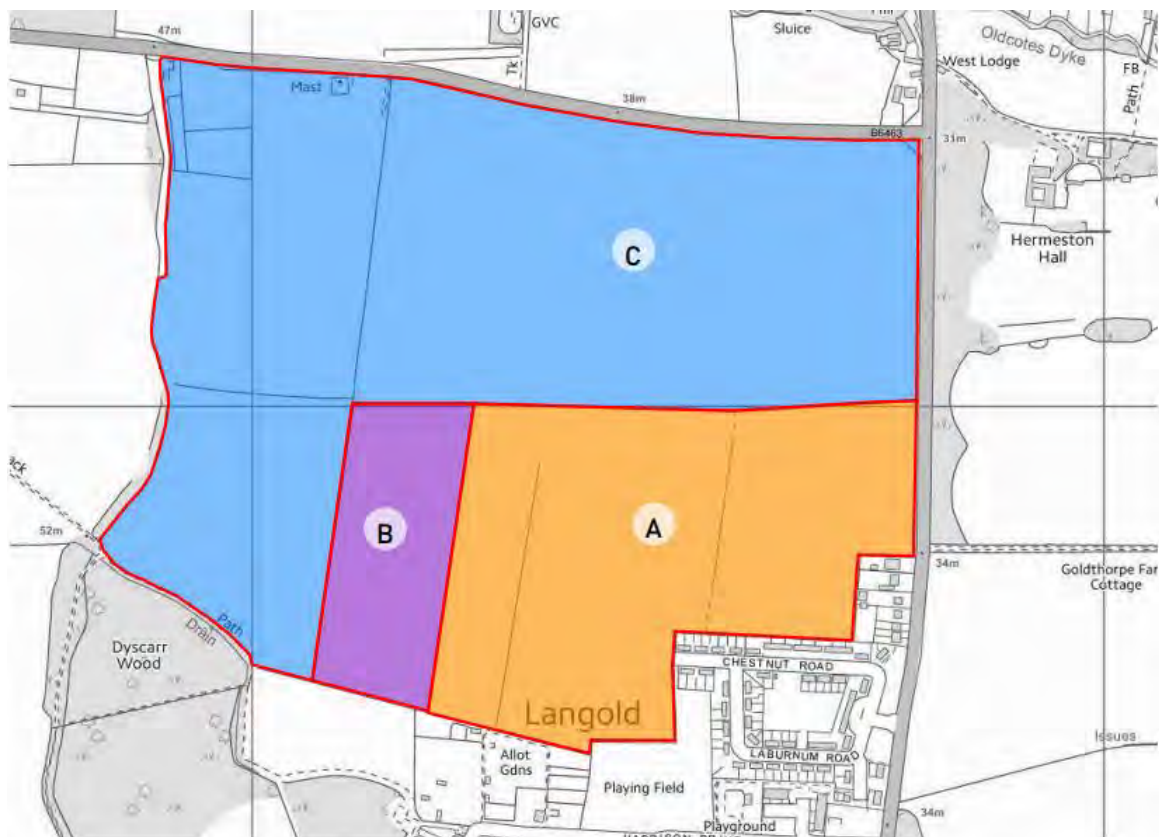
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1. Introduction

- 1.1. This response is made on behalf of our client Barratt Homes in respect of their interests at Land to the North of Chestnut Road, Langold to the current consultation upon the Bassetlaw Local Plan. It is understood that the Bassetlaw Local Plan 2020-2038 Publication Version Second Addendum (Local Plan 2nd Addendum) relates solely to the proposed amendments identified within the consultation document. Our comments are framed in this regard. It must, however, be recognised that some of these amendments have 'knock-on' effects for other elements of the plan.
- 1.2. This response is made solely in respect of Land West of Doncaster Road / North of Langold, as identified by parcels A, B and C figure 1. These sites are identified in the SHLAA under references LAA209 and LAA312. These sites have previously been promoted throughout the Local Plan process.
- 1.3. Parcel A benefits from an outline consent for 300 dwellings (ref: 15/01605/OUT) and a reserved matters application for 300 dwellings (ref: 21/01730/RES) approved 19th May 2022. Parcels B and C would make natural extensions to the existing approvals.

Figure 1: Site Location



- 1.4. Whilst Parcel C is included in its entirety, our client is willing to discuss potential development opportunities across smaller elements of this parcel.

1.5. In making these representations we have taken account of the tests of soundness which will be applied to the local plan when it is examined by the local plan inspector. Paragraph 35 of the NPPF confirms that plans would be considered sound if they are:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

2. Consultation Response

2.1. The following comments relate to selected elements of the Local Plan 2nd Addendum.

Policy ST1: Bassetlaw's Spatial Strategy

2.2. This policy covers the housing requirement and supply, each element is dealt with separately below.

Housing Requirement

2.3. The proposed housing requirement is unsound as it is not justified or consistent with national policy.

2.4. The Local Plan 2nd Addendum identifies an increase in planned jobs from 9,735 to 9,852 over the plan period yet suggests a reduction in the housing requirement over the same period. The reduction over the plan period relates to 162 dwellings (10,638 to 10,476) or a reduction of 9 dwellings per annum (dpa) (591dpa to 582dpa). Whilst the reduction in the housing requirement is not substantial it is considered unsound. Our reasoning for this conclusion is set out below.

2.5. The NPPF is clear that the standard method for determining local housing need (LHN) should be used to identify the minimum housing requirement within the plan unless exceptional circumstances exist. The LHN for Bassetlaw is 279dpa. The setting of the housing requirement above this figure is supported and considered appropriate.

2.6. The Planning Practice Guidance (ID 2a-010-20201216) identifies several circumstances where the minimum requirement set by the LHN standard method should be exceeded. These are:

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

2.7. The PPG goes on to note that previous levels of housing delivery in an area should also be considered.

Employment Growth

2.8. To ensure that the plan is sustainable it is important that employment and housing strategies are aligned. This will ensure that the economic potential of the area is met in a sustainable manner by optimising the potential to reduce commuting in and out of the area.

- 2.9. The derivation of the amended housing requirement is set out within the Bassetlaw Housing & Economic Needs Assessment: Addendum, published April 2022 (HEDNA 2022). It is understood that this report provides a focused update to the 2020 HEDNA.
- 2.10. Table 2.3 of the HEDNA 2022 identifies that additional plan period (2020 to 2038) jobs are likely to fall within the range 9,852 and 11,354 jobs. The requirement for 582dpa is linked to the upper end of this range. This is supported.
- 2.11. The 2022 HEDNA converts this jobs range into the housing requirement using three main assumptions, these being: double-jobbing, community ratio and claimant count. The key difference between the 2020 HEDNA and 2022 HEDNA is understood to relate to the claimant count.
- 2.12. The 2022 HEDNA Figure 1.3 of Appendix A identifies the large spike in the claimant count which occurred in quarter 1 of 2020. This is to be expected given the economic impact of the first 'lockdown' due to the Covid-19 pandemic. This impact was not modelled in the 2020 HEDNA but it was noted that:
- "...unemployment will have increased in 2020 due to COVID 19, with August 2020 claimant count at 5.3% albeit lower than the national average of 6.5%. The Office for Budget Responsibility's central COVID scenario indicates around 4 year to return to near pre COVID unemployment levels" (2020 HEDNA, paragraph 5.4).*
- 2.13. Despite this understanding the 2020 HEDNA concluded in relation to unemployment that:
- "...This would indicate that there may be limited scope for further improvements and for the purposes of analysis in this report it has been assumed that there are no changes to the number of people who are unemployed moving forward to 2037." (paragraph 5.3)*
- 2.14. In contrast the 2022 HEDNA adjusts the housing need calculation based upon the fact that:
- "...1,870 people not working in 2020 who might be expected to return to employment in the future (taken to be over the period to 2038 for consistency with other analysis in this report)." (paragraph 3.14).*
- 2.15. The impact of the pandemic was, therefore, known at the time of the 2020 HEDNA and as can be seen in figure 1.3 of the 2022 HEDNA the recovery to date has been swift. The recovery in many of these jobs are likely to be in the trades and hospitality sectors which were particularly hard hit during the early part of the pandemic. These types of business are now re-opening and once again seeking employees. Indeed, it has recently been widely reported that UK unemployment edged down to 3.7% in quarter 1 2022. This is the lowest reading since 1974 with fewer unemployed people than job vacancies.
- 2.16. Given this information it appears that the 2022 HEDNA is unduly pessimistic in terms of the ability of those unemployed during the pandemic to get suitable work in those sectors within which they previously worked. Given these recent changes it is considered that the discount applied to the housing requirement on the basis of those unemployed is unjustified and effectively dampens the economic-led housing need figure.
- 2.17. Furthermore, it is noted that if the commuting ratio were to be held constant to that most seen in the census then the economic led housing need would be 590dpa, approximately the same as that within the previous iteration of the submitted plan.

- 2.18. It is recommended that further consideration is given to the unemployment issue discussed above, prior to the submission of the plan.

Past rates of Delivery

- 2.19. The council has in recent years delivered significantly more housing than the 582dpa identified within Policy ST1. Indeed, paragraph 5.1.23 of the Local Plan 2nd Addendum acknowledges an average supply of 644dpa. This is 62dpa or nearly 11% greater than the proposed housing requirement. Setting the housing requirement below these average levels which include a pandemic are contrary to the ethos of the NPPF and its requirement to boost significantly the supply of housing.

Conclusions

- 2.20. Based upon our assessment the reduction in the economic-led housing need figure is unjustified and should as a minimum be retained at the level identified in the previous iteration of the plan. Indeed, we would argue that given the increase in potential job creation there is a justified argument to increase the housing requirement.

Housing Supply

- 2.21. Figure 7 of the Local Plan 2nd Addendum identifies a total supply of 12,551 dwellings over the 18-year plan period, to 2038. This equates to a buffer of 2,075 dwellings over the proposed minimum plan requirement, 10,476 dwellings. The council will be aware that our previous response to the first addendum raised concerns over the supply. The reduction in the supply is largely due to the deletion of the Bassetlaw Garden Village proposals, following withdrawal by the landowner. The reduced supply and available buffer increase these concerns.
- 2.22. The various sources of supply which will deliver the minimum housing requirement over the plan period include 5,995 dwellings from existing commitments. These commitments represent a significant proportion of the overall housing supply, nearly 48%, and nearly 60% of the Local Plan housing requirement. The Council is, therefore, heavily reliant upon delivery from this source of supply. As such it is imperative that the council provide a positive framework to ensure the delivery of this source of supply.
- 2.23. Within our previous representations we raised the issue of a lack of a supportive framework should the permission on any of these commitments lapse. There is little reference to individual sites within the Local Plan Addendum, or its previous iteration save a listing within the appendices. The situation with regards to commitments is further exacerbated by the fact that several commitments remain outside of development boundaries. Given that commitments are an intrinsic and important element of the Council's housing land supply this is not only unjustified but would also render any development on identified commitments with a lapsed application to be contrary to several Local Plan policies, such as 'ST2: Residential Growth in Rural Bassetlaw'.
- 2.24. This approach is considered unsound and provides no certainty that the commitments which contribute nearly 48% of the housing supply will be delivered.
- 2.25. In addition, a further 635 dwellings are proposed in the Worksop Central Development Plan Document. Whilst this document was the subject of consultation in June / July 2021 it is still at least two-years away from adoption and as such delivery from this source is not yet

certain. It is also notable that whilst only 3 months have passed since the previous Local Plan consultation 90 dwellings have been removed from this source of supply.

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

Policy ST2: Residential Growth in Rural Bassetlaw

- 2.30. The policy is considered unsound as it is overly restrictive. As such it is considered contrary to the national policy and not effective or justified.
- 2.31. The Local Plan 2nd Addendum paragraph 5.1.53 identifies that the Large Rural Settlements of Blyth, Carlton in Lindrick and Costhorpe, Langold/Hodsock, Misterton and Tuxford are the most sustainable and act as service centres for the surrounding rural area. As previously noted, parcels B and C, as identified on figure 1, are located in Langold.
- 2.32. Despite the deletion of 590 dwellings at the Garden Village none of these settlements are identified to deliver further growth over and above existing commitments and the allocation at Tuxford. Figure 8, as amended, identifies that all of the additional growth required to meet the removal of the Garden Village appears to have been located in Harworth and Birchoates. Given the important role that Large Rural Settlements play within Bassetlaw this is considered unjustified.
- 2.33. Policy ST2 (parts 2 and 3) effectively place a moratorium on development if cumulatively the 20% growth figure is met or surpassed through allocations and commitments. The only exception is where a proposal:

"...has the support of the community through the preparation of a neighbourhood plan (including a review), or in the absence of a Neighbourhood Plan, through a developer-led pre-application community consultation..."
- 2.34. In terms of Langold it is noted that the Neighbourhood Plan was made on 6th May 2021. This plan identifies the current commitments within the settlement which are identified to deliver its requisite growth over the neighbourhood plan period 2020 to 2037. Whilst the Neighbourhood Plan is an important consideration it should not be used as a reason for a moratorium upon future development within the settlement. In addition, the 20% figure is

an arbitrary figure which pays no regard to opportunities or constraints. Such an approach is considered contrary to the ethos of the NPPF.

- 2.35. Land parcels B and C, as identified in figure 1, represent an opportunity for a sustainable extension to the existing sustainable settlement of Langold. These provide a clear development opportunity to expand the extant consent (parcel A) later in the plan period. The delivery of these parcels could be combined with a new landscaped defensible boundary. Using the roads to the north and east of the site, future development parcel to the south and an existing mature hedgerow to the west. Whilst not yet determined the access to these parcels could potentially be accessed via the A60.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

.Leeds

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SA-REF005



From: [REDACTED]
Sent: 14 June 2022 13:38
To: The Bassetlaw Plan
Cc: [REDACTED]
Subject: Representation to Bassetlaw Local Plan Second Addendum Regulation 19 Consultation
Attachments: reg-19-form-a-b-14pt-may-2022.pdf; 26740.A3.MC.DM Representations to Bassetlaw Second Addendum Reg 19 Consultation.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 Howard (Retford) Limited, Barton Willmore, now Stantec hereby submits a representation to the Bassetlaw Local Plan Second Addendum Consultation.

Please see attached the following documents which comprise the representation submission:

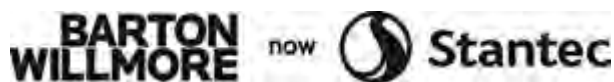
- Regulation 19 Consultation Form
- 26740.A3.MC.DM Representations to Bassetlaw Second Addendum Reg 19 Consultation (written statement).

Thanks,

[REDACTED]

[REDACTED]
Senior Planner

[REDACTED]
bartonwillmore.co.uk
Tower 12, 18/22 Bridge Street, Spinningfields, Manchester, M3 3BZ



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Bassetlaw Local Plan 2020-2038

Publication Version Second Addendum Representation Form May - June 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 21st June 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 Alternatively this form can be completed and returned as an e-mail attachment to thebassetlawplan@bassetlaw.gov.uk or by post to **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

Please note:

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

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

Data Protection Notice:

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

All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name

of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: [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: 14/06/2022

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): HOWARD (RETFORD) LIMTIED

Address:

Postcode:

Tel:

Fax:

Email:

2. Agent Details (if applicable)

Agent:

[REDACTED]

Organisation (if applicable): BARTON WILLMORE, NOW STANTEC

Address: TOWER 12, 18/22 BRIDGE STREET,
SPINNINGFIELDS, MANCHESTER

Postcode: M3 3BZ

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: HOWARD (RETFORD) LIMITED

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

Policy: ST1; ST3; ST4; ST15; HS13

Paragraph: 5.1.11 – 5.1.22 (PLUS PARAGRAPHS ASSOCIATED WITH ABOVE POLICIES)

Policies Map:

4. Do you consider the Local Plan is:

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

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

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

PLEASE SEE SUPPORTING REPRESENTATION

Continue on a separate sheet if necessary

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

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

PLEASE SEE SUPPORTING REPRESENTATION

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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:**

HOWARD (RETFORD) LIMITED IS A KEY STAKEHOLDER IN BASSETLAW AND THE LEAD LANDOWNER AT THE ORDSALL SOUTH ALLOCATION SITE. HOWARD (RETFORD) LIMITED HAS WORKED WITH THE COUNCIL THROUGHOUT THE LOCAL PLAN PROCESS AND IT WOULD BE APPROPRIATE TO BE IN ATTENDANCE AT HEARING SESSIONS TO COMMENT IN A PUBLIC SETTING AND ANSWER ANY QUERIES THAT MAY ARISE.

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

Bassetlaw District Council

Draft Bassetlaw Local Plan 2020-2038

PUBLICATION VERSION SECOND ADDENDUM

Representations on Behalf of Howard (Retford) Limited

June 2022

**Bassetlaw District Council Draft Bassetlaw Local Plan 2020-2038
Regulation 19 Publication Version Second Addendum May 2022**

Representations on behalf of Howard (Retford) Limited

Project Ref:	26740/A3/MC	26740/A3/MC
Status:	Draft	Final
Issue/Rev:	01	02
Date:	08/06/2022	08/06/2022
Prepared by:	MC	MC
Checked by:	DM	-
Authorised by:	DM	DM

Barton Willmore, now Stantec
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Date: June 2022

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Appendices

Appendix 1: Representations to Regulation 19 Publication Draft Bassetlaw Local Plan

Appendix 2: Representations to Regulation 19 Publication Version Addendum

1.0 INTRODUCTION

- 1.1 Bassetlaw District Council ('BDC' / 'the Council') is currently preparing the Bassetlaw Local Plan which will guide development in the district through to 2038. Once adopted, it will replace the Core Strategy Development Management Plan and along with 'made' neighbourhood plans and adopted minerals and waste local plans will form the overall development plan for the District.
- 1.2 The emerging Local Plan is at an advanced stage of preparation, having been subject to a Regulation 19 Publication Draft Bassetlaw Local Plan in September and October 2021, and a Regulation 19 Publication Version Addendum in January and February 2022. The representations made by Barton Willmore, now Stantec on behalf of Howard (Retford) Limited (the 'client') to these consultation exercises is appended to this document at Appendix 1 and 2 respectively.
- 1.3 The Council are now progressing with a Regulation 19 Publication Version Second Addendum consultation due to one of the two landowners withdrawing their site from the proposed Bassetlaw Garden Village allocation. The consultation is being undertaken to address consequential changes and to provide focussed changes in response to updated evidence prior to submitting the plan for examination. The consultation closes on the 21st of June 2022.
- 1.4 Barton Willmore, now Stantec set out below our client's comments in relation to the Second Addendum consultation which should be read in conjunction with our previously submitted representations.
- 1.5 It is noted that the Council has updated a number of other background documents which although not subject to consultation are nevertheless relevant as part of the evidence base to the emerging Local Plan.

2.0 PUBLICATION VERSION SECOND ADDENDUM

Spatial Strategy

- 2.1 Paragraphs 5.1.11– 5.1.22 have been updated to reflect the Housing and Economic Needs Assessment: Addendum (April 2022) (HENA) which supports the Publication Version Second Addendum. The HENA specifically considered changes to the employment supply position and any resulting impacts on housing need.
- 2.2 In accordance with the HENA, the Council set out a housing requirement of 582 dwellings per year, the upper end of projected growth scenarios, and provide an employment need buffer of 10% to mitigate economic uncertainty and to accommodate the potential for employment windfall sites.
- 2.3 The above approach and inclusion at draft Policy ST1 of a housing need requirement of 582 dwellings per year to reflect the high job growth scenario set out in the HENA is supported.

Bassetlaw Garden Village

- 2.4 As set out in the introduction, it is understood that a landowner has withdrawn their site from the proposed Bassetlaw Garden Village draft allocation. As a result, the Bassetlaw Garden Village draft allocation has been removed from the emerging Local Plan. The Garden Village allocation was set to accommodate 590 residential units by 2038 and 4,000 residential units in total, under draft Local Plan Policy ST3.
- 2.5 In previous representations to the emerging Local Plan, Howard (Retford) Limited questioned the deliverability of the Bassetlaw Garden Village. The proposed Garden Village site would have been in a freestanding location without the benefit of existing infrastructure or links to existing settlements. The delivery of the Garden Village would therefore have been uncertain without significant external funding. It was also considered that a new Garden Village is not necessary in Bassetlaw with its main settlements suitable and able to accommodate urban extensions. Directing development to the main settlements as urban extensions is a more sustainable approach to meeting development need.

- 2.6 The removal of the Bassetlaw Garden Village allocation under draft Local Plan Policy ST3 and ST4 is therefore supported.

Housing Requirement

- 2.7 The removal of the Bassetlaw Garden Village from the emerging Local Plan would not impact the delivery of the overall spatial strategy of the emerging Local Plan as it constituted an 'additional' component of the Council's housing supply. The vast majority of the Garden Village was anticipated to come forward beyond the plan period of 2038.
- 2.8 It is therefore essential that the Council does not use the removal of the Bassetlaw Garden Village allocation as a reason to materially reduce the number of residential units it is seeking to deliver over the plan period.
- 2.9 National Planning Policy Framework paragraph 60 sets out that to support the Government's objective of 'significantly boosting the supply of homes' it is important that a sufficient amount and variety of land can come forward for housing where it is needed. In addition, draft Local Plan Policy ST1 bullet 1b states that the Council's housing requirement is a minimum requirement.
- 2.10 In keeping with the spirit of paragraph 60 and draft Local Policy ST1, we are of the view that an allowance should be made at draft Local Plan Policy ST15 for the residual capacity of allocations to be delivered within the plan period where there is demand. We are confident that all 1,250 residential units can be delivered at draft allocation HS13 Ordsall South within the plan period which would further enhance the housing supply available to the Council.

3.0 CONCLUSIONS

- 3.1 The above representations provide a commentary on BDC's emerging Local Plan Publication Version Second Addendum Version and should be read in conjunction with our comments to the Regulation 19 Publication Draft Bassetlaw Local Plan and Regulation 19 Publication Version Addendum consultations which took place in autumn 2021 and early in 2022 respectively.

APPENDIX 1 – Representations to Regulation 19 Publication Draft Bassetlaw Local Plan

Bassetlaw District Council

Draft Bassetlaw Local Plan Regulation 19 Consultation

Representations on Behalf of Howard Retford Ltd

October 2021

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- Appendix 2: Copy of representations by Howard (Retford) Limited to June 2021 Focussed Consultation
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**Bassetlaw District Council Draft Bassetlaw Local Plan
Regulation 19 Publication Version 2021**

Representations on behalf of Howard Retford Limited

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1 INTRODUCTION

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

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

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

2 LOCAL PLAN CONTEXT

Bassetlaw Vision

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

Strategic Objectives

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

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

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

3 SPATIAL STRATEGY

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

Housing needs

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

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

Housing Supply

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

Local Plan Policy ST1: Bassetlaw's Spatial Strategy

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

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

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

Local Plan Policy ST2: Residential Growth in Rural Bassetlaw

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

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

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

Local Plan Policy ST3: Bassetlaw Garden Village

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

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

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

Local Plan Policy ST15: Provision of land for housing

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

Policy 27: Site HS13: Ordsall South

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

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

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

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

4 POLICIES FOR MANAGING DEVELOPMENT

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

ST38 Green Gaps

- 4.2 We object to Local Plan's approach to identifying "Green Gaps". The Local Plan and Policies Map identifies these 'Green Gaps' as existing between settlements and around settlement fringes, some of which are protected such as Conservation Areas.
- 4.3 Our Client's land is proposed to be designated as a Green Gap GG8 (Retford West) within Policy ST38 and Local Plan Proposals Map. Three proposed Green Gaps for Retford (GG6, GG7 and GG8) enclose the entire southern, eastern and western boundary of the designated Main Town, which seeks to essentially safeguard the entire area to the south of Retford from development.
- 4.4 Notwithstanding our Client's clear case as to the appropriateness of land to the south of Retford as a location to meet the future development needs of the town, we object to the designation of a Green Gap in this location as a matter of principle. We consider that the Green Gap policy is not justified, serves no meaningful planning policy purpose and seeks to add an undue level of protection to land on the basis that it is not the Council's current preference for development.
- 4.5 The Council's justification for the above policy approach is set out within the evidence base for the Draft Local Plan within the 'Green Gap Study'. The Study has been prepared to safeguard areas of "important landscape" in sensitive locations and as a reaction to development pressure within the district (Section 5).
- 4.6 It is our client's position that the document does not justify the allocation of the Green Gaps. Paragraph 5.2 of the document simply states "it is certain that similar pressures will continue over the next 20 years" indicating that there has been substantial

development in recent years and “in some cases” settlements extending into the countryside.

- 4.7 We note that, to cater for the growing needs of the District and to facilitate a ‘step change’, development of greenfield land is inevitable over the plan period and it is not sustainable to prevent development on land that is well-suited for development and located on the urban fringe of settlements, such as Retford, without the risk of merging with any settlements to the south or surrounding area.
- 4.8 Whilst there is planning merit in maintain distinctiveness and local characteristics of settlements, the Green Gap study provides no meaningful evidence to demonstrate that protection of land to south of Retford is important to maintaining its character or distinctiveness. There is nothing significant or distinctive regarding the area to the south of Retford and its relationship with surrounding villages which are physically and visually removed from Retford.
- 4.9 We consider that the Council’s proposed Green Gap designation to the south and west of Retford should be deleted from the Local Plan.
- 4.10 Beyond this, the Council is also proposing to allocate land at HS13 and then wash over the Green Gap across it. This represents the introduction of a clear policy conflict between ST38, ST15 and ST27. Furthermore, there might also be tensions with the Council’s proposals to allow growth in some smaller settlements where they are also washed over by Green Gaps.

Policy ST58: Provision and Delivery of Infrastructure

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

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

5 CONCLUSIONS

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

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



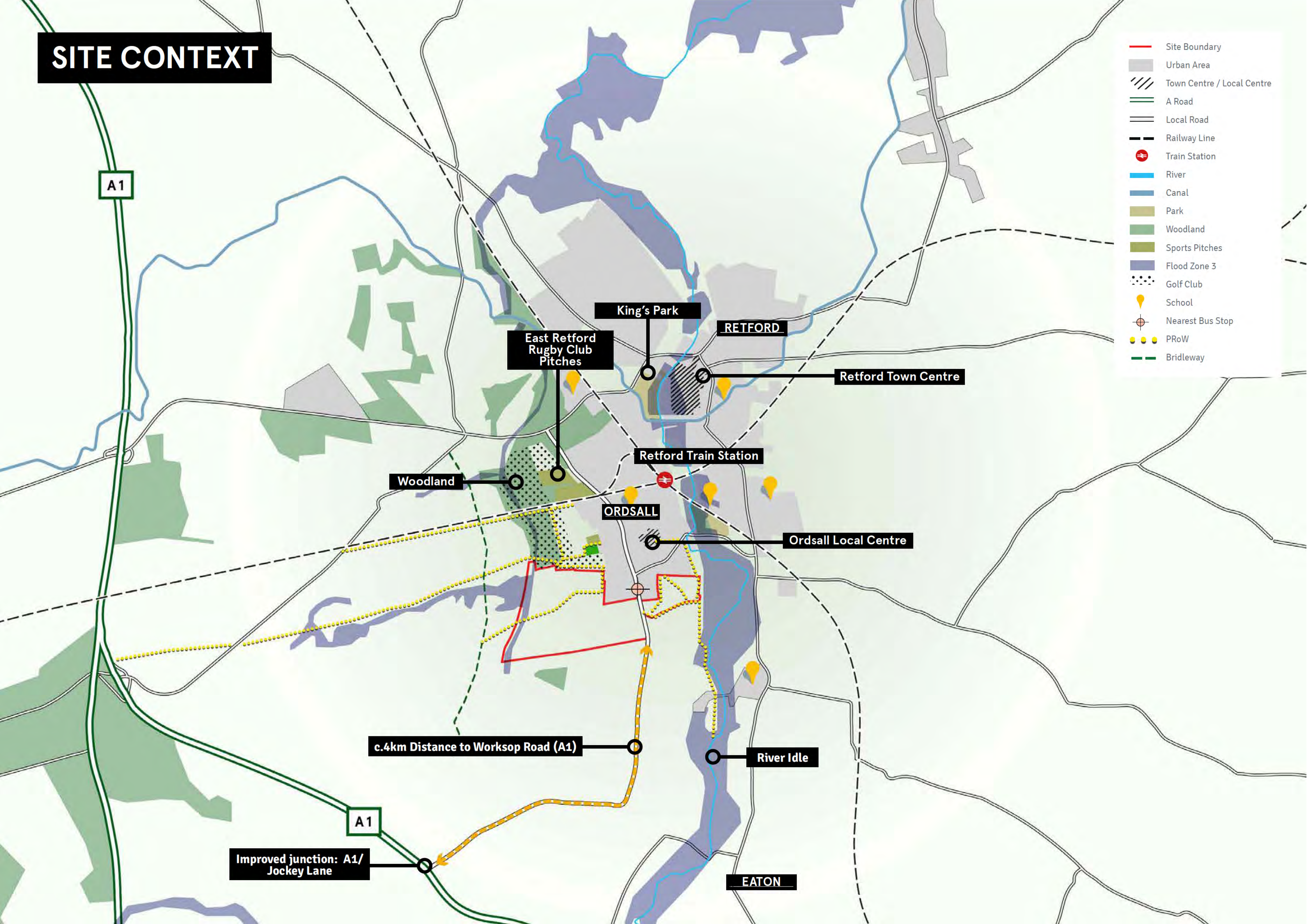
ORDSALL SOUTH

A PLACE IN THE MAKING

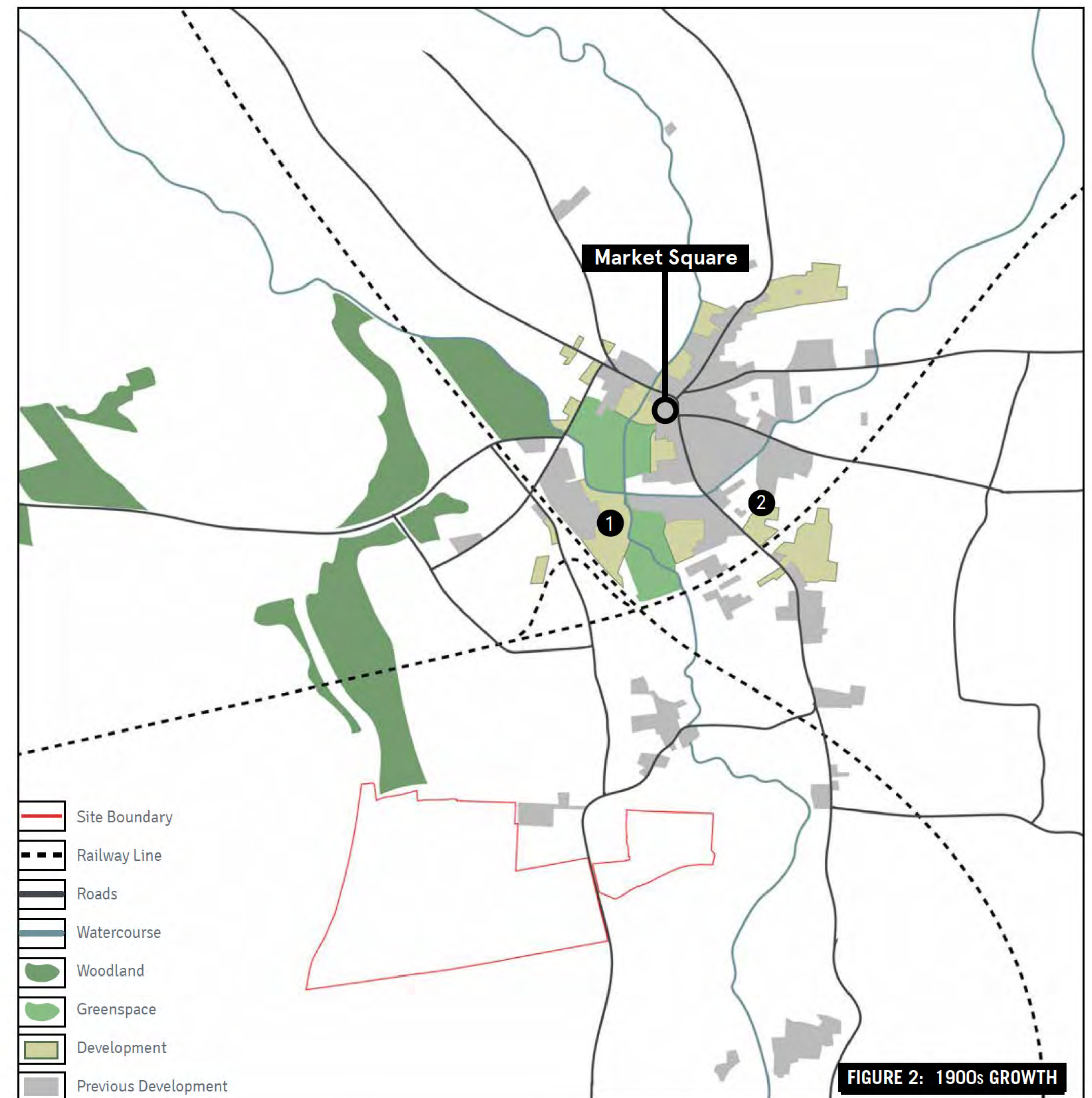
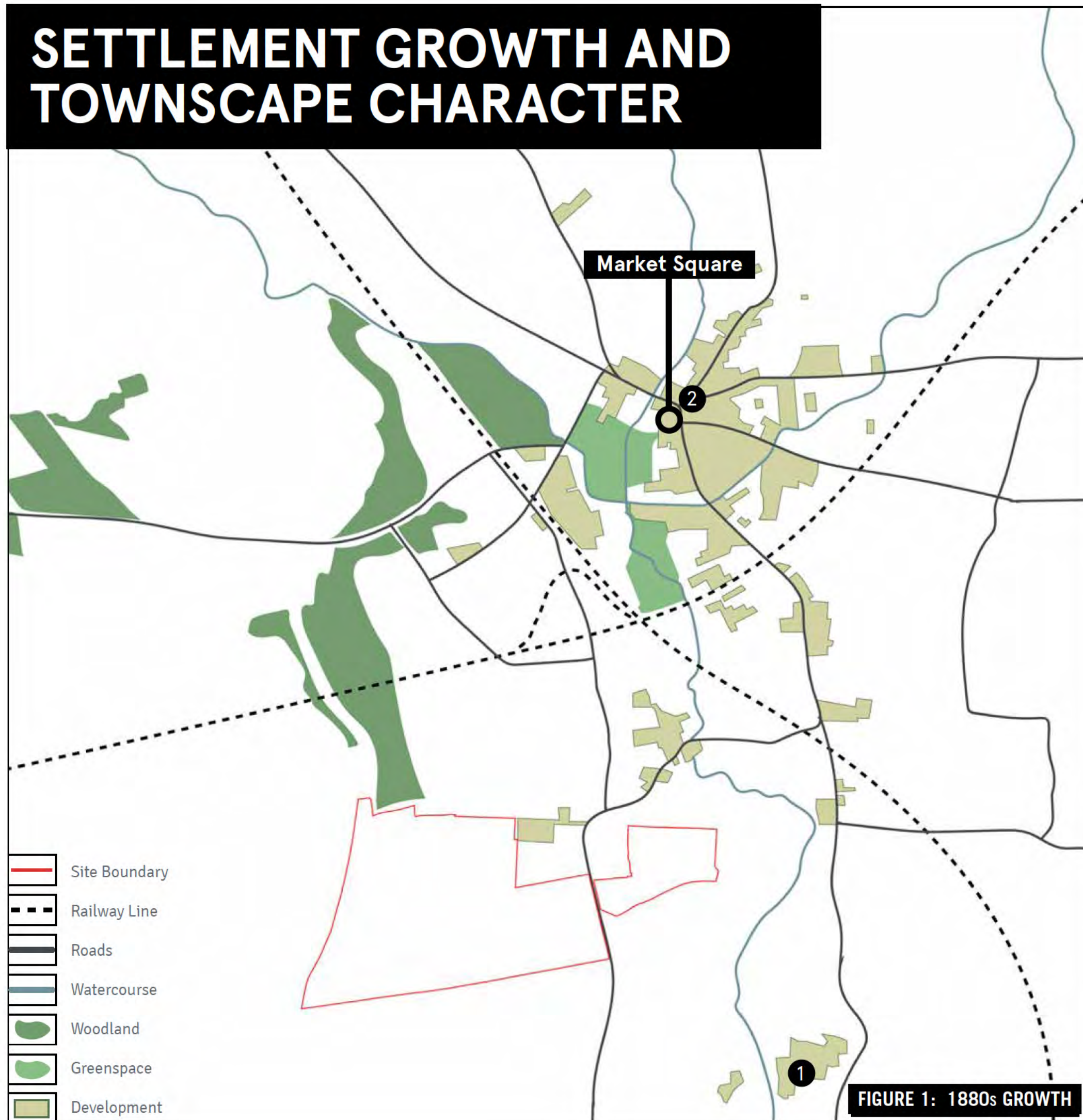


