

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

AD-NRF Responses 001-013

REFERENCE NUMBER	ORGANISATION	PARTICIPATING IN HEARING SESSIONS
AD-NRF001	Natural England	Not indicated
AD-NRF002	Resident	Not indicated
AD-NRF003	Barton Willmore Ordsall South	Not indicated
AD-NRF004	Resident	Not indicated
AD-NRF005	Resident	Not indicated
AD-NRF006	Retford Civic Society	Not indicated
AD-NRF007	West Stockwith Parish Council	Not indicated
AD-NRF008	Derbyshire County Council	Not indicated
AD-NRF009	Severn	Not indicated
AD-NRF010	Resident	Not indicated
AD-NRF011	Resident	Not indicated
AD-NRF012	Resident	Not indicated
AD-NRF013	Resident	Not indicated

This map illustrates the railway network in the Worksop and Retford area. Key features include:

- Stations:** Worksop, Retford, Tuxford, and Gainsborough Central are highlighted with white circles.
- Lines:**
 - Blue:** Worksop to Sheffield via Chesterfield.
 - Green:** Worksop to Mansfield via Warsop.
 - Yellow:** Worksop to Doncaster via Tickhill.
 - Pink:** Retford to Gainsborough Central and Grimsby.
 - Orange:** Retford to Lincoln via Tuxford.
 - Red:** Retford to London via Newark.
 - Grey:** Retford to Nottingham via Ollerton.
 - Black:** Retford to Doncaster via Harworth & Bircotes.
- Other Stations:** Harworth & Bircotes, Tickhill, Bawtry, Scrooby, Ranskill, Bamby Moor, Sutton, Lound, Clayworth, Beckingham, Gainsborough Central, Gainsborough Lea Road, Lincoln, Sturton le Steeple, North & South Wheatley, North & South Leverton, Rampton, Torksey, Dunham On Trent, East Markham, Gamston, Elkesley, Markham Moor, Ollerton, Edwinstowe, Warsop, Norton & Cuckney, Shirebrook, Shireoaks, Dinnington, Whitwell, Creswell, Whaley Thorns & Langwith, and Shirebrook.
- Geographical Features:** The River Trent is shown flowing through the area.

[REDACTED]

From: [REDACTED]
Sent: 12 January 2022 15:07
To: The Bassetlaw Plan
Cc: [REDACTED]
Subject: Bassetlaw Local Plan, Regulations 19 & 20 - Publication Version Addendum - Natural England Response
Attachments: 379315 Bassetlaw Local Plan Addendum.pdf

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Dear [REDACTED],
Please find attached Natural England's response to the above Local Plan consultation.

Kind regards
[REDACTED]

[REDACTED]
Senior Planning Adviser
East Midlands Area
Ceres House
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[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>.

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Date: 12 January 2022
Our ref: 379315
Your ref: none



██████████
Planning Policy Manager
Bassetlaw District Council

BY EMAIL ONLY

Customer Services
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Dear ████████,

Planning consultation: Bassetlaw Local Plan - Regulations 19 & 20 - Publication Version
Addendum, January 2022

Thank you for your consultation on the above dated 06 January 2022 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England generally welcomes the revisions that have been set out in the Addendum. Our detailed comments are set out below:

Bassetlaw Garden Village

5.3.3. Natural England welcomes the inclusion of the last sentence "*green/blue infrastructure and gains to biodiversity*".

5.3.11. We welcome the reference within this paragraph to the Recreational Impact Study and the identification of mitigation measures.

5.3.12. We are pleased to note that Sustainable Alternative Natural Greenspace (SANGs) will be included in the first phase of the development of the Garden Village and also an exclusion buffer zone to protect bird species and minimise cat predation.

5.3.21. We welcome the rewording within this paragraph and confirmation that 40% of the site should comprise of a Green/ Blue Infrastructure network.

5.3.25. The additional wording to include the multifunctionality of green and blue infrastructure together with the green wheel and buffer zones is welcome.

Policy ST3, Bassetlaw Garden Village Design & Development Principles 2(d) – Natural England supports the revised wording which requires relevant mitigation to be implemented to manage the potential recreational disturbance upon Clumber Park SSSI. However, we advise that the following sentence should be revised to include reference to the Recreational Impact Assessment for the Clumber Park SSSI i.e., "*in accordance with Policy ST40A; **Recreational Impact Assessment for the Clumber Park SSSI the Bassetlaw Habitats Regulations Assessment***".

2021 and the applicant's project level shadow HRA including winter bird surveys ...". Our reason for this is that the HRA documents would not be relevant to areas of the Clumber Park SSSI which are outside of the Sherwood ppSPA areas. Reference should therefore be made to evidence that specifically refers to the SSSI designation.

Ordsall South HS13 (7.14.12) - Natural England welcomes the incorporation of SANGs in the form of a 2km walking/cycle path provided that it delivers appropriate natural green space and habitats.

Recreational Disturbance Avoidance and Mitigation Strategy

Paragraphs 8.6.7 to 8.6.17 – Natural England strongly supports the inclusion of these additional paragraphs which clearly set out the requirements for a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) to address identified recreational impacts at Clumber Park. We look forward to continuing to work with the partnership group to establish a strategic solution. Prior to the adoption of the RAMS Natural England have advised that interim measures could be followed as set out in paragraph 8.6.17.

Policy ST40 Biodiversity and Geodiversity A - Recreational Disturbance Avoidance and Mitigation Strategy

Natural England supports the inclusion of the additional wording which sets out the requirements for a RAMS. We have the following specific comments:

1. Natural England advises in the first bullet point that reference should also be made to evidence contained in the Recreational Impact Assessment for Clumber Park SSSI.
3. We suggest that the Recreational Impact Assessment for Clumber Park SSSI is specifically referred to.

Our reason for the above comments is that the HRA documents would not be relevant to areas of the Clumber Park SSSI which are outside of the Sherwood ppSPA areas. Reference should therefore be made to evidence that specifically refers to the SSSI designation.

Monitoring Framework

Natural England welcomes the inclusion of the indicators and targets under the section on ST40a and the proposed Recreational Disturbance Avoidance and Mitigation Strategy.

If you have any queries relating to the advice in this letter please contact me on 02080268500.

Yours sincerely


Senior Planning Adviser
East Midlands Area

AD-NRF002



[REDACTED]

From: [REDACTED]
Sent: 16 January 2022 22:00
To: The Bassetlaw Plan
Subject: Objections of the Peaks Hill Farm Development

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Good Evening

I am writing again to strongly appose the development of Peak Hill Farm

Having read the new documentation I have seen that there have been multiple changes that have been made,

There is an increase in the housing on Peaks Hill Farm by 80, where is the need for the extra?

This will increase Carlton Forest for employment by 5ha

The developer contributions from the plan have been removed what will be done towards roads, health, education, social care etc etc?

The word infrastructure has been removed from the plan what does this mean for constructive support behind the plans.

There is no longer a concept plan from the Peaks Hill farm

There is a reduction of the green woodland from 18.3 to 7.6. That's more than half, what about impact will this have on local wildlife

The removal of keeping hedgerows, again this will have impact on the wildlife

There is no longer a proposed on-site primary school area. this is now just marked as an off site facility. what facility would this be?

There is no longer an appropriate financial contribution towards road improvements. The town itself and surrounding areas already have poor traffic flow. The Cannon being a top one especially when they are constantly having work carried out.

All these points above I feel are valid points in the appraisal to the development with I feel is unjustified and will break a town that is already on its knees

Many Thanks
[REDACTED]

AD-NRF003



From: [REDACTED]
Sent: 17 January 2022 12:48
To: The Bassetlaw Plan
Cc: [REDACTED]
Subject: 26740. Representations to Draft Bassetlaw Local Plan
Attachments: 26740 A3 DM ss Bassetlaw Local Plan Reps FINAL 22-01-17.pdf

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

Dear Sir/Madam,

Please find enclosed submission to the Local Plan Publication Draft Addendum on behalf of Howard (Retford) Ltd.

We would be grateful if you could acknowledge safe receipt.

Regards,

[REDACTED]
Regional Support Senior Coordinator



DDI: 0161 817 4910

W: www.bartonwillmore.co.uk

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Bassetlaw District Council

Draft Bassetlaw Local Plan
PUBLICATION VERSION ADDENDUM

Representations on Behalf of Howard Retford Ltd

January 2022

CONTENTS

	Page
1 INTRODUCTION	1
2 LOCAL PLAN ADDENDUM	2
3 CONCLUSIONS	5

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
Issue/Rev:	01	02
Date:	10/1/22	17/1/22
Prepared by:	DM	DM
Checked by:	DM	DM

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Ref: 26740/A3/DM/jc
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

CONTENTS

	Page
1 INTRODUCTION	1
2 LOCAL PLAN CONTEXT	3
3 SPATIAL STRATEGY	5
4 POLICIES FOR MANAGING DEVELOPMENT	13
5 CONCLUSIONS	16

Appendices

- Appendix 1: Development Framework Document - Land to the South of Ordsall, Retford
- 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

Project Ref:	26740/A3/DM	26740/A3/DM/jc
Status:	Draft	Final
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Date:	14/9/21	5/10/21
Prepared by:	DM	
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Ref: 26740/A3/DM/jc
October 2021

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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

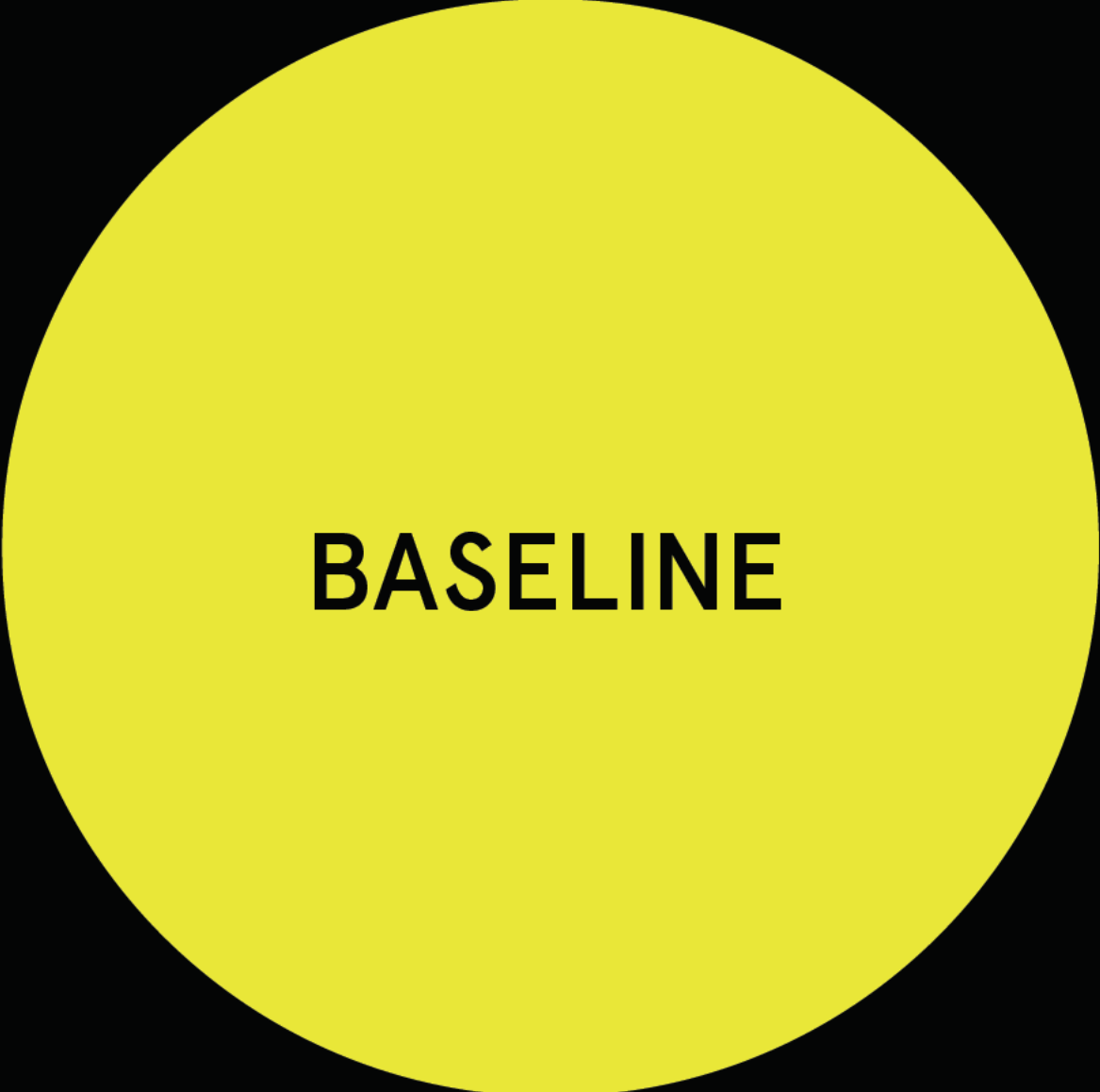
- 5.1 The above representations have provided a review and commentary on the Bassetlaw Draft Local Plan Publication Draft 2021 on behalf of Howard (Retford) Limited).
- 5.2 Our client is generally supportive of the spatial approach set out and focus upon the three main towns of Worksop, Retford and Harworth 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



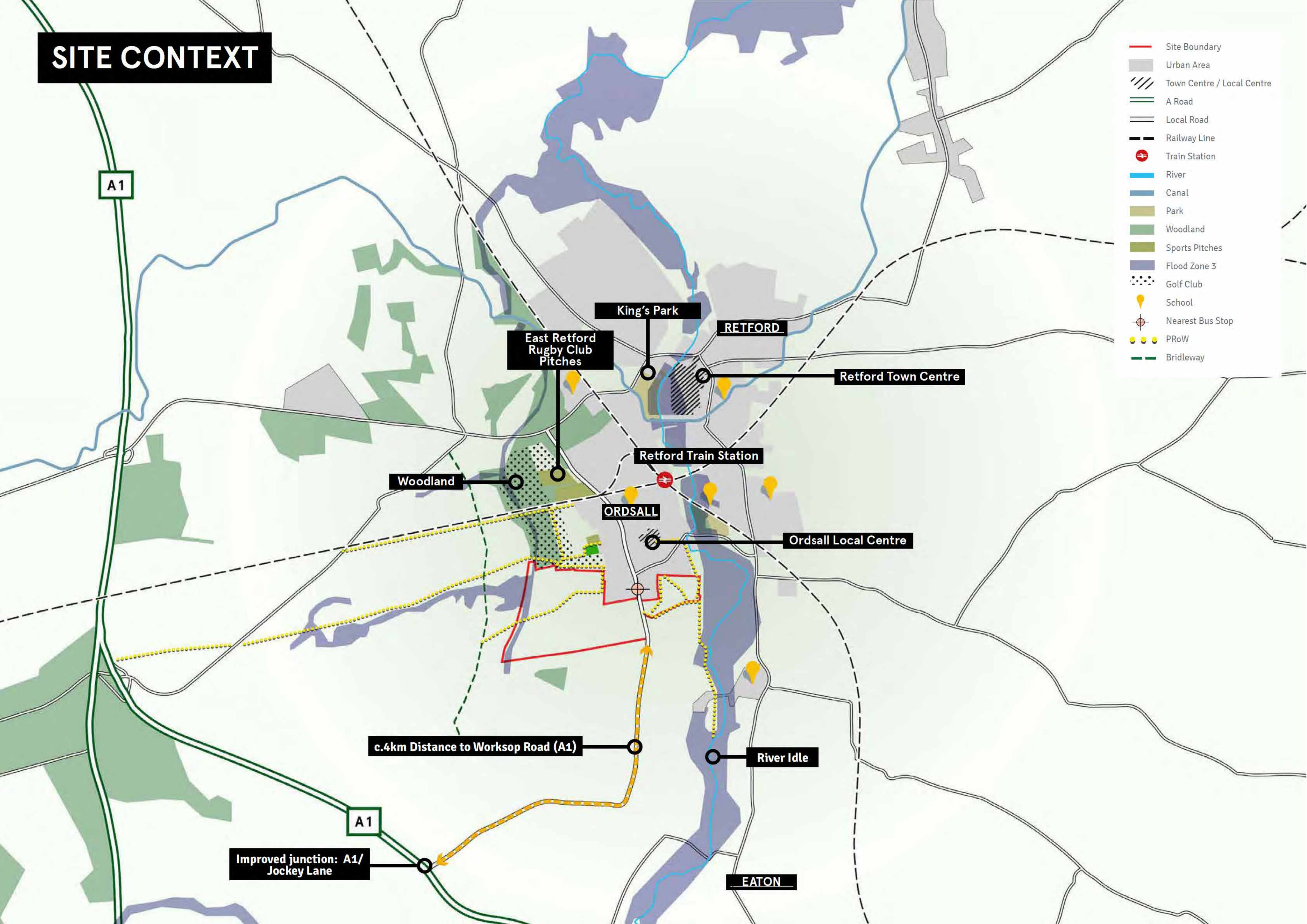
ORDSALL SOUTH

A PLACE IN THE MAKING

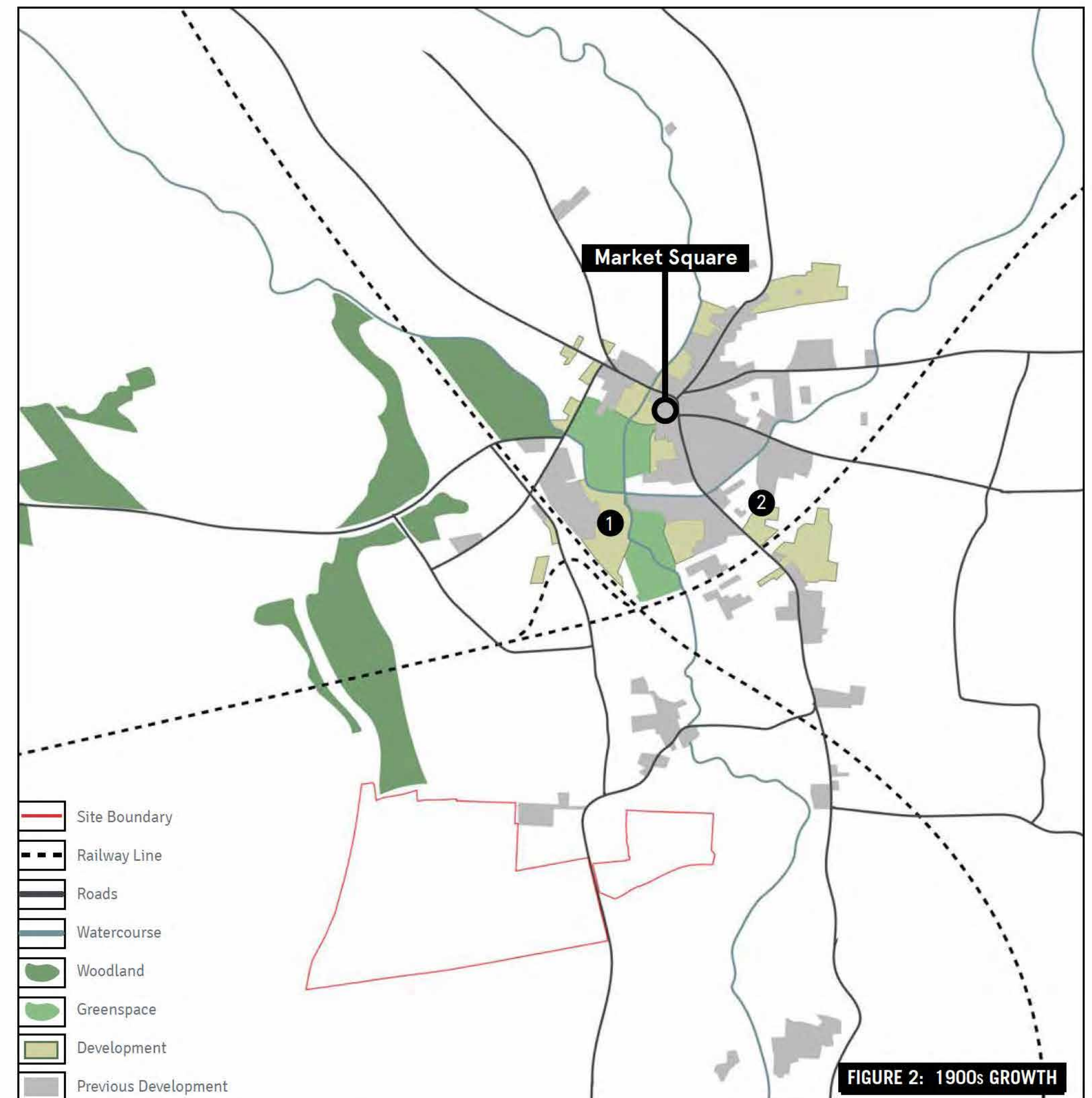
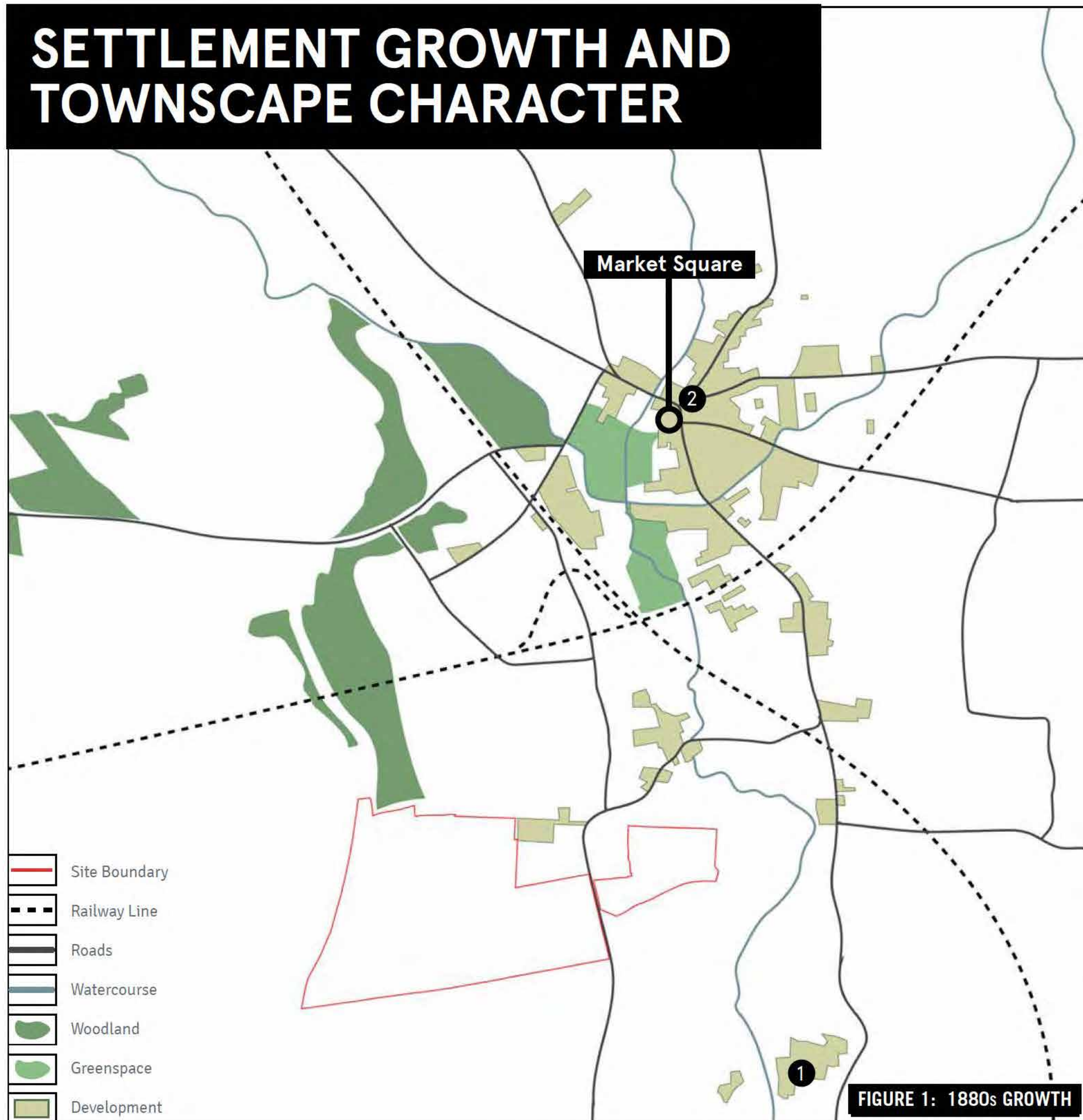