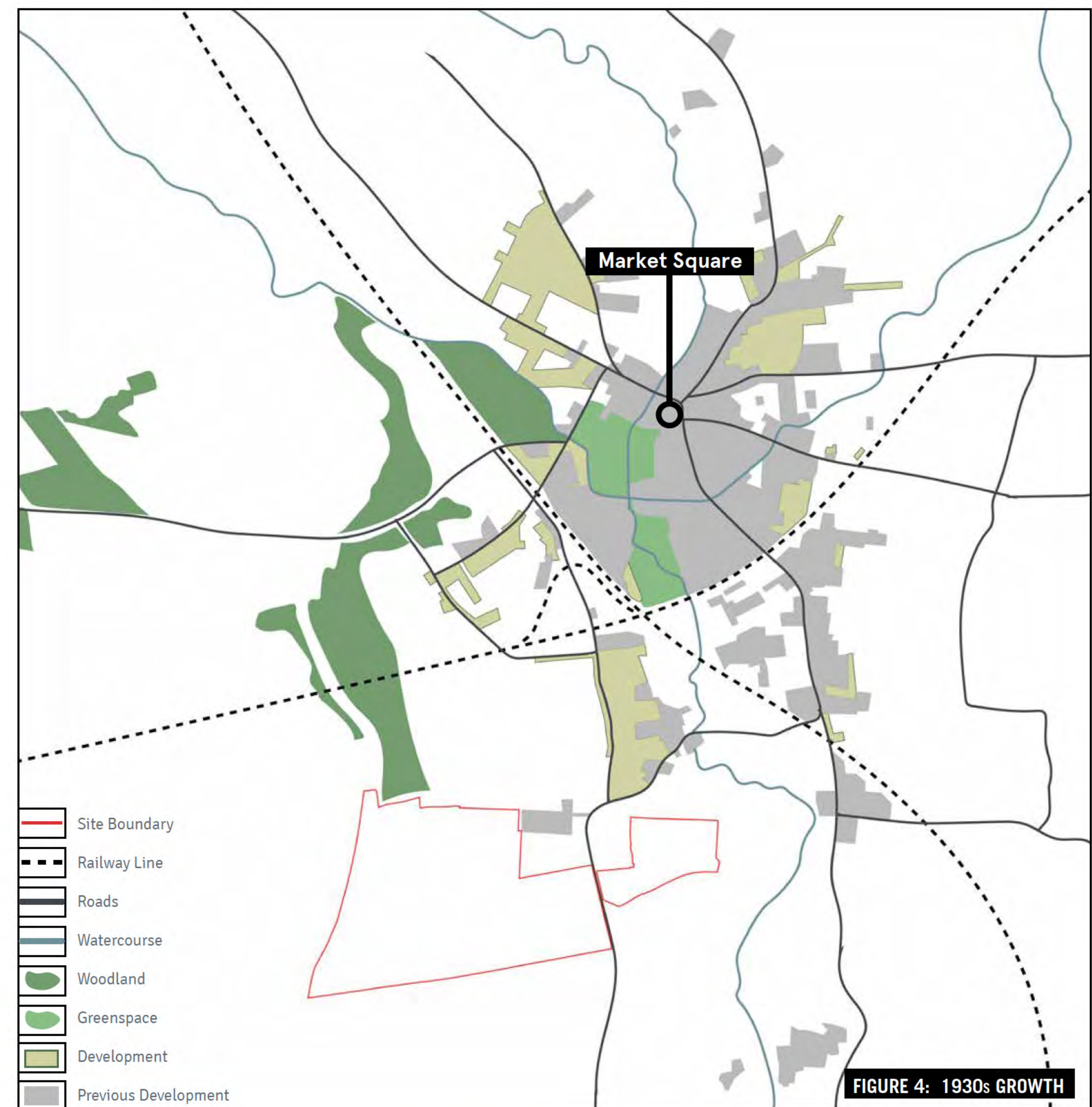
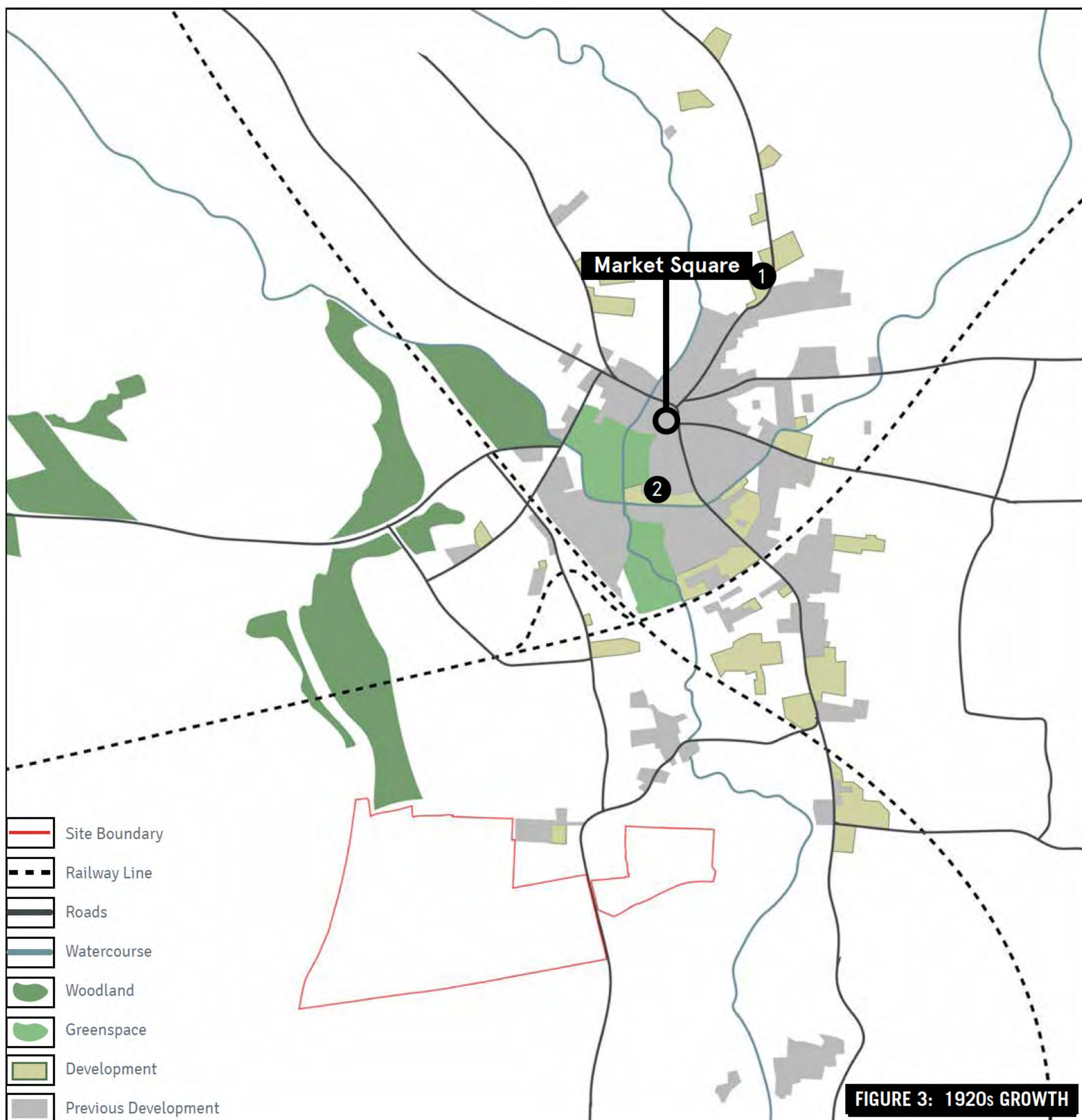
BASELINE

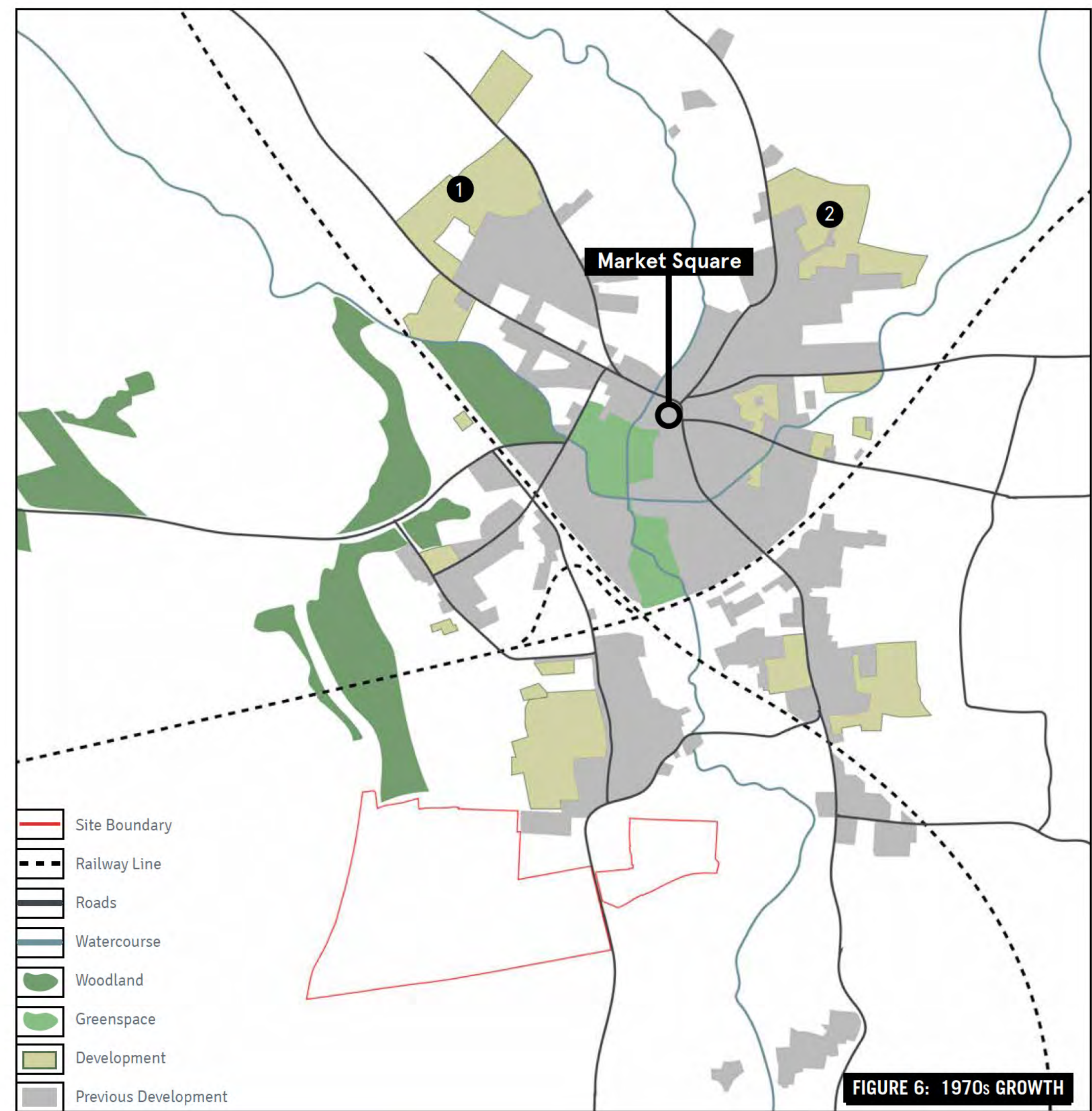
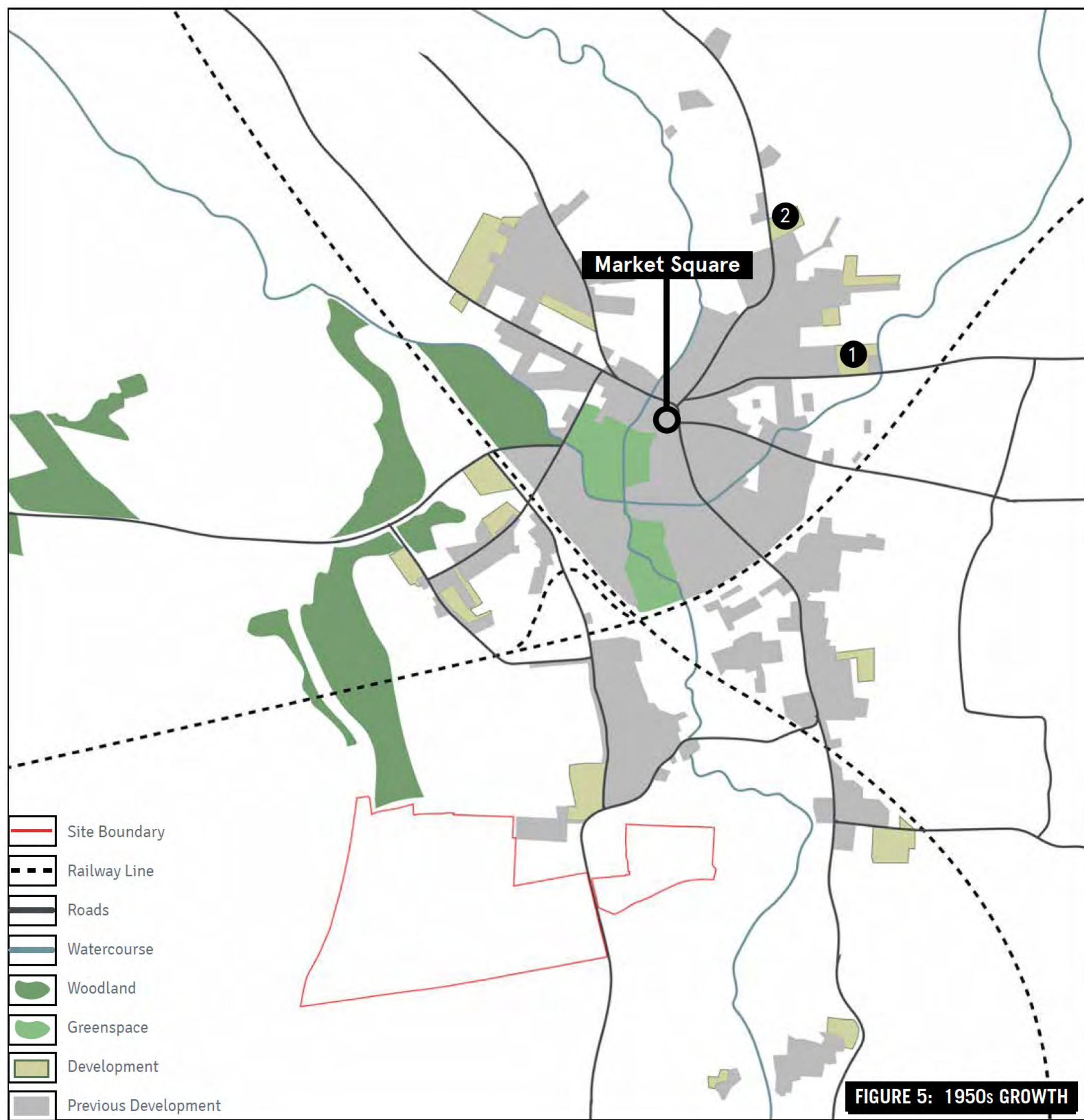
SITE CONTEXT

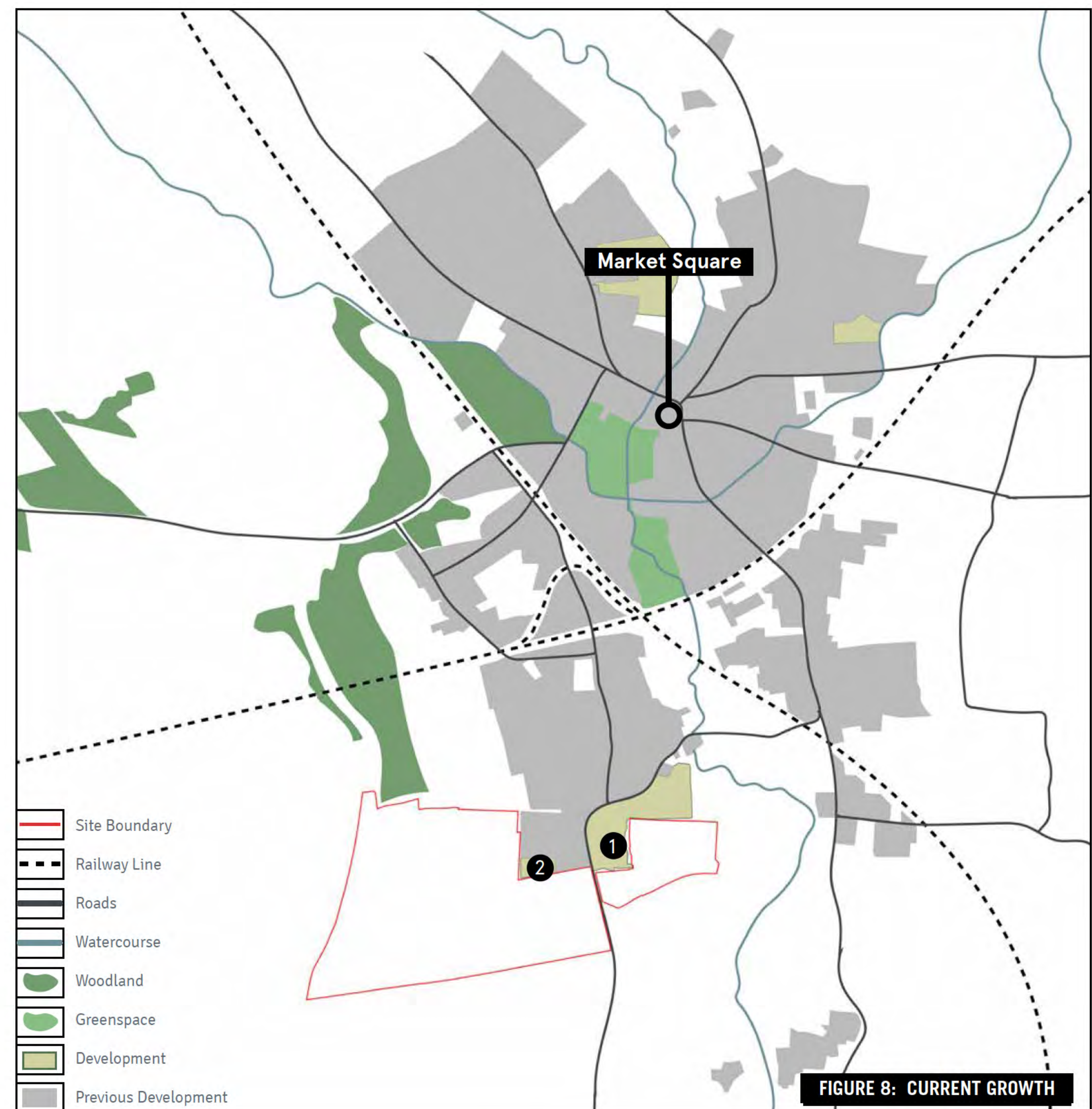
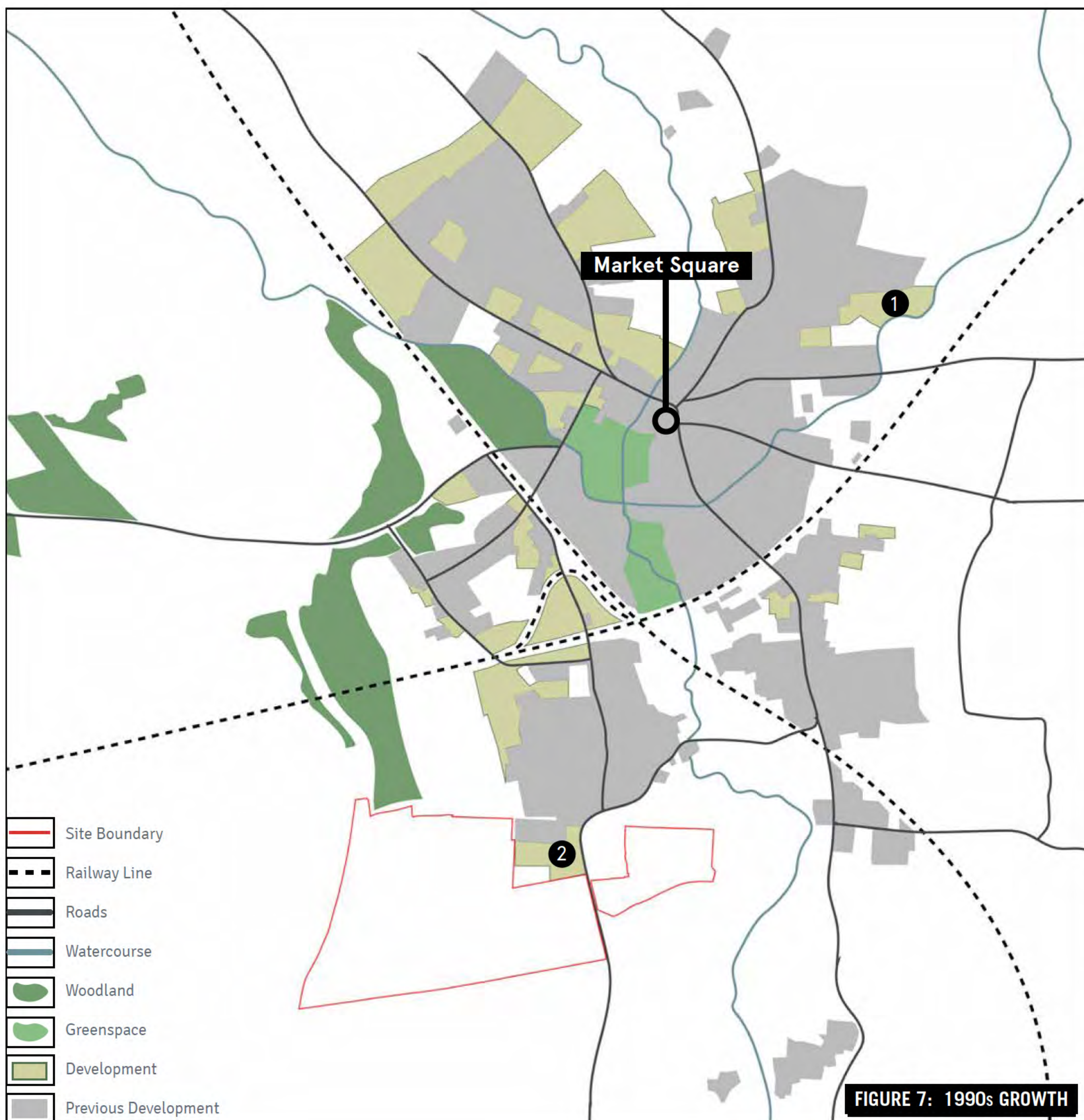


SETTLEMENT GROWTH AND TOWNSCAPE CHARACTER









LOCAL NEIGHBOURHOOD

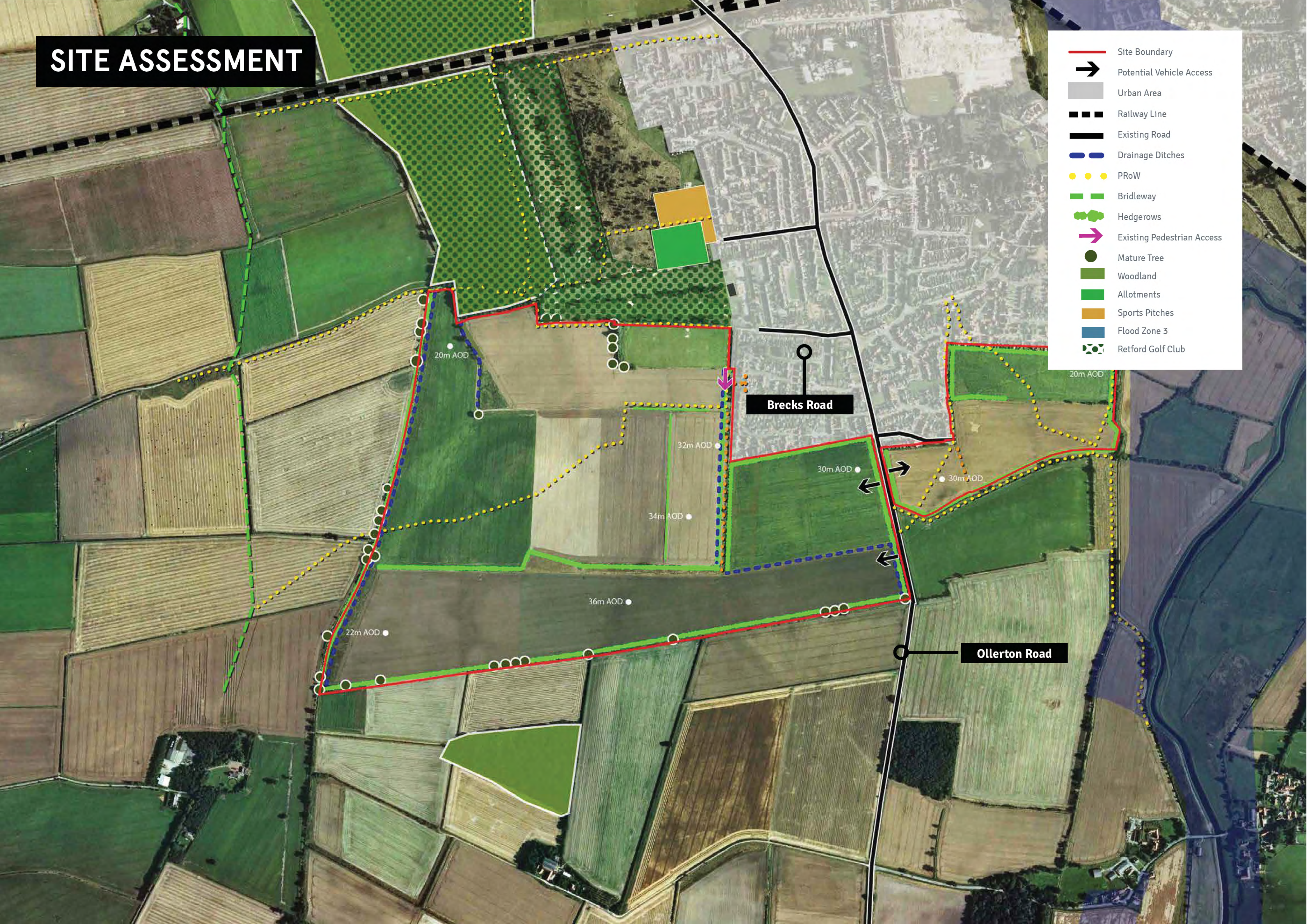


PHOTOGRAPHIC ANALYSIS (NEIGHBOURHOOD)

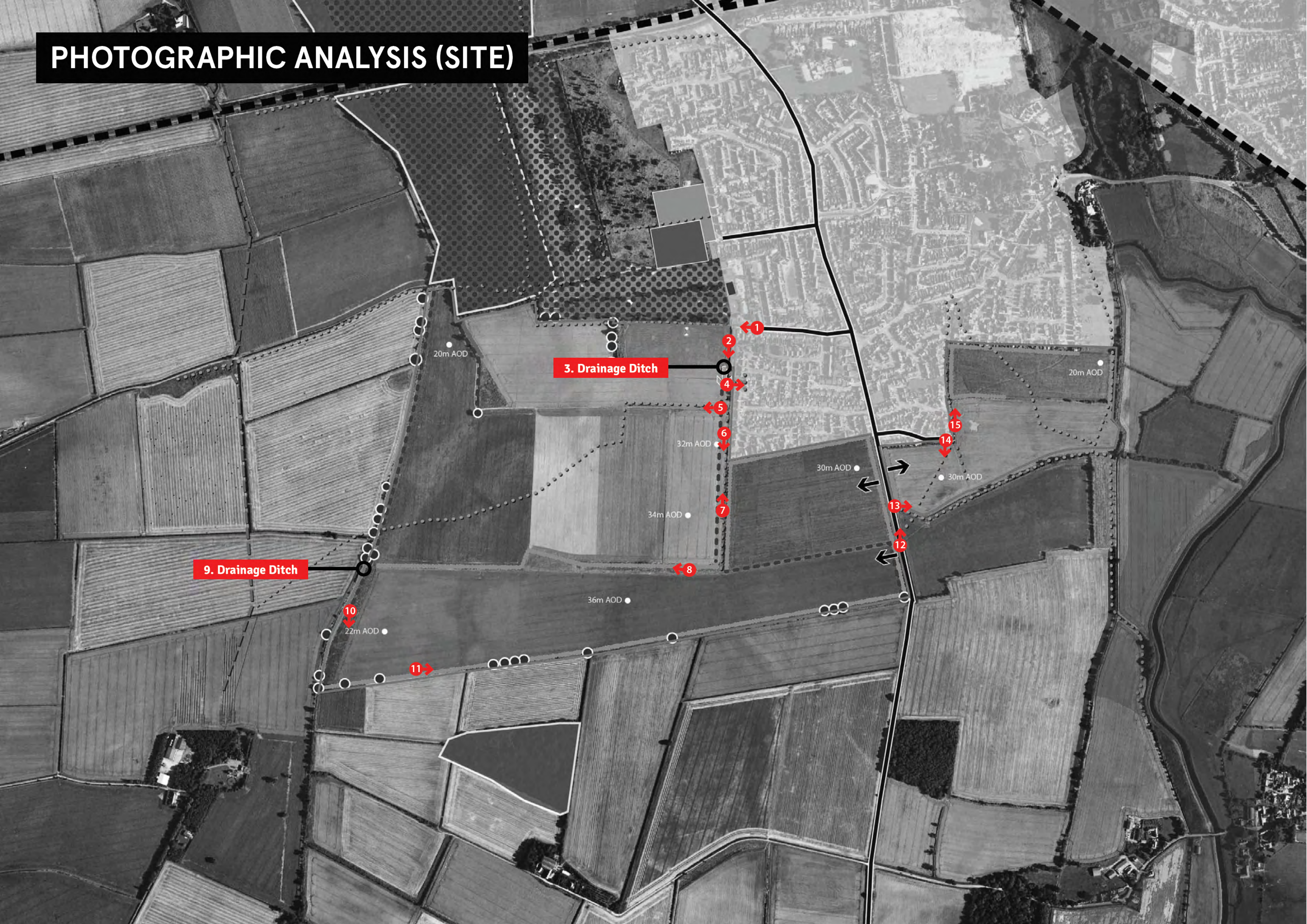


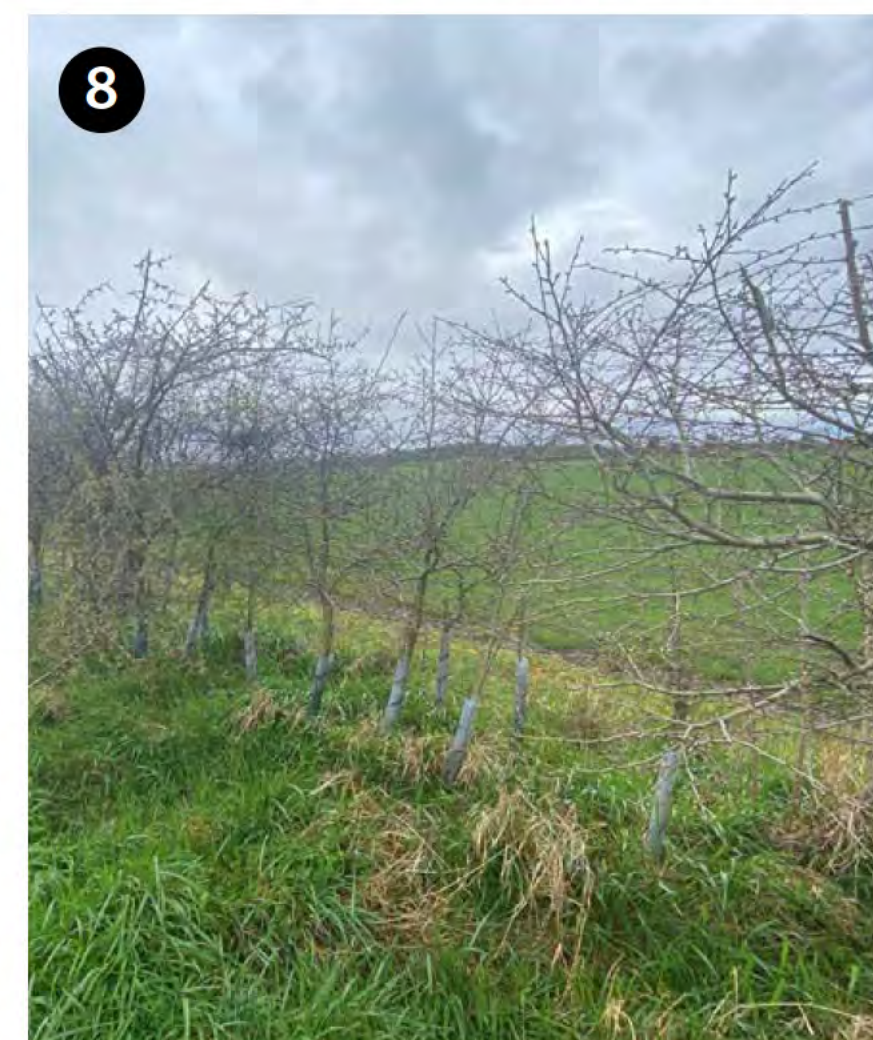
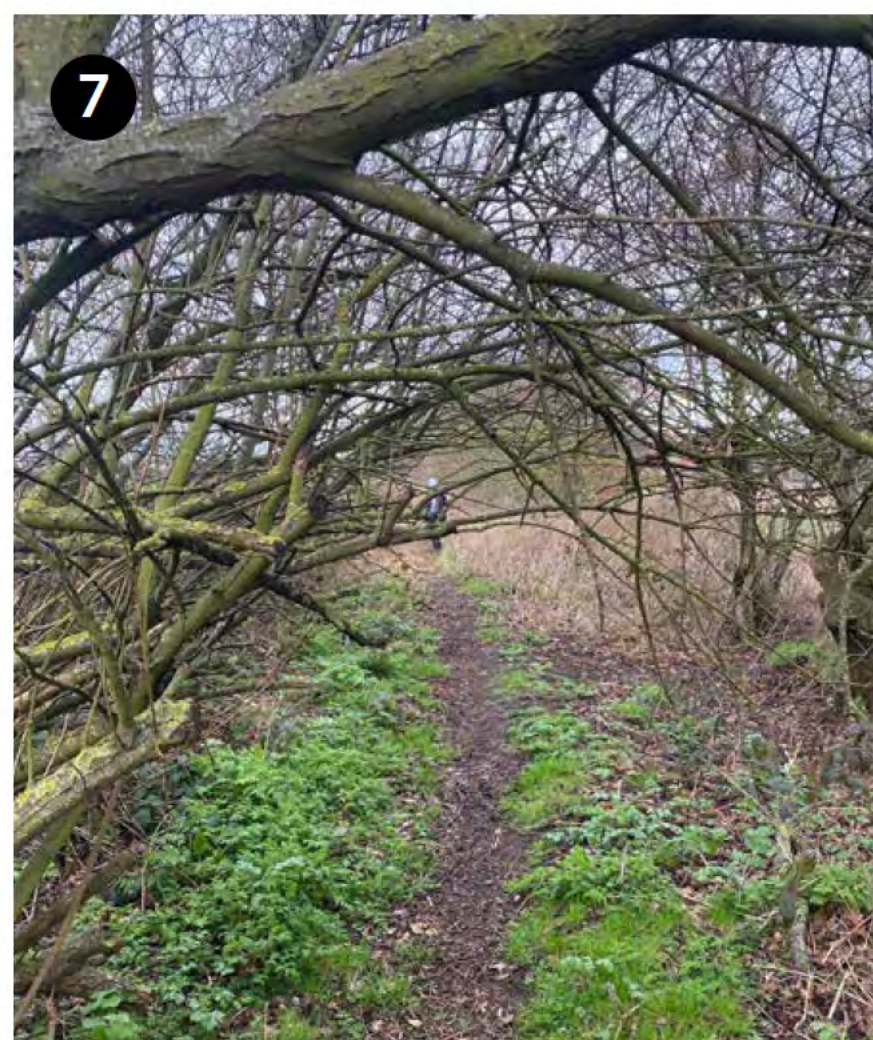
SITE ASSESSMENT