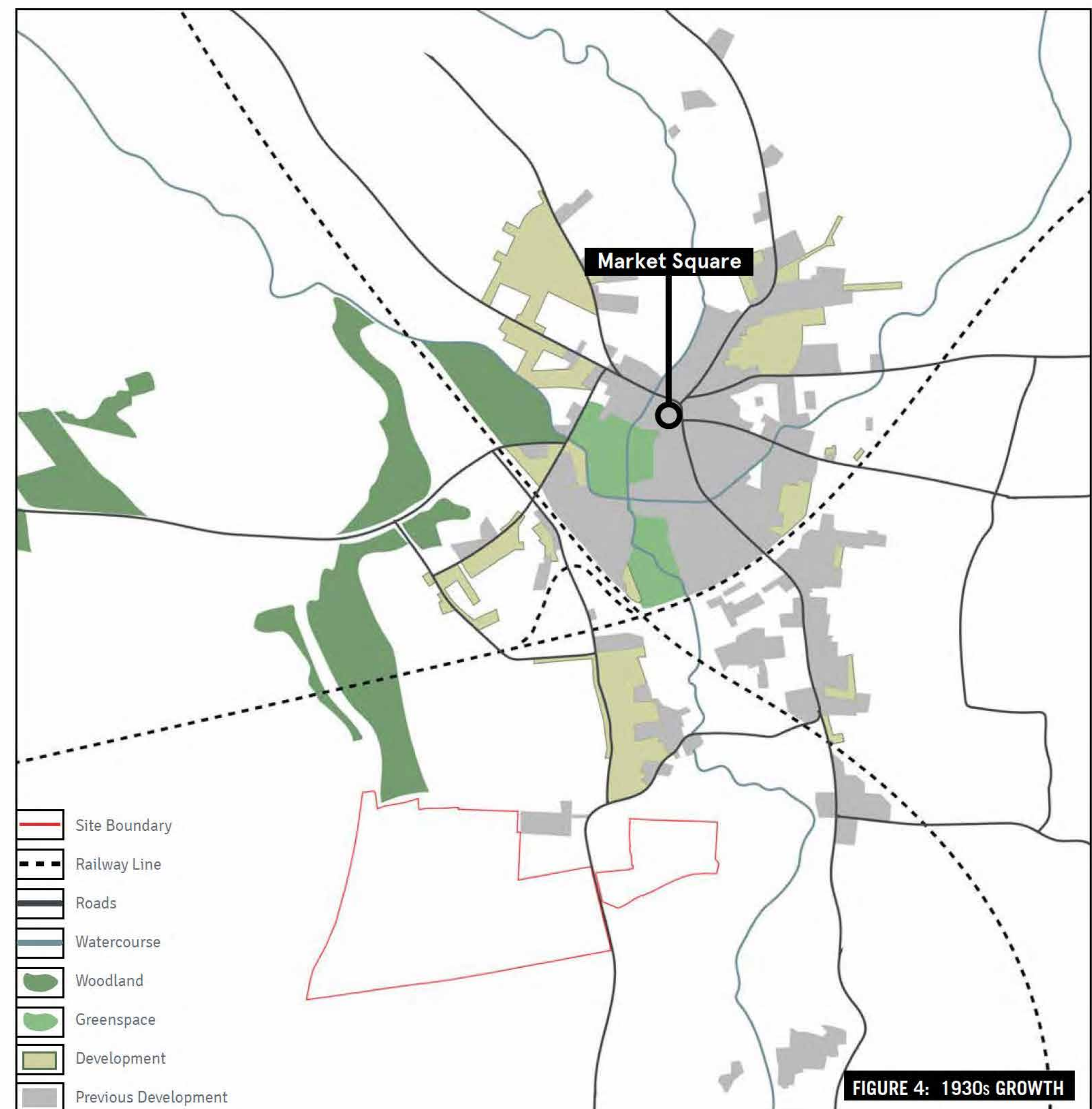
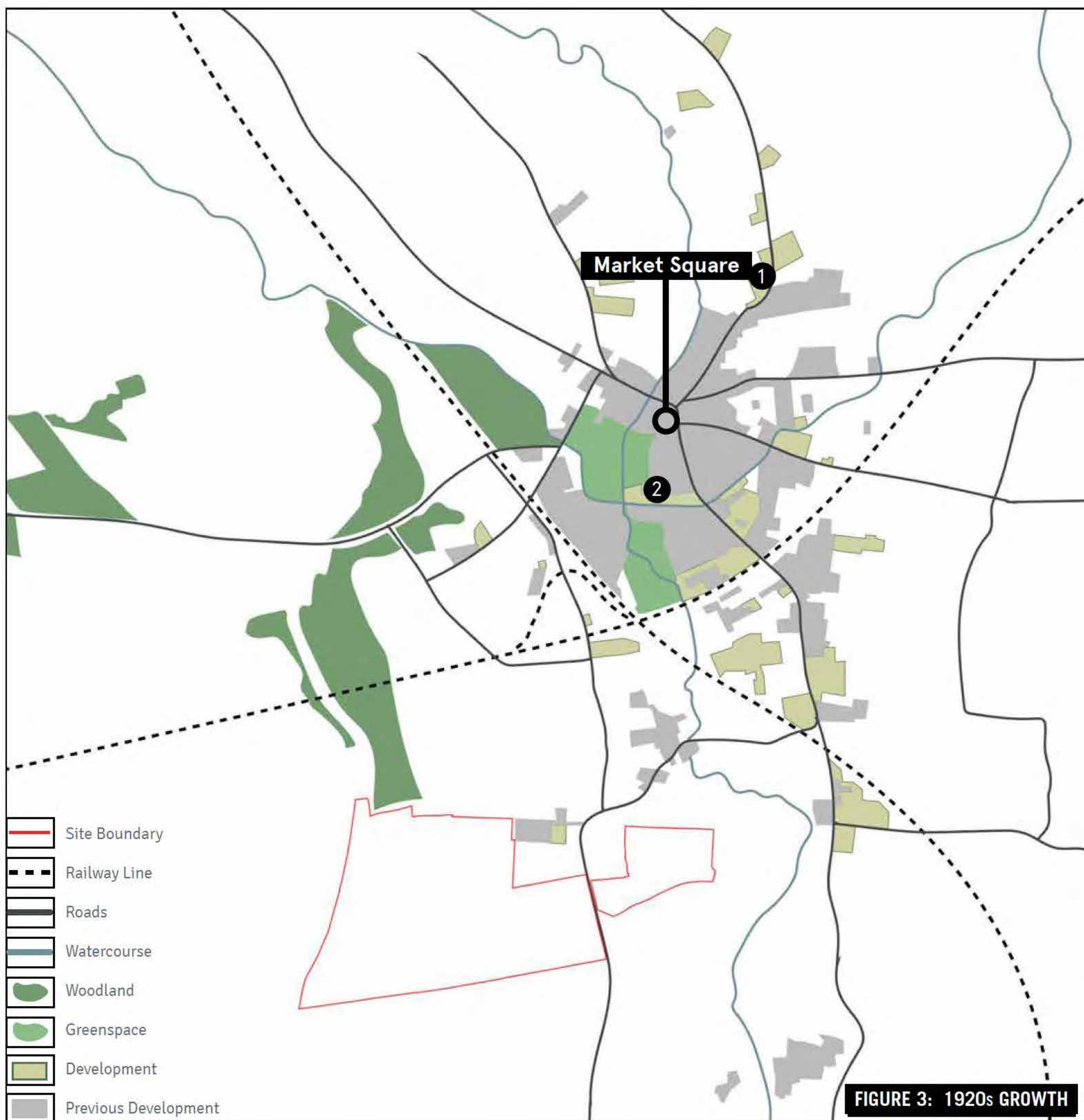
BASELINE

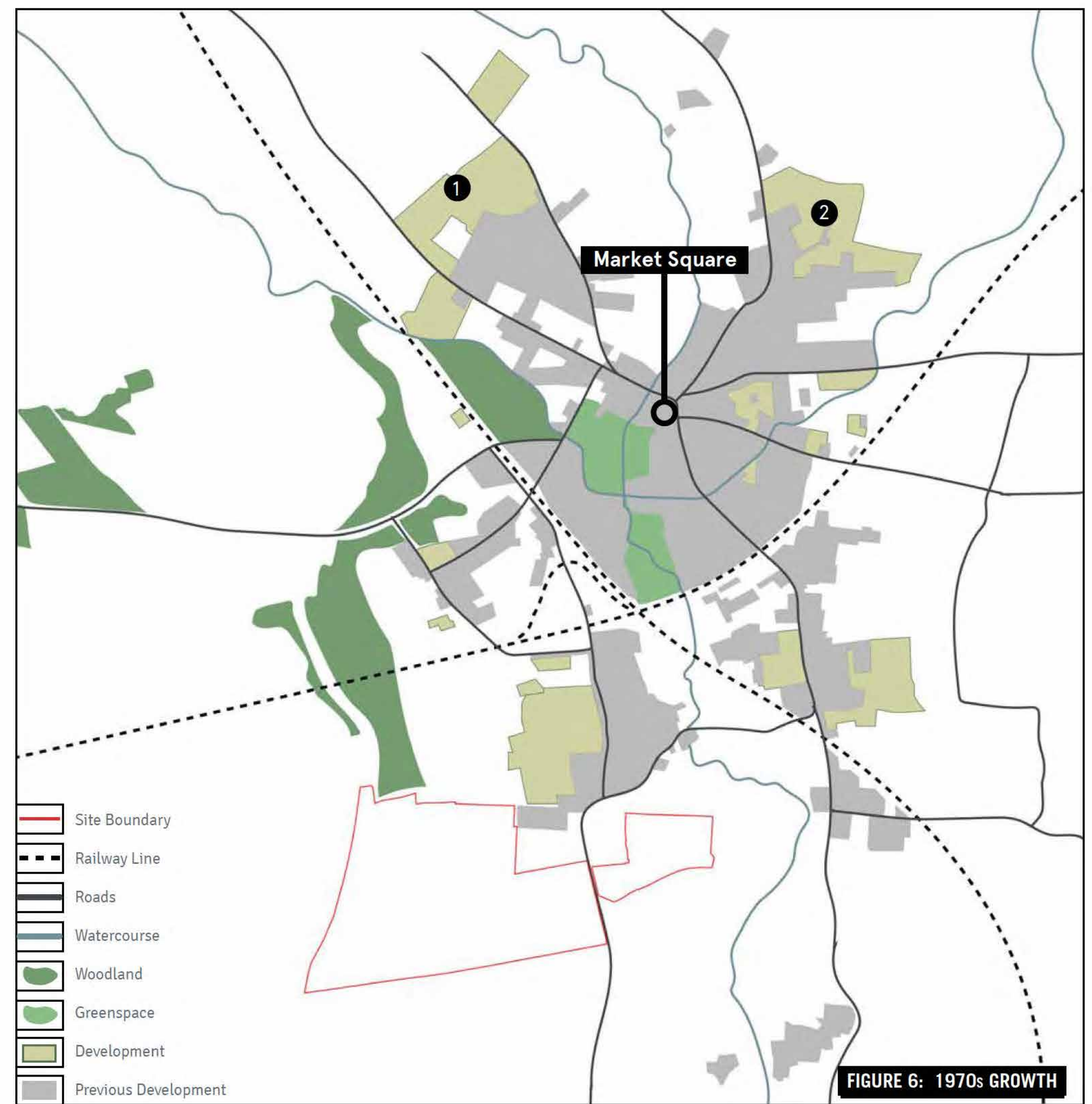
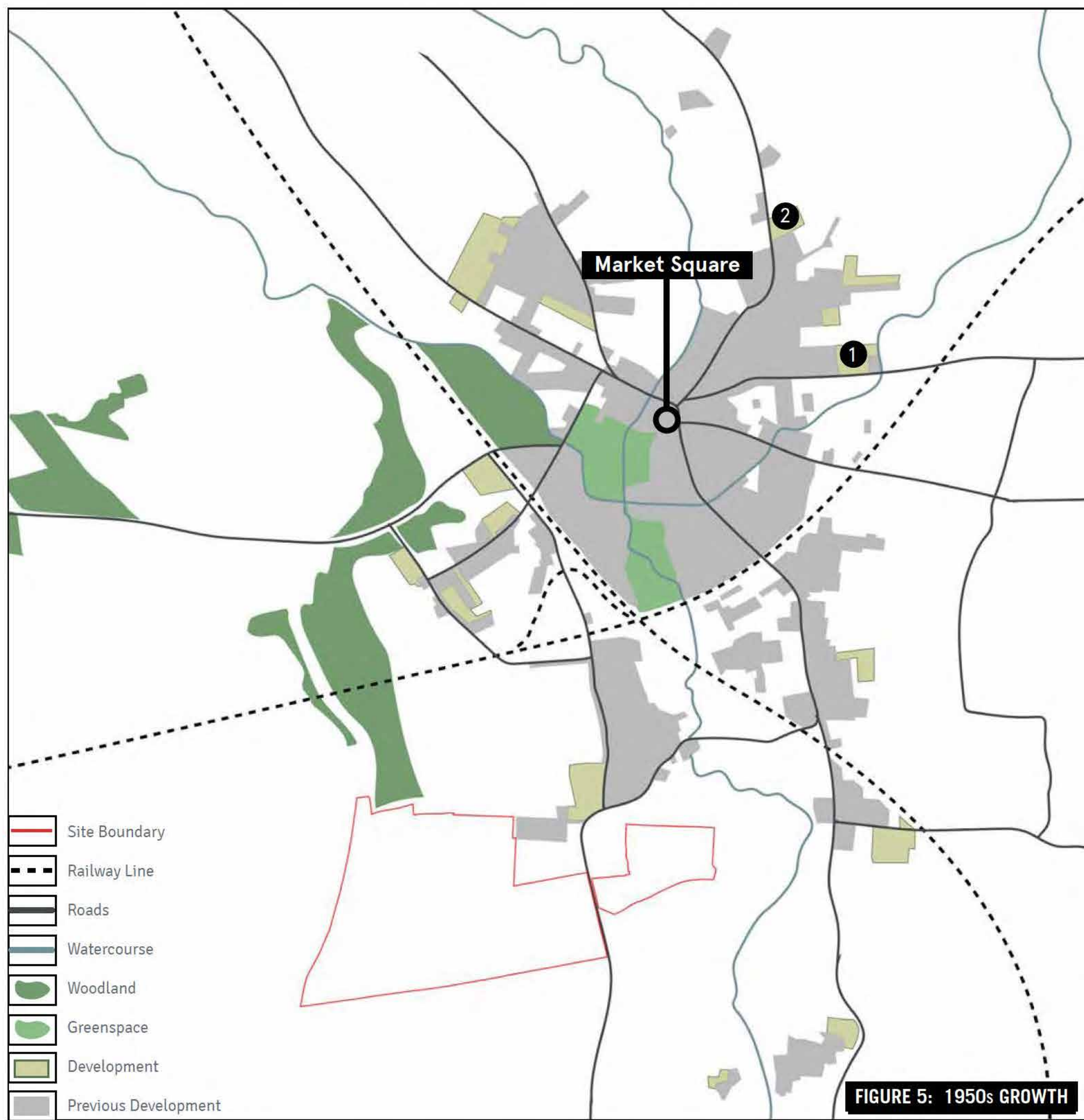
SITE CONTEXT

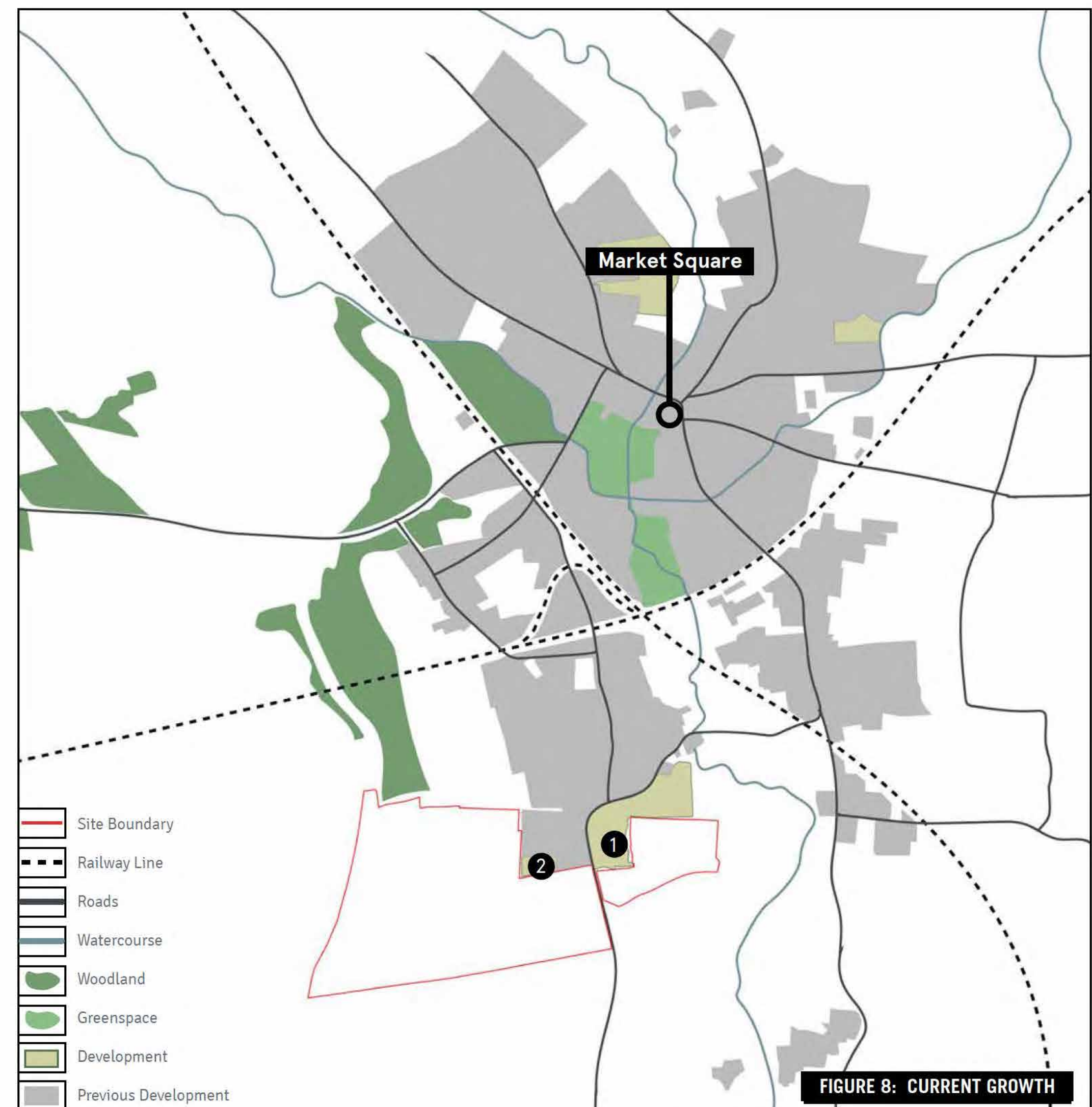
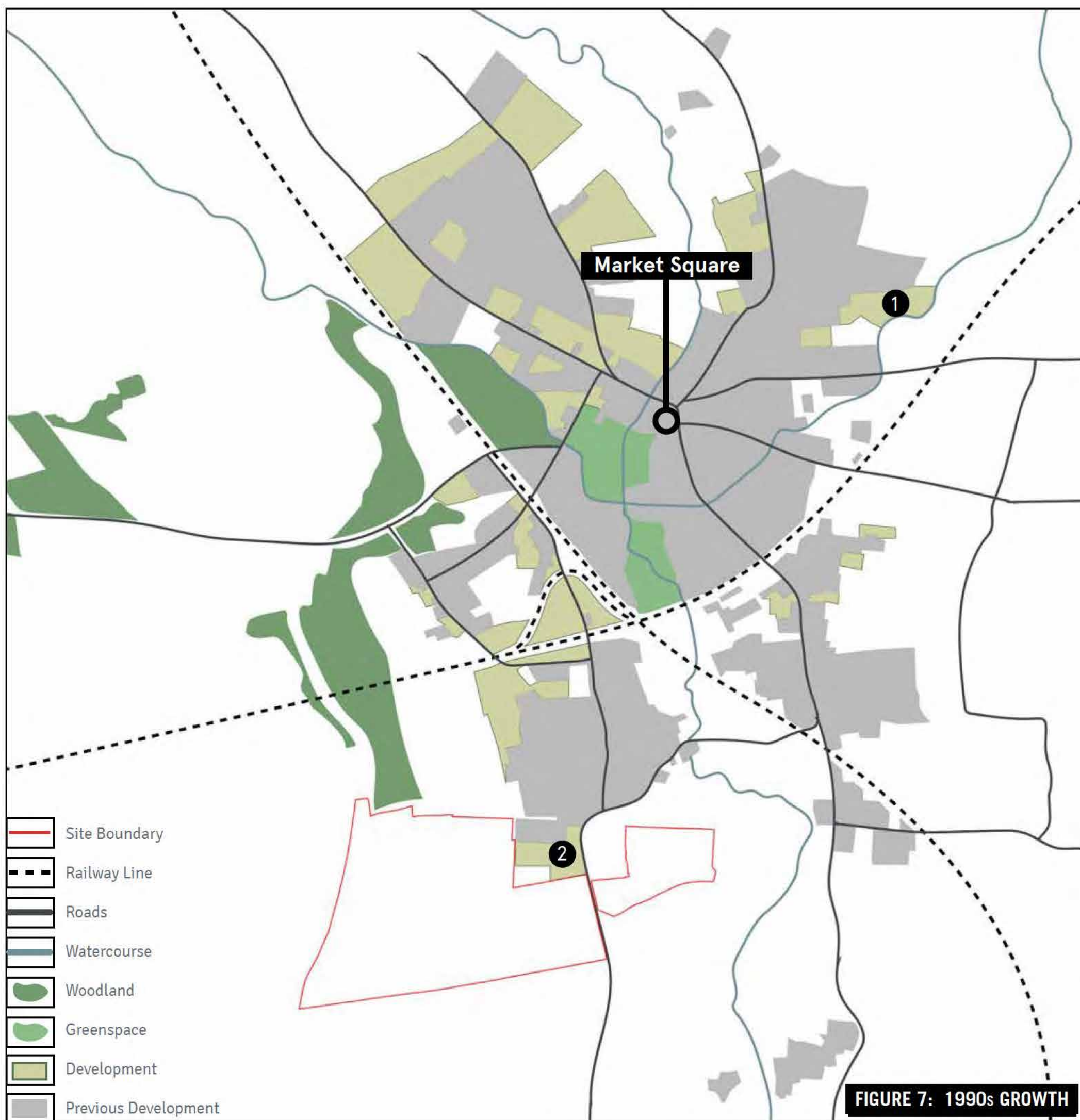


SETTLEMENT GROWTH AND TOWNSCAPE CHARACTER









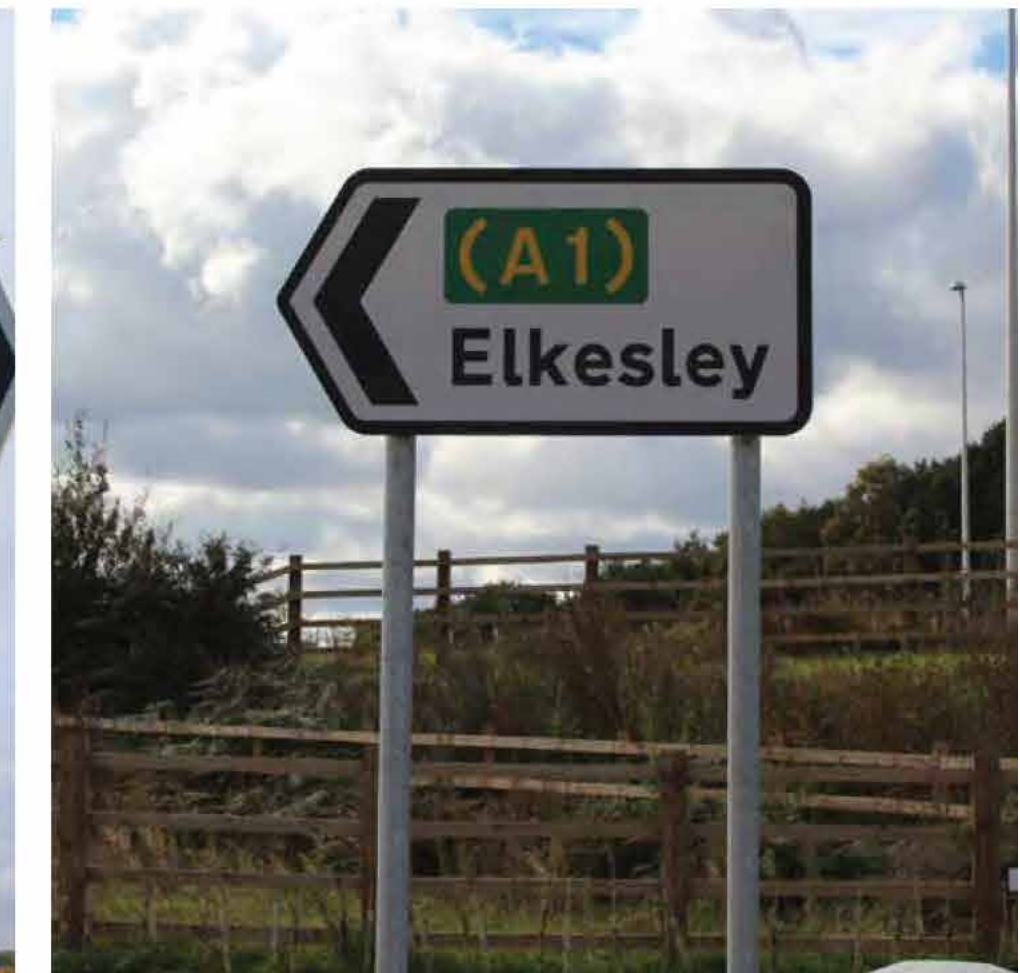
LOCAL NEIGHBOURHOOD



- Site Boundary
- Town Centre
- Railway Line
- Train Station
- River
- Woodland
- Sports Pitches
- Allotment
- Golf Club
- School
- Local Shop(s)
- Sports Facilities
- PRoW
- Bridleway
- Primary Bus Route

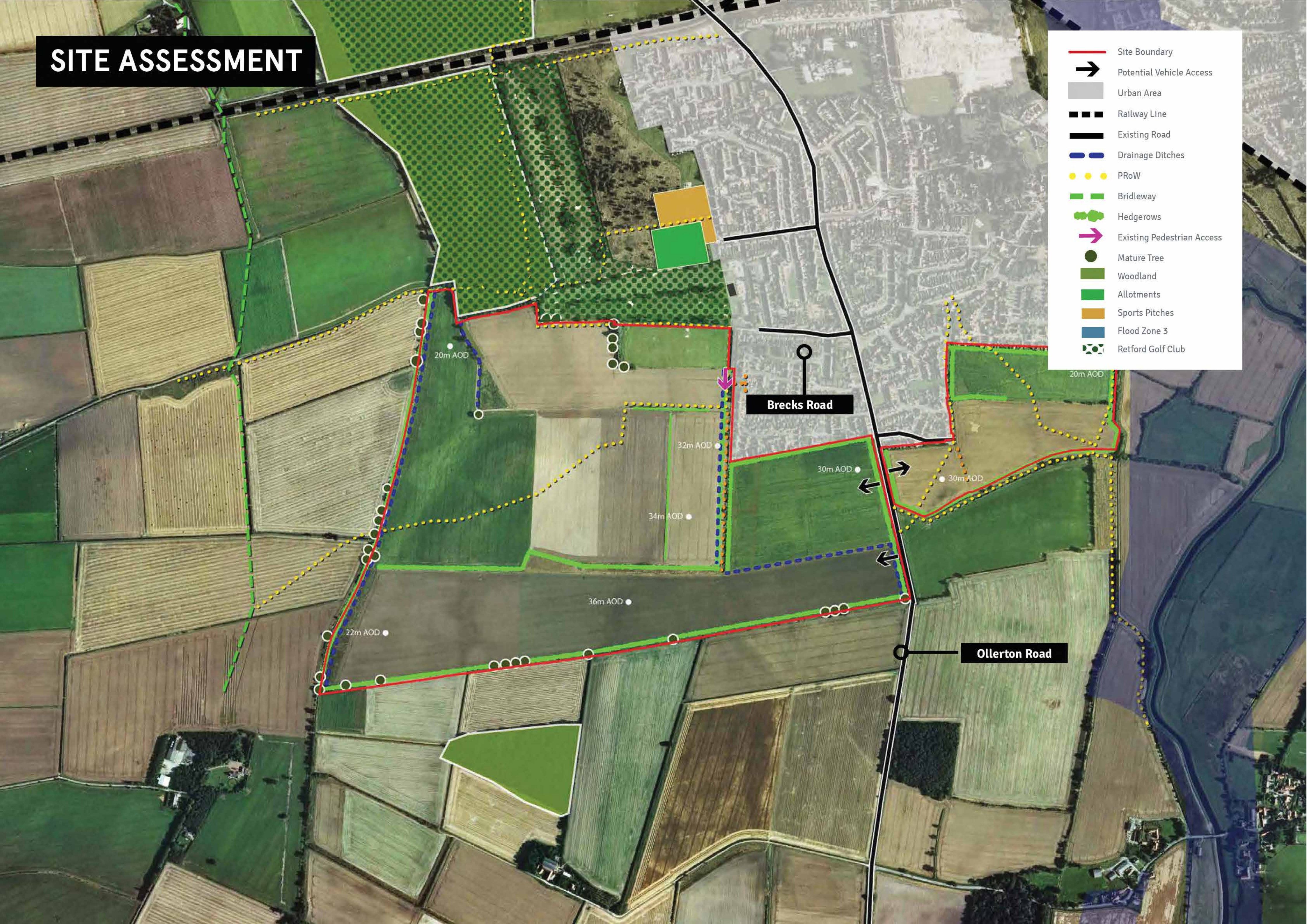
A1

PHOTOGRAPHIC ANALYSIS (NEIGHBOURHOOD)