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



PHOTOGRAPHIC ANALYSIS (SITE)





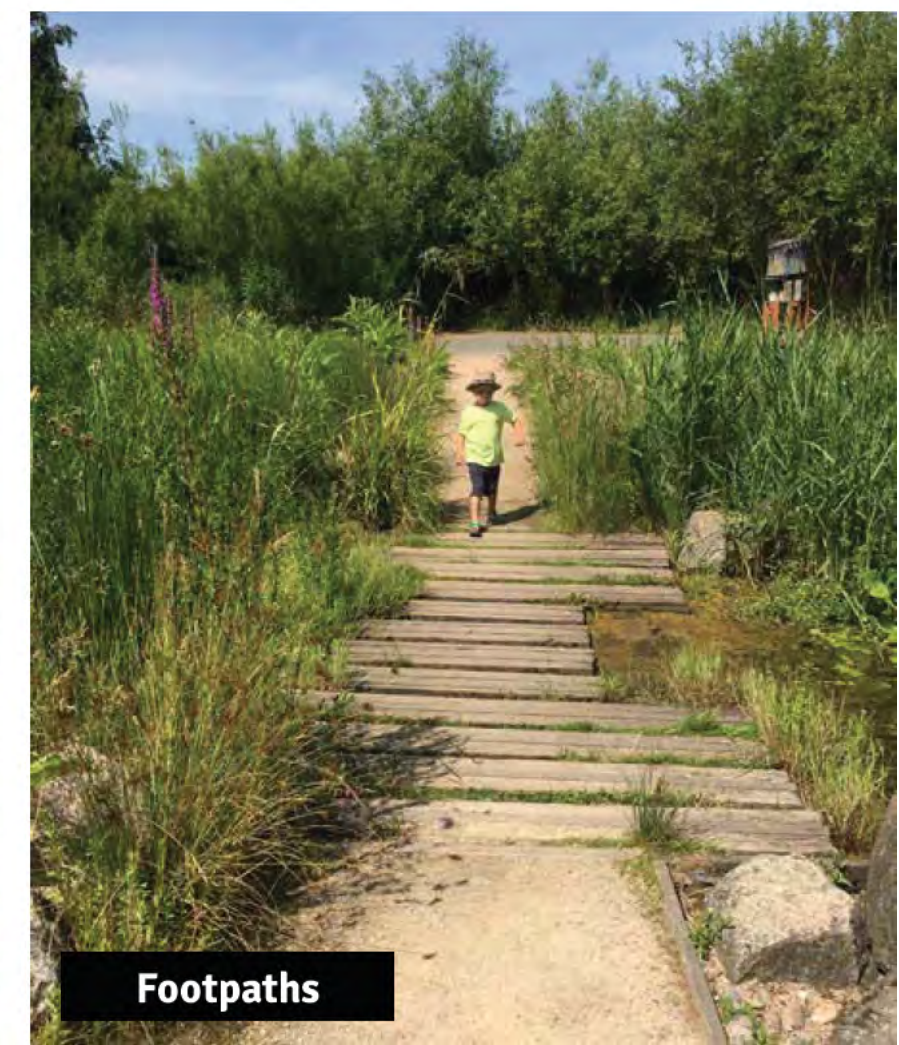
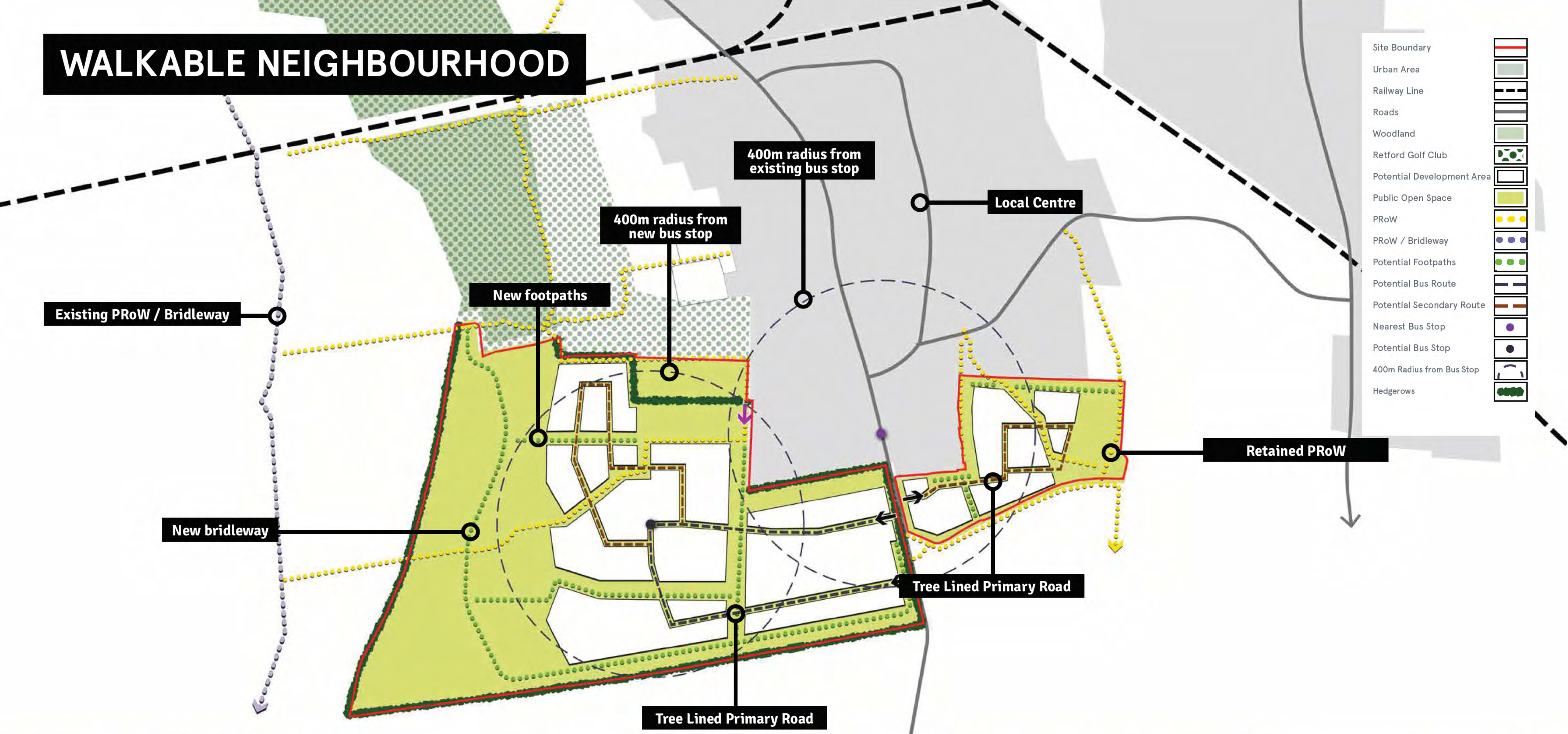


VISIONING

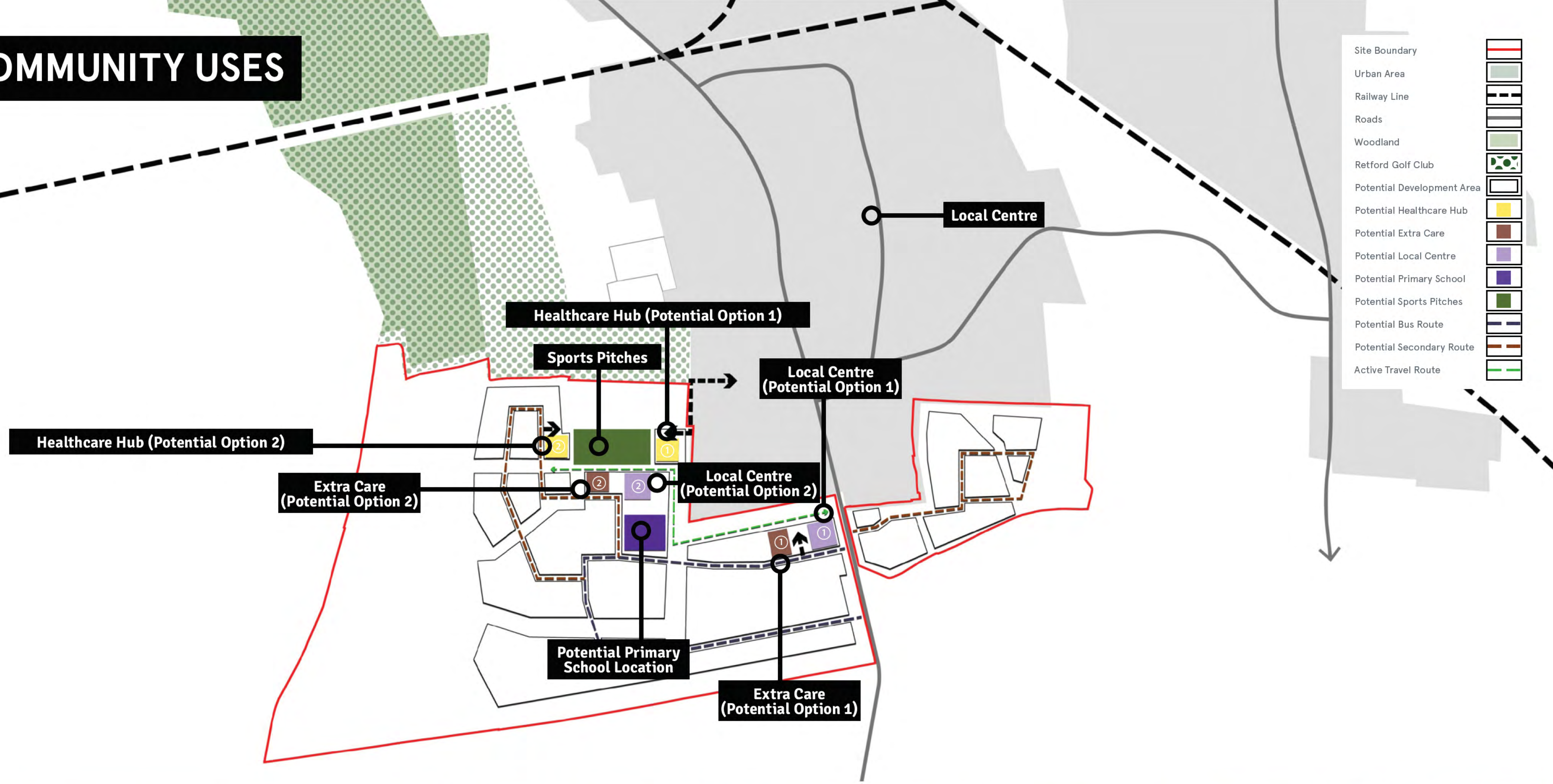
LANDSCAPE FIRST



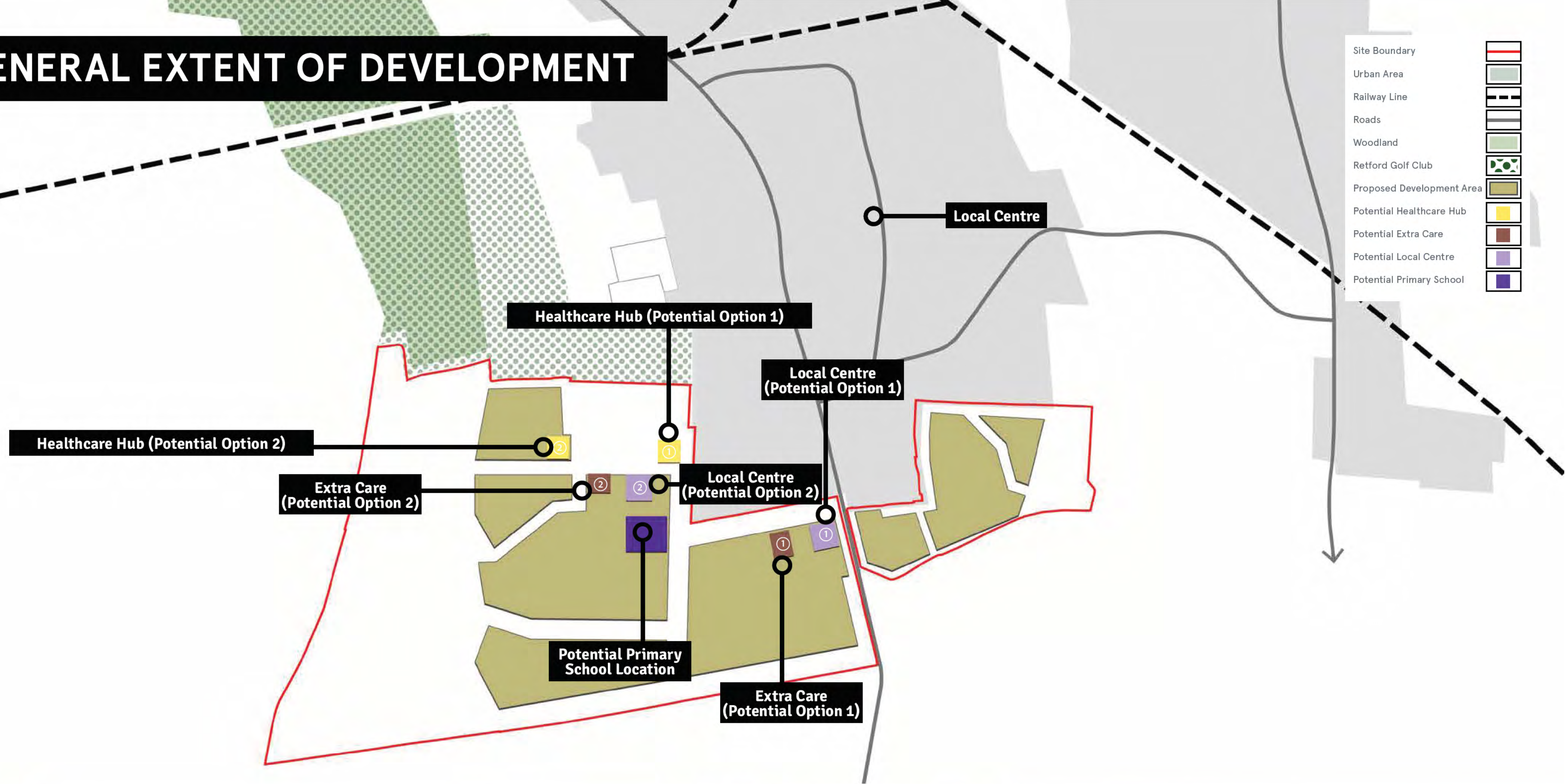
WALKABLE NEIGHBOURHOOD



COMMUNITY USES



GENERAL EXTENT OF DEVELOPMENT



APPENDIX 2:

PLANNING PERMISSION [LPA REFERENCE 15/00971/OUT]

Draft Bassetlaw Local Plan:

Focussed Consultation June 2021 and
Ordsall South Preliminary Concept Plan

Representations on Behalf of Howard Retford Ltd

July 2021

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

Representations on behalf of Howard Retford Limited

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

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Date: July 2021

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1 INTRODUCTION

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

2 ORDSALL SOUTH PRELIMINARY CONCEPT PLAN

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

3 POLICIES MAPS: RETFORD INSET

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

4 FOCUSED CONSULTATION DOCUMENT

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

Site HS13: Ordsall South

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

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

Policy ST58: Safeguarded Land

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

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GRAPHIC COMMUNICATION
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DEVELOPMENT ECONOMICS

APPENDIX 3:

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

Bassetlaw District Council

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

Representations on Behalf of Howard Retford Ltd
Delivering Ordsall South (Site HS13)

October 2021

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Bassetlaw District Council

Regulation 19 Local Plan (August 2021)

Representations on behalf of Howard Retford Limited

Project Ref:	26740/A3/DM	26740/A3/DM/jc
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Issue/Rev:	01	
Date:	14/9/21	5/10/21
Prepared by:	DM	DM
Checked by:	DM	DM/jc

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1 INTRODUCTION

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

2 INFRASTRUCTURE DELIVERY PLAN (IDP PUB-009)

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

Total contributions & potential errors

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

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

Education provision

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

Healthcare provision

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

Sport facilities and Green Infrastructure

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

Flood management / SuDS / Utilities

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

Transport and connectivity

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

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

3 WHOLE PLAN VIABILITY (PUB-0010)

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

4 SUMMARY

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

APPENDIX 1

EXTRACT FROM IDP APPENDIX 2 – SITE HS13

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

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APPENDIX 2 – Representations to Regulation 19 Publication Version Addendum

Bassetlaw District Council

Draft Bassetlaw Local Plan
PUBLICATION VERSION ADDENDUM

Representations on Behalf of Howard Retford Ltd

January 2022

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Appendices

Appendix 1: Representations to Regulation (19 October 2021)

**Bassetlaw District Council Draft Bassetlaw Local Plan
Regulation 19 Publication Version Addendum January 2022**

Representations on behalf of Howard Retford Limited

Project Ref:	26740/A3/DM	26740/A3/DM/jc
Status:	Draft	Final
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Date:	10/1/22	17/1/22
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January 2022

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1 INTRODUCTION

- 1.1 Bassetlaw District Council (the “Council”) consulted upon its’ Regulation 19 Publication Draft Bassetlaw Local Plan in September and October 2021. On behalf of Howard (Retford) Limited, Barton Willmore provided comments and a masterplan strategy document as part of that consultation process, appended to this document at Appendix 1.
- 1.2 The Council has now produced an Addendum to its’ Regulation 19 Publication document which is subject to further consultation. The Addendum is primarily concerned with providing an update to the housing strategy and relevant figures and includes an update position in relation to housing supply. It is also noted that the Council has updated a number of other background documents which are not subject to consultation, but nevertheless are relevant as the evidence base to the Local Plan.
- 1.3 We set out below our client’s comments in relation to the Addendum report only and ‘tracked changes’ issued for consultation. These should be read in conjunction with our previously submitted comments at Appendix 1.

2 LOCAL PLAN ADDENDUM

Vision and Objectives

- 2.1 The Council has updated the plan period to 2038. This change is supported.
- 2.2 The suggested rewording of the vision as it relates to Retford at paragraph 4.6 is supported.

Strategic Objectives

- 2.3 The suggested changes to the Strategic Objectives are supported.

Spatial Strategy

- 2.4 Paragraphs 5.1.12 to 5.1.17 have been updated to reflect the economic led growth strategy of the district. This states that a net increase of circa 6,000 jobs is forecast based upon existing site commitments. The Plan sets out that this requires a corresponding increasing in housing provision to support the step-in growth. This general spatial strategy is supported by Howard (Retford) Limited.
- 2.5 Paragraph 5.1.20 seeks to amend the overall housing requirement now that the plan period has been extended by 1 year. This change is supported.
- 2.6 The Table at paragraph 5.1.25 seeks to update the Local Plan in relation to commitments as of December 2021 (updated from April 2020). Whilst there is no objection to this approach, it is not totally clear as to which evidence-based document the completions update has been derived from – usually data is used based on an end of March reporting year.
- 2.7 Paragraph 5.1.38 seeks to update Ordsall South to 890 dwellings from 800 dwellings to be provided in the plan period. The Site has the ability to deliver this slight change in delivery forecast and the change is supported.

- 2.8 Paragraph 5.1.41 provided minor amendments to the housing distribution model. We would refer to our comments made in relation to the October 2021 consultation and do not add further comments here.
- 2.9 The remaining parts of Section 4 comprise a largely mathematical update based on the 'tweaks' to the housing figures and we do not wish to comment further at this stage.

Bassetlaw Garden Village

- 2.10 We would refer to our previous comments at Appendix 1 in respect of the proposed Bassetlaw Garden Village and its' deliverability. This questioned the delivery of what was deemed essential infrastructure on site, including the rail interchange.
- 2.11 Unfortunately, the Addendum significantly 'waters down' the policy mechanisms to secure essential infrastructure. Instead of providing a mechanism to ensure delivery of infrastructure early, the Policy is now split and refers to infrastructure and policy components that '*should*' be delivered *by 2038*, and further, "*beyond 2038*". The latter includes the new rail interchange, which is a core part of the justification for the Site in the first instance. Without a comprehensive approach to infrastructure up front, the district could be left with a significant development that is entirely car dependant. As such, we maintain our concerns regarding this part of the Local Plan.

Housing

- 2.12 Section 7 of the Addendum considers housing policy. There are several minor changes to which we support. Policy ST15 is also updated with minor numerical changes, to which we have no comment.
- 2.13 In relation to HS13: Ordsall South, the Addendum suggests a number of changes. We comment as follows.
- 2.14 Paragraph 7.14.4 refers to financial contributions to enhancements at Retford Golf Club. We refer to our previous objections to this part of the policy. Retford Golf Club owns the parcel in question and will benefit from a capital receipt from the proceeds of that land, should it be sold. There is therefore no need for any developer contribution. In any case, Retford Golf Club is a private Members club and therefore improvements at the Golf Club would not be of benefit to the wider population.

- 2.15 It is further noted that the Training Ground land is not required to facilitate the wider allocation. If the Club has decided to sell this land for development, then the onus should be on the Club as to how any loss meets the relevant tests in paragraph 99 of NPPF.
- 2.16 Paragraph 7.14.12 includes a new proposal regarding the creation of a 2km walking, cycling route. This is supported.
- 2.17 Paragraph 7.14.19 proposes a change to 890 dwellings in the plan period which is supported.
- 2.18 Part m) iii) of the Addendum refers to several road junctions. As the Council is aware, these are currently being tested with Nottinghamshire CC and we therefore reserve the right to make further comments once the output of the Council's highway evidence is fully known.

3 CONCLUSIONS

- 3.1 The above representations provide a commentary on the Local Plan Addendum Version which should be read in conjunction with our comments to the October 2021 regulation 19 stage.

APPENDIX 1:
REPRESENTATIONS TO REGULATION 19 STAGE OCTOBER 2021 –
LAND TO THE SOUTH OF ORDSALL, RETFORD

Bassetlaw District Council

Draft Bassetlaw Local Plan Regulation 19 Consultation

Representations on Behalf of Howard Retford Ltd

October 2021

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Appendices

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- Appendix 2: Copy of representations by Howard (Retford) Limited to June 2021 Focussed Consultation
- Appendix 3: Representations to the Draft CIL Charging Schedule, Whole Plan Viability and Infrastructure Delivery Plan

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

Representations on behalf of Howard Retford Limited

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1 INTRODUCTION

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

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

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

2 LOCAL PLAN CONTEXT

Bassetlaw Vision

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

Strategic Objectives

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

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

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

3 SPATIAL STRATEGY

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

Housing needs

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

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

Housing Supply

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

Local Plan Policy ST1: Bassetlaw's Spatial Strategy

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

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

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

Local Plan Policy ST2: Residential Growth in Rural Bassetlaw

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

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

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

Local Plan Policy ST3: Bassetlaw Garden Village

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

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

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

Local Plan Policy ST15: Provision of land for housing

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

Policy 27: Site HS13: Ordsall South

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

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

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

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

4 POLICIES FOR MANAGING DEVELOPMENT

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

ST38 Green Gaps

- 4.2 We object to Local Plan’s approach to identifying “Green Gaps”. The Local Plan and Policies Map identifies these ‘Green Gaps’ as existing between settlements and around settlement fringes, some of which are protected such as Conservation Areas.
- 4.3 Our Client’s land is proposed to be designated as a Green Gap GG8 (Retford West) within Policy ST38 and Local Plan Proposals Map. Three proposed Green Gaps for Retford (GG6, GG7 and GG8) enclose the entire southern, eastern and western boundary of the designated Main Town, which seeks to essentially safeguard the entire area to the south of Retford from development.
- 4.4 Notwithstanding our Client’s clear case as to the appropriateness of land to the south of Retford as a location to meet the future development needs of the town, we object to the designation of a Green Gap in this location as a matter of principle. We consider that the Green Gap policy is not justified, serves no meaningful planning policy purpose and seeks to add an undue level of protection to land on the basis that it is not the Council’s current preference for development.
- 4.5 The Council’s justification for the above policy approach is set out within the evidence base for the Draft Local Plan within the ‘Green Gap Study’. The Study has been prepared to safeguard areas of “important landscape” in sensitive locations and as a reaction to development pressure within the district (Section 5).
- 4.6 It is our client’s position that the document does not justify the allocation of the Green Gaps. Paragraph 5.2 of the document simply states “it is certain that similar pressures will continue over the next 20 years” indicating that there has been substantial

development in recent years and “in some cases” settlements extending into the countryside.

- 4.7 We note that, to cater for the growing needs of the District and to facilitate a ‘step change’, development of greenfield land is inevitable over the plan period and it is not sustainable to prevent development on land that is well-suited for development and located on the urban fringe of settlements, such as Retford, without the risk of merging with any settlements to the south or surrounding area.
- 4.8 Whilst there is planning merit in maintain distinctiveness and local characteristics of settlements, the Green Gap study provides no meaningful evidence to demonstrate that protection of land to south of Retford is important to maintaining its character or distinctiveness. There is nothing significant or distinctive regarding the area to the south of Retford and its relationship with surrounding villages which are physically and visually removed from Retford.
- 4.9 We consider that the Council’s proposed Green Gap designation to the south and west of Retford should be deleted from the Local Plan.
- 4.10 Beyond this, the Council is also proposing to allocate land at HS13 and then wash over the Green Gap across it. This represents the introduction of a clear policy conflict between ST38, ST15 and ST27. Furthermore, there might also be tensions with the Council’s proposals to allow growth in some smaller settlements where they are also washed over by Green Gaps.

Policy ST58: Provision and Delivery of Infrastructure

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

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

5 CONCLUSIONS

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

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

A young boy wearing a white shirt, dark pants, and a black bicycle helmet is riding a green and black bicycle through a lush green field. The field is filled with tall grass and small yellow wildflowers. In the background, there are large green trees and a tall lamppost under a blue sky with white clouds.

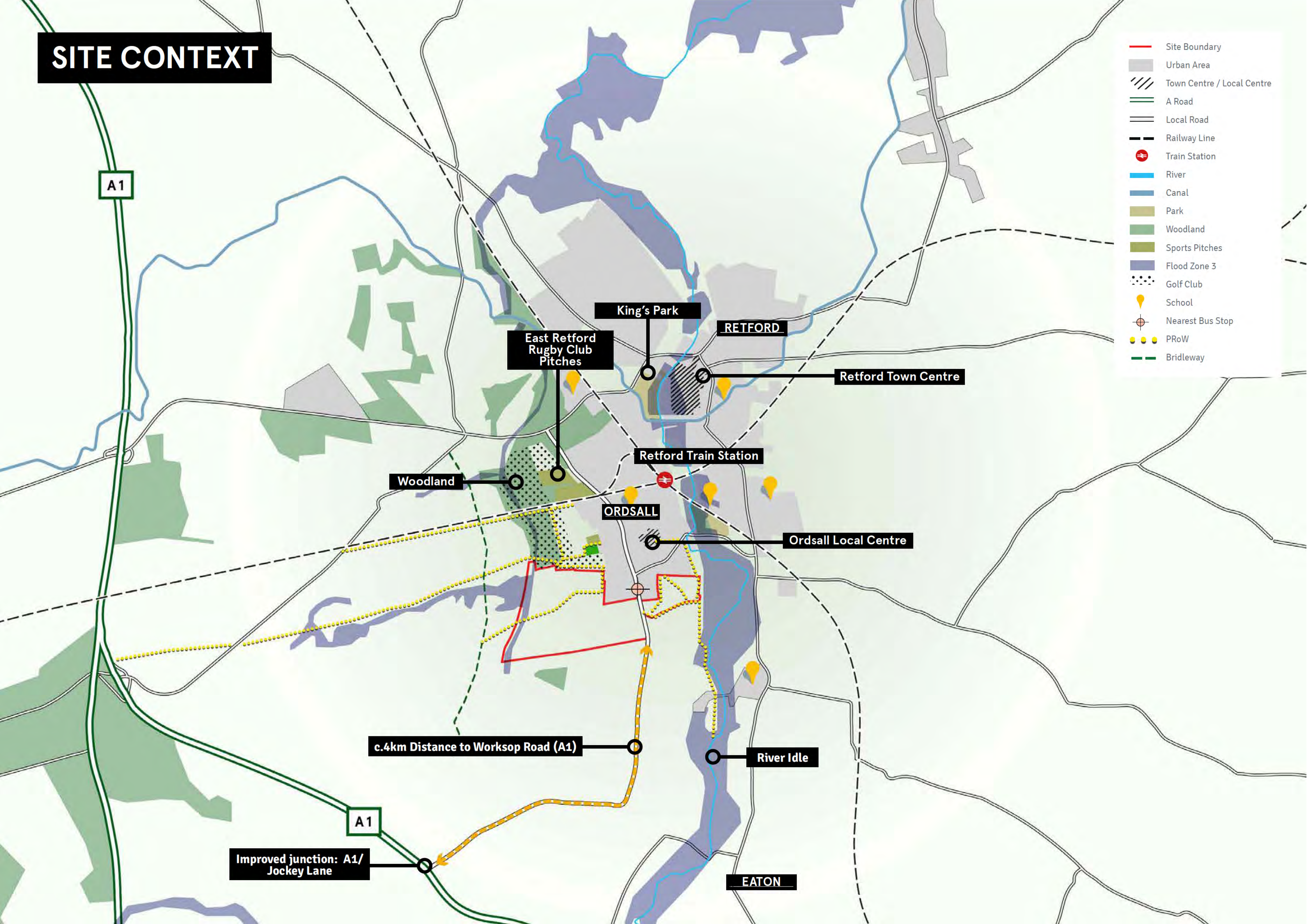
ORDSALL SOUTH

A PLACE IN THE MAKING

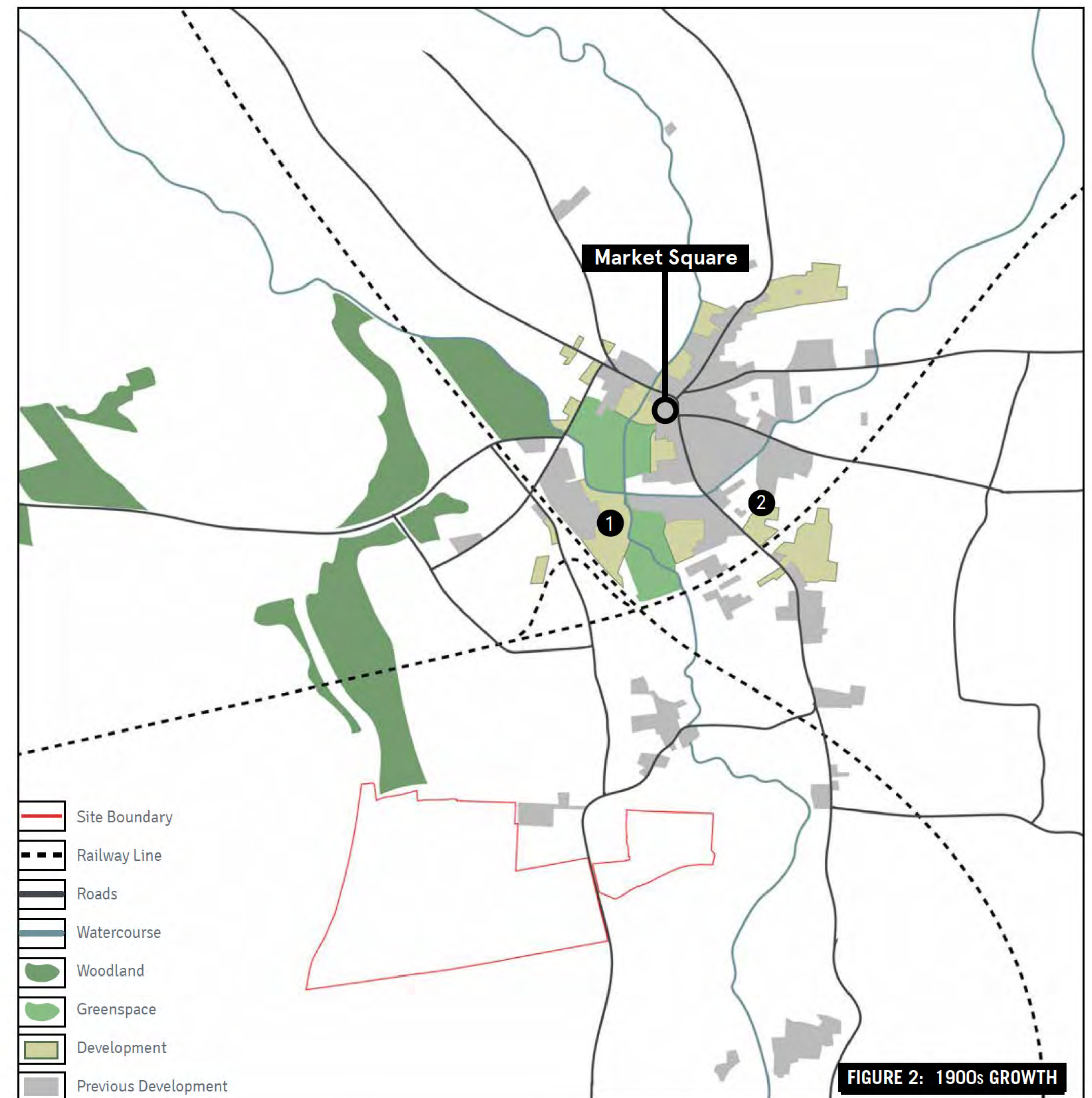
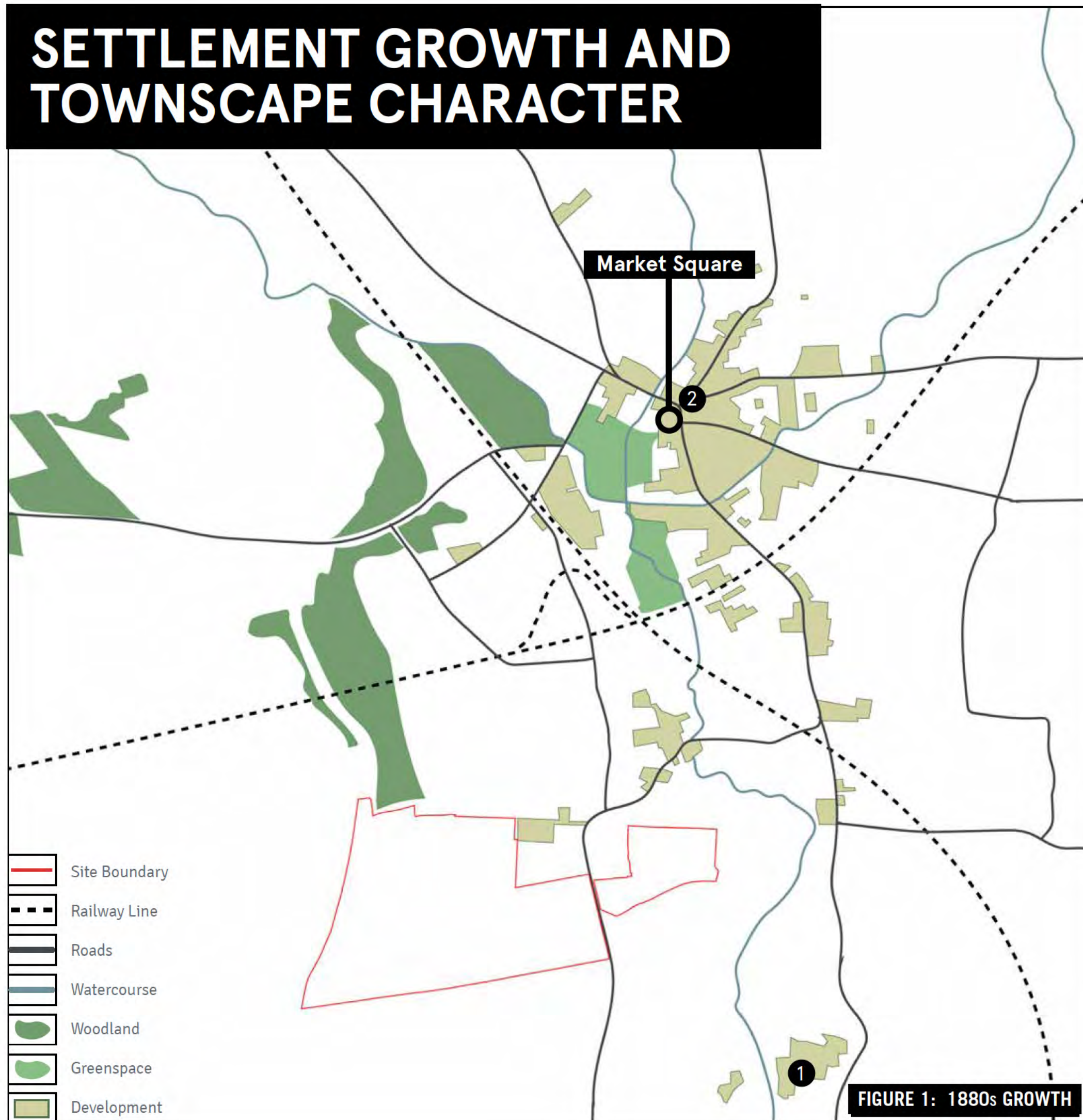