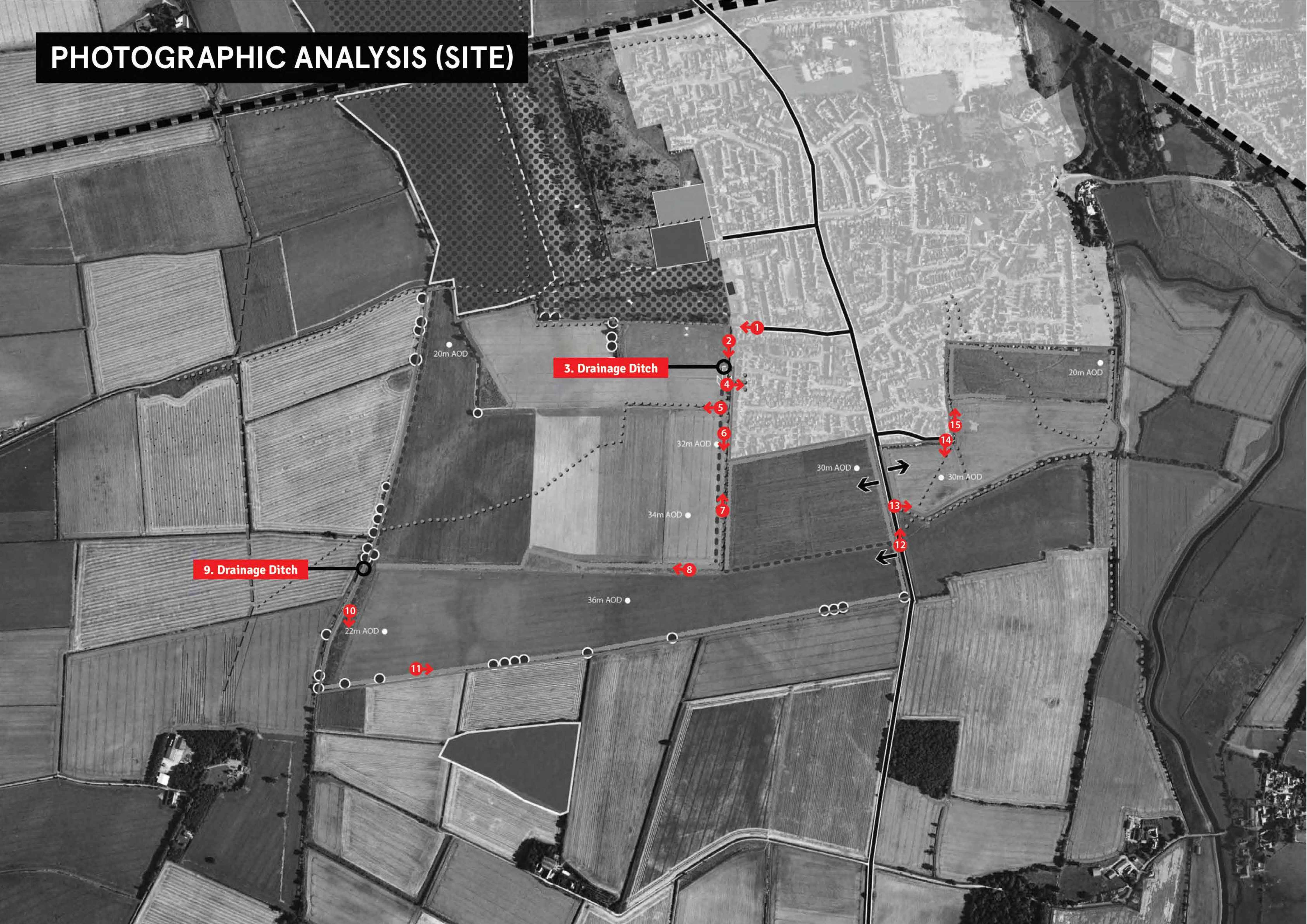


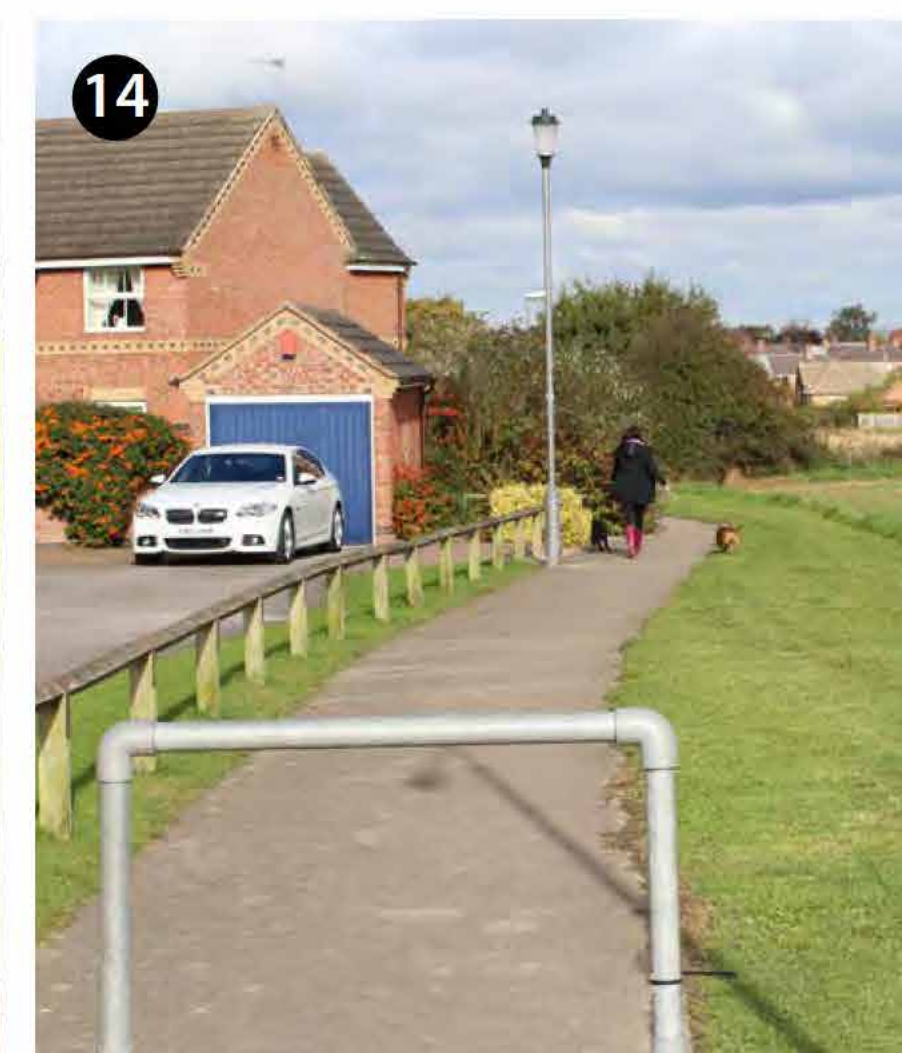
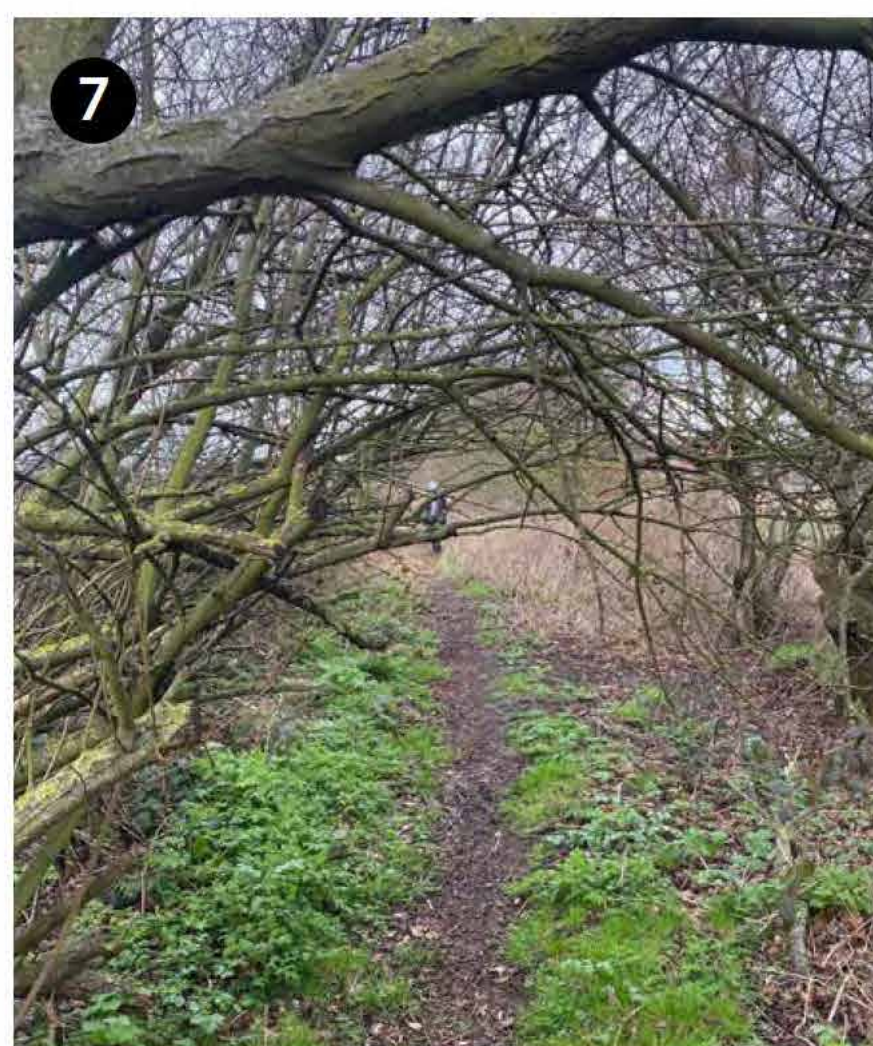
SITE ASSESSMENT

- 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)

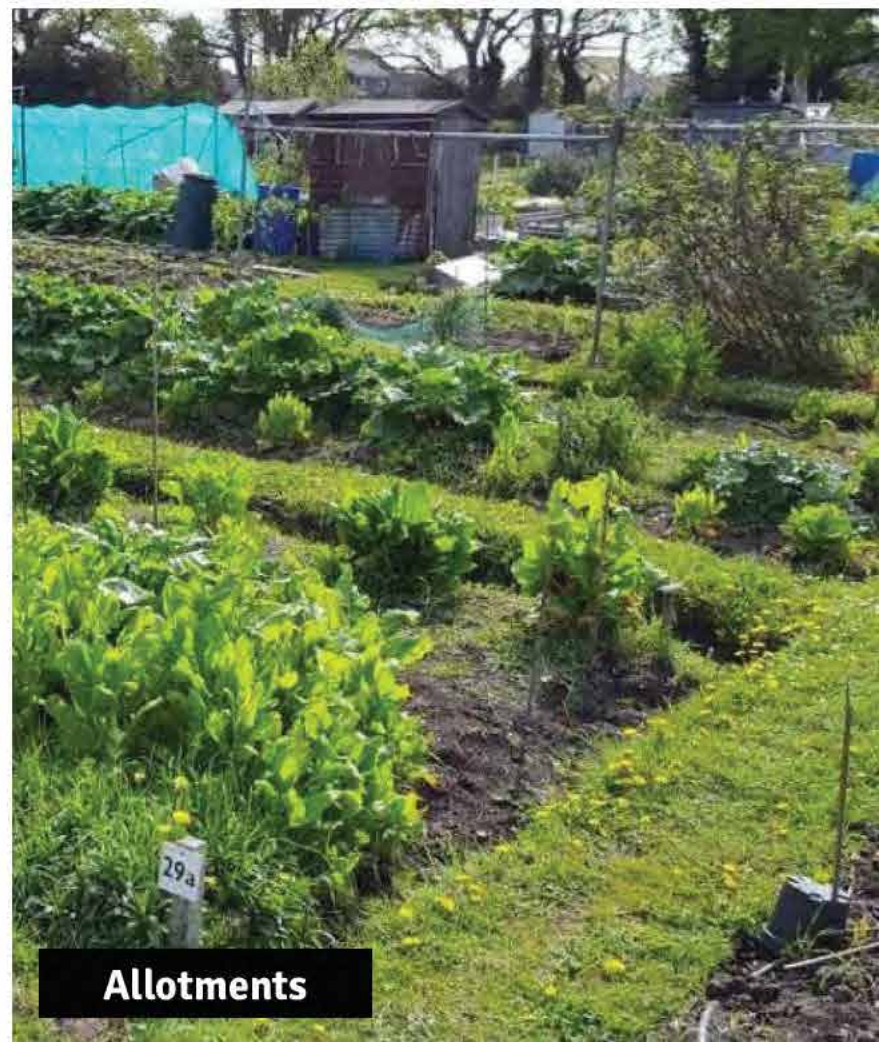




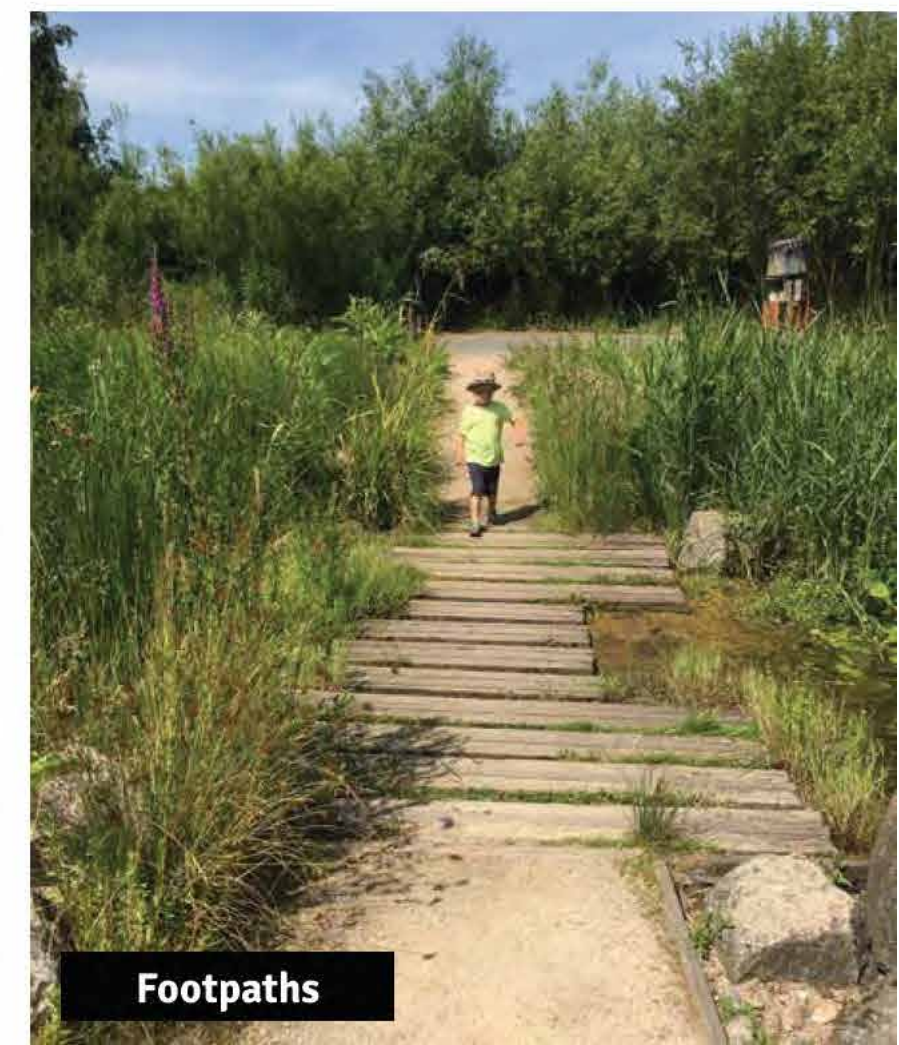
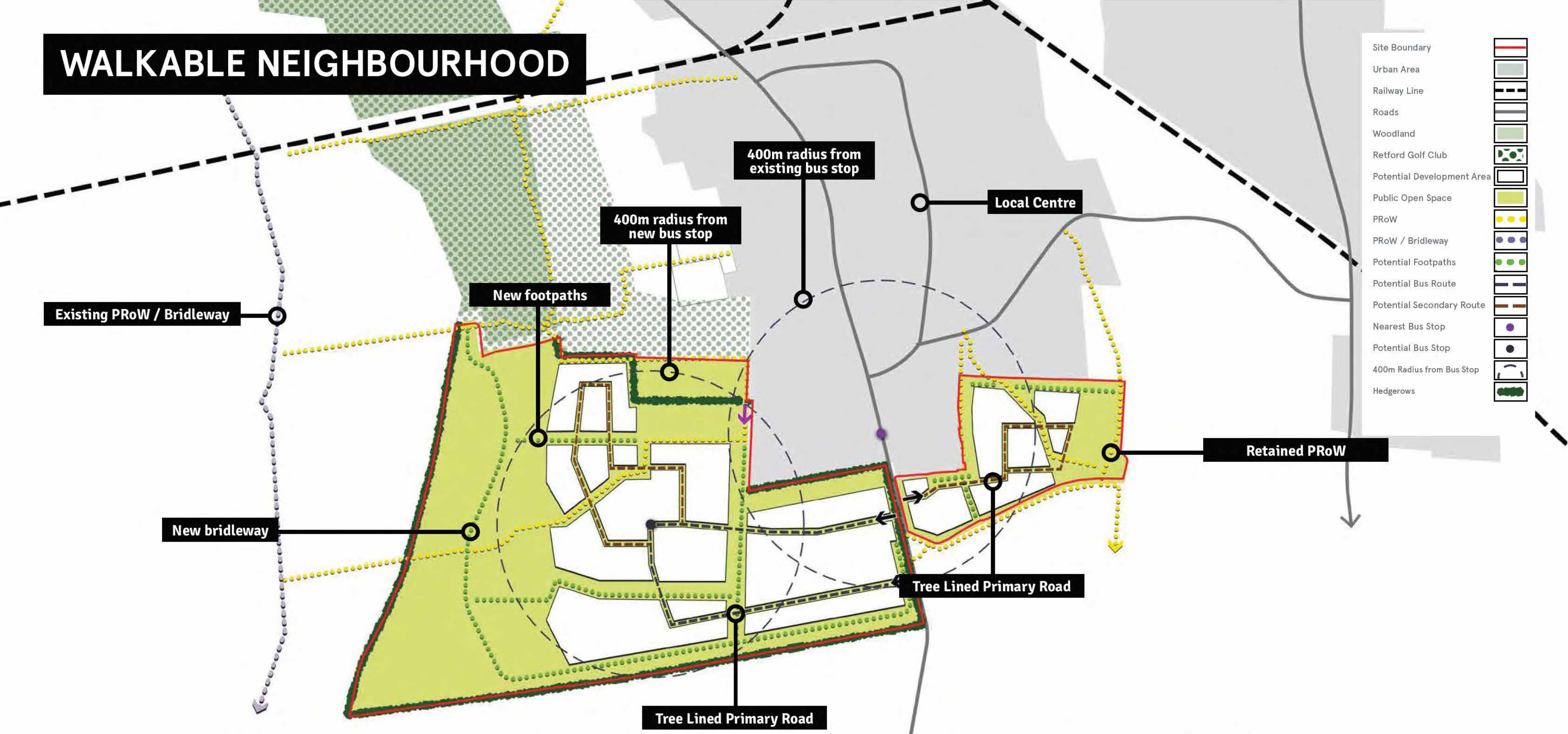


VISIONING

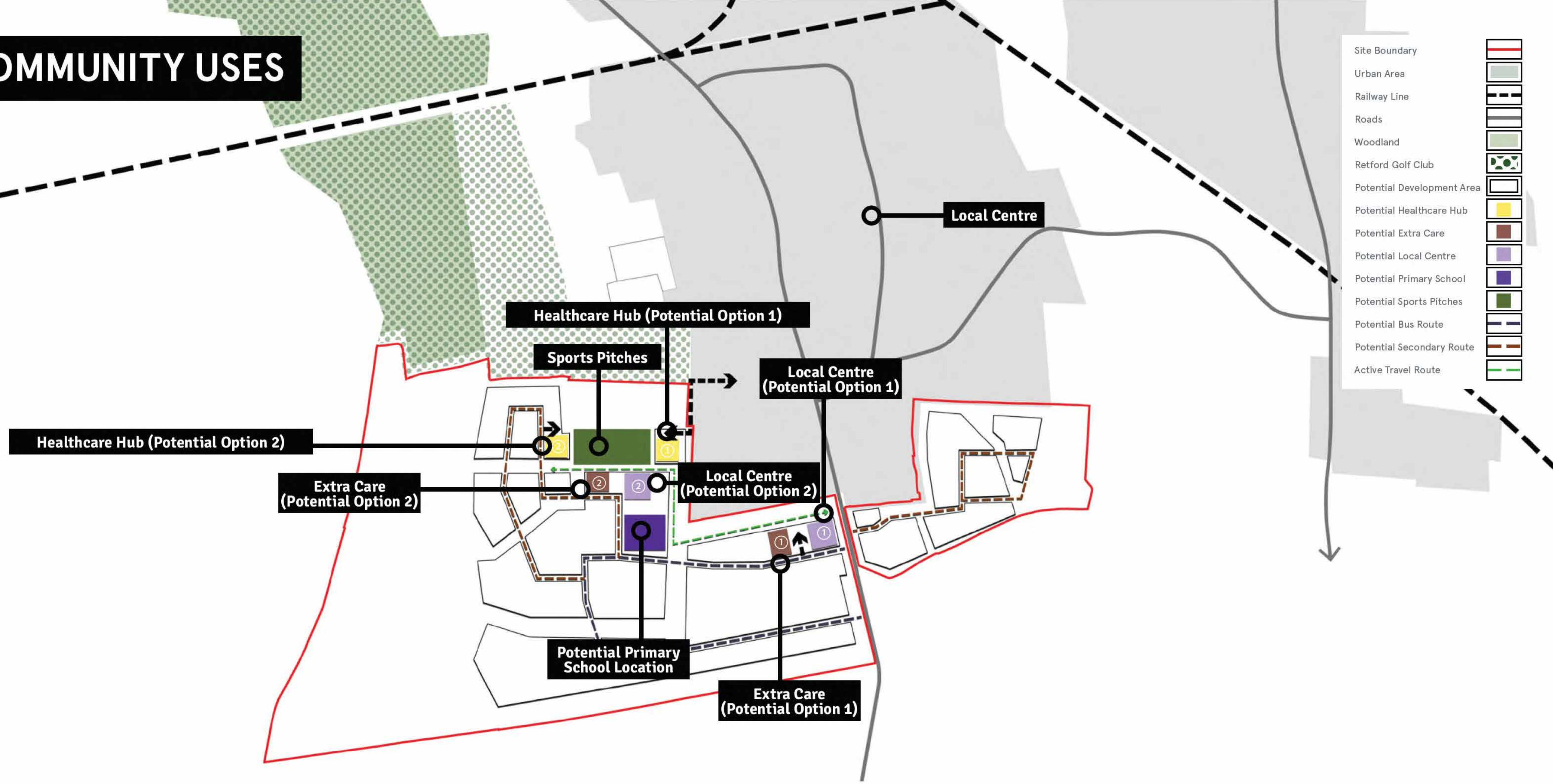
LANDSCAPE FIRST



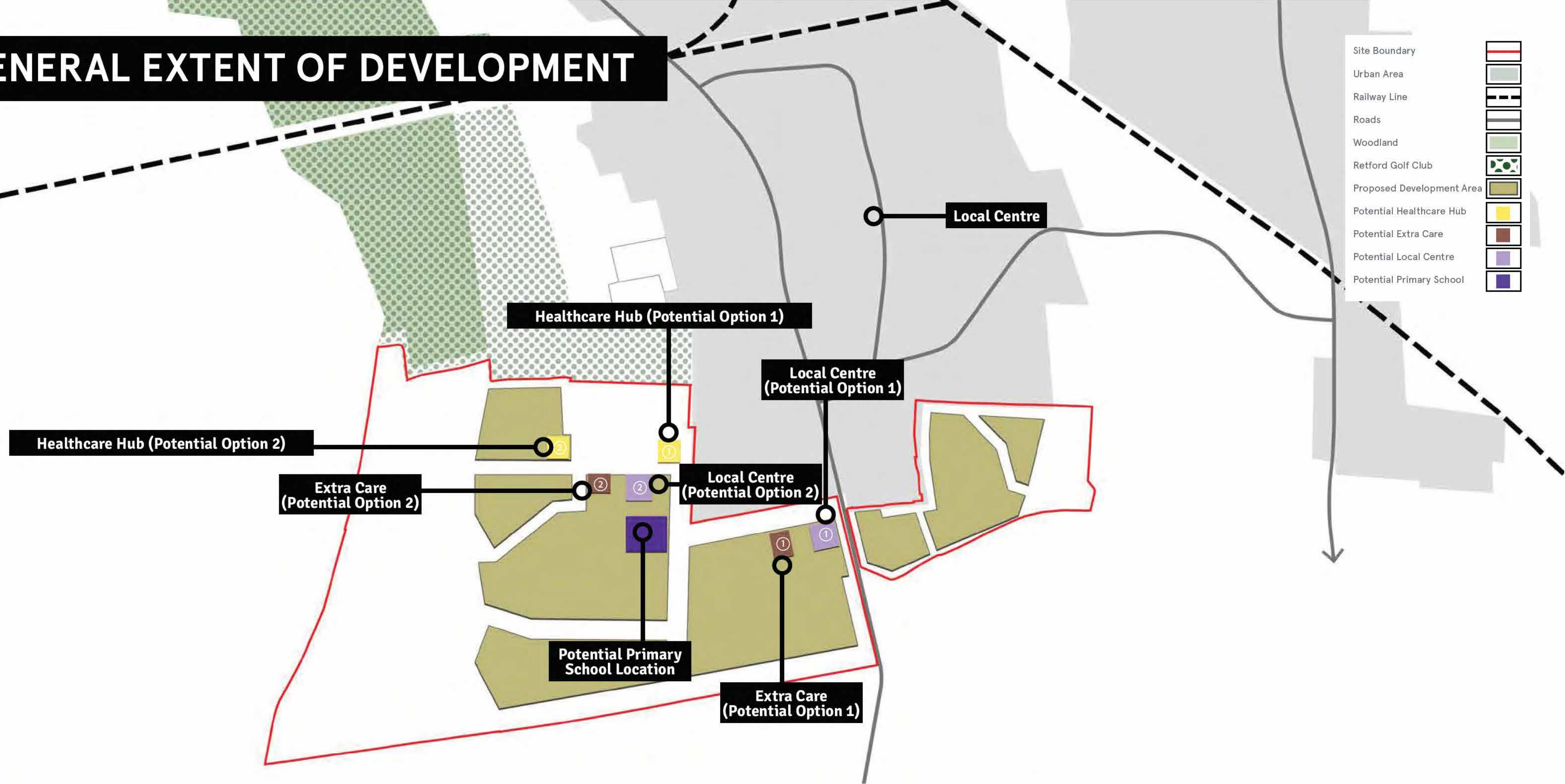
WALKABLE NEIGHBOURHOOD



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

CONTENTS

	Page
1 INTRODUCTION	1
2 ORDSALL SOUTH PRELIMINARY CONCEPT PLAN	2
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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GRAPHIC COMMUNICATION
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

CONTENTS

	Page
1 INTRODUCTION	1
2 INFRASTRUCTURE DELIVERY PLAN (IDP PUB-009)	2
3 WHOLE PLAN VIABILITY (PUB-0010)	6
4 SUMMARY	7

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	UKly 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	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	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	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	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	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	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	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	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	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	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	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	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	
Transport, highways	Contribution towards improvements at London Road/Whitehouses	Retford	HS9	Essential	S106	1,080,000	Y	0	85,000	85,000	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	
Transport, highways	Contribution to Ordsall Old Village traffic management scheme	Retford	HS13	Essential	S106	?	N/A	0	?	?	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	
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	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	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	Costs unknown at this stage.
Transport, walking/cycling	Contribution to a cycleway along Brecks Road	Ordsall South	HS13	Necessary	S106	?	?	0	?	?	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	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	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	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	
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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PUBLIC ENGAGEMENT
DEVELOPMENT ECONOMICS

AD-NRF004



From: [REDACTED]
Sent: 17 January 2022 15:39
To: The Bassetlaw Plan
Subject: Re: Regulations 19 and 20: Bassetlaw Local Plan 2020-2037: Publication Version Addendum, January 2022

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

Sir/Madam,

Having read through the 'revised' building plan I cannot find any reference to any major road development for Ordsall South which is blatantly a vital priority BEFORE any building starts.