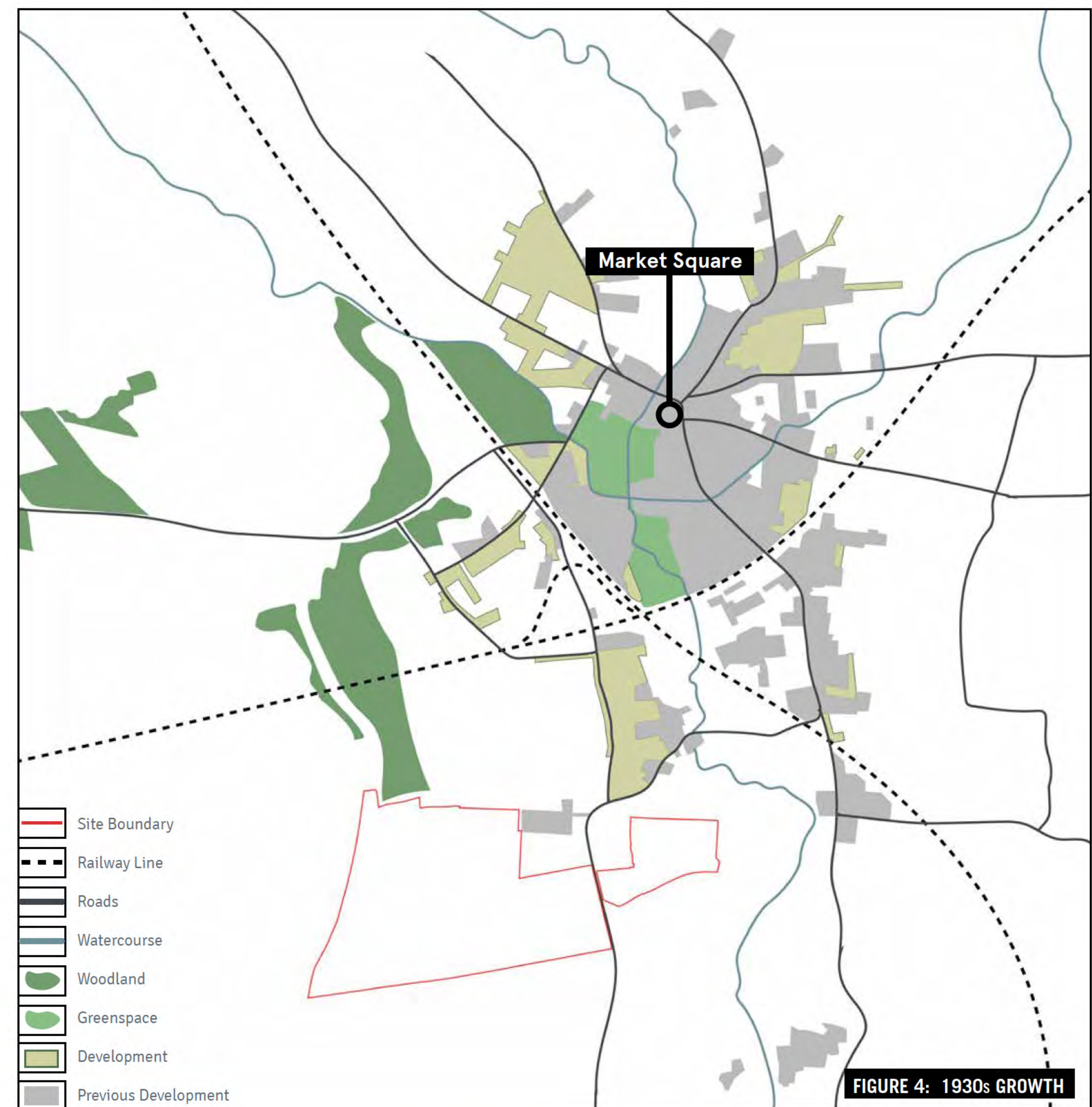
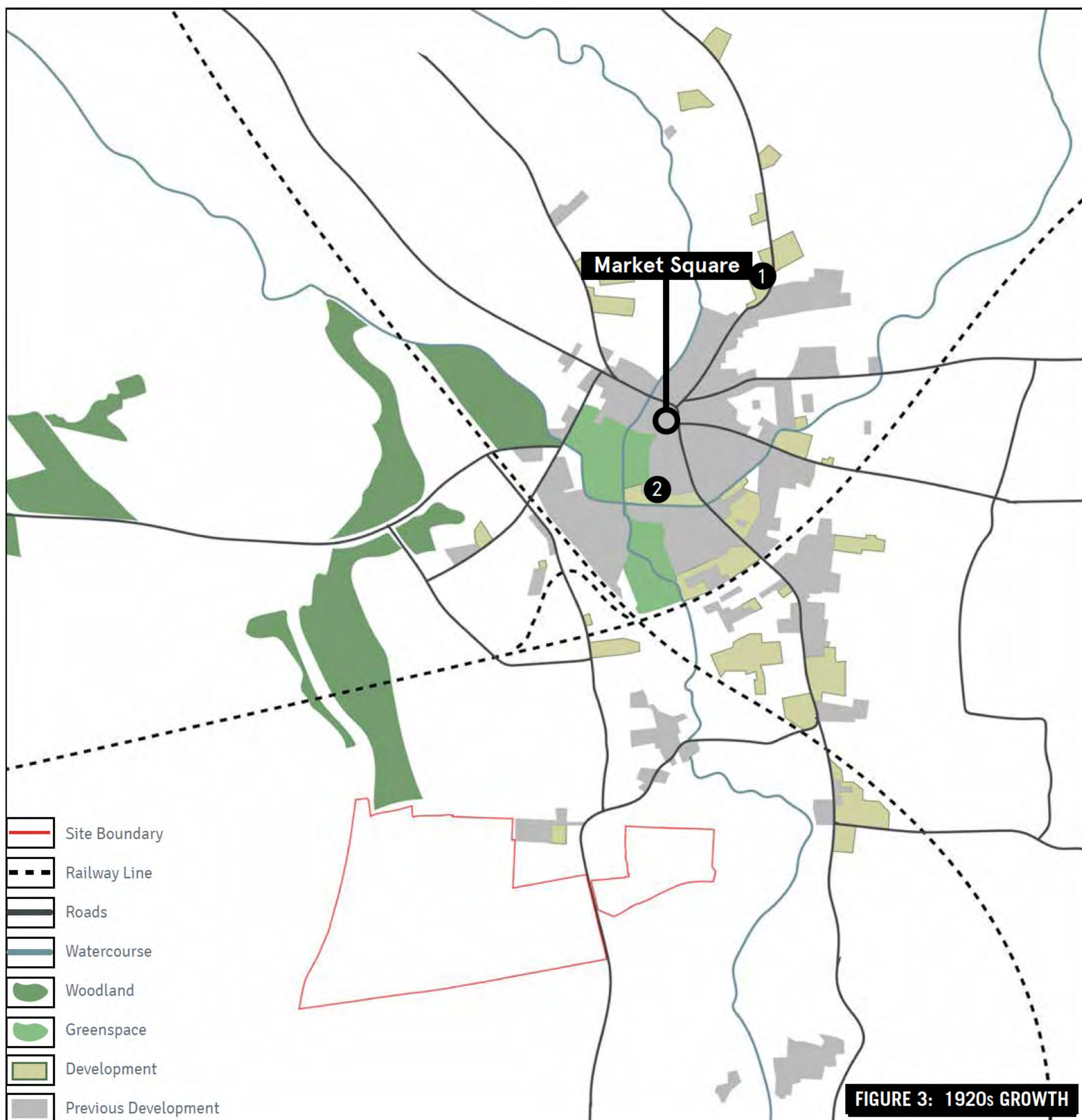
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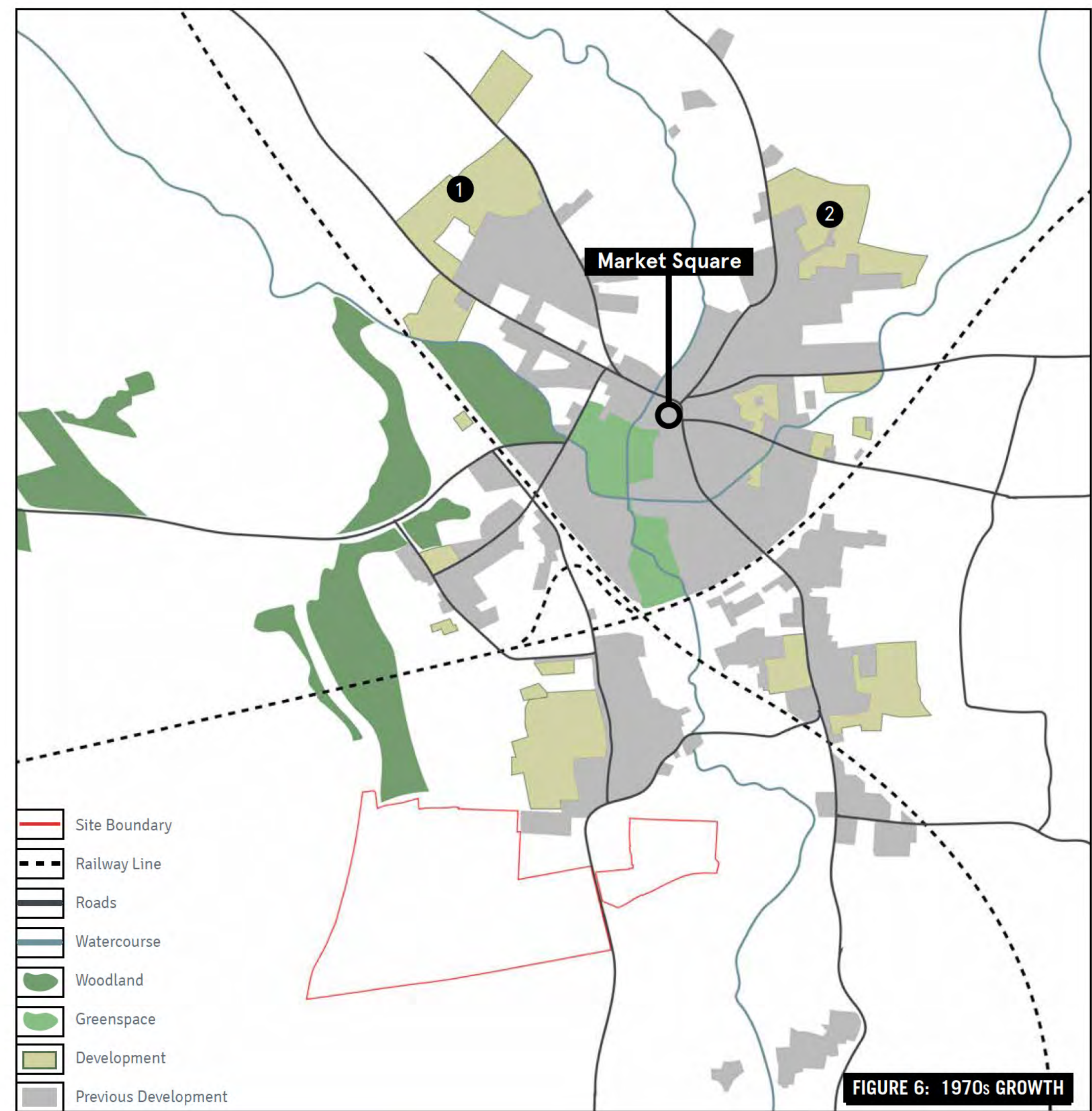
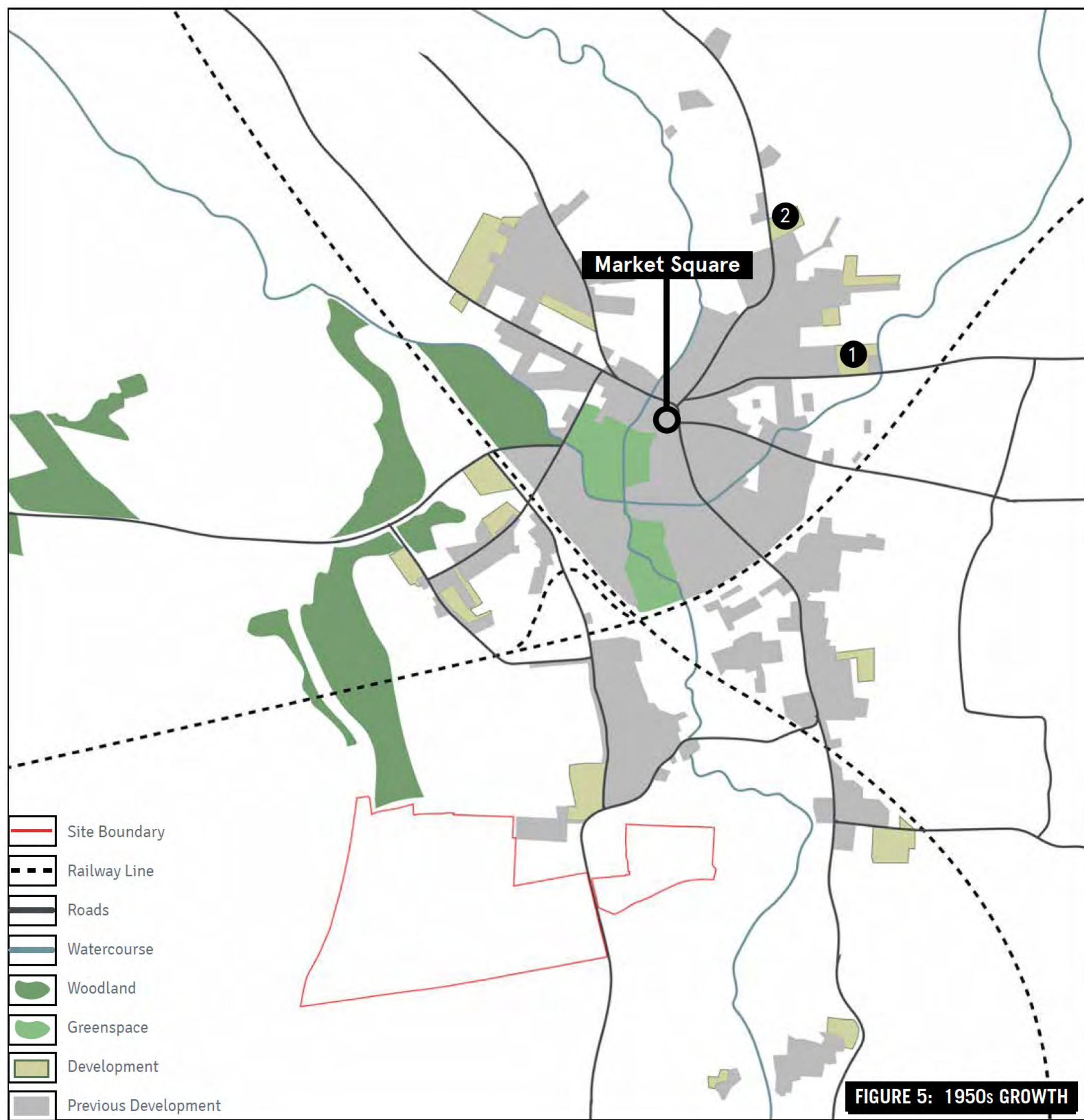
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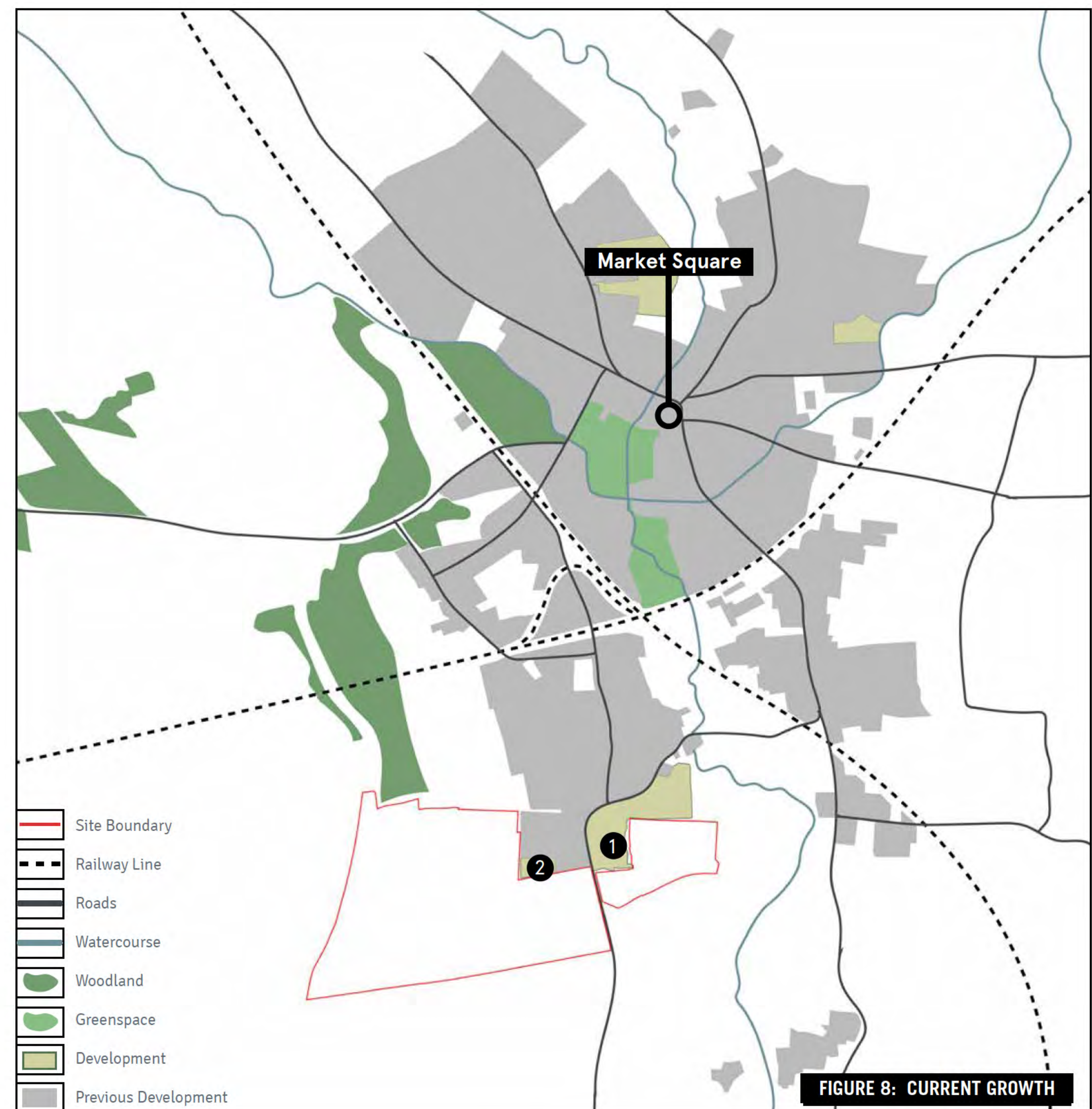
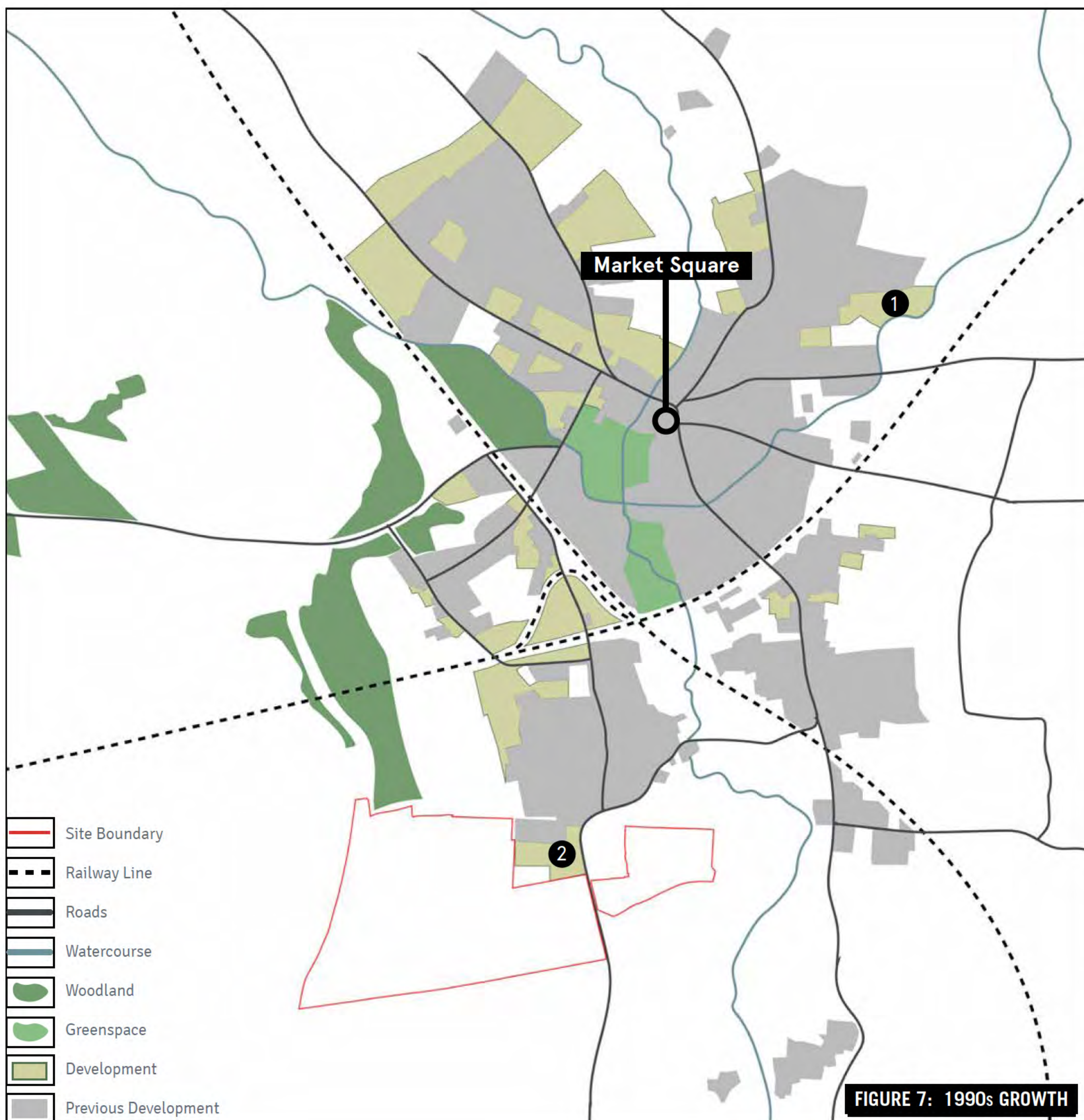


SETTLEMENT GROWTH AND TOWNSCAPE CHARACTER









LOCAL NEIGHBOURHOOD

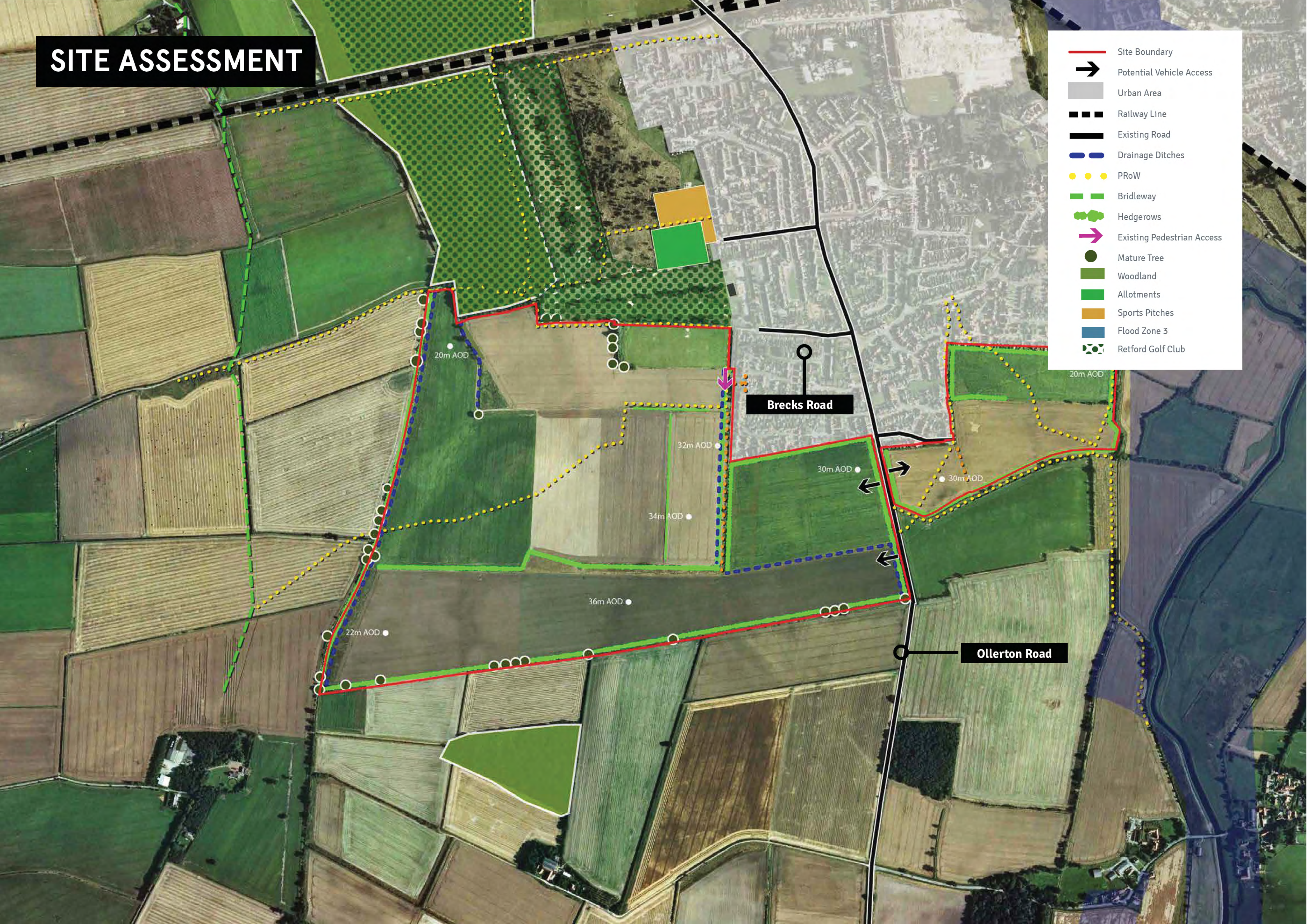


PHOTOGRAPHIC ANALYSIS (NEIGHBOURHOOD)

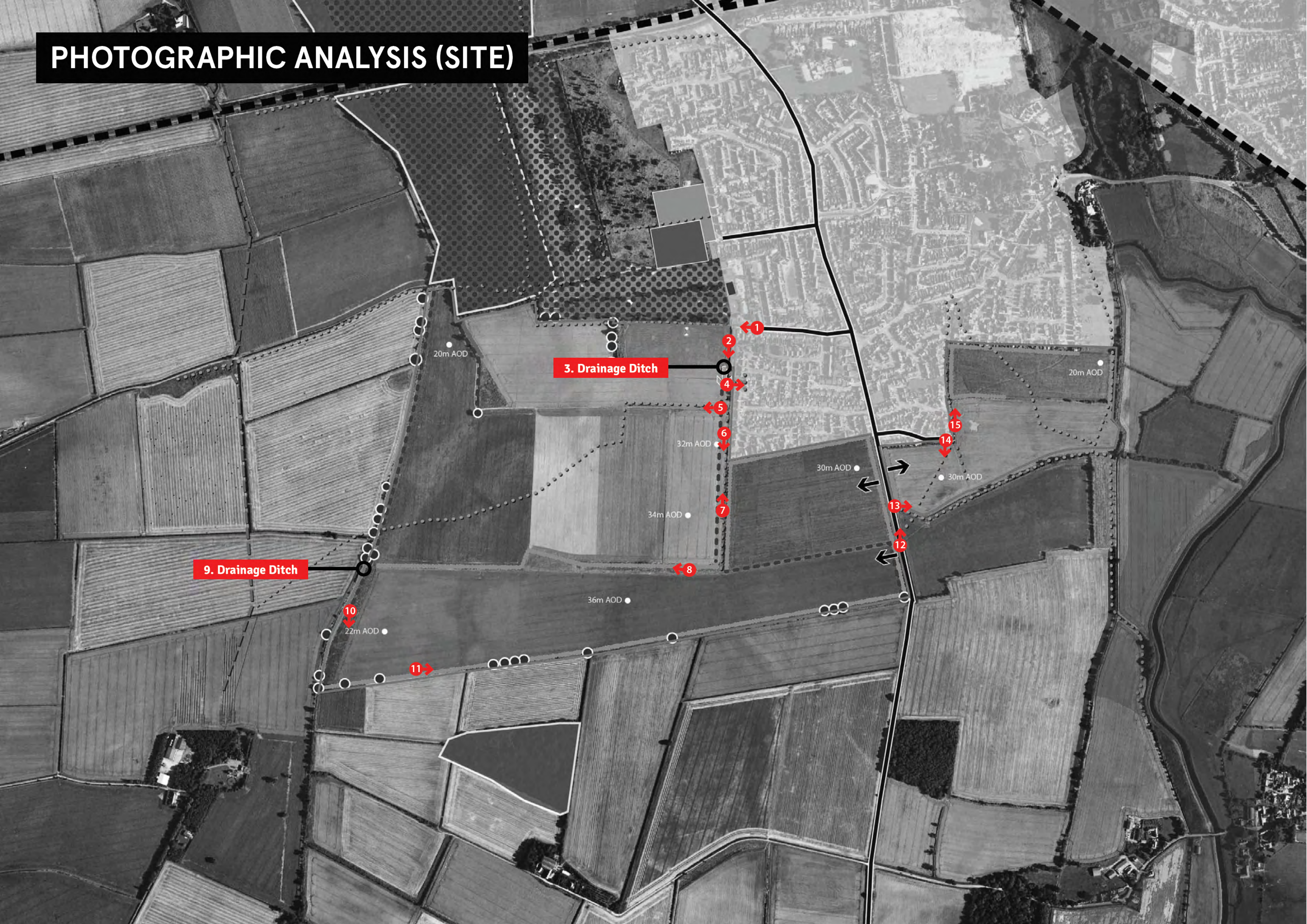


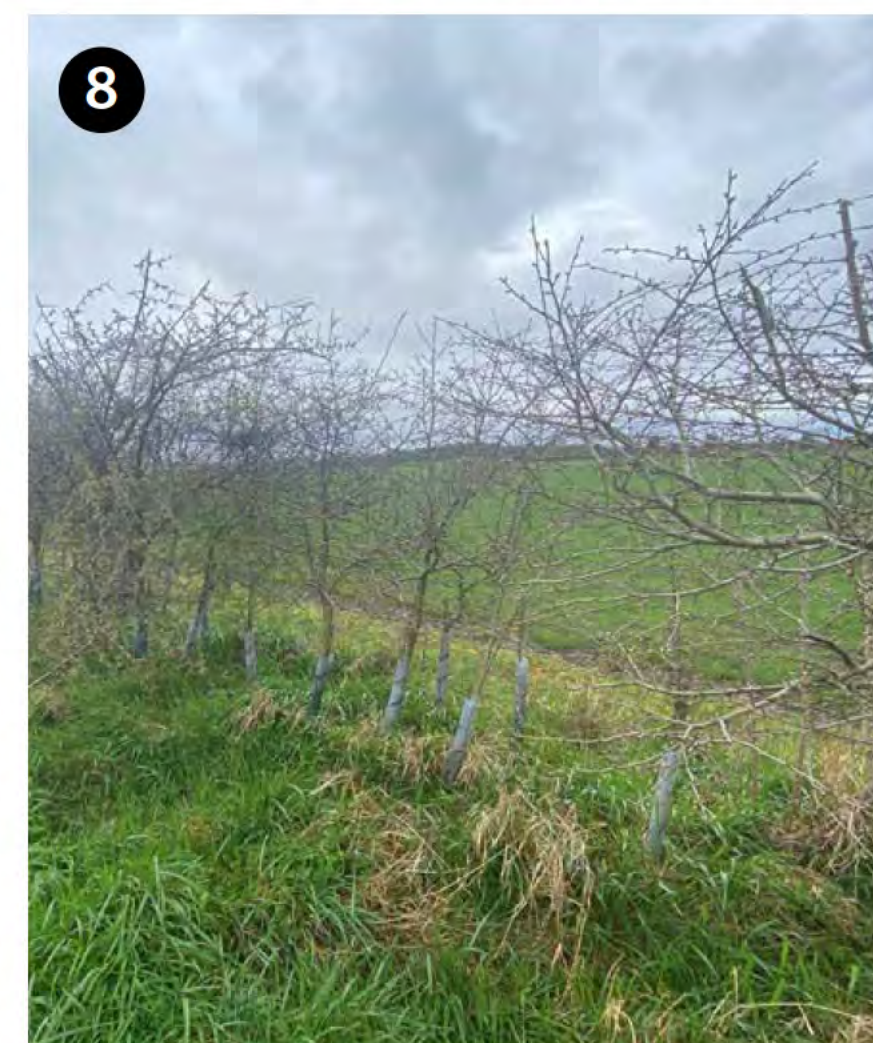
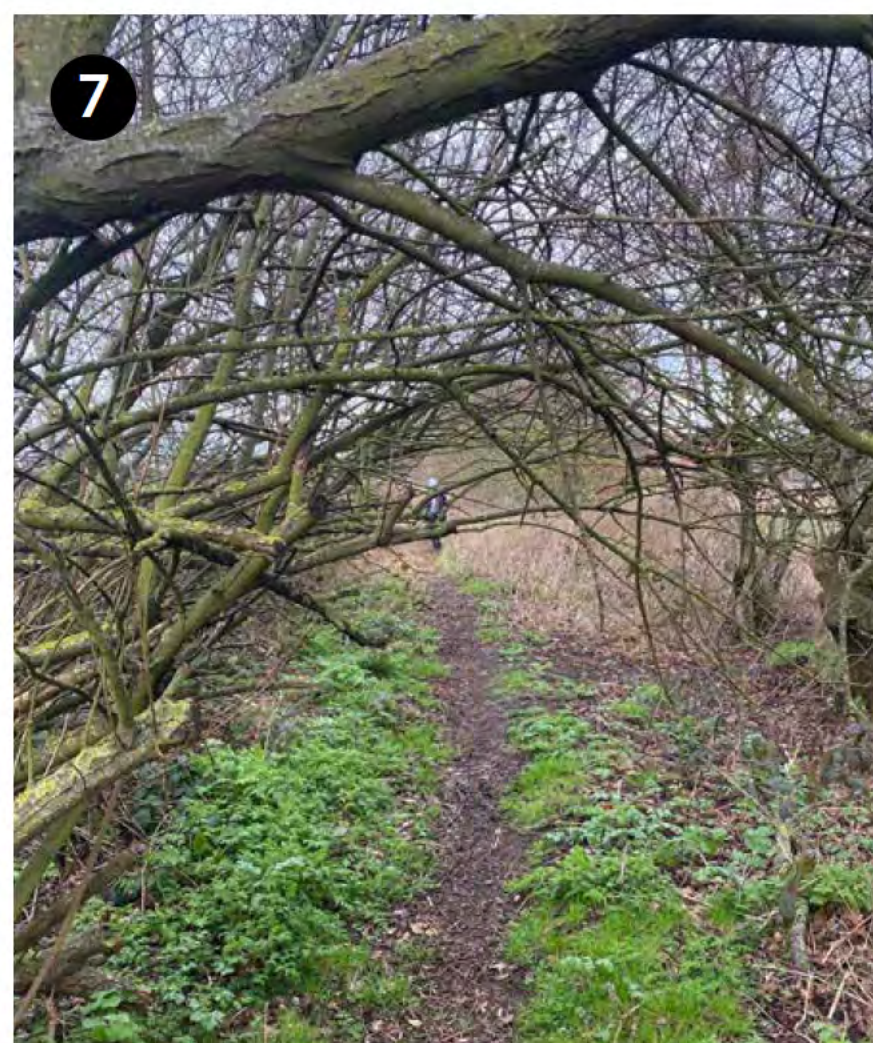
SITE ASSESSMENT

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



PHOTOGRAPHIC ANALYSIS (SITE)





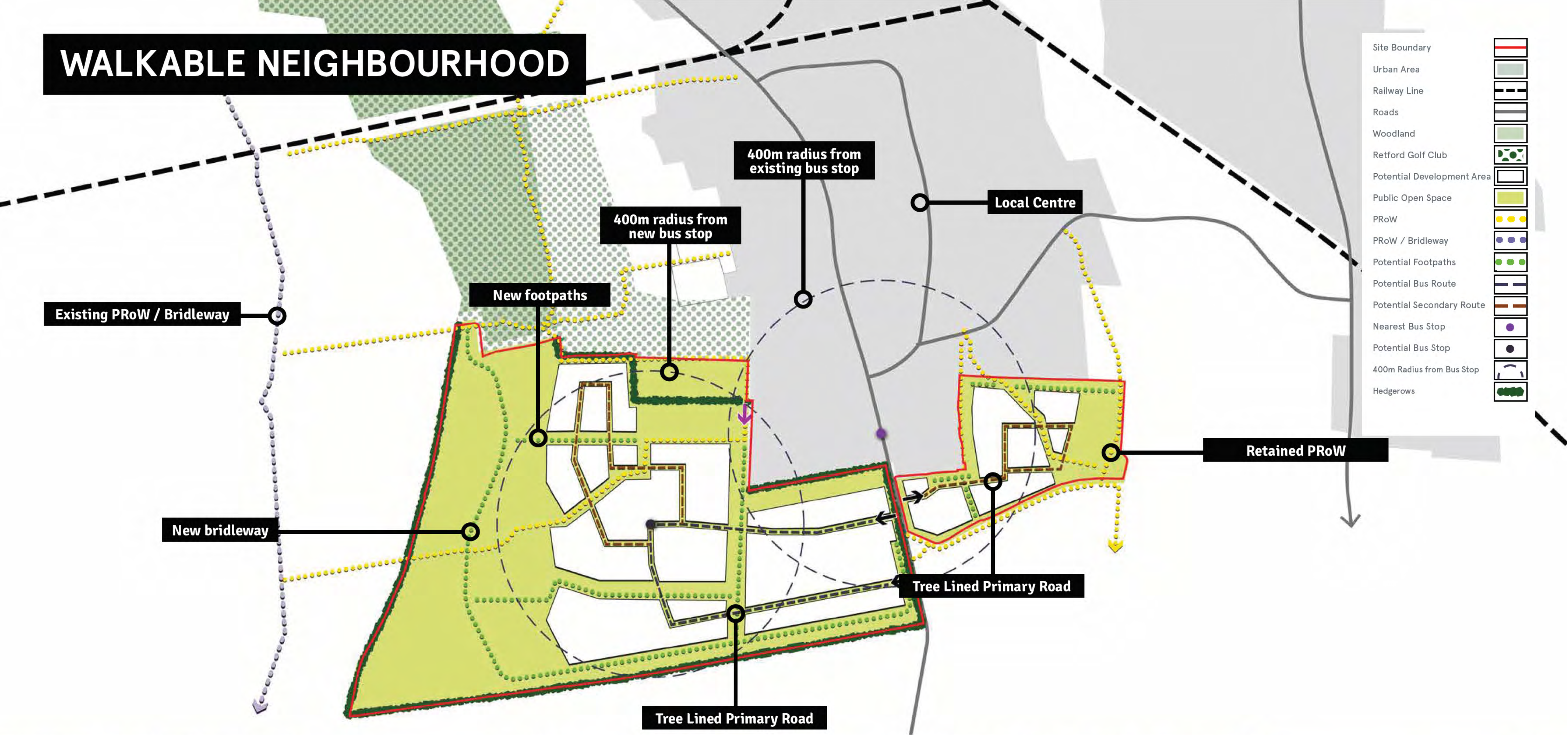


VISIONING

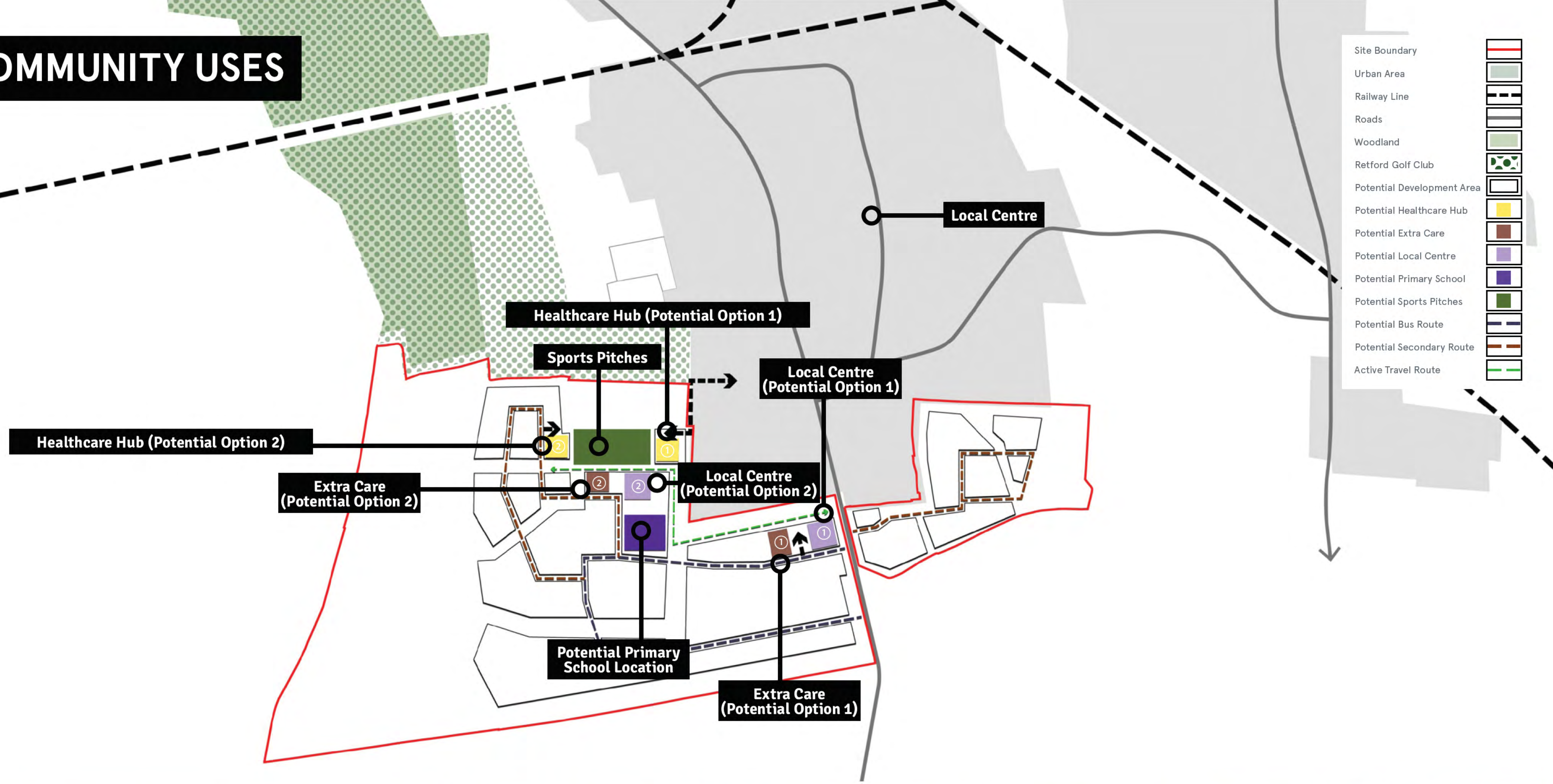
LANDSCAPE FIRST



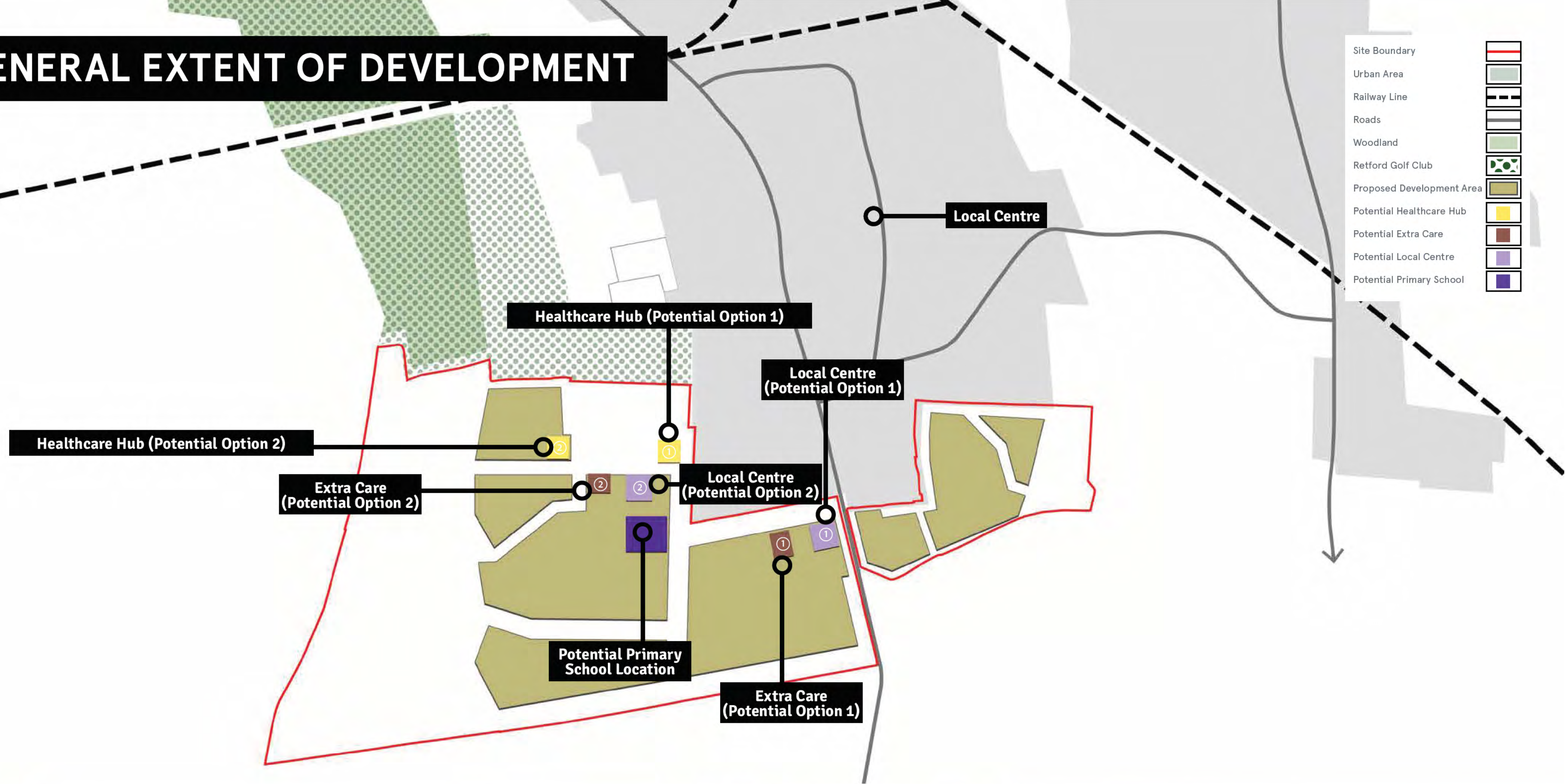
WALKABLE NEIGHBOURHOOD



COMMUNITY USES



GENERAL EXTENT OF DEVELOPMENT



APPENDIX 2:

PLANNING PERMISSION [LPA REFERENCE 15/00971/OUT]

Draft Bassetlaw Local Plan:

Focussed Consultation June 2021 and
Ordsall South Preliminary Concept Plan

Representations on Behalf of Howard Retford Ltd

July 2021

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3 POLICIES MAPS: RETFORD INSET	3
4 FOCUSSED CONSULTATION DOCUMENT	4

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

Representations on behalf of Howard Retford Limited

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

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Date: July 2021

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1 INTRODUCTION

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

2 ORDSALL SOUTH PRELIMINARY CONCEPT PLAN

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

3 POLICIES MAPS: RETFORD INSET

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

4 FOCUSED CONSULTATION DOCUMENT

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

Site HS13: Ordsall South

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

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

Policy ST58: Safeguarded Land

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

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PUBLIC ENGAGEMENT
DEVELOPMENT ECONOMICS

APPENDIX 3:

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

Bassetlaw District Council

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

Representations on Behalf of Howard Retford Ltd
Delivering Ordsall South (Site HS13)

October 2021

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3 WHOLE PLAN VIABILITY (PUB-0010)	6
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Bassetlaw District Council

Regulation 19 Local Plan (August 2021)

Representations on behalf of Howard Retford Limited

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

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1 INTRODUCTION

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

2 INFRASTRUCTURE DELIVERY PLAN (IDP PUB-009)

2.1 The IDP is a recently prepared document (dated August 2021). Paragraph 1.1.4 notes that it is a 'live' document which the Council expects to update annually and if new infrastructure requirements emerge. Our client supports this approach noting that this might require adjustments to viability appraisals accordingly.

2.2 Paragraph 3.3 notes that the Council's approach to infrastructure is focused on the following topics:

- Education;
- Healthcare;
- Green infrastructure and open space;
- Transport;
- Flood management; and
- Water supply and wastewater management.

2.3 These categories are broadly supported by our client. However, it is noted that the provision of infrastructure must be related to the site in question. Appendix 2 of the IDP provides a schedule of costs for Site HS13. We have extracted this in the Table below for ease of cross reference and wish to make several comments.

2.4 Whilst our client fully supports the provision of appropriate infrastructure to deliver this site, we are concerned with some the provisional figures and justification for the sought contributions. There is no further detail provided within the IDP as to how the contributions sought have been derived.

Total contributions & potential errors

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

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

Education provision

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

Healthcare provision

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

Sport facilities and Green Infrastructure

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

Flood management / SuDS / Utilities

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

Transport and connectivity

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

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

3 WHOLE PLAN VIABILITY (PUB-0010)

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

4 SUMMARY

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

APPENDIX 1

EXTRACT FROM IDP APPENDIX 2 – SITE HS13

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

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The Bassetlaw Plan

Representation for Bassetlaw Local Plan 2020-2038: Publication Version Second Addendum

reg-19-form-a-b-14pt-may-2022.pdf; 14_00213_OUT-COMMITTEE_REPORT-253716.pdf; Masterplan.pdf

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E-mail to : TheBassetlawPlan@bassetlaw.gov.uk

Date : 14 June 2022

Bassetlaw Local Plan 2020-2038 - Publication Version Second Addendum Representation

Please find attached representations on behalf of, ***H Machin, J.V.Machin, H.V.Machin and R.G.V.Machin.***

These relate to landholdings to the North and South of Gateford Rd, Worksop.

The representations are duly submitted in advance of the deadline – 5pm on the 21st of June 2022.

Confirmation of receipt would be appreciated, and we look forward to hearing from you.

Regards, Nick.

BA(Hons) Dip TP MRTPI•Partner



2 Hollowstone, The Lace Market,
Nottingham NG1 1JH



Granted - Celebrating the approval of two major developments in the green belt →

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Bassetlaw Local Plan 2020-2038

Publication Version Second Addendum Representation Form May - June 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 21st June 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 Alternatively this form can be completed and returned as an e-mail attachment to thebassetlawplan@bassetlaw.gov.uk or by post to **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

Please note:

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

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

Data Protection Notice:

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

All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name

of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: [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 ☐

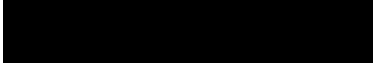
Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Bassetlaw Local Plan.

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

Yes x ☐

No ☐

Printed Name: 

Signature: 

Date: 20 June 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):

Address:

VIA AGENT

Postcode:

Tel:

Fax:

n/a

Email:

2. Agent Details (if applicable)

Agent:

[REDACTED]

Organisation (if applicable): GraceMachin Planning & Property

Address:

2 Hollowstone, The Lace Market, Nottingham

Postcode:

NG1 1JH

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: GraceMachin Planning & Property

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

Policy:

Paragraph:

Policies Map: Worksop

4. Do you consider the Local Plan is:

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

4.(1) Legally Compliant

Yes 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.

Representations were previously sent to Bassetlaw District Council, as Local Planning Authority (LPA) in February 2020 and January 2021 principally relating to Policy ST 14: Housing Distribution and Policy ST 37: Conservation and Enhancement of the Historic Environment.

In October 2021, representations set out that it was / is not considered a robust planning strategy to only seek one greenfield allocation on the edge of Worksop to 2037 (now 2038) (Peaks Hill Farm) and re-examination of the previous development areas submitted in Gateford on behalf of my clients, must be considered by the Inspector if he / she has any concerns over the 'deliverability' of units at Peaks Hill Farm.

These representations relate to amendments to Paragraph 5.1.7 which now states that, *"Over the past 3 years, Worksop has experienced high levels of housing growth, with areas such as Gateford Park seeing over 250 housing completions. As can be seen from figure 8 at 31 March 2022 over 1,450 of the expected housing growth in Worksop has been delivered, or is on committed sites, with the remainder to come from new allocations. Consequently, there is a requirement to allocate land for a minimum of 1,970 dwellings in Worksop. This includes 725 dwellings to be delivered through the Worksop Central Development Plan Document. Approximately 90 of these dwellings have either been delivered or gained planning permission, so are included in the supply as completions or commitments"*.

We continue to submit representations that the LPA have incorrectly identified our client's land as Gateford Park when it should be identified as mixed grass and arable farmland - Gateford Hall Farm. Our client's land is not a 'formal park or garden'.

Re-examination of the previous development areas submitted in Gateford on behalf of my clients, must be considered by the Inspector if he / she has any concerns over the 'deliverability' of units at Peaks Hill Farm. This is an important matter considering the size of the of the scheme (circa 1,000 new units) and potential deliverability difficulties.

The proposed allocation of a single large greenfield site on the edge of Worksop is a high-risk strategy in terms in housing delivery.

We represent a major landowner on the edge of Worksop who has consistently delivered housing sites to the Worksop market over many years and we trust that we will have the opportunity to take part in the Hearing debate. To allocate a single complex greenfield site on the edge of Worksop is not sound planning.

If the Inspector has any concerns about the strategy of allocating a single greenfield site on the edge of Worksop, he / she should be comforted by the fact that 'omission sites' do exist to meet the housing needs of the area.

Indeed, the Proposals Map does identify land for housing which is owned by my client but has a current planning permission on it for part EMPLOYMENT – 19,000 sq m of Offices. Cross Ref LPA Ref: 14/00213/OUT. A copy of the Committee Report accompanies these representations.

Continue on a separate sheet if necessary

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

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

The LPA have identified land for housing in Worksop on the Proposals Map which is currently employment land in the context of Planning Application 14/00213/OUT.

It is not a sound proposition to allocate one site on the very Northern edge of Worksop (Peaks Hill Farm) when the LPA have identified land for housing on the Proposals Map but not included it within their housing projections and allocations.

We wish to appear and debate at future Hearing Sessions.

The allocation of a single allocation at Peaks Hill Farm is not robust and land South of Gateford Rd and North of Claylands Avenue should be formally allocated and identified as a Housing Site within the Local Plan as per the Proposals Map as a minima.

These comments are made in the context of amendments made to:

Paragraph 5.1.7 which now states that, *“Over the past 3 years, Worksop has experienced high levels of housing growth, with areas such as Gateford Park seeing over 250 housing completions.*

Continue on a separate sheet if necessary

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

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

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

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

Yes x ☒

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

No ☐

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

To debate the need to formally identify my clients land within Worksop as a housing allocation with an appropriate housing density / number.

It is currently identified as a housing site on the Proposal Map but not as a formal allocation. These comments are submitted in the context of its planning history which relates to a mixed use permission which proposed both residential units and employment space to the South of the site.

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

ITEM SUBJECT OF A SITE VISIT

Item No: a1

Application No: 14/00213/OUT **Application Type:** Outline Planning Application

Proposal Outline Planning Application for Mixed Use Development Comprising of Residential (up to 380 units) and Commercial (up to 19,000 sq m) of B1 (a) Office.
Provision of Open Space and Improved Site Landscaping. Vehicular Access from Gateford Road, Gateford Toll Bar & Claylands Avenue

Location Land South Of Gateford Road Worksop Nottinghamshire

Recommendation: Grant subject to Conditions and Signing of a S106 Agreement

Case Officer: [REDACTED] **Tel No:** 01909 533227

Web Link: <http://publicaccess.bassetlaw.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=N1LTJHCSIXT00>

THE APPLICATION

The application seeks outline planning permission to erect a mixed use development of up to 380 dwellings and 19,000sq metres of B1 (a) offices.

The site would be accessed from three points, at Gateford Road, Gateford Toll Bar and from Claylands Avenue.

The application site consists of two agricultural fields of approximately 18.14ha in area in total.

The site is bounded by Gateford Road to the North, the A57 to the west, Claylands Avenue and an industrial unit to the south and an existing residential estate to the east.

The Old Gateford Conservation Area is located to the north of the site on the opposite side of Gateford Road.

The application site is currently located outside the Worksop development boundary as defined in the Bassetlaw Local Development Framework.

The site was previously identified in the Bassetlaw Site Allocations Preferred Options Consultation Paper 2014 (now withdrawn) as a mixed use site, MU2 Gateford Common.

The applicant's agents have submitted a number of supporting documents which Include:

- Design and Access Statement;
- Planning Policy Statement
- Statement of Community Involvement;
- Transport Assessment;
- Flood Risk Assessment;
- Landscape and Visual Appraisal;
- Arboriculture Report;
- Ecological Appraisal and Protected Species Assessment;
- Archaeological Assessment;

- Noise Assessment;
- Heritage Appraisal;
- Financial Viability Assessment

All these documents are available for inspection within the Council's offices, with the exception of the viability assessment which is commercially sensitive.

DEVELOPMENT PLAN AND OTHER MATERIAL CONSIDERATIONS

Part 1 of the National Planning Policy Framework states that the Government is committed to securing sustainable economic growth in order to create jobs and prosperity. It also reinforces the position that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. Of particular relevance are paragraphs, 14, 47 and 49 which set out if the approach local authorities should adopt in the absence of a 5 year supply of land for housing.

Policy CS1 of the Bassetlaw Local Development Framework states that until the adoption of the site allocations DPD, development in the settlements identified in the hierarchy will be restricted to the area inside defined settlement boundaries. In addition, it states that over the plan period, additional permission may be granted where the development proposal would benefit in addressing a shortfall in the District's five-year housing supply or its employment land supply.

Policy CS2 of the Bassetlaw Local Development Framework states that all housing development, will be required to contribute towards the achievement of an affordable housing target of at least 15% for Worksop

In addition this policy states that at least 45% of the District's employment land needs will be delivered at Worksop through existing permissions and allocations in the Site Allocations DPD, for the plan period 2010-2028.

Policy DM4 of the Bassetlaw Local Development Framework states that all major development proposals will need to demonstrate that they make clear functional and physical links with the existing settlement and surrounding area; complement and enhance the character of the built, historic and natural environment; are of a scale appropriate to the existing settlement and surrounding area and provide a qualitative improvement to the existing range of houses, services, facilities, open space and economic development opportunities.

The Bassetlaw Local Development Framework contains policy DM7, which states that support will be given for economic development proposals that bring inward investment opportunities to the district and that deliver or contribute to opportunities for the growth of indigenous businesses. In addition it indicated that new employment allocations will be expected to deliver or provide opportunities for the development of starter units and grow on space for small and medium sized enterprises.

Policy DM8 of the Bassetlaw Local Development Framework states that the historic environment shall be protected and enhanced to secure its long term future and that any development that would be detrimental to the significance of the heritage asset or its setting, will not be supported. This is reiterated in paragraph 132 of Part 12 of the National Planning Policy Framework, which states that any harm or loss to heritage assets should require clear and convincing justification

The Bassetlaw Local Development Framework contains policy DM9, which states that new development proposals will be expected to provide functional on-site open space and/or sports facilities, or to provide contributions towards new or improved facilities elsewhere locally, protect green infrastructure assets and demonstrate that they will not adversely affect or result in the loss of features of recognised importance.

Policy DM11 of the Bassetlaw Local Development Frameworks states that all applications will be expected to demonstrate that the necessary infrastructure (social, physical and green) will be in place in advance of, or can be provided in tandem with, new development and, where appropriate, that arrangements are in place for its subsequent maintenance.

In addition it states that arrangements for the provision or improvement of infrastructure required by the proposed development and/or to mitigate the impact of that development will, in line with national guidance and legislation, be secured by Community Infrastructure Levy (CIL) charge, planning obligation or, where appropriate, via conditions attached to a planning permission.

Policy DM12 of the Bassetlaw Core Strategy and Development Management Policies DPD indicates that all new development will be required to incorporate Sustainable Urban Drainage Systems (SuDS) and provide details of adoption, ongoing maintenance and management unless other key factors show them not to be technically feasible.

Policy DM13 of the Bassetlaw Local Development Framework states that development proposals will be expected to, minimise the need to travel by car, provide linkages or develop new footways, cycle paths and bridleways giving access to key local facilities and provide appropriate facilities to support access to high quality public transport.

RELEVANT PLANNING HISTORY

The site was previously identified in the Bassetlaw Site Allocations Preferred Options Consultation Paper 2014 (now withdrawn) as MU2 Gateford Common, a mixed use site of 330 dwellings and 6.5ha of employment land.

A screening opinion was issued in relation to residential development on this site application on 8th April 2014. This concluded that an Environmental Impact Assessment will not be required to accompany any planning application.

RESPONSES FROM STATUTORY BODIES

NOTTINGHAMSHIRE COUNTY COUNCIL

Waste

The County Council would wish to see the best practice of waste management for the proposed development in line with Policy WCS2 of the Waste Core Strategy.

Minerals

There are no objections to the proposal from a mineral perspective.

Planning Policy

There are no strategic planning policy objections in principle to the proposed development.

Nature Conservation

Whilst the submitted information indicates that biodiversity value of the site appears to be low, given that it is dominated by arable farmland and that existing woodland/hedgerows are largely being retained, a number of issues need to be flagged up, which should be addressed prior to the determination of this application:

- Although the site has been subject to a walk-over survey, no description of the habitats present on the site is provided (as would be expected for an Extended Phase 1 Habitat Survey). It is therefore difficult to assess their quality or value, and it is recommended that Bassetlaw DC seeks further information in this respect.
- No breeding bird survey has been carried out; it can be assumed that the site is used by a range of common and widespread species. However, it is unclear if the site is used by red-listed farmland specialists.
- Whilst two nocturnal bats surveys were carried out, these do not appear to have been done in accordance with current guidelines produced by the Bat Conservation Trust, which recommend (for a site of this nature), that one transect should be carried out each season (spring, summer and autumn), with automated surveys carried out over three consecutive nights each season. In addition, no plan is provided showing the transect route(s) that was walked. It is therefore recommended that Bassetlaw DC seeks further information/comment on this matter.
- It is not clear why surveys for reptiles have been scoped out of the surveys/consideration (as appears to have been the case), nor whether the site is considered to provide suitable terrestrial habitat for great crested newts and whether the presence/absence of ponds in the surrounding area has been considered.
- Consideration should be given to potential impacts on hedgehogs, along with measures for avoidance/mitigation.

Notwithstanding the comments made above, and in the event that Bassetlaw DC is minded to grant planning permission at this stage, the following matters should be secured through appropriate planning conditions:

- i. No vegetation clearance should take place during the bird nesting season, unless otherwise approved.
- ii. Retained vegetation should be protected during development, in accordance with relevant standards, with details submitted prior to the commencement of development.
- iii. Bird and bat boxes should be incorporated within the fabric of a proportion of the proposed buildings, with details submitted prior to the commencement of development. Bird boxes should focus on species such as house sparrow, starling and swift.
- iv. Bird and bat boxes should also be installed within tree belts around the site.
- v. Areas of green infrastructure, especially around the site perimeter and in association with SUDS/swales and along 'green corridors', should be designed such that their biodiversity value is maximised;
- vi. A landscape management plan should be produced, to guide the ongoing management of green infrastructure and to ensure that its biodiversity value is maximised.
- vii. Other conditions as necessary, pending the results of the additional information/clarification recommended above, but to potentially include the design of hedgehog-friendly gardens (i.e. ensuring that fencing contains small gaps to allow hedgehogs to enter and exit new gardens) and other mitigation measures.

Public Transport

The County Council will seek a Section 106 contribution towards improving public transport to serve the site, including bus service support and bus stop infrastructure.

Land Contamination

The site, in terms of the current state of knowledge does not present a significant risk from contaminative use. This should be verified during the intrusive ground investigations.

Noise

The noise assessment report submitted with the application appears to sufficiently address the impacts from both nearby road traffic and industrial noise sources through the careful consideration of the site layout. The District Council should be aware however of the proposals for the nearby waste transfer station on Claylands Avenue.

Developer Contributions

Developer contributions will be required towards libraries, education and public transport provision. It is likely that developer contributions or CIL payments or S278 agreements will be sought towards highway improvements.

Highways - No objections subject to conditions, including but not exclusively requiring:

- i. Phasing and completion of highway and private street works;
- ii.) Permanent closure of the existing Claylands Avenue site access;
- iii.) Conversion of Gateford Road to a single carriageway with right turn lanes serving the site access and Toll Bar and associated refuges.

Rights of Way

It is intended to retain the existing north - south line of FP 13 through the development. The last 2 thirds is shown on an estate road (The Greenway) which is also the primary access road in to the residential part of the development. If the estate roads are to be adopted by the Highway Authority this section of footpath will be surplus and could be extinguished while retaining the last third through the green corridor to connect with the rest of the footpath to the south.

I also note that the designers have acknowledged the desire lines around the site which currently exist. Whilst these paths are not currently recorded on the Definitive Map of Public Rights of Way, it is possible that claims from local users to add the paths could be triggered by the development. I would ask that consideration is given to how these paths will be designated legally and who will be responsible for the ongoing maintenance. I realise this is an outline application but these issues need to be considered at an early stage.

On Masterplan 2 at the north western corner the estate road links to Gateford Toll Bar and there is an NMU link through to the footway on the A57. There is provision 85m north to cross the A57 through a gap in the safety fence to reach Footpath 14, Shireoaks. I have also recently commented on a planning application for land to the north of Shireoaks Common in respect of FP14. If planners have a desire to encourage non-motorised movement between these 2 proposals it would make sense to improve the crossing for pedestrians at this location or improve footway provision on the west side of the A57 to connect FP14 to a crossing in a different location.