Anyway since there have already been at least 3 lots of surveyors about the site it is quite obvious that you are going ahead with this dangerous development and ignoring all the sensible objections.

I did notice comments about road calming measures for Ordsall old village and Eaton village: such measures will be totally useless for those lanes which should be immediately obvious to anyone who has looked at those village roads.

Finally I fail to understand why the objections made 2/3 years ago by Bassetlaw District Council to a development on the East/ North East side of Retford do not apply several times over to Ordsall South: viz:

The development would have an ' unacceptable impact on highway safety' and.....

it was ' an inappropriate extension into the countryside'.

Clearly road safety and the countryside are simply unimportant for Ordsall.

At least the resultant road traffic accidents,(hopefully not deaths), and congestion will be clearly attributable to the Councils decision.

Yours in desperation.

[REDACTED]

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From: The Bassetlaw Plan <TheBassetlawPlan@bassetlaw.gov.uk>

Sent: Thursday, January 6, 2022 12:36:43 PM

To: The Bassetlaw Plan <TheBassetlawPlan@bassetlaw.gov.uk>

Subject: Regulations 19 and 20: Bassetlaw Local Plan 2020-2037: Publication Version Addendum, January 2022



Regulations 19 and 20 Town and Country Planning (Local Planning) (England) Regulations 2012: Bassetlaw Local Plan 2020-2037: Publication Version Addendum, January 2022

Bassetlaw District Council is currently consulting all interested parties on the [Bassetlaw Local Plan 2020-2037: Publication Version Addendum](#), in accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. The Council welcomes your comments at this stage to help shape the development of the new Local Plan for Bassetlaw. You are receiving this letter because you have previously expressed an interest in the Bassetlaw Local Plan.

AD-NRF005



[REDACTED]

From: [REDACTED]
Sent: 18 January 2022 13:29
To: The Bassetlaw Plan
Subject: Policy 16 Peaks Hill Farm Site HS1 Peaks Hill Farm

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

Good afternoon,

Please find below objections to the recent addendum for this development.

Main objections

1. Increasing the housing on Peaks Hill Farm by 80.
2. Increasing Carlton Forest for employment by 5ha
3. Developer contributions have been deleted from the plan So does this mean that nothing will be done towards roads , health , education , social care etc etc
4. Deleted the word infrastructure from the plan ... so does this mean there is no constructive support behind the plans ? Just build houses and not infrastructure?
5. Deleted concept plan from the Peaks Hill farm.
6. Reduced the green woodland from 18.3 to 7.6 ha . We need green space!
7. Deleted keeping hedgerows
8. Changed an on-site primary school to an off site facility where will the education or healthcare for all these new people bne?
9. Deleted appropriate financial contribution towards road improvements . So does this mean there will be over 1080 houses with no road improvements?

Regards,

[REDACTED]

AD-NRF006



[REDACTED]

From: [REDACTED]
Sent: 26 January 2022 10:31
To: The Bassetlaw Plan
Subject: Local Plan Addendum
Attachments: Local Plan amendment to inspector.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

Attached are comments from the Retford Civic Society on the Addendum to the Local Plan published recently. Please acknowledge receipt and confirm that these, and the Society's previous comments on the Publication Draft will be passed to the Inspector when one is appointed

Bassetlaw Local Plan – Publication Version Addendum January 2022

Retford Civic Society has read carefully the addendum to the Local Plan published in January 2022. The Society regrets to see that none of the concerns raised in its October 2021 submission in response to the last iteration of the Plan (the Publication Version August 2021) have been addressed.

The revised text emphasises the potential that Bassetlaw has to attract large logistics developments. The Society recognises that this potential exists and supports efforts to capitalise on it with the allocation of land at Apleyhead.

The market for logistics developments has expanded greatly in recent years, partly due to the effects of Covid. Bassetlaw might well take some share of this market but Doncaster, Sheffield, Rotherham, Mansfield, Nottingham and other area are now working hard to attract identical growth and will continue to do so. Apleyhead may not attract the investment needed to service it fully or at all; its development may be slower than anticipated, extending to well beyond the Plan period; it may produce fewer jobs than expected. Of course, being an extremely competitive market, demand could contract rapidly later in the Plan period.

In our earlier submission to the Inspector we questioned the assumption that economic development in Bassetlaw will be restricted unless there is a massive increase in house building. Nothing in the published amendments persuades us to change our view. It is unlikely that employment growth will be at the top of the range considered by GLHearn as worth testing. On the basis of the evidence presented, we think it is more likely to be closer to Hearn's forecast of 3800 additional jobs. The scale of housing growth proposed in the Plan should be reduced to a proportionate level. If employment does grow at the higher rate anticipated in the Plan there will be plenty of time to consider the need for more house building when the Plan is reviewed.

The revised text elaborates on the provision of infrastructure expected as part of the large housing development in Ordsall. It offers, however, nothing to address serious concerns about the impact of traffic generated by the Ordsall expansion on the local road network. Also, doubts remain about how other, vital facilities - schools, medical services, shops and more - would be provided, financed and operated. Until these matters are resolved there is a very real risk that what is proposed would be undeliverable.

Retford Civic Society is not opposed to housing development in Bassetlaw. It is opposed to unnecessary, large-scale housing developments that are not proportionate or supported securely by the infrastructure required to sustain good community life within them and beyond their boundaries. When viewed from this perspective, the Ordsall development is found wanting and we cannot support it.

Retford Civic Society

January 2022

AD-NRF007



[REDACTED]

From: [REDACTED]
Sent: 31 January 2022 10:36
To: The Bassetlaw Plan
Subject: Regulations 19 and 20: Bassetlaw Local Plan 2020-2037: Publication Version Addendum, January 2022

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Dear Sir or Madam

I have been authorised by West Stockwith Parish Council to state that they have no major comments to make on this consultation.

Kind regards

[REDACTED]
[REDACTED]
Clerk, West Stockwith Parish Council
C.Eng B Sc. FIEE FIRSE

[REDACTED]
Tel: +44 (0) 1427 890294

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AD-NRF008



[REDACTED]

From: [REDACTED]
Sent: 31 January 2022 16:54
To: The Bassetlaw Plan
Subject: RE: Regulations 19 and 20: Bassetlaw Local Plan 2020-2037: Publication Version Addendum, January 2022

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For the Attention of [REDACTED]

Dear [REDACTED],

Thank you for consulting Derbyshire County Council on the Bassetlaw Local Plan 2020-2037: Publication Version Addendum. I have reviewed the Addendum in the context of the comments that Derbyshire County Council submitted to you on the Bassetlaw Local Plan 2020-2037: Publication Version on 21st October 2021 and write to confirm that Derbyshire County Council has no further comments to make on the Addendum.

Kind Regards

[REDACTED]

[REDACTED] **Team Leader**
Policy and Monitoring
Place | Derbyshire County Council
County Hall, Matlock, Derbyshire, DE4 3AG
01629 539808

The Planning Service Privacy Notice can be found [here](#)

From: The Bassetlaw Plan <TheBassetlawPlan@bassetlaw.gov.uk>
Sent: 06 January 2022 12:36
To: The Bassetlaw Plan <TheBassetlawPlan@bassetlaw.gov.uk>
Subject: Regulations 19 and 20: Bassetlaw Local Plan 2020-2037: Publication Version Addendum, January 2022
Importance: High



Regulations 19 and 20 Town and Country Planning (Local Planning) (England) Regulations 2012: Bassetlaw Local Plan 2020-2037: Publication Version Addendum, January 2022

Bassetlaw District Council is currently consulting all interested parties on the [Bassetlaw Local Plan 2020-2037: Publication Version Addendum](#), in accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. The Council welcomes your comments at this stage to help shape the

AD-NRF009



[REDACTED]

From: [REDACTED]
Sent: 03 February 2022 08:48
To: [REDACTED]
Subject: FW: Regulations 19 and 20: Bassetlaw Local Plan 2020-2037: Publication Version Addendum, January 2022
Attachments: Bassetlaw 33 Resp.pdf

Severn Trent' response

[REDACTED]

Planning Policy Manager
Bassetlaw District Council

Queens Buildings
Potter Street
Worksop S80 2AH

Tel: 01909 533495

From: [REDACTED]
Sent: 03 February 2022 07:41
To: [REDACTED]
Subject: RE: Regulations 19 and 20: Bassetlaw Local Plan 2020-2037: Publication Version Addendum, January 2022

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ST Classification: OFFICIAL PERSONAL

Dear [REDACTED]

Please find attached a copy of our response regarding the Bassetlaw Local Plan 2021 Addendum.

Kind Regards

[REDACTED]
Drainage & Wastewater Management Planning (DWMP) - Strategic Catchment Planner
Asset Strategy & Planning – Chief Engineer
Severn Trent

[REDACTED]
Severn Trent Water Ltd, PO Box 51, Raynesway, Derby, DE21 7JA
(Sat Nav postcode DE21 7BE)

Working together to get the best out of our assets

 Consider the environment. Please don't print this e-mail unless you really need to.

02 February 2022

Our ref: Bassetlaw 33

Dear Sir/Madam

Bassetlaw Local Plan 2020-2037 Publication Version Addendum

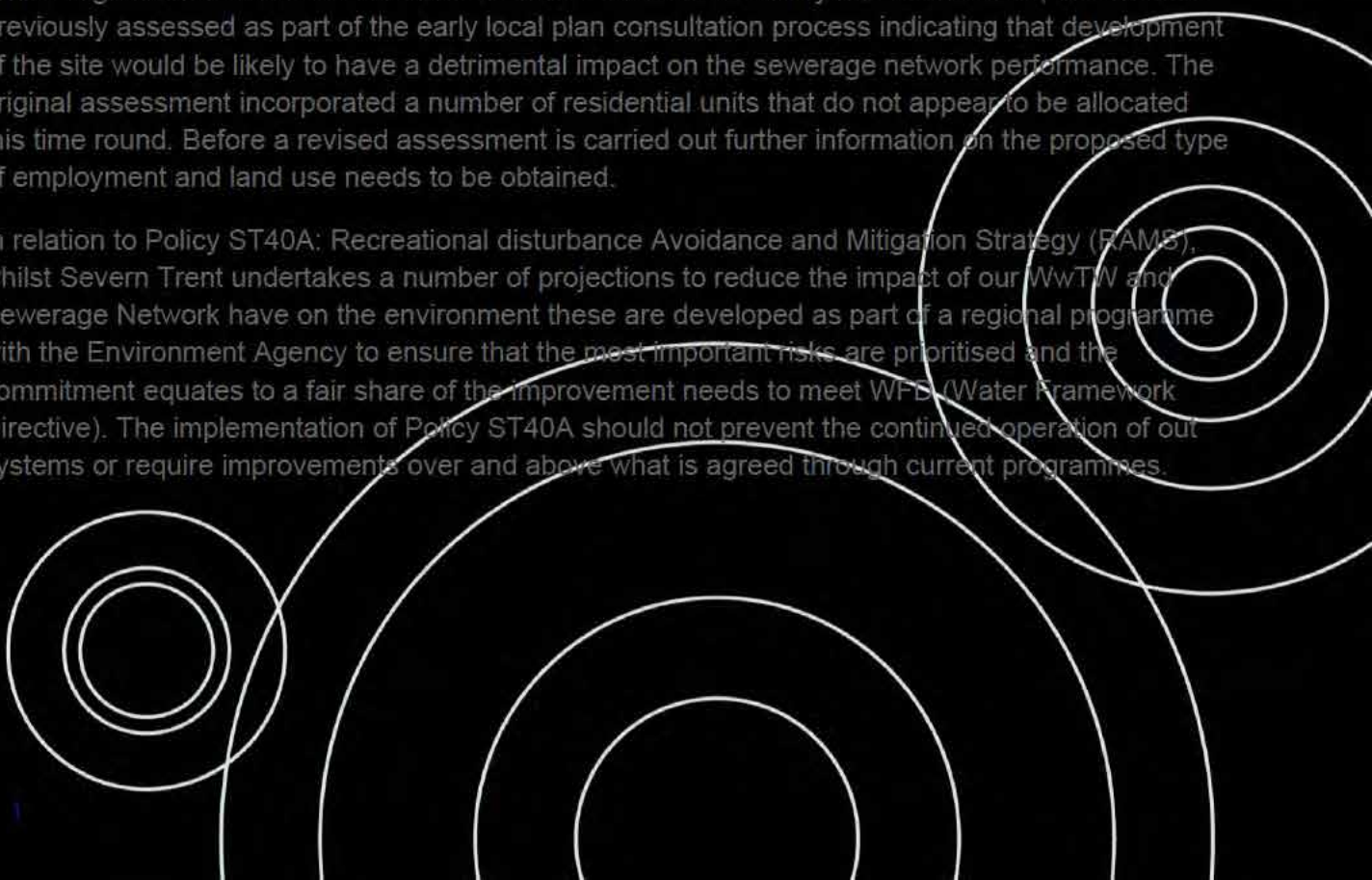
Thank you for the opportunity to comment on your consultation, Severn Trent note that the majority of the changes within the Addendum appear to relate to changes to the timescales extending the plan period to 2038. The changes to the policy wording do not appear to significantly alter the proposals of the policies therefore we have nothing further to add to our previous responses regarding the Draft Local Plan.