The COUNTY ARCHAEOLOGICAL OFFICER - While no archaeological features exist within the site, the Historic Environment Records (HER) has a record of Roman coins being recovered at Gateford Hall. Gateford Hall was a moated medieval manor house and it is possible that deposits associated with the medieval origins of the site may be present within the proposed development.

However, because of the site's topographic location I think it is likely that the significance of the site's archaeological resource is likely to be relatively low. Accordingly, I am content to suggest that the archaeological issues can be addressed post determination and before development commences, assuming consent is granted. This can be achieved through a condition requiring a programme of archaeological mitigation, the details of which need to be agreed with the local planning authority.

It would possibly be in the applicants' best interests to fulfil this condition in two phases; firstly to undertake archaeological evaluation- geophysical investigation may be a sensible first step, possibly leading to trial trenching, then depending on the results of the first phase a second phase involving archaeological mitigation - the excavation and recording of any archaeological features in a manner appropriate to their significance.

ENVIRONMENT AGENCY - No objections subject to a condition ensuring the implementation of an acceptable scheme for surface water drainage.

HIGHWAYS AGENCY has no objections.

NOTTINGHAMSHIRE WILDLIFE TRUST -- We wish to be assured that the provision of natural and semi-natural green space proposed by the scheme is in line with local and national policies.

We would suggest that gains could be made if green links are strengthened along the northern and southern boundaries of the Toll Bar quarter.

Whilst this is an outline planning application there is a lack of detail with respect to the extent and proposed management of retained and created habitats.

Biodiversity enhancement measures should be provided in relation to both the residential and office development.

A Biodiversity Management Plan and a Construction Environmental Management Plan should be secured through conditions.

In addition to the above, concerns have been raised by local residents about the impact of the development on hedgehogs. It is recommended therefore that a survey be undertaken and a mitigation strategy be agreed prior to determination.

SEVERN TRENT WATER - No objections subject to a condition requiring details of surface water and foul sewage.

ENGLISH HERITAGE - We are concerned by the lack of information and assessment of the impact of this proposal on designated heritage assets. We recommend this application is determined with relevant policy guidance contained in the NPPF including paragraphs 131, 132, 134 and 137 and with reference to you specialist archaeological and conservation advice.

The DISTRICT CONSERVATION OFFICER - The proposed development would be located in close proximity to Gateford Hall, a Grade II* listed building and the Old Gateford Conservation Area. Nonetheless, provided that the existing tree screen to Gateford Road is sustained / improved in the long term, conservation has no objection to the proposals and perceives no significant impacts on the setting of the designated heritage assets.

The DISTRICT ENVIRONMENTAL HEALTH OFFICER -

1. As no details of extract ventilation systems have been submitted with the application, a condition may be required to ensure that any systems installed in the commercial units have prior approval;
2. The measures detailed in the noise report, outlining noise attenuation should be required by suitable planning conditions;
3. On the basis of the submitted noise report it is considered that the operation of the nearby, and recently granted Waste Transfer station, would have no adverse impact on the proposed development;
4. Whilst the noise report has established that the adjacent Scania bus depot is unlikely to give rise to excessive noise for the occupiers of the new dwellings, it is important to note that occupier of the commercial site may change in the future. Accordingly, it is recommended that more significant acoustic screening be installed;

5. The proposed commercial element of the proposal (Class B1 - Offices) would be unlikely to have a significant adverse effect on the proposed dwellings. The impact if the development in terms of noise from service areas, overlooking and light pollution should be given careful consideration;
6. It is recommended that noise attenuation measures should be required to safeguard the amenities of the occupiers of the proposed dwellings from the adjacent A57;
7. Construction work should be limited to 7.00am-7.00pm Mon-Fri, 9.00am-1.00pm Saturdays and no working on Sundays and Bank holidays;
8. Whilst the information currently available suggests that there have been no contaminative uses at the site, it is recommended a condition be imposed on the permission requiring the investigation into potential contamination and if required the implementation of a scheme of mitigation.

OTHER COMMENTS RECEIVED

65 Letters have been received from LOCAL RESIDENTS, objecting to the development on the following grounds:

1. Gateford Toll Bar is a minor road servicing the residential properties on Gateford Toll Bar, Thorlby Drive and Gledhill Drive;
2. The increase in use of the Gateford Toll Bar access would have a detrimental impact on the community and character of the Toll Bar by reason of noise, disturbance, loss of privacy;
3. The increase in traffic using the Toll Bar would have a negative impact on highway and pedestrian safety;
4. The development would have a devastating impact on hedgerows and wildlife;
5. The increase in use of the Toll Bar access onto Gateford Road would be likely to increase the likelihood of road traffic accidents;
6. The Gateford Toll Bar access and footway is not suitable to accommodate a significant increase in traffic movements;
7. Congestion would occur at the Toll Bar junction with Gateford Road at peak times ;
8. A more appropriate means of access to the site should be considered;
9. A ransom strip runs the length of Claylands Avenue;
10. The route to the commercial element of the site should be from Claylands Avenue;
11. Siting the proposed play area next to the A57 would be wholly inappropriate and dangerous for children;
12. A previous application which proposed access onto Gateford Common was blocked by the Secretary of State.;
13. The creation of a further access onto Gateford Road would have implications for highway safety;
14. What kind of access link is proposed for Kirkpatrick Drive?
15. The public open space would generate noise, disturbance and anti-social behaviour;
16. The area already experiences power outages and sewage problems;
17. The commercial element of the proposal would be likely to generate pollution;
18. The development would result in the loss of trees and wildlife habitats;
19. The development would result in the loss of arable farm land;
20. The proposal would result in overlooking and loss of privacy;
21. There is a lack of facilities in the area to sustain a further 380 dwellings;
22. The site is liable to flooding and the development may exacerbate this;
23. The development would result in the reduction in neighbouring house prices;
24. Gateford Toll Bar is of historic importance;
25. The last few fields in this area are worth protecting;
26. The proposed play area should be re-sited;
27. The Increase in traffic would be dangerous for children playing in the area;

28. The application is being fast tracked at a speed that proper consideration may not be given to the implications of the development;
29. Turning right from the Toll Bar access would involve crossing four lanes of traffic travelling at 70mph;
30. The creation of ponds would be a hazard to children;
31. A full environmental impact survey should be undertaken;
32. No mention was made of an access via Gateford Toll Bar in the Strategic Land Availability Assessment;
33. A less intensive form of residential development should be considered on the site;
34. The application site is located in close proximity to a recently proposed Waste Transfer station;
35. The Council's Core Strategy states that new development should not have a detrimental effect on the amenity of local residents;
36. Upon confirmation that a colony of hedgehogs is present will a mitigation strategy be drawn up?
37. The development would generate unacceptable levels of noise and disturbance;
38. The development would be contrary to policies DM1, DM4, DM12 of the Bassetlaw Local Development Framework;
39. Technology industries would be unlikely to be attracted to the new units;
40. There is no demand for office units and if built would stand empty and be open to vandalism;
41. The recently granted waste transfer site on Claylands Avenue will have a significant impact on the amenity of the new residents in terms of noise, odours, dust and visual appearance;
42. The submitted noise assessment, environmental assessment and travel plan report will not have taken into consideration the existence of the waste transfer station;
43. The application would not provide the 6.5ha of employment land required by the Bassetlaw Preferred Options Consultation Paper;
44. The developers have reduced the extent of employment land and increased the number of dwellings by 50, for the financial benefits;
45. A ransom strip on Claylands Avenue is owned by Bassetlaw District Council, which will have major implications for the proposed access and the finances of the scheme;
46. Further information is required by the Environment Agency, Highways Agency and Nottinghamshire Wildlife Trust in order to address their concerns;
47. A previous scheme for developing the site was prevented by the existence of a ransom strip;
48. Worksop does not need more housing;
49. What will happen to the natural grassland bordering Gateford Toll Bar

TWO LETTERS have been received from DISTRICT COUNCILLORS objecting to the development on the following grounds:

1. In the Site Allocations document, and the Land Availability Assessment carried out by the District Council, no access to the site was proposed via Gateford Toll Bar;
2. The use of Gateford Toll Bar as an access to the site would have a serious detrimental effect on the quality of life for residents;
3. The development would be contrary to policy DM4 of the Bassetlaw Local Development Framework, which require that developments make clear physical links with existing settlements and surrounding areas, enhance the built and natural environment; are of a scale which is appropriate to the surrounding area and provide improvements to the range of houses, services and economic development opportunities;
4. The Toll Bar is only 40 metres away from Old Gateford Conservation Area;
5. Negotiations should be undertaken with the developer to provide an alternative means of access to the site.

Copies of all the responses and comments are available for inspection either on the Council's web page or in the Council Offices.

CONSIDERATION OF PLANNING ISSUES

The main issues to be taken into consideration in the determination of this application are an assessment of the proposal against the policies of the Bassetlaw Local Development Framework and the National Planning Policy Framework (NPPF)

Principal

With regard to Housing Land policy issues, the key planning policies in relation to this application are contained within the adopted Core Strategy Policy CS2 and National Planning Policy Framework, along with the latest housing land supply information contained within the Strategic Housing Land Availability Assessment (SHLAA).

The Core Strategy sets out the housing requirements for Worksop in Policy CS2. At least 32% of the District's housing will be delivered in Worksop, which equates to around 2000 houses to be planned for through the Site Allocations process (including the houses planned for in the five year supply, as well as new land allocated for housing).

The NPPF sets out the requirements for Local Authorities to identify a supply of deliverable sites, sufficient to provide five years' worth of housing against their housing requirements, with an additional buffer of 5% (or 20% where there is a persistent under delivery) (paragraph 47). The NPPF also states that if Local Planning Authorities cannot demonstrate a five-year supply of deliverable sites, then their relevant policies for the supply of housing will not be considered up-to-date. Therefore, it is important that the Council keeps a constant supply of deliverable sites, either by allocating land through the Site Allocation process or through granting permission for windfall developments (such as this one).

The latest SHLAA (published in the five year supply statement in August 2014) shows that the Council cannot demonstrate a five-year supply of deliverable land (plus a 20% surplus).

Taking into account the housing land supply issues, it is considered that this site could help ensure that the Council has a supply of deliverable sites for the next five years (as well as the 20% surplus) required by the National Planning Policy Framework.

With respect to the Employment Land issues, the key planning policies in relation to this application is contained within the adopted Core Strategy policies CS1 and CS2.

Policy CS1 states that until the adoption of the Site Allocations DPD, development in the settlements will be restricted to the area inside defined Development Boundaries. However additional permissions may be granted for development where it is demonstrated to the Council's satisfaction that a development proposal will be of benefit in addressing a shortfall in the District's five-year employment land supply.

Policy CS2 states that at least 45% (48ha) of the District's employment land needs will be delivered in Worksop. It is considered therefore that the delivery of 5 ha of employment land in this sustainable location adjacent to the long established Claylands Industrial Estate would be consistent with the exceptions listed in the Core Strategy policies outlined above.

Visual Amenity

Whilst the application proposes a mix of residential and commercial units on a 18 hectare greenfield site, the subsequent development would be viewed in the context of both the

existing residential development to immediately to the east and the industrial estate to the south and would not therefore appear unduly discordant in terms of landscape character.

In addition it is considered that the imposition of conditions requiring planting and landscaping would ensure the satisfactory overall appearance of the completed development and would help assimilate the new development into its surroundings.

Heritage Assets

Although the development would be located within the setting of Gateford Hall a Grade II* listed building and the Old Gateford Conservation Area, the site is largely hidden by a dense screen of trees on the site boundary. Provided that this tree screen is retained, it is considered that the development would have no significant impact on the setting of the designated heritage assets.

The County Archaeologist has indicated that although there are no archaeological features within the site, roman coins have been recovered at Gateford Hall, just beyond the north eastern limit of the site. Accordingly, he has requested that further a condition be imposed on the any subsequent permission requiring archaeological field evaluation and mitigation prior to development commencing.

Residential Amenity

Whilst there are a number of dwellings that directly bound the site, it is considered that the development would not result in significant impacts in terms of overlooking and loss of privacy or be significantly overbearing or oppressive. However further consideration would need to be given to such issues at the reserved matters stage when details of layout, scale and landscaping are being considered.

As a mixed development, the current proposal would result in the new dwellings being sited adjacent to commercial office buildings. It is considered however, that with careful consideration to the layout and adequate buffering and planting between the two elements, the commercial part of the proposal would have no adverse impact on the residential amenity of the occupiers of the new dwellings.

In addition it is considered that conditions requiring the implementation of sound attenuation measures to mitigate against the impact of noise from the A57 and the adjacent commercial units, would safeguard the amenities of the new residents.

The District Environmental Health Officer has indicated that recently granted Waste Transfer Station to be sited on Claylands Avenue would have no adverse impact on the amenity of the occupiers of the new dwellings in terms of noise and disturbance.

Highways Matters

The County Director of Environment and Resources (Highways) has indicated that the proposed development would require alterations to Gateford Road and the access arrangements. This would principally require, the reduction of Gateford Road to a single carriageway from the A57 roundabout and providing right turn lanes serving the site access and Gateford Toll Bar.

Subject to ensuring the implementation of the above off-site highway works and conditions requiring the phasing and completion of the road network within the application site, there would be no objections to the development on highway safety grounds. These works to facilitate the improvements would be through a Section 278 Agreement.

Whilst objections have been received from local residents to the use of Toll Bar as a means of access to the site, Nottinghamshire County Council (Highways) have indicated that such development would promote connectivity and sustainable travel by providing links between the existing and proposed residential areas and thereby avoiding isolated communities

The County Council have also indicated that the cumulative impact of the current application and the recently permitted Waste Transfer Station to be sited on Claylands Avenue would be of no detriment to highway safety.

The Highways Agency have also indicated that the development would not be expected to have a material impact on the closest strategic routes of the M1 and A1.

Rights of Way

The application site has a public footpath bridleway that runs north to south through the eastern half of the site.

The proposed development seeks to retain this right of way in its existing position and would connect to the proposed greenways and street network, also providing connections into the existing residential estate to the east. This would be addressed through the imposition of conditions and subsequent application for reserved matters.

Ecology/Nature Conservation

Nottinghamshire County Council have indicated that whilst the submitted information indicates that biodiversity value of the site appears to be low, a number of issues need to be addressed prior to the determination of this application. These principally relate to surveys of hedgerows and trees, breeding birds, bats and reptiles.

It is considered however that these matters can be adequately addressed through the conditions such as those requested by the Nottinghamshire Wildlife Trust, relating to a Biodiversity Management Plan and a Construction Environmental Management Plan.

Nottinghamshire County Council have raised the issue of the potential impact of the development on the prospective classification of parts of Sherwood Forest as a Special Protection Area (SPA) for its breeding bird (Nightjar and Woodlark).

It is considered however that the distance separating the application site from the prospective SPA is sufficient to mitigate against the impact of air pollution, noise and disturbance, pet predation and light pollution. In addition it is considered that the enhancement of rights of way within the site and the provision of open space would make a positive contribution to reducing the recreational pressures on these more sensitive sites.

Drainage

Both the Environment Agency and Severn Trent Water have indicated that there would be no objection in principle to the development subject to conditions requiring details of how surface water and foul sewage is to be disposed of from the site. The above matters will be addressed through the imposition of conditions and through the requirements of the Section 106 Legal Agreement.

Open Space

The development proposes to provide land for a Multi-Use Games Area (MUGA), a Play Area and informal football field along with the adequate buffer zones.

Whilst the application is in outline form, the illustrative drawings show the play space and multi-use games area being sited adjacent to, and on the boundary with the A57. It is considered however that the proposed play facilities should be sited within a more central and accessible location within the site. This matter can be addressed at the reserved matters stage.

The provision (through a financial contribution to provide the play equipment on site) of this open space infrastructure and the maintenance of the land for a 12 year period (the open space land will be transferred to the District Council) will be secured through a S106 planning obligation. The total cost of providing a MUGA and 8 pieces of play equipment would be £170,000 and is expected that the cost of maintaining these open spaces areas for 12 years will be £30,469.

Affordable Housing

Policy CS2 of the Bassetlaw Local Development Framework states that housing development, will be required to contribute towards the achievement of an affordable housing target of at least 15% for Worksop. This will be either through on-site provision or through a financial contribution to the delivery or improvement of affordable housing elsewhere. The Affordable Housing Supplementary planning document also states that the Council will normally expect development to deliver affordable housing on-site unless there are demonstrable viability reasons.

The Strategic Housing Market Area Assessment (SHMA) states that at least 70% of on-site affordable housing should be social/affordable rent units. Furthermore, feedback from the Strategic Housing Manager indicates that there is now more demand for smaller properties (2 and 3 bedroomed houses) than the larger properties. This is largely down to the changes brought in with the recent Welfare Reform.

Education

The development is of a scale (380 dwellings) that generates the need for additional 80 primary classroom places, which cannot currently be accommodated within existing schools. Consequently the development would be required to contribute towards providing additional school places to accommodate the pupils generated from the development. The County Council have indicated that they would prefer the 1 form entry (c210 place) primary school provided on the Gateford Park site to be extended to allow the further expansion to a 1.5 form entry (c315 place) primary school. It is requested that a financial contribution be sought to cover the cost of building the entire extension (estimated at £1.6m) and purchasing the additional land set aside for the Gateford Park development (fixed fee of £40,000).

Should the school site at Gateford Park not come forward the above monies would be directed to existing schools to provide new school places for north Worksop.

Public Transport and Infrastructure

The Highways Authority have requested that a contribution is made towards part of the costs of providing two new buses, which will serve the wider Worksop area. This contribution is calculated on the number of houses on the site and equates to £412,500 for this site.

The Highways Authority has also requested money to upgrade existing bus stops on Gateford Road and Claylands and to provide a new bus stop on the site. This could include a shelter and real time displays. The total amount for these works is estimated at £54,120.

In addition to the above a contribution of £12,500 would be required to facilitate a Travel Plan and monitoring fee.

Library Book Provision

Nottinghamshire County Council (Libraries) have requested a sum of £14,712 towards the provision of additional books for Worksop Library.

Other Matters

Although this is not a planning consideration, the issue has been raised that a ransom strip exists between the application site and the highway boundary on Claylands Avenue. However, if true, this could have impacted on how the site was to be accessed (which could have affected the deliverability of the employment element of the proposal). There has been extensive research done on this matter and the Nottinghamshire County Council have written and confirmed that in their opinion the land falls within the defined Highway boundary. After consideration, the District Council is not disputing this and therefore the applicants have a right to access their land from Claylands Avenue.

Viability

Policy DM11 states that where development proposals cannot meet their necessary Planning Obligations/CIL requirements due to issues of viability, applications will need to be accompanied by a detailed viability assessment. The applicant submitted a detailed Viability Assessment, which under the policy requirements, was independently assessed by an external consultant.

After a robust appraisal process and acknowledging that in accordance with para 173 of the NPPF which states; "To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable".

Through detailed discussions with the applicants, their viability consultant and the independent assessor, the total amount of available money to be sent on s106 contributions was agreed by officers and the applicant. Officers, along with feedback from the local ward Councillors, residents and key consultees, determined how the available monies were prioritised.

A summary of the contributions that will be included within the s106 agreement are as follows:

i. Education

In line with the County Education team request, a financial contribution (£1.6m) to ensure the extension to form a 1.5 form entry (315 place) primary school (of the 1 form entry school secured on the Gateford Park site) and a further contribution of £40,000 to purchase the land required for this extension. This will ensure that there are sufficient places to cover the pupils generated from this development and will have an element of spare capacity as requested by the County Council. Should the school site at Gateford Park not come forward the above monies would be directed to existing schools to provide new school places for north Worksop.

ii. Public Open Space/Play Equipment

With regard to provision and maintenance of open space to be transferred and adopted by the council, a sum of £30,469 would be required based on the Council's Parks and Open Space team's calculations for a maintenance period of 12 years. In addition to the above, a sum of £40,000 would be secured to provide play equipment on land that is to be transferred to the District Council (this has been reduced from the £170,000 requested).

iii. Public Transport Provision

County Highways have indicated that a sum of £227,060 would be required towards the provision of new bus stop infrastructure to improve the existing stops on Gateford Road and Claylands Avenue and towards the bus service improvements. As there is a bus route in close proximity to the site, it is possible for the residents on the majority of the development to still be largely within 400m of the existing bus stops (which would be improved with the contribution being sought).

In addition to the above a contribution of £12,500 would be required to facilitate a Travel Plan and monitoring fee.

iv. Affordable Housing

Due to viability constraints and how the contributions were prioritised, the remaining available monies were put towards provision of affordable housing (£630,029). This equates to 2.6% affordable housing (or 10 units) over the entirety of the scheme. It is proposed that these units, in line with the advice from the SHMA and housing providers, are to be smaller units for social/affordable rent. Therefore, the Council will be securing 9 x 2bed and 1 x 3bed units.

v. Admin fees

A fee of £5000 (capped) will be paid to the Council to cover the admin costs of processing and monitoring the s106 agreement and payments.

vi. CIL Contributions

In addition to the financial requirements above, the development would attract the Community Infrastructure Levy (CIL). Due to the viability constraints on this site and with the infrastructure that is being provided, it is felt that there is a strong case to accept that exceptional relief is applicable in part. The Council would be seeking a CIL payment of £ 314,943 (which is the money that would have been spent on increasing the bus provision for the site or on more affordable housing). This money could earmarked be spent on improving the strategic road network around Worksop and help to provide additional secondary school places (as indicated in the consultation on the CIL 123 list). This would be in compliance with the Council's policy.

As the proposal will not be meeting the Council's full policy requirements when it comes to affordable housing, public transport contributions and the CIL levy, it is recommended, therefore, that a review mechanism is incorporated into the S106 agreements. This will ensure that in the event of changing circumstances that may affect the development finances, half of any net profit increase would be recovered by the Council to go towards the provision of affordable housing in the district.

Conclusion

Given that Bassetlaw District is unable to demonstrate a 5 year supply of land for housing, the application would help significantly to address this shortfall and would also contribute 19,000sq m of office space, the provision of a primary school on the Gateford Park site, open space and affordable housing.

The application site would be located in a sustainable location on the northern edge of Worksop and is considered not to have a significant detrimental impact on the character and appearance of the area, residential amenity, highway safety, heritage/conservation issues, biodiversity or flood risk.

RECOMMENDATION: Grant with the following conditions and the Signing of S106 Agreement

- 1 The first application for approval of reserved matters shall be made not later than the expiration of three years beginning with the date of this permission and the development shall be begun not later than:
 - a) the expiration of two years from the final approval of the reserved matters or;
 - b) in the case of approval of the reserved matters on different dates, the final approval of the last such matter to be approved.

Reason: To comply with section 51 of the Planning & Compulsory Purchase Act 2004.

- 2 The scale and appearance of the building(s), the layout and the landscaping of the site shall be only as may be approved in writing by the Local Planning Authority before any development commences.

Reason: This permission is granted in respect of an outline application which did not contain details of the matters hereby reserved for approval.

- 3 Development shall not commence until a scheme for the phasing of the development hereby permitted has been submitted to and agreed in writing by the Local Planning Authority. The development shall only be carried out in accordance with the agreed scheme unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the site is developed in an appropriate manner and as envisaged by the Local Planning Authority.

- 4 No development shall take place until a phasing and completion programme for the highway and private street works covering the whole of the development has been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved phasing and completion programme or revised phasing and completion programme that may be agreed by the Local Planning Authority from time to time.

Reason: In the interest of highway safety

- 5 In accordance with details submitted in accordance with the phasing and completion programme the existing Claylands Avenue site access shall be permanently closed to all traffic and shall be removed and replaced with full height kerbs, footway, and verge to satisfaction of the Local Planning Authority.

Reason: In the interest of highway safety

- 6 The development shall not exceed 19,000sqm B1 office and 380 dwellings

Reason: In the interest of highway network capacity

- 7 No one phase of development shall be commenced until details of the proposed arrangements and plan for future management and maintenance of the proposed streets including associated drainage contained within that phase of development have been submitted to and approved by the Local Planning Authority. The streets and drainage shall thereafter be maintained in accordance with the approved management and maintenance details until such time as an agreement has been entered into under section 38 of the Highways Act 1980 or a private management and Maintenance Company has been established.

Reason: To ensure that the road infrastructure is maintained to an appropriate standard

- 8 No dwellings or employment units within each phase of the development shall be occupied until the roads affording access to those dwellings or employment units have been completed in accordance with the phasing and completion programme.

Reasons: To ensure that the roads serving the development are completed and are available for use by the occupants and other users of the development in the interest of highway safety

- 9 Prior to commencement of each phase of the development hereby permitted detailed plans and particulars relating to the following items appropriate for that phase shall be submitted to and be approved by the Local Planning Authority and which shall be implemented in accordance with the phasing and completion programme:

- a) A detailed layout plan of the phase in context with the whole site (for the avoidance of doubt the submitted Master Plan and Design & Access Statement shall be considered to be for indicative purposes only) which shall be accompanied by a swept path analysis of a 11.7m refuse vehicle and a maximum size bus/coach on the bus route;
- b) Pedestrian and cycle facilities on the south side of Gateford Road from Lady Walk on to the A57, a route through the site between Gateford Road and Claylands Avenue, and connections between the site and existing facilities which shall be available for public use on completion of the said phase;
- c) The layout and marking of car parking, servicing and manoeuvring areas;
- d) Details of the means of foul and surface water drainage together with a programme of implementation;
- e) Cycle and bin storage facilities;
- f) The provision of bus stops through the site, Gateford Road, and Claylands Avenue serving both directions including, bus stop poles, timetable cases, dropped kerb wheelchair and pushchair access, lit bus shelters with real time displays, and the provision of footway connections/hard standings;
- g) Flood lighting/exterior lighting including lux plots that include spillage onto the highway;
- h) Provision for lorry manoeuvring and routeing;
- i) The means of access and highway route for demolition and construction traffic;
- j) Wheel washing facilities and street cleansing (including full details of its specification and siting) that maybe varied from time to time with the approval of the Local Planning Authority I and as made necessary by the works or ground conditions in any phase;

Reason: In the interest of highway safety

- 10 No dwelling shall be occupied on any part of the application site unless or until Gateford Road has been converted to a single carriageway with right turn lanes serving the site access and Gateford Toll Bar and associated refuges have been provided as shown for indicative purposes only on plan reference no. 5973-002 Rev F to the satisfaction of the Local Planning Authority.

Reason: In the interest of highway safety, sustainable transport, and highway network capacity

- 11 Prior to the commencement of each phase of the development, details of the footpaths, greenways and cycle routes within the site, including the timetable for provision of such works, shall be submitted to and agreed in writing with the Local Planning Authority. The development shall be carried out only in accordance with the agreed details and timetable, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the footpaths and pedestrian links within the site are laid out in a satisfactory manner.

- 12 Prior to the commencement of development a scheme for the manner in which foul sewage and surface water are to be disposed of from the site, shall be submitted to and agreed in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details before the phase to which it relates is completed.

Reason: To ensure that the development is drained in a satisfactory manner.

- 13 Development shall not commence until a surface water drainage scheme for the site based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be fully implemented in accordance with the approved details before the development is completed.

The scheme to be submitted shall demonstrate:

- i. The utilisation of holding sustainable drainage techniques which incorporate at least two differing forms of SuDs treatment in accordance with table 3.3 of the CIRIA C697 'The SuDs Manual' prior to discharging from the site;
- ii. The limitation of surface water run-off to the equivalent Greenfield run-off rate;
- iii. The ability to accommodate surface water run-off on-site up to the critical 1 in 100 year event plus an appropriate allowance for climate change, based upon the submission of drainage calculations;
- iv. That infiltration into the ground is not a viable means of disposing surface water from the site by undertaking further infiltration testing in accordance with the BRE 365 Guidance;
- v. That there will be no cross catchment discharge to receiving water bodies;
- vi. The responsibility for the future maintenance of the drainage features.

Reason: To prevent the increased risk of flooding and to improving and protect water quality, habitat and amenity, given the site is approximately 24ha and just 4 infiltration tests were undertaken, further infiltration testing will be required to ascertain whether or not infiltration into the ground is a viable means of disposing of surface water from the site. To prevent an increased risk of flooding elsewhere, to ensure the future maintenance of the sustainable drainage structures

- 14 Prior to the commencement of development, a Construction Environmental Management shall be submitted to and approved in writing by the Local Planning Authority. The construction Environmental Management Plan shall include;

- Measures to minimize the creation and impact of noise, dust and artificial lighting.
- Mitigation for, bats, birds newts, slow worms and hedgehogs;
- The implementation of suitable stand-offs with appropriate protection measures for all retained hedgerows, trees and woodland.
- Once approved, the Construction Environmental Management Plan shall be adhered to at all times unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure the development is carried out in a way which safeguards protected species, hedgerows and trees.

- 15 Prior to the commencement of development, a Biodiversity Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Management Plan shall span a minimum of 5 years for each phase of the development and include details for appropriate management of semi-natural habitats eg. Hedgerows, retained grassland and trees.

The Management Plan shall include a scheme for the provision of bird and bat boxes within the development. The Management Plan shall also include a scheme for hedgehog mitigation measures, in the form of hedgehog friendly boundary treatments and fences. The boxes and hedgehog mitigation measures so approved within each phase shall be completed and available for use before the last dwelling or office within that phase is completed.

Reason: To ensure that the optimal benefits of biodiversity are achieved.

- 16 All site clearance work shall be undertaken outside the bird-breeding season (March - September inclusive). If clearance works are to be carried out during this time, a suitably qualified ecologist shall be on site to survey for nesting birds in such manner and to such specification as may have been previously agreed in writing by the Local Planning Authority.

Reason: To ensure that birds' nests are protected from disturbance and destruction.

- 17 No development on the residential areas of the site shall commence until a noise assessment has been conducted and the results submitted to and agreed in writing by the Local Planning Authority. Any sound attenuation measures required to address the noise nuisance identified in the assessment shall be fully implemented before the occupation of the dwellings affected.

Reason: To ensure that the residential amenity of the occupiers of the new dwellings are not affected by the adjoining commercial units and the A57.

- 18 A scheme to provide a buffer/ acoustic screening between the residential elements of the application site and the existing and proposed commercial/employment land to the south shall be submitted to and agreed in writing by the Local Planning Authority before development commences. The agreed scheme shall be fully implemented before the occupation of any houses within 50 metres of the existing and proposed commercial site boundaries.

Reason: To reduce the impact of the adjoining industrial uses on the dwellings to be erected within the application site.

- 19 Should during the development, land contamination not previously considered be identified, then the Local Planning Authority shall be notified immediately and no further works shall be carried out until a method statement detailing a scheme and timetable for dealing with suspect contamination has been submitted to and agreed in writing with the Local Planning Authority. The mitigation measures identified by the investigation shall be carried out in full and in accordance with the previously agreed timetable.

Reason: To ensure that the site, when developed is free from contamination in the interests of safety.

- 20 No works relating to site preparation or construction shall take place outside 8:00am - 6:00pm Monday to Friday, 8:00am - 1:00pm on Saturday and not at all on Sundays or Bank Holidays.

Reason: To safeguard the amenities of the dwellings located in the vicinity of the application site.

- 21 No development shall take place within the application site until the details of a scheme for a programme of archaeological investigation and mitigation have been submitted to and approved in writing by the LPA thereafter, the scheme shall be implemented in full accordance with the approved details.

Reason: To ensure that any features of archaeological interest are protected and recorded.



- proposed residential dwelling
- proposed office accommodation
- existing tree belts retained
- existing public right of way
- existing 'woodland trail' retained within northern tree belt
- existing desire lines retained around perimeter of site / new footpath provided throughout development
- primary street (the greenway)
- secondary street (the avenue)
- tertiary street (lane)
- private drive (shared)
- car parking bay
- existing dwelling
- indicative soft landscaping
- local equipped area of play
- multi use games area
- formal play space
- potential bus route
- potential bus gate location

Development Schedule - 380 Residential Dwellings

A - 4 4 bedroom detached	I - 5 4 bedroom detached	Q - 7 4 bedroom detached
B - 22 4 bedroom townhouse	J - 2 4 bedroom detached	R - 10 3 bedroom townhouse / detached
C - 37 3 bedroom townhouse	K - 3 4 bedroom detached	S - 1 3 bedroom townhouse
D - 53 3 bedroom detached / semi detached	L - 8 4 bedroom detached	T - 30 2 bedroom townhouse
E - 34 2 bedroom townhouse	M - 88 3 bedroom townhouse	U - 40 1 bedroom apartment
F - 2 2 bedroom apartment	N - 5 4 bedroom detached	V - 22 2 bedroom apartment
G - 2 2 bedroom apartment	O - 1 3 bedroom detached	
H - 1 3 bedroom detached	P - 3 3 bedroom detached	Office accommodation 19,000 square metres

Land south of Gateford Road Gateford - Development Plan

dwg.no. 13-114-03 scale 1-1000@A1 December 2013

SA-REF007



From: [REDACTED]
Sent: 15 June 2022 12:13
To: The Bassetlaw Plan
Subject: FOR ACTION: Bassetlaw Plan - reg-19-form-a-b-14pt-may-2022
Attachments: reg-19-form-a-b-14pt-may-2022.docx

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

Dear [REDACTED] and colleagues

Please find HE's completed Reg 19 2nd addendum response form in relation to the current consultation for the draft Bassetlaw Plan.

We have no issues to raise with the revisions proposed.

Kind regards, Ros

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

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

[REDACTED]
www.HistoricEngland.org.uk



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Bassetlaw Local Plan 2020-2038

Publication Version Second Addendum Representation Form May - June 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 21st June 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 Alternatively this form can be completed and returned as an e-mail attachment to thebassetlawplan@bassetlaw.gov.uk or by post to **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

Please note:

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

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

Data Protection Notice:

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

All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name

of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: [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: 15-06-2022

This form has two parts:

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

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

Part A- Personal Details

1. Personal Details

Name:

[REDACTED]

Organisation (if applicable): Historic England

Address: The Foundry, 82 Granville Street, Birmingham

Postcode: B1 2LH

Tel:

Fax:

Email: e-midlands@historicengland.org.uk

2. Agent Details (if applicable)

Agent:

Organisation (if applicable):

Address:

Postcode:

Tel:

Fax:

Email:

Part B - Your representation

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

Name or Organisation: Historic England

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

Policy: Y

Paragraph: Y

Policies Map: Y

4. Do you consider the Local Plan is:

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

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☒

No ☐

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

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

HE has no issues to raise in terms of its historic environment remit in relation to the soundness and legality of the draft Plan and Duty to Cooperate.

Continue on a separate sheet if necessary

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

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

N/A

Continue on a separate sheet if necessary

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

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

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

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

Yes ☐

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

No ☒

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

N/A

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

SA-REF008



From:

17 June 2022 11:22

To:

The Bassetlaw Plan

Cc:

Subject:

Representations to the Bassetlaw Local Plan (2020-2037): Publication Version Second Addendum

Attachments:

Forms A and B (Policy ST1).docx; Form B (Policy ST2).docx; 29883 Vision 10 LR.pdf; 220617 Representations to BDC Draft Local Plan Publication Version Second Addendum.pdf

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

Dear Sir/Madam,

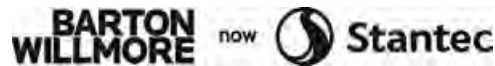
Please find attached our representations and the appropriate forms in response to the Regulation 19 (Publication Version Second Addendum) Local Plan.

Please let us know if you require any further information.

Kind regards,

Senior Planner

bartonwillmore.co.uk
9th Floor, Bank House, 8 Cherry Street, Birmingham, West Midlands, B2 5AL



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Bassetlaw Local Plan 2020-2038

Publication Version Second Addendum Representation Form May - June 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 21st June 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 Alternatively this form can be completed and returned as an e-mail attachment to thebassetlawplan@bassetlaw.gov.uk or by post to **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

Please note:

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

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

Data Protection Notice:

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

All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name

of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: [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: 17th June 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: C/O Agent

Organisation (if applicable): Heyford Developments Ltd

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: 

Organisation (if applicable): Barton Willmore, now Stantec

Address: 9th Floor, Bank House, 8 Cherry Street, Birmingham

Postcode: B2 5AL

Tel: 

Fax: N/A

Email: 

Part B - Your representation

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

Name or Organisation: Barton Willmore, now Stantec

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

Policy: ST1: Bassetlaw's Spatial Strategy

Paragraph: N/A

Policies Map: N/A

4. Do you consider the Local Plan is:

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

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

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

Please refer to enclosed representations

Continue on a separate sheet if necessary

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

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

Please refer to enclosed representations

Continue on a separate sheet if necessary

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

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

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

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

Yes ☒

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

No ☐

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

Please refer to enclosed representations

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



Bassetlaw Local Plan 2020-2038

Publication Version Second Addendum Representation Form May - June 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: Barton Willmore, now Stantec

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

Policy: ST2: Residential Growth in Rural Bassetlaw

Paragraph: N/A

Policies Map: N/A

4. Do you consider the Local Plan is:

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

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

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

Please refer to enclosed representations

Continue on a separate sheet if necessary

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

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Please refer to enclosed representations

Continue on a separate sheet if necessary

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

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

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bartonwillmore.co.uk
9th Floor
Bank House
8 Cherry Street
Birmingham
B2 5AL
T/ 0121 711 5151

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

VIA EMAIL

29883/A3/MAS/JB

17th June 2022

Dear Sir/Madam

REPRESENTATIONS TO THE DRAFT BASSETLAW LOCAL PLAN (PUBLICATION VERSION
SECOND ADDENDUM— REGULATION 19): MAY – JUNE 2022

We write on behalf of our Client, Heyford Developments Ltd and welcome the opportunity to respond to the Draft Bassetlaw Local Plan Second Addendum (the 'draft Plan'). We respond in respect of our Client's land interests at Park Farm, Blyth ('the site', as shown on the appended red line plan).

The site was promoted through the Blyth Neighbourhood Plan ('BNP') for around 50 dwellings, which has now been formally 'made' following the referendum held on the 6th May 2021.

We have responded to previous versions of the draft Plan, most recently the Regulation 19 consultation in January 2022 – February 2022. We do not consider that the revisions address our concerns. We recognise that the Council are not consulting on the entirety of the Publication Version, most notably, what was formerly Policies ST3 (Bassetlaw Garden Village Design and Development Principles) and ST4 (Bassetlaw Garden Village) following one of the landowners withdrawing their site from the proposed Garden Village prior to Submission. We welcome the deletion of the Garden Village allocation following concerns around its deliverability, as set out in our representations to previous versions of the draft Plan.

We consider that our comments and objection to the draft Plan are still relevant in the context of the issues we have raised regarding Policies ST1 and ST2, which have been updated following the omission of Policies ST3 and ST4.

We note that the Council have not updated the Land Availability Assessment (LAA) as part of the Publication Version Second Addendum. As was the case previously, the Council's assessment through the January 2022 Land Availability Assessment (LAA) (Appendix J) concludes that our Client's site (reference LAA435) has a capacity of 54 dwellings, is considered "suitable" for development and has "no significant constraints identified at this stage". We consider it is an appropriate site to allocate through the Local Plan to deliver much needed housing in a sustainable rural large village, particularly now that the Garden Village is not coming forward. This is demonstrated on the Vision Document also appended.

We set out our response to the current draft Plan consultation in chronological order below.

Policy ST1: Bassetlaw's Spatial Strategy

The draft Policy identifies that the District will provide a minimum of 10,476 dwellings (582 dwellings per annum) for the plan period 2020-2038. This figure is lower than the target in the previous draft Plan Regulation 19 (10,638 dwellings) due to the Bassetlaw Garden Village now not coming forward. This is in spite of the intention to keep housing delivery at high levels, with Paragraph 5.1.23 setting out that delivery averaged 644 dwellings per annum over the past five years. Whilst we welcome the inclusion of sites in excess of the housing requirement (total supply now being reduced to 12,551 dwellings), we continue to raise issues with the manner in which the housing supply is distributed within the District, and we consider that more growth should be directed to the Large Rural Settlements, particularly Blyth.

Policy ST1 states the District's housing need will be delivered in accordance with the settlement hierarchy below:

- i. **"at the Main Towns:**
 1. approximately 2,719 dwellings in Worksop Outer Area;
 2. approximately 725 dwellings in the Worksop Central DPD;
 3. approximately 2,272 dwellings in Retford;
 4. approximately 1,199 in Harworth and Bircotes;
- ii. by supporting the delivery of 1,535 dwellings in the Large Rural Settlements;
- iii. by supporting the delivery of 1,826 dwellings in the eligible Small Rural Settlements;

The spatial strategy continues to split out Worksop Outer Area, Worksop Central, Retford and Harworth / Bircotes, with a total of 7,915. When the above (a) to (d) are added together, it comes to 11,276 dwellings. The difference between the Plan's total minimum requirement (10,476) and the cumulative total of the sites (11,276) should be explained.

We continue to have no objections and no specific comments to the growth being directed to the main towns, providing there is sufficient infrastructure to support the allocations and they are backed up by evidence around viability and deliverability. Our principal concern remains with the Rural Settlements and the re-distribution of dwellings following the withdrawal of the Garden Village.

As we set out in our previous responses to the draft Plan, the growth identified in Policy ST1 (and ST2) is in part reliant on the Neighbourhood Plans. Whilst we generally support the locally-led approach which underpins the neighbourhood plan process, the recently adopted Blyth Neighbourhood Plan is reliant on one site to deliver the majority of its housing requirement, despite our view that it is of questionable deliverability / developability. This therefore presents a risk to the Council meeting its housing growth targets.

We continue to object to the arbitrary 20% growth cap for Large Rural Settlements, including Blyth (see Policy ST2 below for further detail).

In our response to Policy ST2 we also raise issues with the list of settlements and growth allocated to each. From the five Large Rural Settlements, the total delivery over the Plan period is expected to be 1,535 dwellings, made up of 198 completions (as at 31st March 2022), 1,063 extant permissions (as at 31st March 2022), 199 made Neighbourhood Plan allocations and 75 new dwellings allocated in Tuxford.

As was the case previously in the Land Availability Assessment (January 2022), the extant permissions and Neighbourhood Plan allocations appear to be as follows:

- Blyth – 77
- Carlton - 410
- Costhorpe – 0
- Langold/Hodstock – 465

- Misterton – 163
- Tuxford – 86
- Total – 1,201

With the completions (198) and 75 new dwellings in Tuxford, this totals 1,474. This is 61 dwellings less than the specified 1,535 dwellings. Under Policy ST2 it requires each settlement to grow by 20%.

We welcome the inclusion of the table in in Policy ST2 (page 30) setting out growth requirements for eligible settlements. In terms of eligible Large Rural Settlements, this list totals 1,297 dwellings, 238 less than the settlement hierarchy states. This is a larger deficit compared to the previous draft Plan, which stood at 199 dwellings. Clarification is required as to why the draft Plan is providing considerably less than the settlement of hierarchy states. We also think Neighbourhood Plan allocations have been double counted.

The same table on page 30 has eligible Small Rural Settlements totalling 481 dwellings if each is to grow by 20%. No new allocations are proposed as there are 538 completions (2020-2022), 1,053 extant permissions and 235 Neighbourhood Plan allocations; totalling 1,826 dwellings. Again, this list of commitments should be checked and the relationship between them and the 20% Growth Requirement clarified.

As we set out in representations to previous versions of the draft Plan, the spatial strategy needs to ensure that housing and employment needs are aligned, so that housing is proposed where there is demand for employment. As paragraph 6.1.2 of the draft Plan notes:

“The logistics sector also continues to grow, with recent significant development at Manton Wood, and substantial construction at Snape Lane and Symmetry Park underway, evidence that potential exists for the District to capitalise on its strategic accessibility along the A1 and A57 corridors”.

The recently upgraded A1 junction to the north of Blyth offers a significant opportunity to meet this need and assist in delivering economic growth in the District, particularly in sustainable rural locations to ensure growth is balanced. Housing should be located nearby to ensure jobs and workers are closely located and accessible by public transport – there are regular buses running between Blyth and the A1 roundabout to the north.

In summary, we therefore continue to object to Policy ST1. It is not justified as the evidence supporting it is not clear how the housing requirement will be delivered, meaning it is also not positively prepared or effective. As insufficient growth is directed to Blyth, the Plan will not deliver balanced growth spread across the more sustainable rural settlements and so this will not be consistent with the NPPF and its aims to deliver sustainable development.

Suggested changes:

1. The difference between the Plan’s total requirement (10,476) and the cumulative total of the draft allocations (11,276) should be explained. Clarification is required as to what level of growth will be delivered for each of the Rural Settlements (and whether Neighbourhood Plan allocations have been double counted) and what the contribution is to the overall housing requirement.
2. The growth targets for specific settlements should be updated to contain mechanism for guarding against non-delivery of housing through Neighbourhood Plans (see Policy ST2).
3. In light of the matters raised in relation to Policy ST1, and issues around supply, trajectory and deliverability, further growth should be directed to the sustainable settlement of Blyth.

Policy ST2: Residential Growth in Rural Bassetlaw

We note that Policy ST2 is being consulted on in the draft Plan, whereas it was not included in the previous Publication Version Addendum consultation which took place January 2022 – February 2022. We consider that to our comments to the previous draft Plan Regulation 19 are still relevant in the context of the omission of our Client's site, and our comments and objection to Policy ST1.

The Bassetlaw Rural Settlement Study Update (November 2020) acknowledges at page 4 that an out-of-date Plan in the past has:

"contributed to the inconsistent management of rural growth across Bassetlaw. Some settlements have grown by hundreds of houses and others have had none, contributing to a growing conflict between the balance of sustainable growth and the benefits that generally accompany new development.

In Bassetlaw, these conflicts are translated – most apparently - into a lack of infrastructure being delivered to support a growing population and a large oversupply of residential planning permissions (or commitments) in areas – particularly those that, perhaps, do not have an **adequate level of services and facilities to support such a high level of growth".**

We note that the Council do not consider a blanket growth requirement for all the Rural Settlements to be appropriate, as set out in paragraph 5.2.7 in the Publication Version Plan Regulation 19 (August 2021). This is suggested by differentiating between Large and Small Rural Settlements. Whilst we support splitting the settlements and the methodology behind it, there is a blanket growth approach for both Large and Small Rural Settlements. Blyth is one of the Large Rural Settlements determined to be eligible to grow by 20% in the plan period, along with several others, in addition to several eligible Small Rural Settlements. However, there is no distinction between the level of services, facilities, and amenities between the settlements, therefore the blanket growth requirement will perpetuate this imbalance and unsustainable growth that has been created in a policy vacuum. Instead, further growth should be directed to sustainable settlements, such as Blyth, which has a higher capacity for growth than the arbitrary 20% cap allows. The policy in its current form raises concerns over its consistency with the NPPF's objective to significantly boost the supply of homes (paragraph 60).

Growth in Rural Settlements is largely dependent on commitments, but as above, the draft Plan is unclear as to what will be delivered. There is an apparent inconsistency between Figure 8 (suggesting total growth of 1,535 dwellings in Large Rural Settlements) and the commitments in the Land Availability Assessment (suggesting 1,296 dwellings, when taking into account the proposed allocation in Tuxford). It appears that the Neighbourhood Plan allocations have been double counted. We query whether the same has been done for Small Rural Settlements. This needs to be addressed, otherwise there is a potential shortfall, which is not clear as the draft Plan is unclear as to what will be delivered.

The revised housing distribution at Policy ST1 appears to suggest an increase over and above the January 2021 consultation of 94 dwellings in the Large Rural Settlements and 231 dwellings in Small Rural Settlements. It is difficult to understand why this is the case given the findings of the Bassetlaw Rural Settlement Study Update and Spatial Strategy Background Paper (Update November 2020), which clearly set out the distinction between Small and Large Rural Settlements and their comparative capacity for growth. If there is an issue with double counting Neighbourhood Plan commitments, then the shortfall should be directed towards Blyth.

Part 3 of Policy ST2 sets out the principles for which additional residential development will be supported above the 20% growth requirement. The only mechanism appears to be a community-led approach via the neighbourhood plan process. We strongly object to Part 3 on the basis that it will limit growth coming forward in sustainable locations given the strict adherence to a cap. Whilst the opinions of the local community are important to consider through the planning process, there are a wider range of material

considerations that should also be appropriately assessed. It is considered that this element should be removed and replaced with a more specific set of criteria to which applications should be assessed.

This is particularly important given the points we raise above in relation to Policy ST1 and the potential for Neighbourhood Plans to allocate sites which may not be ultimately deliverable or developable in the Plan period. If there is no requirement or mechanism to require a review of a Neighbourhood Plan, then there is no means of approving alternative housing under Policy ST2 Part 3.

To assist with this, Policy ST2 should also include a reference to the need for ongoing monitoring of delivery and supply within the Rural Settlements. It should make provisions for instances where Neighbourhood Plan allocations (or permissioned sites) are not being implemented, and the 20% growth not being achieved (see LAA which states a historic lapse rate of 24% for such sites). The policy should state that in these circumstances a review of those allocations will be necessary and additional supply will be brought forward ahead of such reviews via a reasonable criteria-based policy, so as to ensure an ongoing supply of housing (in accordance with NPPF paragraphs 74-77). The criteria-based policy could reflect that of the current Bassetlaw District Core Strategy (2011) Policy CS1 and approach of the Council in relation to developments outside of the settlement boundaries (as stated in the Authority Monitoring Report (AMR) 2020/21 in relation to Indicator H5: Number of houses built and permitted outside the settlement boundaries).

We therefore continue to object to Policy ST2. It is not justified as the evidence supporting it is not clear how the housing requirement will be delivered, meaning it is also not positively prepared or effective. As insufficient growth is directed to Blyth, the Plan will not deliver balanced growth spread across the more sustainable rural settlements and so this will not be consistent with the NPPF and its aims to deliver sustainable development.

Suggested changes:

1. The Policy should set out clearly what the breakdown is in terms of commitments (including reductions for lapse rates) and new housing, with a particular focus on clarifying whether Neighbourhood Plan allocations have been double counted in the commitments. It should also address the imbalance between the significantly higher quantum of development that the Small Rural Settlements are set to accommodate compared to the Large Rural Settlements. This can be rebalanced if there is a shortfall due to double counting.
2. The draft Plan should revisit the 20% growth requirement/cap applied to Large Rural Settlements and should account for lapse rates. Additional growth should be directed to more sustainable settlements such as Blyth. This should consider the relationship between employment and housing growth as noted in our response to Policy ST1.
3. The policy should remove reference to the weight to be afforded to local community support in determining applications as this could undermine the assessment of an application on its merits. This should be replaced with a more appropriate set of criteria (see 4 below also).
4. The policy should incorporate an ongoing monitoring of delivery and supply within the Rural Settlements, with a policy basis to support additional supply in the event Neighbourhood Plan allocations and other commitments are not being delivered.

We trust these representations are helpful to inform the preparation of the Local Plan. Should you require any clarifications of the points raised please contact me or Mark Singer.

Yours sincerely



Associate Planning Director



Barton Willmore / 101 Victoria Street / Bristol BS1 6PU
tel: 0117 929 9677 / email: james.dehavilland@bartonwillmore.co.uk

Desk Top Publishing and Graphic Design by Barton Willmore Graphic Design

This artwork was printed on paper using fibre sourced from sustainable plantation wood from suppliers who practice sustainable management of forests in line with strict international standards. Pulp used in its manufacture is also Elemental Chlorine Free (ECF).

J:\29000 - 29999\29800 - 29899\29883 - Park Farm, Blyth\A5 - Reports & Graphics\Graphic Design\Documents\Vision Document\29883 Vision 10

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Date 24.05.19 **Status** Final Rev - A **Author** NO **Checked by** - JDH



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- 7. Summary of Aspirations.....46



“ To provide **a sustainable development** that offers **a variety of high-quality housing for the local community**, within the centre of Blyth. The development seeks to be **responsive to its setting and context; to historic, built and natural assets** that contribute to the distinct identity of the village. ”





I. Introduction

The Vision Document has been prepared on behalf of Heyford Developments Ltd, to support proposals for residential development at Park Farm, Blyth.

The purpose of this document is to support the promotion of the site at Park Farm, Blyth to accommodate residential development. The key aims and objectives of the document are to:

- » present a vision and design framework to guide and shape the proposals
- » review the site in the context of current planning policy
- » present an initial understanding of the site and the local context, and
- » present the emerging concept masterplan, supported by an explanation of the key design principles that have informed it.

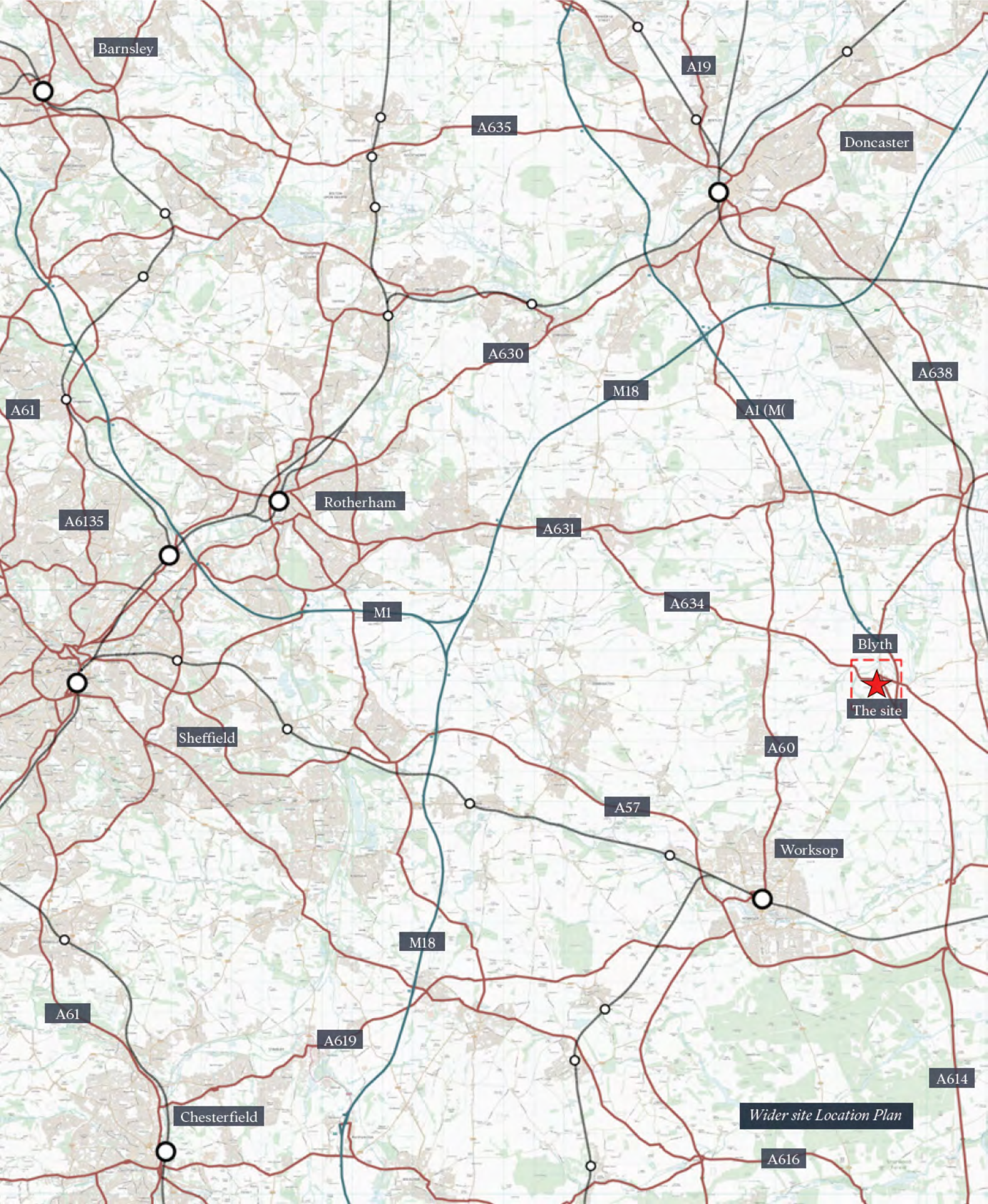
Site Context

The site is located to the south-west of Blyth, a village and civil parish in the Bassetlaw district of the county of Nottinghamshire (East Midlands). It is located six kilometres north of Worksop and broadly midway between Worksop, Retford and Bawtry.

Blyth is easily accessible from the adjacent A1(M) at the Blyth roundabout, which provides excellent connectivity to the wider strategic road network A631, A634, A60 and M18. Worksop Railway Station can be reached via a 15-minute bus journey and provides hourly services to key destinations such as Leeds, Lincoln and Nottingham and bus services to Doncaster, Worksop and Gainsborough.



Looking east towards Worksop Road



Barnsley

A19

Doncaster

A635

A630

M18

A1 (M)

A638

A61

A6135

Rotherham

A631

M1

A634

Blyth

The site

Sheffield

A60

Worksop

A57

M18

A619

A61

Chesterfield

A614

Wider site Location Plan

A616

The site

The site is approximately 3.9 hectares (ha), on land most recently used as a farm. It includes a number of agricultural buildings and structures, as well as agricultural grassland.

The site lies to the south-west of Blyth and is bounded by the A634 and existing development to the north, residential and commercial development to the east, Worksop Road (B6045) to the south and an unnamed access track (accommodating a Public Right of Way (PRoW) with agricultural fields beyond to the west.



View of site from north west site boundary



A634

A634

A634 High Street

B6045 Workshop Road

Aerial site Plan

2. Planning Policy Context

Development Plan

The Development Plan in relation to this site comprises the Bassetlaw District Council (BDC) Core Strategy and Proposals Maps (adopted 22 December 2011):

Bassetlaw Core Strategy

The Core Strategy sets out an overall housing requirement of 6,384 houses (355 per annum) over the Plan Period 2010 – 2028). It identifies Blyth as a ‘Rural Service Centre’ in the settlement hierarchy, offering a range of services and facilities, and the access to public transport, that makes them suitable locations for limited growth (Policy CS8). According to Policy CS8, up to 10% (599 houses) of the District’s housing requirement will be delivered in the Rural Service Centres. The affordable housing target for Blyth is 25%.

Within the Proposals Maps, Blyth is shown on Inset Map 02. The site is shown as sitting outside the development boundary and adjacent to (within a small area falling within) the Conservation Area boundary, which is limited to the eastern site boundary to the rear of Park Farm.

The Plan also includes development management policies which are key for informing both the Concept Masterplan within this Vision Document, but also any future planning application.

Other Material Considerations

National Planning Policy Framework (NPPF February 2019)

The NPPF (2019) continues to require Councils to significantly increase the supply of housing and several important changes have been made to reflect the need to demonstrate and ensure deliverability, including the Housing Delivery Test and the Standard Method for calculating housing needs. The Draft Bassetlaw Local Plan will need to respond to these requirements.

Emerging Policy

Draft Bassetlaw Local Plan (2018–2035)

A new Local Plan is currently being prepared. A Regulation 18 consultation for the Part 1 Strategic Plan took place between 14th January and 10th March 2019, which suggested an overall housing requirement of 6,630 dwellings (390 per annum). The draft Plan encourages Neighbourhood Plans to allocate housing development to meet local requirements. The indicated housing requirement for Blyth between 2018 and 2035 is 56 dwellings (representing 10% growth), with a capped growth (20%) of 106 dwellings.

Part 2 of the Local Plan consultation is timetabled to take place in June 2019, with a Regulation 19 draft expected in January 2020 and formal adoption of the full Local Plan in February 2021.

Blyth Neighbourhood Plan (2018–2035)

The site falls within the boundary of the Blyth Neighbourhood Plan area, which was designated on 28th September 2017. A Regulation 14 Consultation took place between 18th February and 7th April 2019. The draft Neighbourhood Plan looks to deliver the full capped growth of 106 dwellings as proposed in the draft Local Plan. The draft Neighbourhood Plan seeks to meet this primarily through a draft allocation for 53 new dwellings, located to the south-east of Blyth. As we set out in this Vision Document, the site being that of the site at Park Farm to the west of Blyth is a more appropriate and sustainable site to deliver the village’s housing needs.

Design Policy Summary:

Policy Reference	Policy Name	Key Points
Core Strategy (December 2011)		
Policy DM4	Design and Character	Key policy and guidance for residential layouts
Policy DM5	Density	Reflect specific characteristics of the site/area



Looking north from Worksoy Road

3. Local Context

Access and Movement

The site is located on and is accessible via Worksop Road (B6045), which runs along the eastern boundary of the site. The site is also accessible via sustainable modes of transport. The site also benefits from excellent foot and cycle linkages to local schools, the High Street, bus stops and formal sports and recreational facilities.

Worksop Road (A6045)

Worksop Road is a single carriageway B-road, subject to a 40mph speed limit. Worksop Road varies between 5.6m in width at points along the frontage of the site, to 7.3m width adjacent to the southern boundary of the site. There is a footway on the eastern side of the carriageway measuring 1.7m in width and separated from the carriageway by a 1.6m grass verge. On the northern side of the carriageway, east of the proposed site, a 1.6m footway runs for a distance of 80m from the priority junction with High Street.

High Street (A634)

The A634 runs to the north of the site in a west-east alignment. This road runs through the heart of the village and provides access to a range of local amenities, retail and community uses. This road is subject to National Speed Limit until the road approaches Blyth, where it is reduced to a 30mph speed limit. The A634 varies between 5.6m and 6.2m in width along its route with footways on either side of the carriageway at 2.1m in width.



Worksop Road (B6045)

Public Transport

Local bus stops are located within walking distance from the site, providing regular services to local destinations such as Doncaster, Worksop and Gainsborough. The nearest bus stop to the site is located on Worksop Road, approximately 150m walking distance from the proposed site access. There is a further stop located on Retford Road, 350m from the proposed pedestrian access, from which further bus services can be accessed.

The closest railway station to the site is Worksop Station, located approximately 5 km south of Blyth. Worksop Station is accessible via the Stagecoach 25 Bus Service from Worksop Road, an approximate journey time of 15 minutes. Worksop Station provides rail services to Leeds, Lincoln and Nottingham (all depart once per hour).

Pedestrians and Cycles








The site also benefits from excellent foot and cycle linkages to local schools, Blyth High Street, bus stops, formal sports and recreational facilities.

A PRoW is located to and forms the western boundary of the site.



High Street (A634)



- | | | | | | |
|---|---------------|---|----------|---|-----------|
|  | Site Boundary |  | Motorway |  | Bus Route |
|  | Bus Stop |  | A Road |  | PRoW |
| | |  | B Road | | |

Local Facilities

Blyth offers a good range of local facilities, services and excellent transport links to the A1(M). The site is located within walking distance of the majority of facilities and amenities, within 5-10 minutes walking journey.

Key facilities are as follows:

Key Facility/Amenity	Average walking distance/time
Local supermarkets and pubs	500 – 1200 metres
Angel Inn	(5 – 13 minutes walking journey)
Red Hart Inn	
Fourways Hotel	
White Swan	
Blyth Memorial Hall	
Blyth Medical Surgery	
Cricket Ground and Pavilion	
Blyth Primary School	
Bowling Green and Pavilion	
St Mary and St Martin Church	1200 – 1700 metres
Play Park (Biber Road)	
Play Park (Spital Road)	
Dental Surgery	

The proximity of local amenities and the ability to reach such facilities by foot and cycle is a key consideration when determining the sustainability of development.

Guidance provided by the Institution of Highways and Transportation (IHT) in ‘Guidelines for providing journeys on foot’ (2000) suggests that in terms of *‘commuting, walking to school and recreational journeys, walking distances of up to 2 km can be considered as a preferred maximum with ‘desirable’ and ‘acceptable’ distances being 500m and 1000m respectively’*.

The site is therefore considered to be accessible via sustainable modes of transport and there are a variety of amenities within IHT guidelines for walking distances.



High Street Shops



High Street



Angel Inn, High Street



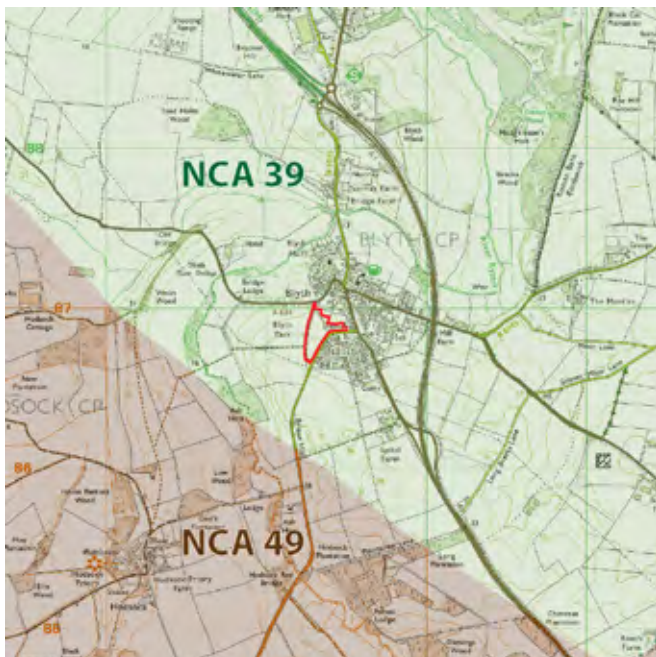
Key Facilities Plan

Landscape Character

National Landscape Character: NCA: 39 Humberhead Levels

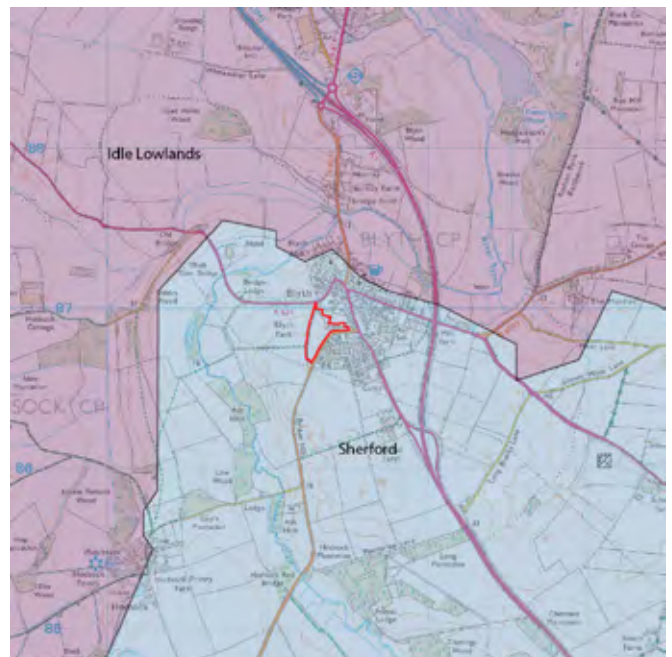
The site and its immediate surroundings lie within the National Character Area profile: NCA 39 Humberhead Levels. The site and its surroundings are situated at the south-western edge of NCA 39. Humberhead Levels extends to a considerable area (171,805 ha). The site at 3.5 ha in area and the setting, exhibits a few of the key characteristics of the national NCA:

- » A low-lying, predominantly flat landscape...
- » Views to distant horizons are often long and unbroken, with big expansive skies, and vertical elements like water towers, power stations and wind turbines are very prominent
- » Despite settlements, motorways and main roads, there is still a sense of remoteness to be experienced on the Levels



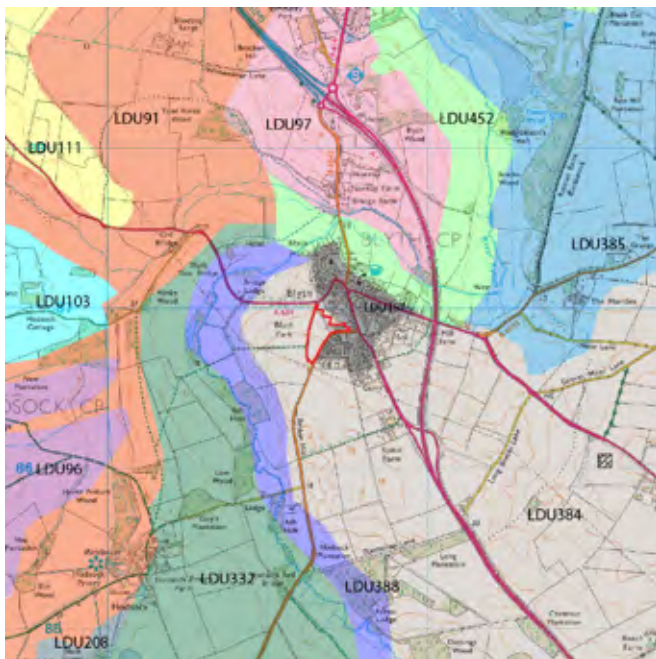
Regional Landscape Character: Bassetlaw Landscape Character Assessment (2009)

The Bassetlaw Landscape Character Assessment (BLCA) defines the landscape character of the administrative area of Bassetlaw District Council (BDC). The BLCA divides the area into five regional Landscape Character Areas. The site and its immediate surroundings lie within the northern edge of 'Sherwood' character area.



Local Landscape Character: Landscape Description Units

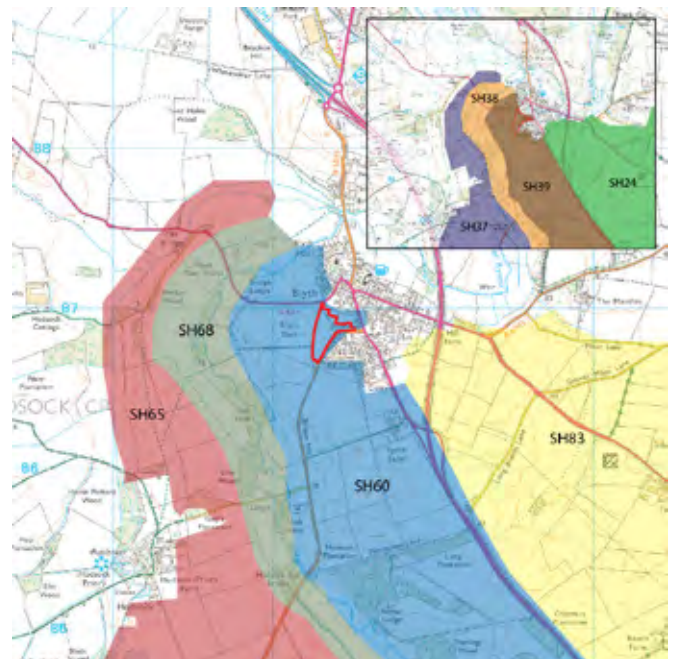
The ‘Sherwood’ regional character area has been subdivided into smaller homogeneous units at a local scale known as Landscape Description Units (LDUs). The site and the majority of its setting lies within LDU 384. The eastern surroundings of the site, being part of the urban area of Blyth, falls under LDU 157. The LDUs have been further divided into survey units known as Landscape Character Parcels (LCPs).