It is noted that the number of dwellings proposed at Trinity Farm has increased, this will increase the likelihood and need for capacity improvements, but these constraints would not prevent the delivery of the site, but additional time may be needed to facilitate the necessary infrastructure improvements.

It is also noted that the proposals for High Marnham Green Energy Hub have been removed from the local plan, it would be useful to what the proposals for this site and any associated timescales are?

Whilst High Marnham has been removed Former Bevercotes Colliery has been added, this site was previously assessed as part of the early local plan consultation process indicating that development of the site would be likely to have a detrimental impact on the sewerage network performance. The original assessment incorporated a number of residential units that do not appear to be allocated this time round. Before a revised assessment is carried out further information on the proposed type of employment and land use needs to be obtained.

In relation to Policy ST40A: Recreational disturbance Avoidance and Mitigation Strategy (RAMS), whilst Severn Trent undertakes a number of projections to reduce the impact of our WWTW and Sewerage Network have on the environment these are developed as part of a regional programme with the Environment Agency to ensure that the most important risks are prioritised and the commitment equates to a fair share of the improvement needs to meet WFD (Water Framework Directive). The implementation of Policy ST40A should not prevent the continued operation of our systems or require improvements over and above what is agreed through current programmes.



Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

For your information we have set out some general guidelines that may be useful to you.

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

Sewage Strategy

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

Surface Water and Sewer Flooding

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

Water Quality

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres per minute or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We would also encourage the use of rainwater harvesting on larger developments, either residential or commercial. This helps to reduce the demand on public supply, associated carbon impact of supply and also reduced site run off and sewer flows. Rainwater Harvesting as a development rather than on a property by property basis is more cost efficient and can produce greater benefits.

Both the [River Severn River Basin Management Plan](#) (Page 52) and the [Humber River Basin Management Plan](#) (page 46) recommend that Local Plan set out policies requiring homes to meet

the tighter water efficiency standard of 110 litres per person per day *as described in Part G of Schedule 1 to the Building Regulations 2010*. As such Severn Trent's recommendation is consistent with wider objectives within our water supply regions.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

Yours sincerely

██████████

Strategic Catchment Planner

growth.development@severntrent.co.uk

AD-NRF010



[REDACTED]

From: [REDACTED]
Sent: 03 February 2022 10:03
To: [REDACTED]
Subject: FW: Planned Gypsy site North Blyth

Please could you register and acknowledge?

[REDACTED]

Planning Policy Manager
Bassetlaw District Council

Queens Buildings
Potter Street
Worksop S80 2AH

Tel: 01909 533495

From: [REDACTED]
Sent: 03 February 2022 09:37
To: [REDACTED]
Subject: FW: Planned Gypsy site North Blyth

Hi [REDACTED]

These comments relate to the proposed traveller site in Blyth. I had advised Mr Pendlebury to submit his comments using the website but he has emailed me directly

Many thanks

[REDACTED]

From: [REDACTED]
Sent: 01 February 2022 20:40
To: [REDACTED]
Subject: Planned Gypsy site North Blyth

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

Hello [REDACTED] regarding Local Plan 2020-2037
Addendum January 2022 (GT005)
I'm writing this email on your advice
As I have tried using the Bassetlaw app
And found it would be better by email as not sure
I was filling it out correctly

As you say can you please forward this to the correct department on my behalf
As I'm sure you are aware I have been complaining about the goings on over the road from my
Property [REDACTED] since late 2019
As you aware I live [REDACTED] from the land
Which is under discussion known as the Homestead
Over the years they have filled the land with animals the RSPCA Has visited with concerns of there well-
being
Police have attended when horses have escaped
The land now is full of caravans and flat bed vans
They are constantly burning rubber material
And have four flood lights shining into my home at night I haven't a clue where they are getting the power
supply from Bassetlaw Environment department was made of this many times
I have recently rebuilt a property on the site of
Kewetta which is next door [REDACTED]
[REDACTED]

And my family with amount of unsavoury character that even before planning approved
Are living on the site full time
There is many items I could make you aware of
As things happen on a daily basis
I hope the correct people can take my concerns
Into account when any discussion is made
Yours Many Thanks
[REDACTED]

Sent from my iPhone
[REDACTED]
[REDACTED]

[REDACTED]
Planning Development Manager

[REDACTED]
Planning Policy Manager

AD-NRF011



[REDACTED]

From: [REDACTED]
Sent: 04 February 2022 13:40
To: The Bassetlaw Plan; [REDACTED]
Subject: Policy 16 Peaks Hill Farm Site HS1 Peaks Hill Farm
Attachments: Peak Hills Farm Development.docx

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sent again with my objections to the development of Peaks Hill Farm

I also note you have not acknowledged the petition signed by residents. I also note the following have been altered on the latest plan:

1. Increase the housing on Peaks Hill Farm by 80.
2. Increasing Carlton Forest for employment by 5ha
3. deleted developer contributions from the plan So nothing will be done towards roads , health , education , social care etc etc
4. deleted the word infrastructure from the plan ... so no constructive support behind the plans . Just build house and leave .
5. deleted concept plan from the Peaks Hill farm so basically anything will go !!!
6. reduced the green woodland from 18.3 to 7.6 ha so guessing that is where the extra houses will be !!!!
7. Deleted keeping hedgerows
8. changed an on-site primary school to an off site facility So guess that will be more area for houses and not education or healthcare .
9. deleted appropriate financial contribution towards road improvements . So over 1080 house with no road improvements.

Why has the above happened? Why has the concept plan been deleted? What will happen instead? Why has the woodland been decreased again? To make way for more houses? what about the deer? Why have the hedgerows been taken down? What about the birds?

thank you for logging my concerns. I hope to hear from you soon

[REDACTED]

From: [REDACTED]
Sent: 04 February 2022 13:28
To: [REDACTED]
Subject: Peaks Hill Farm, Workop

Brendan

Please see attached my concerns regarding the Peak Hills Farm Development. I note from your letter there is no mention of the residents petition against this site. I am unsure if you are supporting the houses or not.

I have previously written to Bassetlaw council on 17 December 2020 and again on 1 September 2021 as well as attending the consultation evening via zoom, as well as signing the petition.

I now send my concerns to you and ask you to think about the location of the school. The extra shops and noise and light coming from these. And also the wildlife such as deer, buzzards and owls that also call this place home.

1000 houses will mean about 2000 -2500 extra cars, plus those working for the school and the shops. Plus parents dropping off and picking up children. I do not think this is an appropriate site to build a new community.

You can contact me via email or my mobile of [REDACTED]

[REDACTED]

From [REDACTED]
Sent: 01 September 2021 10:58
To: [REDACTED]
Subject: Fw: Peaks Hill Farm, Worksop

Hello

I would like to submit my concerns again for the housing development at Peak Hills Farm at Worksop.

Whilst I appreciate the field is big i think 1500 houses having 3000 cars, a school which will require staff cars and extra parents is excessive for our little estate. There is also no mention of a new doctors or dentist. I am concerned at how close the school will be to my house - it will be directly at the side of my house.

There is also the wildlife to consider as the deer and buzzard live in the woodland.

Thank you

[REDACTED]

From: [REDACTED]
Sent: 17 December 2020 16:47

To: The Bassetlaw Plan <TheBassetlawPlan@bassetlaw.gov.uk>

Subject: Peaks Hill Farm, Worksop

Hello

Please see attached some considerations for the housing development at Peak Hills Farm.

I am happy to be contacted either by email, post or telephone.

Mobile number is [REDACTED]

thank you for your time

[REDACTED]

Good afternoon,

I live at [REDACTED] and would like to raise some concerns and suggestions regarding the new 1000 house development at Peak Hills Farm. For reference my house is located here, right on the tip of the new development and circled in blue:



I would like to log some suggestions regarding the dwellings and school proposed to be built on the site. I have attended the council zoom meeting on 8 December 2020. Whilst I understand this building site has to happen due to government numbers I would like to ask if a few things could be considered. For instance:

- The location of the Primary School. Whilst I am aware that this is part of the building site when needed (a few years after the houses are completed maybe) I wondered if it could be built at any other point on the site? Perhaps on the boundary of the red lines on the other side of the new road? Nearer Peak Hill Farm boundary. I am worried of the noise created by parents dropping off children, children playing and screaming at break and lunch times, the bell going 8 times a day. There will also need to be a car park too for staff. I am also concerned by the view from the back of my house (bedroom 2, 4 and 5) as these will directly overlook the school and I'm sure will de-value my house due to its proximity not to mention make me feel like I cannot look out of my window for fear of being accused of a pedophile.



School going here



School going here



School going here

Whilst I understand I will probably be the one most affected by the school there will be other houses (and the new houses) affected by the noise and car pollution and traffic. I wondered if it could be re-considered where the school is built before site construction begins? I am also concerned for the wildlife that live in the woods behind (deer, buzzards, field mice, owls, pheasants, small birds) which would be again affected by the noise and cars in the current location mapped for the school and probably killed or at the very least, made homeless.

And from the map (whilst I understand it is a guide and not very detailed) it looks like the primary school will stretch from the woodland to the long plantation. Which would be a very very big primary school.

- The boundary hedge. At the meeting it was discussed there would be some type of border between existing housing and new housing to give some privacy. From the photos you can see the view from my second (top) floor and the existing hedge which is about 6 foot high. Is there any thought as to what kind of border? I thought trees would give the best privacy. I am concerned how much my garden will be overlooked so a border which will be x wide would give the feeling of more privacy. (I am unsure at the moment how far you intend to build new houses but I suppose there will be houses at the side of me, if not a school.)

I also think a hedge would be good for keeping new lighting (street lights/house lights) farther away from us so that our house remains dark at night time.

- I was told the sports centre would be near the Gateford Hill and a new, small road to be built. Therefore, the playing field behind my house would be used for whatever is required. I am concerned if this is a football/rugby pitch with goalposts and floodlighting.
- The Long plantation. I am concerned as I was told the trees will stay but I don't understand how roads (from the new houses to the new road) will be able to go around the tree's perimeter, particularly if the Primary school is as big as made out to be. Again this will impact on wildlife and generate noise and pollution.

From the front of my property the view is this:

The field on the left is allocated to the primary school. The hedge in the middle is where I assume new houses will end. The trees in the middle are staying but I fail to see how this helps the wildlife – particular the deer



There is no mention of how the roads will join up or where the shops will go, or how much extra traffic and noise and light this will generate. There is no mention of a new GP surgery or dentist.

1000 houses will mean about 2000 -2500 extra cars, plus those working for the school and the shops. Plus parents dropping off and picking up children. I do not think this is an appropriate site to build a new community.

Thank you for listening to my concerns. Please feel free to contact me in writing either via email or post. And my mobile number is [REDACTED].

Thank you

[REDACTED]

AD-NRF012



[REDACTED]

From: [REDACTED]
Sent: 05 February 2022 11:03
To: The Bassetlaw Plan
Subject: Fwd: Planned gypsy site North Blyth

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Sent from my iPhone

Begin forwarded message:

From: [REDACTED]
Date: 5 February 2022 at 10:59:13 am GMT
To: [REDACTED]
Subject: Planned gypsy site North Blyth

Hello [REDACTED]
My name is [REDACTED] and I live directly opposite the to the planned gypsy site
At north of Blyth I believe known as the Homestead I believe the submission is under
2020-2037 Addendum 2022(GT005)
I live at [REDACTED]
I have many reasons for wanting to object to this
1...We have just had to except the largest industrial warehouse in Europe this was thrust
open us along with the amazing amount of lorries thundering past my home 24 hours a day
2...Symetary Park which is a couple of hundred yards away with anouther two warehouses
coming
3...They are regularly burning rubber which I've asked them not to do as it enters my home
and garden
4...My daughter has recently moved in to next door Kewetta which my husband and I have
recently built [REDACTED]
My objections could go on for every with the unsavoury men over there
Please take my views to account when a decision is made
Many Thanks
[REDACTED]

Sent from my iPhone

AD-NRF013



[REDACTED]

From: [REDACTED]
Sent: 08 February 2022 22:36
To: The Bassetlaw Plan
Subject: Objections to Bassetlaw Local Plan 2020

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Specific objections to the Peaks Hill Farm development, there are far more suitable places for the houses to be built A57 Shireoaks springs to mind.

The additional housing will also cause severe difficulties for the local villages of Carlton in Lindrick, Costhorpe & Langold, the additional traffic expected through the already highly congestion narrow A60.

The development has increased in size by 80 houses, whereas the preserved woodland has reduced from 18 acres to 7 acres, there was a commitment to maintain hedgerows, this has been removed from the plan.

There was supposed to have been an onsite school to be built at the expense of the developer, this has now been changed to an offsite school to be built at the expense of the taxpayer.

These houses are being build for the profit of the developers & the benefit of additional revenue for BDC, they disregard the wildlife that currently lives in the area.

These houses are being built within the current Carlton in Lindrick Parish & are completely at odds with their Neighbourhood Plan <http://www.carlton-in-lindrickparishcouncil.org/storage/NeighbourhoodPlanning/Referendum%20Version%20Carlton%20Neighbourhood%20Plan%20November%202018.pdf>, the Parish Council themselves object to them being built, BDC's solution is to move the boundary so they do not fall into Carlton in Lindrick Parish.

There are no plans for any amenities, shops, schools, GP's Dentists, any form of employment, which means all these people will have to travel, meaning more vehicles, meaning more emmissions, there is no provision for public transport to serve the area.

[REDACTED]