Local Landscape Character: Landscape Character Parcels

The LCPs are assessed in terms of their individual landscape character. The site and its surroundings fall within LCP SH60. The landform of SH60 is gently undulating and comprises *“fields interspersed with small areas of mixed and coniferous woodland and bounded with well maintained trimmed hawthorn hedges.”*

LCPs that have similar attributes have been combined to form Policy Zones (PZs). The site lies within the northern end of SH PZ 39: Blyth which is in very good landscape condition with a coherent pattern of elements with few detracting features. The area *“retains a rural character despite the close proximity of the AI”*. The PZ has *“a moderate sense of place combined with moderate visibility equates to moderate landscape sensitivity”*. The overarching policy for SH PZ 39 is ‘Conserve’.



Landform of the site and the setting

Landform is a key component of landscape character as it influences many other attributes of landscape character: land use, settlement pattern, tree cover etc. The site has a gently sloping landform falling northwards towards River Ryton further north. The landform is characteristic of the wider landscape being gently undulating. The many watercourses including River Ryton and Oldcotes Dyke form shallow valleys, giving the land its undulation.

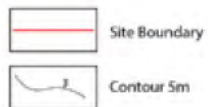
Landform across the wider setting, tends to rise towards the north at Styrrup with Oldcotes and the west, past Doncaster Road (A60). Some hills are noted within the landscape including Bracken Hill to the north, Blyth Law Hill to the south and Malpas Hill to the north-west amongst others. These hills are generally not very high and thereby providing the undulation to the land.

Land Use and Settlement Pattern

The site adjoins the village of Blyth to the north, east and south-east. The closest town to the site is Worksop, the largest town in Bassetlaw District with a population of 41,820 in the 2011 Census. The centre of Worksop lies approximately 8km to the south-west of the site. The site is located to the west of relatively new (late 20th century) housing along Worksop Road (B6045). However, to the north along Sheffield Road (A634) and east along the High Street, the site is situated adjacent to and in parts within a more historic area which comprises the Blyth Conservation Area.

The landscape is criss-crossed by major transport corridors generally traversing in a north-south alignment including the A1, A638 and A60. Another major route, the A634, crosses the landscape from the north-west to the south-east through the centre of Blyth. The B6045 running alongside the site's eastern boundary is the primary link between Blyth and Worksop. Settlements are common in the wider landscape and tend to be nucleated. Some scattered farmsteads are present across the landscape.

The site, being situated to the south of the A634 and west of the B4065 and adjoining the established urban area is well related to the settlement to the north and east.



Landform Plan

Tree Cover of the Setting

Extensive tree cover is present within the wider setting (approximately 15km from the site) comprising generally blocks of woodland and hedgerow trees. Many of these woodland blocks are situated in close proximity to watercourses that cross this valley landscape. These woodlands include Broom Hill Wood to the south, Toad Holes Wood to the north amongst others. Plantation blocks are common as well, with several in the wider landscape, generally to the south of the site. Some of these include Hodsock Plantation, Steeple Plantation and Long Plantation. Blyth Wood, approximately 1.2km to the north of the site is an Ancient and Semi-Natural Woodland.

Much of the tree cover in the immediate setting of the site (approximately 1km from the site), lies within the parkland in association with the erstwhile Blyth Hall to the north of Sheffield Road, hedgerow trees, street trees in particular the avenue of limes flanking Sheffield Road and woodland cover such as Ash Holt and Low Wood along the River Ryton corridor. The well managed hedgerows in the surroundings are occasionally interspersed with mature oak trees.





Blyth FP2 PROW

View from Blyth FP2 PROW looking south along the site's western boundary

4. Opportunities and Constraints

The findings from the initial site and context assessment have been evaluated to identify the emerging constraints and opportunities relevant to the development of the site.

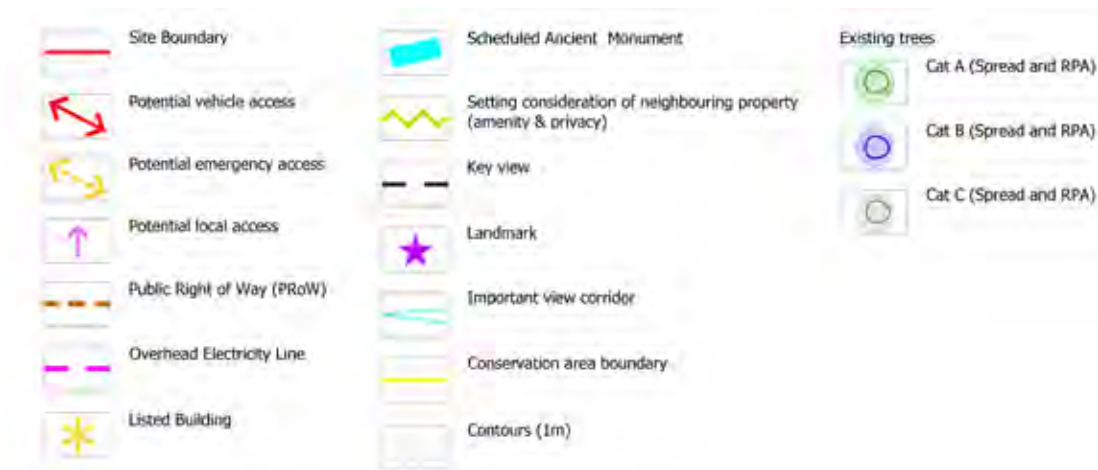
The plan in this section presents an analysis of these elements, the qualities of the site and technical surveys that provides the context for future development proposals. It should read alongside the following technical summaries:

Access and Movement

Vehicle access to the site will be provided from a new access on Worksop Road, to meet the required visibility based on measured vehicle speeds. There is the potential to retain the existing farmhouse access on Worksop Road in the form of a private drive, providing access to a small number of dwellings.

Pedestrian access and facilities can be provided utilising existing infrastructure, such as the existing footway along Worksop Road. There is the potential for a further pedestrian access points from Worksop Road and to the north of the site.

Pedestrian linkages also provide the opportunity to connect across the site to the existing PRow and Bridgeway that bounds the site to the west. This will provide a variety of routes and decrease walking distances to local amenities within Blyth and improve the permeability of the site.





Ecology

An extended Phase 1 Habitat Survey and desk-based data search was undertaken in April 2019, to identify any key ecological features associated with the site and the surrounding area and to inform future development.

In summary, the site is currently generally grassland and ephemeral vegetation with boundary scrub, trees and hedgerow, and hard standing surrounding the existing farm buildings.

The site has potential to support nesting birds, and roosts for Tawny Owl within the boundary vegetation. The site may also support foraging and commuting bats, with several farm buildings on site and trees on the boundary identified as having potential for roosting.

Surveys of these identified species are recommended within the PEA in line with The Conservation of Habitats and Species Regulations 2010 which include provisions for European Protected Species, and will be considered as appropriate to support any future planning applications. Appropriate mitigation measures will be reviewed in line with the development proposals.

Arboriculture

The site is lined on the western boundary by a group of mature Category B trees, which form a canopy for the PRow. A number of mature trees (Category B and C) and hedgerows are located along Worksop Road (B6045). A single mature Category A tree exists in the eastern section of the site, this Sycamore is on the site boundary and adjacent to the access for farm buildings.

Generally, the tree resource is confined to the boundaries, and this vegetation will be retained and enhanced, where possible. Ecological and arboricultural features associated with the site (where specified) should be retained and inform any future development proposal.

Arboricultural input will continue to inform the design process and an Arboricultural Impact Assessment will be provided at the appropriate standards and guidance once the layout is finalised.

Appropriate tree protection measures will be provided during any future construction phase in accordance with BS standard 5837:2012 and best practice policy and procedures.



Tree canopy located along the PRoW to the western boundary of the site

Heritage and Archaeology

A desk-based review of the site and its locality with regard to potential impacts on archaeological and heritage assets has been undertaken as part of the initial site analysis.

There are no designated or non-designated heritage assets within the boundary. Within 1km of the site there are 40 listed buildings.

Listed Buildings

The closest Listed Buildings are the Grade II Park Farm House and Grade II Parish Room which lie approximately 50m to the east of the site. Park Farm House will be subject to impact by development in the east of the site as the existing vegetation between the site and Park Farm House is unlikely to provide comprehensive screening. This impact would be reduced by sensitive development orientation, and rear gardens backing onto the eastern boundary. The Parish Room is less likely to experience an impact due to being single storey and the presence of existing farm outbuildings and vegetation acting as a barrier to the site.

22 and 24/26 High Street, c 120m to the northeast of the site may experience some impact from development of the site although this cannot be confirmed at present. However, due to distance and separation of these buildings from the site, and the existing buildings in the intervening spaces, this impact is likely to be low/negligible.

The main clustering of listed buildings is along the north to south A634 High Street and to the north at the junction of the A634 and B6045, the majority of these will be screened by the existing 19th/20th century development and vegetation.

The exception to this is the Grade I Listed Blyth Priory Church of St Mary and Saint Martin which lies c 300m to the north of the site. Whilst the site would not be inter-visible from ground level, it is likely that a significant proportion of the site, barring those locations screened by existing mature vegetation, would be visible from the church tower resulting in some impact, if the entire site were to be brought forward for development. Similarly,

development is likely to impact upon views towards the church tower when approaching Blyth from the south along the B6045 Worksop Road.

Despite this, mid-20th century residential development to the east of the site (Spitalfields/ Briber Road) has already impacted and defined the southern extent of Blyth when approaching from the south west along Worksop Road and looking southwards from the church tower.

The sole Listed Building not associated with the village core is the Grade I Blyth New Bridge located c 600m to the northwest; this is screened from the site by topography and vegetation.

Conservation Area

The site lies immediately to the south and west of the Blyth Conservation Area which therefore, without sensitive masterplanning could be impacted upon due to the aforementioned designated heritage assets which are considered to contribute towards the character of the Conservation Area.

There are three Scheduled Monuments within 1km of the site, the former Blyth Priory, the former St John's Hospital chapel (referred to in the scheduling report as Blyth School) and Blyth New Bridge.

There are also 79 non-designated assets recorded by the Nottinghamshire Historic Environment Record within 1 km, some of which are repetitions of previously mentioned assets such as the Listed Buildings and Scheduled Monuments.

Of the non-designated, archaeological assets, the nearest is a ring ditch of unknown date recorded via aerial photography which lies immediately adjacent to the western boundary. The site also lies immediately to the east of the unregistered park and garden, Blyth Park.

Overall from a desk-based review, the designated asset requiring most consideration, will be the setting of the Grade I Listed Building which will be considered through careful design within the masterplan.



Church of St Mary and St Martin

Drainage and Flood Risk

A desk based assessment has been undertaken as part of the initial site analysis. The site is in Flood Zone 1 and therefore is at a low risk of flooding.

The surface water strategy will explore all Sustainable Drainage System (SUDs) options. A desk-based review of the topography indicates that the site falls from the highest point in the south of the site away to the lowest point in the north. The information from the British Geological Society (BGS) online resource suggests that the site could be suitable for soakaway solutions for surface water drainage.

To inform suitable drainage solutions, a number of options will be assessed including the viability of soakaways on the site. These will be assessed further through infiltration testing, with a view to including soakaway based drainage opportunities potentially for each individual property.

Foul water flows generated from the development will be directed into the public foul sewer system in consultation with Severn Trent Water Ltd.

Noise

A desk-based review was undertaken as part of the initial site analysis. A potential source of noise which has been identified is the A1 bypass which passes Blyth to the east of the village and a large group of agricultural buildings to the south east of the site. The local highway network within Blyth will also contribute to overall noise sources. The residential properties situated between the proposed development site and the A1 will provide some screening in terms of noise attenuation.

The masterplan will be designed to ensure adequate buffers and screening are considered in the context of these potential sources of noise and will include appropriate considerations of current guidance.

If required, a Noise Assessment will be undertaken to support any future planning application for the site. Should noise survey measurements be required to inform assessment, these will be discussed with the local planning authority's Environmental Health Officer and undertaken as appropriate.



View from the north of the site towards the highest point in the south

Ground

A preliminary desk-based review has been undertaken using available information for the site to assess the current and past uses of the site.

The site falls within a designated Nitrate Vulnerable Zone. This is an area designated as being at risk from agricultural nitrate pollution; this designation covers approximately 55% of land within England. This may restrict the farming uses of nitrogen fertilisers; however, this does not pose any potential impacts or constraints to the proposed residential future use.

Geological mapping from the BGS for the area states that the site is underlain by the Chester formation, a form of sandstone. Further investigations will be undertaken post planning submission to inform the SUDs design proposals for the individual plots.

Reference to the Coal Authority Interactive Mapping website confirms that the site is within a Coal Mining Reporting Area; however, it is in a Low Risk Area- where past coal mining activity has taken place at sufficient depth that it poses low risk to new development.

Soils

The most current and detailed Agricultural Land Classification (ALC) data for the site (the Provisional 1:250,000 mapping provided by DEFRA) shows that the site is ALC Grade 3 (potential Best and Most Versatile (BMV) land).

Data from the National Soil Resources Institute (NSRI) identifies the site is within soilscape grade 10, which suggests that the site is freely draining, slightly acid sandy soil.

The majority of the wider area has a similar quality of soil and therefore in this context there appears to be no significant loss of BMV in the area as a result of the development proposals.



View from the southern corner of the site

Landscape of the site

The site has well defined boundaries. Sheffield Road and field boundaries define the northern boundary, properties on the High Street and Worksop Road form the eastern and south-eastern boundaries. Field boundary in combination with the Public Right of Way (PRoW) – Blyth FP2 define the site's western limit.

The landform of the site is gently sloping towards the north and north-east ranging from 19m AOD to the north-east to 28m AOD to the south. The site is of an irregular shape following the existing field pattern and Worksop Road. It comprises two fields that are pastureland and several built units part of the Park Farm located within the northern and eastern part of the site. The fields are located on either side of the farm buildings – the larger to the west and the smaller to the east. A smaller shed is located at the northern boundary edge.

Mature trees border the site along the western, southern and eastern boundaries. The double line of trees, on either side of the PRoW, to the west form a tunnelled canopy walkway forming a key feature of the site. The fields in general are open with tree cover in the remaining areas being limited to the boundary hedgerow vegetation along the field boundaries. Although mature trees line Worksop Road, the understorey in parts is thin providing permeability to the site and a greater connection with existing built area of Blyth.

There is one Public Rights of Way (PRoW) on site, located at the western edge Blyth FP2 which runs in a north-south alignment. PRoW Blyth FP1, although not on site, adjoins with Blyth FP2 in an east-west direction providing connectivity to the wider countryside.



- Site Boundary
- Listed Building
- Settlement
- Public Right of Way
- Blyth Conservation Area

- Baseline: Landform
- Contours
 - Slope
- Baseline: Vegetation on Site
- Tree Cover and field trees
 - Hedgerow

- Landscape Edge Characteristics
- North: Residential & S Recreation Ground
 - East: Residential
 - South east: B6045 Workshop Road
 - West: Countryside

- Local Visual Analysis
- Clear/open Viewline
 - Filtered/Partial Viewline
 - Truncated Viewline
 - Important View F: Village Entrance From Workshop Road (Blyth Draft Neighbourhood Plan, 2016 - 2035)

Views and Visual Amenity

The site is visually contained from its immediate setting to the west and the north due to the dipping topography. From the south-east and east visibility is limited to the immediate setting of Worksop Road. The urban area of Blyth to the north and east, limits views further north and east. On the approach to Blyth from the south, the site is visible through the trees and is part of one of the first views of Blyth.

Views from the north are limited due to the built-up area of Blyth which borders the site, providing almost no public views. The land also dips to the north which causes the site to be contained. The northern tip of the site can be seen as it borders Sheffield Road and views along the access road provide a degree of visibility of the site.

Views of the site are afforded from the immediate boundaries due to the close proximity to the site. Filtered views of the site are noted all along Worksop Road, with the occasional more open view due to an access gate or break in vegetation. Park Farm and the built form in association with it are also seen from this direction. Clear views in are rare from the south-eastern boundary, although clear views of the built form on site are noted along Worksop Road. Further east, the site is not seen due to the intervening built form.

Views from the south are afforded in close proximity to the site, however most of these views are limited to the vegetation boundary, with the occasional view of the shed and other buildings of Park Farm. The Church of St. Mary and St Martin is a notable feature in the skyline and is present in most views from this direction, in some instances filtered by the intervening site boundary vegetation. The site lies within the foreground of this view, although it is viewed alongside the properties off Worksop Road

Views from the west are wide, due to the countryside. The site is seen through the boundary vegetation from PRoW Blyth FP1 against the backdrop of the properties along Worksop Road. In the wider view, the Church of St. Mary and St Martin is also seen to the far left rising above and forming a key feature in the skyline. Views of the site diminish further west. The roll of the land assists in concealing the site further west.

From within the site, along the PRoW Blyth FP2 to the west the Church of St Mary and St Martin is experienced at varying degree. In places the trees frame the church tower, in others it provides filtered views and at times the trees obscure views of the church. Where the church is seen, it is viewed over the tops of the buildings within the village and is a key landmark in the skyline.



Site Sketch - from existing PROW



Buildings on
Park Farm

Properties along B6045
Worksop Road



Site

On site on Blyth FP2 PRow looking north west across the site towards the Church of St Mary and St Martin.

Church of
St Mary and
St Martin

Blyth Conservation
Area

PRoW Blyth FP2



Park Farm



Off site view from PRow Blyth FPI, looking east towards the site

Buildings part of
Park Farm



Properties along
Worksop Road



On site view from the northern end of the site looking south-east



Shed part of
Park Farm

Workshop Road



Buildings part of
Park Farm



Off site view from Worksop Road looking east towards Park Farm

5. Concept Plan

The concept masterplan plan for the site has been informed by the vision, site analysis and identified constraints and opportunities. The concept masterplan shows the key design principles which underpin the development of the site, as set out below:

- » The proposals provide approximately 2.1ha of residential development land, achieving 53 dwellings using an average density of 25 dwellings per hectare (dph).
- » Vehicular access to the site will be provided from Worksop Road. A potential second local access could also be taken from Worksop Road that serves a small number of dwellings.
- » The existing PRoW has been retained and integrated with a new network of informal footpath routes, aiding the creation of easy and accessible linkages for pedestrians.
- » Heritage, both designated and non-designated assets and their setting have been sympathetically considered within the development proposals.
- » The structure of development blocks has been arranged to ensure the creation of a permeable and legible places that promotes safe streets and spaces.
- » Development blocks will overlook streets and spaces. This will also help to ensure the provision of an attractive and active green corridor that adjoins the western boundary of the site.
- » Existing green capital has been retained wherever possible and will be enhanced to promote a distinctive character for the development. The public open space and attenuation / swale area creates important and valuable green infrastructure, maintains a wildlife corridor and could enhance biodiversity habitat.
- » A significant area of public open space adjoins the western area of the site, recognising the importance of the existing PRoW and mature tree planting. It will be multi-functional in nature, accommodating areas for recreation, formal play, attenuation and ecological enhancement.
- » The new area of public open space is also located to retain the view line to the Church, ensuring that development is not located on higher land within the southern area of the site. The approach to storey heights will also consider this view, being restricted to a maximum of 2 storeys.



LEGEND

- | | |
|--|--|
|  Site boundary |  Attenuation/Swale |
|  Proposed vehicular access point |  Existing tree/hedgerow planting |
|  Potential vehicular access point |  Proposed tree planting |
|  Existing footpath/Public Right of Way (PROW) |  Play Area/Equipment |
|  Residential |  Proposed informal pedestrian route |
|  Public open space | |

Concept Plan

6. Landscape Strategy

The objective of the Landscape Strategy is to set the development into the host landscape in a manner that achieves a sympathetic and successful assimilation in the countryside at the settlement edge

The key objectives for Landscape Strategy are:

- » to make an important contribution to integrating the development with the host landscape of the immediate setting;
- » to create a development that respects the setting of the Church of St Mary and St Martin;
- » to create a public asset of attractive green space to serve the needs of the development; and
- » to ensure the effects of the development are limited and contained in a manner that makes an attractive and in essence a new edge to the settlement.

Existing components: Field pattern, hedgerows and trees, in association with new green spaces will give form and structure to the new Green Infrastructure (GI). The existing components will be connected by new areas of public open space to form a network of biodiverse planted linked spaces and habitats. It will also provide linkage to other GI assets beyond the site. The existing components will be retained and further enhanced where appropriate, and the development arranged around it, to provide strategic and meaningful space with a strong sense of place.

The Landscape Strategy has at this early stage of conceptual development design work, been identified by Landscape and Visual Appraisal work that is set out in this VD. Landscape Character at a national and local level has informed the understanding of the site and its relationship to the countryside and settlement. A high-level GI and

Landscape Strategy proposes the division and softening of the development, retention of the tree and hedgerow boundaries and addresses the setting of the Church by retaining public open space along the main identified viewlines. This led to a scheme informed by the visual constraints to respond to the needs of the wider setting. The development units are therefore located to the north-east and east.

New publicly accessible open green space within the development will be created that follows a linear north-south route, with the area of green space widening towards the south. This would assist in providing an appropriate green setting for the views towards the Church of St Mary and St Martin. Both areas of green space feature at the pedestrian entrances of the site providing an attractive gateway to the site.

The public open space along the site's western end would allow the countryside to bleed into the site, providing a suitable soft edge to the settlement. The retained double row of trees at the boundary would be retained and provided with sufficient green setting to ensure the site retains its distinctive boundary edge.

The Sustainable Urban Drainage system will incorporate a basin to attenuate surface water along the eastern edge in addition to the existing boundary vegetation, ensuring the GI connectivity. The edge planting to the west would also assist the development on site to assimilate with the wider settlement pattern.

The Sustainable Urban Drainage system will require a storage basin to be created to attenuate rainwater along the site's north-western and western extent. This has been located to serve drainage operational requirements and is likely to be ephemeral in nature. This would also have a biodiversity role as well as providing an enhancement to the development. The basin will be designed, planted and managed in a manner that serves as a public amenity.



Existing Components

-  Site boundary
-  Countryside
-  Settlement
-  Public Right of Way

-  Roads









Vegetation

-  Tree cover
-  Hedgerow

Visual

-  Important View F: Village Entrance From Workop Road (Wyn Traff Neighbourhood Plan 2018 - 2035)
-  View from PRoW

Proposed Components

-  Public green space
-  Development entrance
-  Trees & Hedgerow
-  Attenuation pond
-  Green links into site
-  Road
-  Informal pedestrian route
-  Development area

7. Summary of Aspirations



This document sets out how our proposals for Park Farm, Blyth could deliver the vision, alongside the following key benefits:

- » **Quality Living Environment and New Homes**
High quality development that can deliver up to 53 new dwellings, in a range of types and tenures including up to 13 affordable dwellings
- » **Local Distinctiveness**
Positive features retained and incorporated into the scheme to strengthen local distinctiveness
- » **Accessibility and Sustainability**
A site that benefits from a sustainable location, with easy connections to the wider range of facilities and services Blyth has to offer
- » **Public Open Space and Landscape**
New areas of open space that will be publicly accessible and provide an attractive and usable open space for the wider community
- » **Responsive Design to Local Context**
Development that considers and responds to existing site features and assets, opportunities and constraints within the development proposal
- » **Best Practice**
Attractive development that is based upon best practice design principles to create a safe, active place that has its own identity

SA-REF009



[REDACTED]

From:

[REDACTED]
20 June 2022 12:24

To:

The Bassetlaw Plan

Subject:

Local Plan - 2nd Addendum Representations

Attachments:

22046 SK01 Site capacity study.pdf; reg-19-form-a-b-14pt-may-2022 AM Serlby Road 20062022.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 Local Plan Team,

I am pleased to attach representations on the publication version 2nd 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 attachments?

Kind Regards,

[REDACTED]
[REDACTED]
Planning Director



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.

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Bassetlaw Local Plan 2020-2038

Publication Version Second Addendum Representation Form May - June 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 21st June 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 Alternatively this form can be completed and returned as an e-mail attachment to thebassetlawplan@bassetlaw.gov.uk or by post to **Planning Policy, Queens Building, Potter Street, Worksop, Nottinghamshire, S80 2AH**

Please note:

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Data Protection Notice:

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All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name

of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: [Council's Privacy Notice Webpage](#)

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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:

20th June 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 Ltd

Address: Trafalgar House, Trafalgar Street, Winchester

Postcode: SO23 9DH

Tel:

[REDACTED]

Fax: N/A

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: [REDACTED] – Gentian Developments

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

Policy: ST7

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

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

4.(1) Legally Compliant

Yes ☒

No ☐

4.(2) Sound

Yes ☐

No ☒

4.(3) Complies with the Duty to Cooperate

Yes ☒

No ☐

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

Thank you for the opportunity to provide comments on the Bassetlaw Local Plan 2020-2038 Publication Version Addendum May 2022.

I have reviewed the updated documents published on the Council's website and I consider that the Provision of Land for Employment Development is inconsistent with the approach required by the NPPF and is therefore **unsound**.

The Emerging Local Plan doesn't consider the number of allocations which are under construction and to be completed within the early stages of the local plan cycle and the impact that this may have on supply, particularly towards the later years of the Local Plan Period.

The updated Housing and Economic Needs Assessment (April 2022) notes the updated land employment land need is 196.7ha. The updated supply position is 189.4ha. This leaves a 7.3ha deficit of general and larger unit employment land before the Apleyhead Junction Strategic site is added.

Policy ST7: Provision of Land for Employment Development lists a number of sites which have the benefit of planning permission. This notes that there is the potential residual development land of 183.2ha. Within this, the Snape Lane (42ha) and Symmetry Park (14.4ha) are under construction. Therefore 56.4ha of land could well be completed/partially complete by the time the Local Plan is adopted. Additionally, the Whole of the Manton Wood Extension development is understood to have been leased to DHL, thus removing another 10.7ha (phases 2 and 3) of land from providing additional general employment space within the plan period.

There is currently 56.4ha of consented employment use under construction at Snape Lane and Symmetry Park. (B&Q have agreed a 430,000sqft pre-let at Symmetry Park. <https://tritaxsymmetry.com/latest-news/bq-agrees-430000-sq-ft-pre-let-at-symmetry-park-doncaster/>) The additional employment site with planning permission at Manton Wood (10.7ha) has also been pre-let to DHL on a 20year lease who have detailed permission for Phase 3 and a current application in with planning for Phase 2.

Therefore, when considered holistically and strategically from when the Local Plan has been adopted (say middle/end of 2023) there will be a total of circa 65 ha of employment space nearing completion/pre-let within year 1 of Adoption, which could impact supply further down the line. This has not been considered within the policy allocations and would suggest that given its strategic location there is more demand than supply. The significant pre-let's would suggest this.

(continued next page)

Continue on a separate sheet if necessary

Notwithstanding the above, paragraph 6.1.25 of the Local Plan Addendum and the supporting evidence suggests that the recent past rate of take up/delivery under represents future needs and that Bassettlaw could contribute to meeting this future economic sub regional/ regional need for Logistics, which would suggest that the area is in demand for this particular sector.

Given the local plan evidence suggests a completion trend, there is potential for a further deficit of employment land coming forward to meet that as outlined within the Economic Development Needs Assessment, particularly towards the end of the plan period, which doesn't seem to have been addressed within the Policy.

Whilst it is noted that the Apleyhead Junction Strategic Site will provide an additional 118.7ha of employment floor space, this strategic site is being put forward as a site of regional importance and will service the logistic sector (B8 use only). It is therefore considered that this strategic site should be included within its own entity as it does not conform with the General and larger Unit employment sites.

It is therefore considered that the total amount of employment land proposed with the Emerging Local Plan falls below the required amount as set out through the evidence gathered for the plan period as outlined above. The proposal therefore does not comply with the requirements of the NPPF Para 35(a) which requires Local Plans to be positively prepared and as a minimum seek to meet the areas objectively assessed needs.

Approach to General Employment Sites

The reliance of complementary policy mechanisms for the delivery of the general business growth such as the renewal of existing employment sites (ST10) and business growth in the rural area (ST11) may not be enough to provide adequate business space across the Plan Period, particularly as the local plan does not allocate enough employment space to meet demand before the Strategic Allocation Apleyhead Junction is considered.

Occupiers are constantly seeking for premises which are more sustainable. Whilst retrofitting the existing stock could be undertaken, there may be an impact in terms of replacement supply etc. For example, in some instances the existing stock may require complete redevelopment. There is nothing in the policy to suggest that there will be a net increase of employment floorspace within this policy to meet the unmet demand.

No new allocations for General and Larger Unit Employment sites have been included within the emerging local plan other than those which already have extant planning permission and in some instances under construction. The Emerging Local Plan therefore fails to meet point b) of Para 35 as it does not provide an appropriate economic growth strategy for the plan period. There have been no alternative sites put forward for consideration to both meet the identified unmet demand(7.3ha), or has it considered the DHL lease on Manton Wood which nullifies that site as general employment site, or that there will be circa 56ha of sites coming forward at the early stages of the plan period.

The Local Plan therefore also fails to meet criteria c) as without modifications the employment would not be effective to meeting the identified demand for employment floorspace within the plan period given the reasons set out above.

Given the above, the local plan is considered to be unsound and as such is not consistent with National Policy and fails criteria d) of para 35.

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

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

The Employment Strategy needs to be reconsidered to ensure that it meets the districts objectively assessed needs without the reliance of the strategic employment site to make up the numbers, given this is a regionally strategic allocation.

Employment sites which can deliver a range of sized units should be encouraged to achieve the D2N2 LEP growth sectors such as construction, renewable energies, engineering and general employment floorspace.

There therefore needs to be new allocations within Policy ST7: Provision of Land for Employment Development which promotes new employment land. This will therefore allow for additional floorspace to come forward which can cover the deficit identified above as well as being able to service a range of uses and users on the site.

The land to the North of Serlby Road (LAA580) was assessed within the Updated Site Selection Methodology and was assessed as having the potential for logistics. It was discounted as a reasonable alternative.

Since this submission a capacity study has been undertaken which supports this submission document. This shows that the site is capable of delivering circa 30,000sqm of flexible employment floorspace. The layout etc and final would be subject to a full site survey and appropriate due diligence being carried out, but it is considered that some form of development would be acceptable on the site.

The site has been assessed within the updated sustainability appraisal. It is considered that any development on the site would be required to provide a biodiversity net gain by legislation within the development and as such it is considered that SA Objective 1: Biodiversity and geodiversity could at least achieve 'minor positive effective likely' score as a minimum.

It is also likely that any development on the site would benefit from the use of at surface SUDS, which could also be used as part of a wider blue network biodiversity gain on the site. It is envisaged that there is potential to link to the adjacent pond and as such the area where block L is located may become a balancing pond subject to site surveys etc. We as developers have used this approach on other scores. Therefore, SA Objection 8: Water could have a more positive score.

The initial highways comments have been noted and would form part of any planning application process and we would be able to provide safe access in and out of the site. Road widening could be undertaken at the site by developing into the verge of the road. There is also potential for the installation of a footway which will connect to the existing footpath for the A1 flyover footway. IT is considered that there is potential for a reduction of speed along Serlby Road, which would also improve highways safety. These are all matters which can be dealt with during any planning application process. Whilst there may be an element of logistics which might come forward, the proposal would seek to provide smaller, flexible units which would likely be delivered over various phases throughout the Local Plan period.

Overall, it is considered that the employment strategy as proposed does not meet the tests of Soundness as outlined within Paragraph 35 of the NPPF. The strategy therefore requires modifications for it to be considered sound. The additional of new employment allocations on sites without planning permission is considered to be a practical way forward in order to progress the Local Plan being adopted.

As outlined above and attached, the site located north of Serlby Road (LAA580) provides a real opportunity to provide the required level of additional employment floorspace over the plan period. The site is available, deliverable and achievable within the local plan period.

In terms of policy wording we consider the following as being appropriate:

(Continues on next page)

Policy [XYZ]

Land to North of 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*
- g) Provide for a significant number of new permanent jobs including skilled employment*



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.

Notes

Site Area: approximately 7.5ha / 18.5ac

Red line boundary subject to verification with Title Plans and site survey.

Draft Area Schedule: Gross external areas:

Block	sqm.	sqft.
A	1,870	20,129
B	1,870	20,129
C	1,860	20,021
D	1,794	19,311
E	1,794	19,311
F	2,052	22,088
G	1,782	19,181
H	1,147	12,346
J	1,147	12,346
K	1,860	20,021
L	1,944	20,925
M	1,944	20,925
N	1,944	20,925
P	1,944	20,925
R	1,860	20,021

Sub total 26,812 288,604

10% mezz. 2,681 28,858


TOTAL 29,493 317,462

All areas are indicative only and should not be relied upon for anything other than this draft capacity study.

Car parking: 1 space / 90sqm - 328 spaces



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Hampshire
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Client

GENTIAN DEVELOPMENT

Project

SERLBY ROAD, DONCASTER

Title

DRAFT CAPACITY STUDY

SRD - BSL - ZZ - XX - DR - A - SKO1 - DF

B+S Ref.

22046

Date

MAY 2022

Scale @ A1

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Drawn

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Checked

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Tel: 023 8063 1432

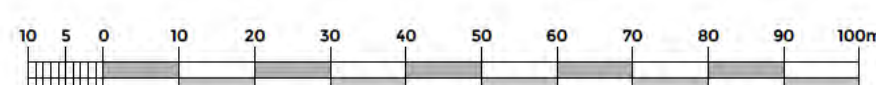
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DRAFT



SA-REF010



[REDACTED]

From: [REDACTED]
Sent: 20 June 2022 12:52
To: The Bassetlaw Plan
Subject: Local Plan 2020-2038 Version Second Addendum, May 2022
Attachments: reg-19-form-a-b-14pt-may-2022.docx

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

Dear [REDACTED]

Thank you for your notification regarding the Local Plan Second Addendum consultation.

Please find attached the comments of the Coal Authority on the completed response form.

Kind regards

[REDACTED]



[REDACTED]
[REDACTED]
[REDACTED]
Development Team Leader (Planning)

[REDACTED] [/the-coal-authority](https://the-coal-authority)

Making a better future for people and the environment in mining areas. Like us on [Facebook](#) or follow us on [Twitter](#) and [LinkedIn](#).

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Bassetlaw Local Plan 2020-2038

Publication Version Second Addendum Representation Form May - June 2022

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Please tick/ delete as appropriate:

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

Yes X ☐

No ☐

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

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

Yes X ☐


No ☐

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

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

Yes X ☐

No ☐

Printed Name: 

Signature: 

Date: 20th June 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): The Coal Authority

Address: 200 Lichfield Lane

Postcode: NG18 4RG

Tel:

[REDACTED]

Fax: N/A

Email: planningconsultation@coal.gov.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: The Coal Auhtorityu

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

Policy: All

Paragraph:

Policies Map:

4. Do you consider the Local Plan is:

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

4.(1) Legally Compliant

Yes X ☐

No ☐

4.(2) Sound

Yes X ☐

No ☐

4.(3) Complies with the Duty to Cooperate

Yes X ☐

No ☐

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.

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

Our records indicate that within the Bassetlaw District area there are some recorded coal mining features present at surface and shallow depth including; mine entries, fissures and reported surface hazards. These features may pose a potential risk to surface stability and public safety. Consideration will need to be given to the risks posed by these features if new development proposals come forward in areas where the recorded coal mining features are present.

Any formal planning application submitted for development in these area would need to be supported by a Coal Mining Risk Assessment.

This current consultation relates to a number of changes proposed to the Local Plan, as set out in the Publication Version Second Addendum. I can confirm that the Planning team at the Coal Authority have no specific comments to make on the changes proposed.

Continue on a separate sheet if necessary

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

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

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

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

Yes ☐

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

No ☒

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

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